Schroders Global GIPS® Compliance

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Global Compliance

- Where?
- Why?
- V How?
- What?

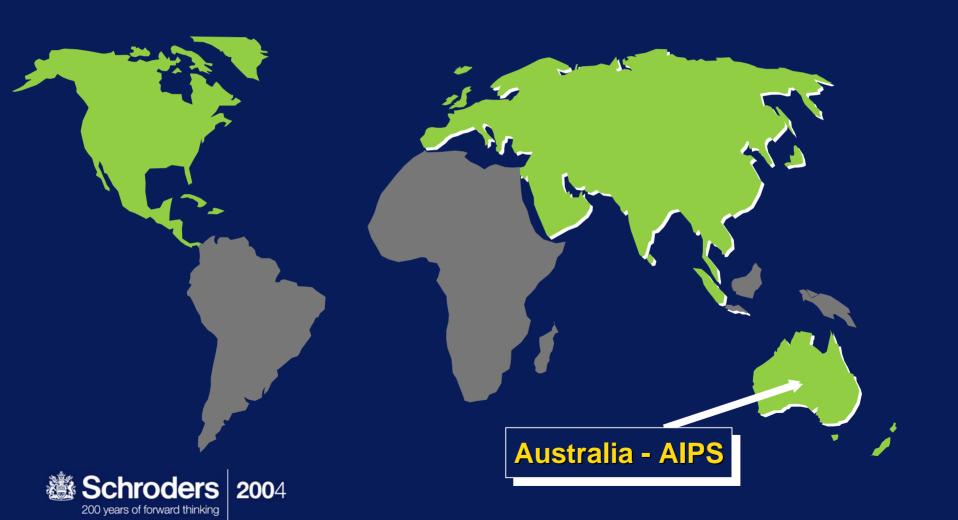












Current Status



Why Schroders Chose to Comply?

- v Best practice
- v Less developed markets Competitive advantage
- More developed markets Marketing imperative
- Confirm data integrity
- International passport
- Improve internal controls

Additional benefits Schroders derives from well run projects

- v Reduced impact on business
- Senior business buy in and understanding
- Improved marketing take-up
- v Central store of globally accessible presentations
- v Meet consultants increasing needs
- v Increased ease of maintaining compliance

How we did it?

- v The Schroders approach
- The Key Ingredients

The Schroders approach

- v Define universe of funds
- v Agree policies
- Groups funds by investment strategy into composites
- v Calculate returns of pools of funds
- Present returns in compliant format
- Verification
- v Educate business

The Key Ingredients to Schroders compliance and verification

- v Business buy in
- v Committee structures
- Preparation
- System choice

Business Buy In

- Who?
- v How?

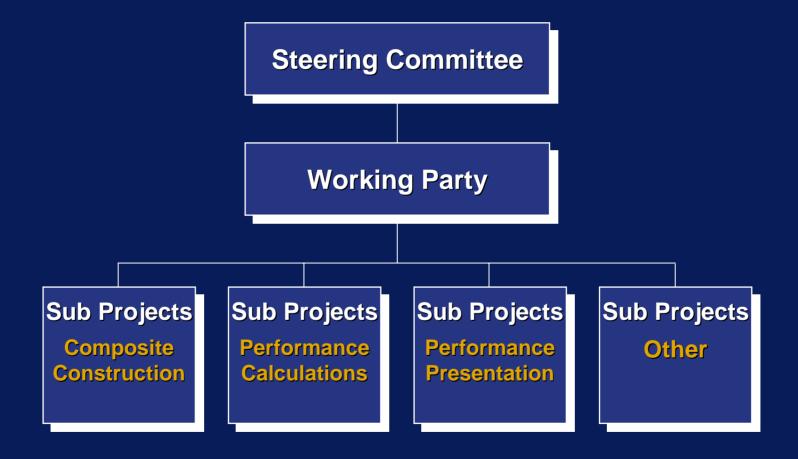


Business Buy In

Experience has shown it is vital to get backing from:

- v Marketing
- Senior Management
- v Investors
- ν
- Operations / Account Management
- Compliance / Legal
- v Performance

Committee Structure



Steering Committee

- v Membership
 - Senior representation
- v Charter
 - Ratify decisions
 - Approve budget
- Frequency
 - Monthly, reserve right for more frequent meetings
- v Hints
 - Agree Committee TOR up-front
 - Structured meetings
 - Raise all issues
 - Tasking senior members with specific issues
 - Use some form of resource mapping

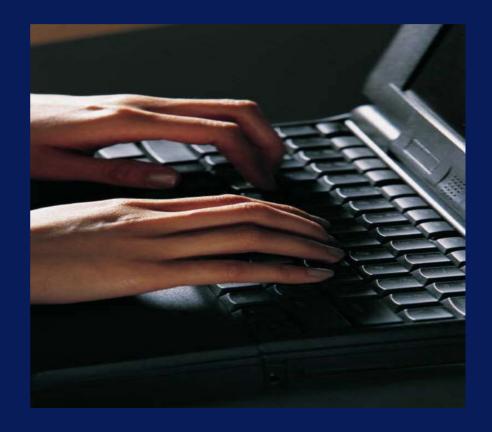


Preparation

- v Set realistic timetable
- v Engage auditor as early in the process as practical
- Take time to comprehensively brief working parties
- v Ensure key members of staff are available
 - Working parties
 - Senior staff
- Perform internal due diligence

System Choice

- v Main Considerations
- Common Errors



Our Main System Considerations

- Adequacy of support resources in time-zone
- v Flexible
- Audit trail
- v Intuitive
- v Access levels
- Complex benchmark construction
- Data integrity controls
- Remote access and functionality

Main System Errors

- Paying too much for unnecessary functionality
- v False economies in buying inferior system
- Incorrect level of IT involvement
- Not enough research into System limitations
- Implementing system too late

How we did it - Summary

- v Right people
- v Right tools
- Well prepared
- v Backed by the business



What can (and has) gone wrong? And how best to avoid this happening to you

- Quality and availability of supporting data
- v High staff turnover
- v Lack of business support
- v Inflexible/inexperienced audit teams
- v Compliance is not maintained going forward
- v Size of project is underestimated
- v Benefits not maximised
- v Invalid claims of compliance





GOOD LUCK!