

CAREY PENSIONS UK LLP



CAREY CORPORATE PENSIONS UK LTD



DUE DILIGENCE
INFORMATION

Introduction

The Information contained in this document concerns both Carey Pensions UK LLP and Carey Corporate Pensions UK Limited.

Information is stated separately where necessary, but otherwise all information contained within the document applies to both firms.

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1. COMPANY INFORMATION

1.1 Company Overview

| | Carey Pensions UK LLP | Carey Corporate Pensions UK Limited |
|--------------------|--|--|
| Introduction | Independent specialist pension administrator and trustee providing Self Invested Personal Pensions (SIPPs). | An operator of occupational pension schemes. |
| Products | SIPPs Group SIPP Property Services | SSASs Workplace pensions Auto-enrolment Trusteeship Third-party administration |
| Customers | Private and Corporate | Corporate |
| Founding date | 2009 | 2013 |
| Staffing | c. 25 | c. 29 |
| Registered Offices | Carey Pensions UK LLP 1st Floor, Lakeside House Shirwell Crescent Furzton Lake Milton Keynes, MK4 1GA | Carey Corporate Pensions UK Ltd 1st Floor, Lakeside House Shirwell Crescent Furzton Lake Milton Keynes, MK4 1GA |
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1.2 Company History

Carey Pensions UK LLP and Carey Corporate Pensions UK Limited are part of Carey Group.

Carey Group's heritage dates back to 1968 with the establishment of Carey Trustees Limited, one of the longest established independent trust companies in Guernsey.

The group now has operations in a number of European locations, including Luxembourg, Zurich, Geneva, and Monaco, but the group's headquarters remain in Guernsey.

We are affiliated with Carey Olsen, a leading legal practice of Guernsey and Jersey law, the shareholders of Carey Group are ten partners of the law firm. However, as an independent group of companies we work closely with our clients' choice of professional advisers such as financial advisers, asset managers, lawyers, accountants, and bankers.

Carey Group provides services to leading institutions, including international banks, investment houses, wealth managers, etc. References can be provided on request.

The pensions division provides a variety of pension scheme both to individuals and corporate clients and has circa 70,000 pension scheme members and in excess of £1billion assets under administration

2. CORPORATE GOVERNANCE

Corporate governance is the responsibility of the Executive Committee of Carey Pensions UK LLP and the Boards of Directors of Carey Corporate Pensions UK Limited and both trustee companies. The memberships of these bodies are tabulated below.

| | Carey Pensions UK LLP | Carey Pension Trustees UK Limited | Carey Corporate Pensions UK Limited | Carey Corporate Trustees UK Limited |
|-------------------|-----------------------|-----------------------------------|-------------------------------------|-------------------------------------|
| | Executive Committee | The Board of Directors | The Board of Directors | The Board of Directors |
| Christine Hallett | Y | Y | Y | Y |
| Simon Cole | Y | Y | Y | Y |
| Beat Haering | Y | Y | Y | Y |
| Coral Hallett | Y | Y | | |
| Louise McWeeney | Y | Y | | |
| Paul Webster | | | Y | Y |

Invitations to attend Executive Committee and Board meetings are extended to senior management.

2.1 Senior Management Team Biographies

Christine Hallett

Chief Executive Officer

Christine established Carey Pensions UK LLP in May 2009, and launched it with FSA approval in August 2009.

Christine has spent over 30 years in financial services with blue chip companies, starting as a clerk in the Midland Bank in 1976 and moving onto Abbey National in 1978. She developed her career over 18 years being promoted to a Senior Executive having been instrumental in implementing customer service centres, new technology, such as robotic systems for their Deeds store and Document Image processing, and workflows for their General Insurance arm in 1989.

In the early 1990's, Christine was involved in setting up a number of new businesses for Abbey National and then moved to take her first Directorship with Pointon York as Operations Director in July 1996. Christine re-positioned the company during her 13 years with them, as Managing Director and CEO before leaving to set up Carey Pensions UK LLP.

Simon Cole

Group COO

Simon started his career as a trainee accountant with KPMG in London. On qualifying, he moved to Paris and then Geneva. In 1988, he moved into banking, initially working for Paribas Switzerland before joining Kleinwort Benson. He then set up a Geneva based private bank for a member of the Saudi royal family. Hyposwiss Private Bank Geneva, initially as the Chief Financial Officer, before becoming their Chief Operations Officer.

