Business operations and control procedures

**Questionnaire**

**1**

To be submitted under section 2.2.4 of Part 2 of Form 1 – Application

for approval to provide securities registrar services

Interpretation

In this questionnaire, unless the context requires otherwise, the following terms bear the following meanings:

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| *securities holder* |  | as defined in section 2 of the ASR Rules |
| *senior management* |  | as defined in section 1.1 of the Code of Conduct for Approved Securities Registrars |
| *service facilities* |  | as defined in section 2 of the ASR Rules |
| *third-party assets* |  | any assets –   1. received by or on behalf of the registrar that is so received from or on behalf of an issuer-client or securities holder of the registrar; or 2. held by or on behalf of the registrar that is so held on behalf of an issuer-client or securities holder of the registrar |

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| **Part 1 – Corporate Governance** |

|  |  |  |  | **Yes** | **No** | **N/A** |
| --- | --- | --- | --- | --- | --- | --- |
| **1.1** | **Do you have any written policies and control procedures to ensure that your board of directors** | |  |  |  |  |
|  |  | establishes a management structure which includes the roles, responsibilities, accountability and reporting lines of your senior management; |  |  |  |  |
|  |  | oversees the appointment of your senior management; |  |  |  |  |
|  |  | establishes systems and controls to supervise your senior management and supervisory staff members who act under the delegated authority of your board of directors; |  |  |  |  |
|  |  | establishes systems and controls to monitor and regularly evaluate the performance of your senior management in their respective areas of responsibility; and |  |  |  |  |
|  |  | establishes policies to ensure that your senior management have access to regular training to maintain and enhance their competencies and to keep themselves updated on industry and regulatory developments relevant to their respective areas of responsibility? |  |  |  |  |
|  |  |  |  |  |  |  |
| **1.2** | **How often will your board of directors evaluate the performance of your senior management in their respective areas of responsibility?** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **1.3** | **Do you have any written policies and control procedures to ensure that your senior management** | |  |  |  |  |
|  |  | have a sound understanding of your business activities and their associated risks; |  |  |  |  |
|  |  | oversee the development and implementation of risk management policies and control procedures to ensure that your risks can be identified, monitored and controlled and that financial and management information is reliable, timely and complete; |  |  |  |  |
|  |  | establish policies to ensure that your risk management, compliance, operational control and review functions are properly positioned, staffed and resourced and carry out their responsibilities independently, objectively and effectively; and |  |  |  |  |
|  |  | review and update regularly your risk management measures to ensure that they remain adequate and consistent with your operating environment, and are able to support business expansion? |  |  |  |  |
|  |  |  |  |  |  |  |
| **1.4** | **Do you have any written policies and control procedures on the following functions?** | |  |  |  |  |
|  | If yes, please indicate how often such policies and control procedures will be reviewed and updated by your senior management. | |  |  |  |  |
|  |  | key business lines comprising one or more types of securities registrar services |  |  |  |  |
|  |  | frequency of review: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | operational control and review |  |  |  |  |
|  |  | frequency of review: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | risk management |  |  |  |  |
|  |  | frequency of review: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | finance and accounting |  |  |  |  |
|  |  | frequency of review: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | information technology |  |  |  |  |
|  |  | frequency of review: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | compliance |  |  |  |  |
|  |  | frequency of review: |  |  | | |
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| **1.5** | **Do you have any written policies and control procedures to ensure that your senior management provide regular, adequate and comprehensive information to your board of directors in relation to the following matters?** | |  |  |  |  |
|  | If yes, please indicate how often such matters will be reported to your board of directors. | |  |  |  |  |
|  |  | implementation of, and adherence to business objectives, strategies and plans |  |  |  |  |
|  |  | frequency of reporting: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | business performance |  |  |  |  |
|  |  | frequency of reporting: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | risks associated with business operations and financial position |  |  |  |  |
|  |  | frequency of reporting: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | internal control deficiencies identified |  |  |  |  |
|  |  | frequency of reporting: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
|  |  | compliance issues with laws, rules, regulations, codes and internal policies and control procedures |  |  |  |  |
|  |  | frequency of reporting: |  |  | | |
|  |  |  |  |  | | |
|  |  |  |  |  |  |  |
| **1.6** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | a management structure with: (i) clearly defined reporting lines of staff members; and (ii) supervisory and reporting responsibilities appropriately assigned, is implemented; |  |  |  |  |
|  |  | authorisations and approvals, and the authority of key positions are clearly defined and communicated to and followed by staff members; |  |  |  |  |
|  |  | only persons, who are fit and proper to perform the duties for which they are employed, are employed and that such persons are duly registered with all applicable regulatory bodies as required; |  |  |  |  |
|  |  | management and supervisory functions are performed by qualified and experienced individuals; and |  |  |  |  |
|  |  | adequate training suitable for the specific duties which staff members perform is provided both initially and on an ongoing basis? |  |  |  |  |

