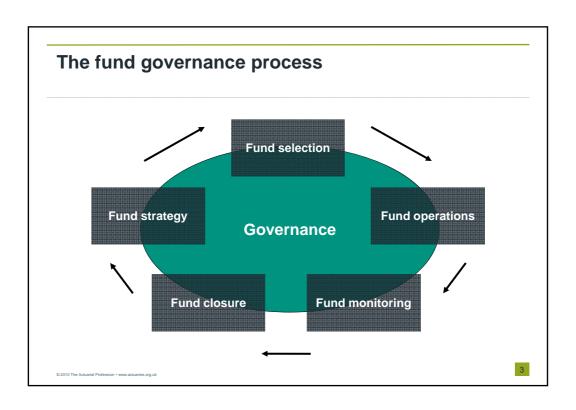


Unit-linked fund governance

- What is fund governance?
- What does good fund governance look like?
- · What are the problems to look out for?
- The focus is on the governance of external/third-party linked funds. Many of the same issues apply to internal funds.

KPMG Linked Business Survey

- Insight into best practice and issues that impact upon insurers writing linked business
- Looked at how linked fund providers
 - Carry out their investment selection and governance
 - Deal with new regulation and product development challenges
 - Tackle issues relating to unit pricing systems and risks
- A small sample, but demonstrated significant differences in approach
- Full survey results available from www.kpmg.co.uk or from paul.shallis@kpmg.co.uk



Fund strategy

- Fund selection

 Fund strategy

 Governance operations

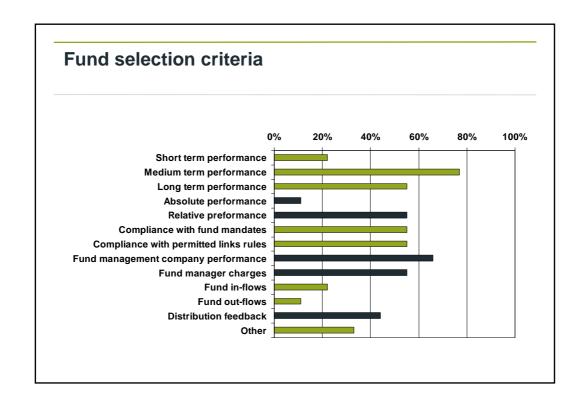
 Fund closure

 Fund monitoring
- Outputs of fund strategy
 - How many funds?
 - Accessibility vs. added value
 - For example, "open architecture"/500+ funds or limited range of 50 of the best funds
- Clarity of implementation of strategy
 - Consistency of communications
 - Consistency in fund selection
 - Sticking to the strategy, e.g. avoiding "fund creep"

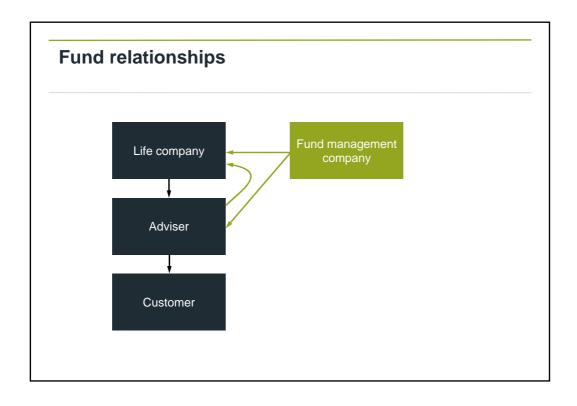
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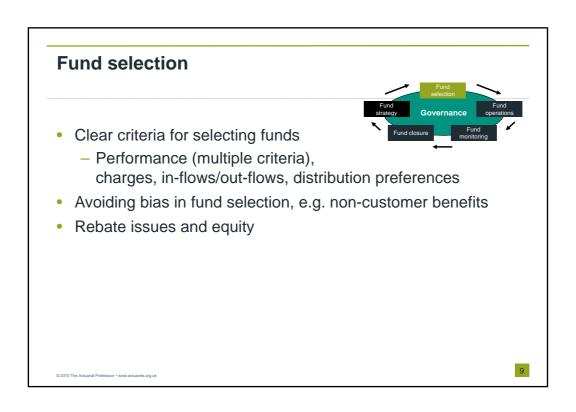
Fund selection