Simon obtained a degree in hotel and catering administration at the University of Surrey (England) and is a ICAEW chartered accountant. He speaks French and English.

Beat Haering

Group CFO

Beat Haering is a Swiss national who provides international experience to the Carey Group senior team.

Beat acquired accounting and finance experience during his formative years with PWC, and most recently was CFO of Intrum Justitia, Europe's leading publicly-listed credit management business.

Prior to this, he was the CFO of the Fortune Group, a Dubai-based joint venture with the Al Nasser International Group which focused on the establishment and management of private equity investments across the global oil and gas, coal, energy and logistics sectors.

Beat speaks fluent German and English and holds an MBA and Master of HRM in Business Administration, a Master of Finance and is a qualified accountant.

Coral Hallett

Head of SIPP, Carey Pensions UK LLP

Coral has 10 years experience as a SIPP specialist, joining Carey Pensions UK in 2009, and now Head of the SIPP Business, having previously worked for a large SIPP provider previously.

Coral has worked in pension administration and managed teams for over seven years. She has a high level of technical, systems, and regulatory expertise and training skills. She maintains excellent relationships with clients and connections.

Louise McWeeney

Head of Compliance and Technical (SIPP Business)

Louise has over 19 years experience in financial services and regulatory compliance, both as an adviser, investment specialist, and compliance and operations and has held senior roles, providing CF10 and CF11 oversight.

She specialises in compliance risk management frameworks including compliance monitoring programmes, conduct of business, market abuse, investments and systems & controls.

She is PFS Diploma qualified

Paul Webster

Head of Compliance and Technical (Corporate Business)

Paul has 22 years experience within the pensions industry with an indepth knowledge of Defined Benefit and Defined Contribution occupational schemes, has held a number of senior positions for large industry pension schemes in a technical and trustee role, both for in-house pension schemes and third party administrators.

He specialises in regulatory and trustee matters and strong analytical, systems and controls skills.

3. REGULATION

3.1 Our Regulators

| | | |
|-----------------------|-----------------------------------|-------------------------------------|
| | Carey Pensions UK LLP | Carey Corporate Pensions UK Limited |
| Regulator | Financial Conduct Authority (FCA) | The Pensions Regulator (TPR) |
| Firm Reference Number | 501747 | n/a |

3.2 Our Approach

Carey Pensions UK LLP

As an FCA-regulated firm, Carey Pensions UK LLP must follow the rules to ensure the business is run in the best interests of consumers.

The Executive Committee is ultimately responsible for ensuring the firm meets (and exceeds) their regulatory obligations. The Technical & Compliance team is responsible for providing a robust regulatory framework to ensure the firm’s obligations are met. This includes:

- Systems and Controls framework
- Business Risk Assessment
- Business Acceptance Policy
- Compliance Monitoring Programs
- Training and Competency system
- Compliance Manual
- Due diligence processes for introducers of business
- Due diligence processes for acceptable investments
- Compliant management
- Treating Customers Fairly
- All staff go through a full compliance induction which is refreshed annually

All members of staff are responsible for ensuring that they perform their duties in a compliant manner and that they act with professionalism and integrity at all times.

The Head of Technical & Compliance reports directly to the Executive Committee.

Carey Corporate Pensions UK Limited

The corporate businesses pension schemes are registered with The Pensions Regulator and must run its business in a fit a proper manner to ensure good member outcomes and adherence to the Code of Practice 13 which set out 31 principles that need to be evidenced across the business.

The Board of Directors is ultimately responsible for ensuring the firm meets its regulatory obligations. The Technical & Compliance team are responsible for providing a robust regulatory framework to ensure its regulatory obligations are met. This includes:

- Business Risk Assessment Framework
- Business Acceptance Policy
- Trustee Board which meet at least half-yearly
- Quarterly Management Information for each Master Trust

- Corporate Governance framework covering the 31 Key Principles that are monitored
- Compliance Monitoring Program
- Scheme Calendar
- Investment due diligence and performance monitoring of default funds
- Complaint Management
- Compliance Manual

There is an independent Trustee Board providing governance and oversight to the Master Trust arrangements the 2 independent corporate trustees are Pitman Trustees Ltd, and RB Pension Services

3.3 Anti Money Laundering and Fraud

The firm has established appropriate systems and controls to deter and detect financial crime being committed by the firm, its employees and its clients.