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| **1.7** | **How often will your senior management evaluate the performance of your staff members performing management and supervisory functions?** | |  |  |  |  |
|  |  | |  |  |  |  |
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| **1.8** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
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| **1.9** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
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| **1.10** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 1, please do so here.)** | |  |  |  |  |
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| **Part 2 – Risk Management** |

|  |  |  |  | **Yes** | **No** | **N/A** |
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| **2.1** | **Do your risk management policies and control procedures cover** | |  |  |  |  |
|  |  | the appointment of a risk manager who has the appropriate qualifications to oversee and monitor your risk exposures and systems; |  |  |  |  |
|  |  | the presence of clear reporting lines for the risk manager; and |  |  |  |  |
|  |  | the way that risks are measured and monitored? |  |  |  |  |
|  |  |  |  |  |  |  |
| **2.2** | **Do you have any written policies and control procedures to ensure that your risk management policies will be** | |  |  |  |  |
|  |  | monitored by a risk management function which consists of a sufficient number of suitably qualified and experienced professionals; and |  |  |  |  |
|  |  | subject to comprehensive reviews at suitable intervals, and wherever there is significant change in the business, operations or key personnel, to ensure that your risk of suffering losses, whether financial or otherwise, as a result of fraud, errors and omissions, interruptions or other operational or control failures are maintained at acceptable and appropriate levels? |  |  |  |  |
|  |  |  |  |  |  |  |
| **2.3** | **Who will be responsible for reviewing your risk management policies and control procedures? (Please specify title and name if available.)** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **2.4** | **Do you have any written policies and control procedures to ensure that your staff members performing risk management function are: (i) independent of the staff members performing key business lines comprising one or more types of securities registrar services; and (ii) reporting directly to senior management?** | |  |  |  |  |

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| **2.5** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
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| **2.6** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
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| **2.7** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 2, please do so here.)** | |  |  |  |  |
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| **Part 3 – Operational Control and Review** |

**Operational control**

|  |  |  |  | **Yes** | **No** | **N/A** |
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| **3.1** | **Do you have any written policies and control procedures to ensure that your operations are regularly reviewed so that your risk of losses resulting from fraud, errors and omissions, and the following operational and compliance matters are adequately managed?** | |  |  |  |  |
|  |  | physical and functional segregation of incompatible duties |  |  |  |  |
|  |  | maintenance and timely production of proper and adequate accounting and other records, and ability to detect fraud, errors and omissions, and other non-compliance with external and internal requirements |  |  |  |  |
|  |  | security and reliability of accounting and other information (eg, exception reports which should accurately highlight unusual activities and facilitate the detection of fraud, errors and significant trends) |  |  |  |  |
|  |  | maintenance of effective record retention policies which enable you, your auditors and the Commission to carry out routine and ad hoc comprehensive reviews or investigations |  |  |  |  |
|  |  |  |  |  |  |  |
| **3.2** | **Do you have any written policies and procedures to ensure that** | |  |  |  |  |
|  |  | management of information, both in physical and electronically stored form, is assigned to qualified and experienced staff member(s); |  |  |  |  |
|  |  | your operating and information management systems meet your needs and operate in a secure and adequately controlled environment; |  |  |  |  |
|  |  | information management reporting requirements are clearly defined to ensure the adequacy and timeliness of production of required internal and external reports including those required by relevant regulatory and self-regulatory bodies; |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  | key components of the information management system design and implementation programme are adequately documented and regularly reviewed for effectiveness; and |  |  |  |  |
|  |  | appropriate and effective information management systems and data security policies and procedures are implemented to prevent and detect the occurrence of errors, omissions or unauthorised insertion, alteration or deletion of, or intrusion into, your data processing system (electronic or otherwise) and data? |  |  |  |  |
|  |  |  |  |  |  |  |
| **3.3** | **Do you have a business continuity plan which includes the following areas to ensure that you are protected from the risk of interruption to your business continuity?** | |  |  |  |  |
|  |  | business impact study |  |  |  |  |
|  |  | identification of likely scenarios involving interruptions |  |  |  |  |
|  |  | documentation and regular testing of your disaster recovery plan |  |  |  |  |
|  |  |  |  |  |  |  |
| **3.4** | **In respect of tasks outsourced as set out in section 2.6 of Part 2 of Form 1 – Application for approval to provide securities registrar services, do you have written policies and control procedures as required under section 5.2 of the Code of Conduct for Approved Securities Registrars?** | |  |  |  |  |
|  |  |  |  |  |  |  |
| **Internal review** | | |  |  |  |  |
|  |  |  |  |  |  |  |
| **3.5** | **Do you have any written policies and control procedures to ensure that your staff members performing the internal review function are: (i) independent of the staff members performing key business lines comprising one or more types of securities registrar services; and (ii) reporting directly to an independent and high level of authority?** | |  |  |  |  |
|  |  |  |  |  |  |  |
| **3.6** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | there is adequate planning, control and recording of all review work performed; |  |  |  |  |
|  |  | findings, conclusions and recommendations are timely reported to your senior management; |  |  |  |  |
|  |  | matters or risks highlighted in the relevant reports are followed up and resolved satisfactorily; |  |  |  |  |
|  |  | all review findings that are not resolved within established time frames are reported to your senior management; and |  |  |  |  |
|  |  | periodic risk assessment is performed, and various levels of risk are ascribed to an appropriate review cycle? |  |  |  |  |