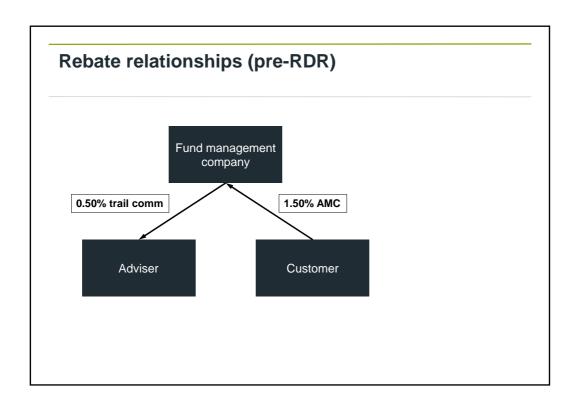
- Clear criteria for selecting funds
 - Performance (multiple criteria),
 charges, in-flows/out-flows, distribution preferences

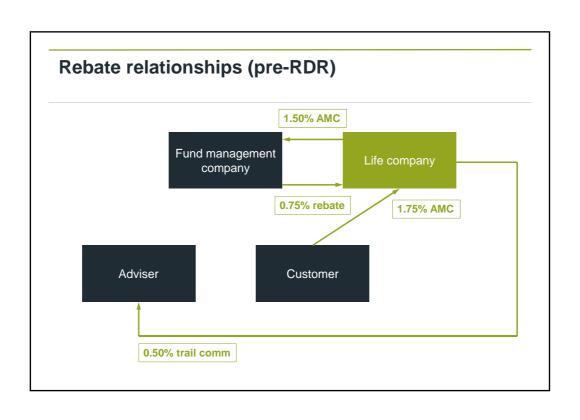


Fund selection Clear criteria for selecting funds — Performance (multiple criteria), charges, in-flows/out-flows, distribution preferences Avoiding bias in fund selection, e.g. non-customer benefits









Rebate issues

- Transparency
 - Charge disclosure rules "look though" rebates the customer must understand what they are paying
 - Existence (or absence) of rebates should not be an issue if the customer understands what they are paying
- Bias
 - If the life company's approach to reinvesting rebates is not consistent, fund or fund manager bias can be introduced

Fund operations

Fund strategy

Fund closure

Fund monitoring

- Dealing with changes:
 - Changes in charges (and rebates)
 - Investment mandate changes
 - Investment manager changes
- Unit pricing errors
- Unit pricing (and liquidity) issues
- Information needs of advisers and customers

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Fund monitoring

- Fund selection

 Fund strategy

 Governance

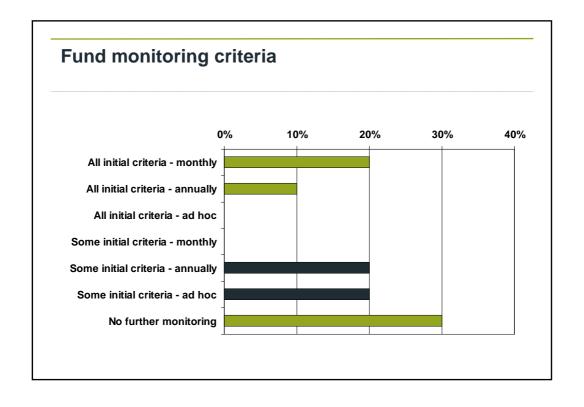
 Fund operations

 Fund closure

 Fund monitoring
- Critical in ensuring that fund range continues to conform to fund strategy
- So if quality is key to strategy, fund monitoring must ensure that quality in maintained
- Rigour of fund monitoring compared to rigour of initial selection?