We do not tolerate any dishonesty, deception, false accounting, concealing, bribery funds, assets or data from the business or the deliberate causing of financial loss or other illegal behaviour. We follow industry and regulatory guidelines for anti money laundering systems and controls.

All staff complete appropriate levels of training and competency each year by taking a specific course and test requiring a pass mark attainment.

4. OPERATIONS

4.1 Pensions Administration Systems

For both our SIPP's and SSAS's we have licensed SIPP~Pro and SSAS~Pro from Delta Financial Systems, who are the leading supplier of self administered pension scheme software in the UK.

Our chosen corporate back office system is supplied by Chamber Townsend Consulting (CTC), one of the industry leading corporate pension administration platforms.

For Auto-enrolment the corporate pensions system has been integrated with Staffcare, one of the leading employee benefit systems in the market place.

The illustration system is provided by Delta Financial Systems.

The document management system is provided by Phoenix Business Solutions.

4.2 Systems Infrastructure

There is a robust process of systems and implementation including requirements definition, IT steering committee, project management, user acceptance testing, and formal sign off. All providers of systems are thoroughly vetted and go through a due diligence process.

Our website structure is robust and secure. It is hosted independently and has been tested by our in-house systems specialists against a rigorous set of procedures.

The business systems are accessed through Citrix. The Delta system is run on Carey Group servers in Guernsey whilst the CTC and Staff Care Auto-enrolment systems are operated under a software outsourced service arrangement with the applications being hosted by the system vendor.

4.3 Security of Information

Systems security is critical to Carey Group and the IT infrastructure is built with maximum security in mind. Systems are hosted remotely and no data is kept locally. They are on servers based and housed with an external data house provider Next Generation IT, who also host all our systems. All servers, systems information and data are dual replicated at a second site and a back up site is also on standby. All data is backed up to the dual servers on a real time basis and a full data back up is performed nightly.

We require staff to ensure that all documentation, papers, correspondence, electronic files and any other similar materials are kept secure and that all departmental security procedures are followed at all times to maintain confidentiality.

4.4 Data Protection

Carey Pensions UK LLP and Carey Corporate Pensions UK Limited comply with the Data Protection Act 1998 which outlines how personal data will be handled and stored.

Each company has its own Data Registration numbers.
The ICO certificates are received and securely filed each year.

4.5 Business Continuity

Disaster Recovery plans are documented and include dual replication of the IT infrastructure through separate servers based remotely from our offices in two locations. Information can be immediately recovered.

Systems can be accessed through secure remote log-in from any location, such that all staff can work independently of the Carey Pensions' offices, if necessary, and reconvene in new offices in a very short period of time.

Disaster recovery plans are reviewed by the Executive Committee of Carey Pensions UK LLP and the Board of Directors of Carey Corporate Pensions UK Limited.

Disaster recovery plans are tested annually.

4.6 Customer Service

We provided a dedicated Client Relationship Manager to look after advisors and their clients. Advisors have direct access to Client Relationship Manager by telephone or email. Ensuring we provide the best possible customer service levels alongside technical help and support when needed.

We maintain and monitor a wide range of internal service standards to ensure the quality of our service, is delivering to the required standards.

All staff follow a formalised induction program during their probationary period and then each member of staff is monitored through the training and competency program. Many of the staff have professional qualifications and we support and encourage professional development.

4.7 Complaint Handling

Both firms have established a complaint handling procedure to ensure that complaints are handled effectively and promptly and in accordance with the firm's regulatory responsibilities.

A complaint register is maintained for both companies.

5. FINANCIAL INFORMATION

As a private company, Carey Group accounts are not publicly available. However, we can provide assurance that the Carey Group business has been profitable for a number of years and continues to expand confidently. Carey pensions UK Ltd is required to meet the FCA's minimum capital requirements.

Deloitte are appointed as Carey Group's auditors across all offices
Carey Pensions UK LLP and Carey Corporate Pensions UK Limited's accounts are publicly available.