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Fund monitoring

- Fund selection

 Fund strategy

 Governance

 Fund operations

 Fund dosure

 Fund monitoring
- Critical in ensuring that fund range continues to confirm to fund strategy
- So if quality is key to strategy, fund monitoring must ensure that quality in maintained
- Rigour of fund monitoring compared to rigour of initial selection?
- Actions arising from monitoring might be discussions with fund manager, but ultimate sanction will be fund closure

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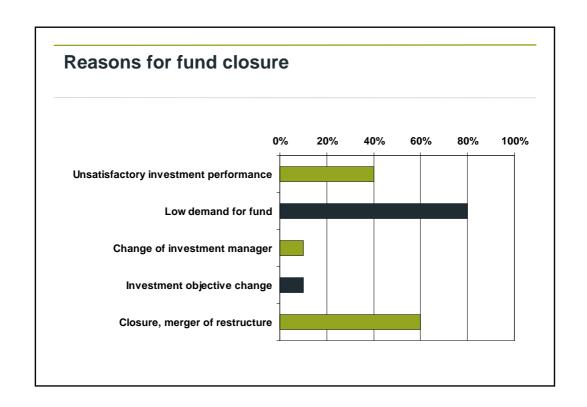
Fund closure

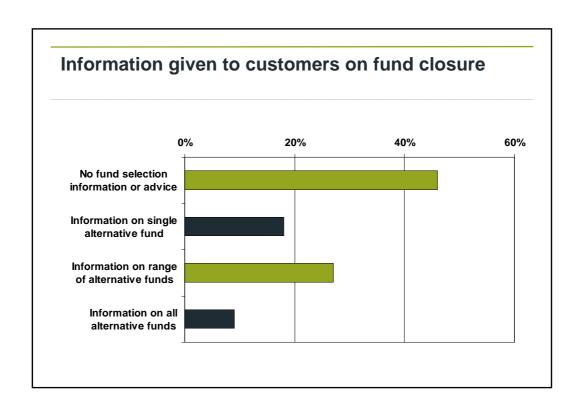
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 Also critical in ensuring that fund
- range continues to confirm to fund strategy
- Can be difficult to achieve, involving significant resource for little tangible benefit

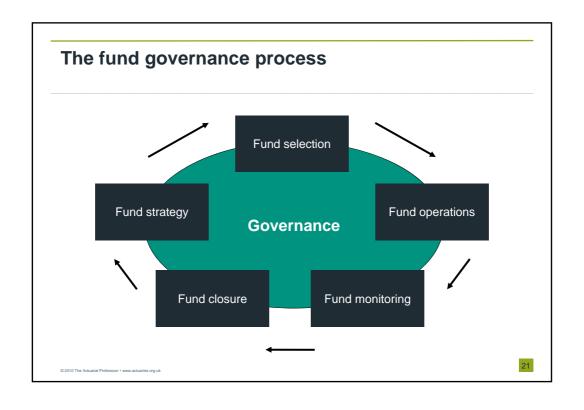
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Fund closure • Also critical in ensuring that fund range continues to confirm to fund strategy • Can be difficult to achieve, involving significant resource for little tangible benefit • How do you deal with investors when you close a fund — information and advice, default options etc.



Final thoughts

- Fund strategy is key it drives all stages of the fund governance process
- The other elements of the fund governance process put the strategy into practice – in a clear, consistent way
- Good fund governance ensures that customers get what they expect – it ensures that you treat customers fairly

Discussion points

- Do you have a fund governance process like this?
- Do you have a fund strategy?
- If so, is your fund strategy documented and agreed and is it implemented consistently?
- What governance issues do you face in managing linked business?
- Do you monitor funds as rigorously as you initially select them?
- Do you have a successful approach to closing funds?