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| **3.7** | **How often will you review your business contingency arrangement?** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **3.8** | **Who will be responsible for managing your operational risks? (Please specify title and name if available.)** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **3.9** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
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|  |  |  |  |  |  |  |
| **3.10** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
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| **3.11** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 3, please do so here.)** | |  |  |  |  |
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| **Part 4 – Onboarding Issuer-clients and Users of Service Facilities** |

|  |  |  |  | **Yes** | **No** | **N/A** |
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| **4.1** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | appropriate identity checks are conducted when onboarding persons as users of your service facilities, and all relevant information and supporting documents are recorded and retained for future reference; |  |  |  |  |
|  |  | users of your service facilities are provided with adequate information about you and the service facilities to be provided to them, together with other relevant documents (eg, relevant risk disclosure statements) and the nature and scope of fees, penalties and other charges you may levy; |  |  |  |  |
|  |  | users of your service facilities are provided with adequate information regarding their rights; |  |  |  |  |
|  |  | execution of applicable user agreements is procured as required under relevant law, rules, regulations and codes; and |  |  |  |  |
|  |  | applications to use your service facilities and amendments to existing user agreements, along with related supporting documentation, are reviewed and approved by designated staff members? |  |  |  |  |
|  |  |  |  |  |  |  |
| **4.2** | **If you onboard users of your service facilities online, do you have the following procedures to verify their identities?** | |  |  |  |  |
|  |  | obtaining a user agreement which is signed by the user by way of an electronic signature together with a copy of the user's identity document (eg, an identity card or relevant sections of the user's passport) |  |  |  |  |
|  |  | maintaining proper records of the onboarding process for each user of your service facilities which are readily accessible for compliance checking and audit purposes |  |  |  |  |
|  |  |  |  |  |  |  |
| **4.3** | **Do you have any written policies and control procedures regarding the operation of your service facilities by a third-party on behalf of a person who has been onboarded as a user of those facilities, including** | |  |  |  |  |
|  |  | obtaining sufficient evidence that the third-party has been duly appointed by the user; |  |  |  |  |
|  |  | obtaining evidence of proof of the relationship between the user and the third-party in case of doubt; |  |  |  |  |
|  |  | clarifying the circumstances in which senior management approval may be needed before a third-party's appointment and operation of the service facilities may be accepted; |  |  |  |  |
|  |  | ensuring that the factors taken into account in accepting the third-party's appointment are properly documented; and |  |  |  |  |
|  |  | ensuring that the operation of service facilities by the third-party is reasonably monitored for irregularities. |  |  |  |  |
|  |  |  |  |  |  |  |
| **4.4** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | you will enter into a written agreement which contains the minimum content as set out under section 7.1 of the Code of Conduct for Approved Securities Registrars with your issuer-clients before services are provided; |  |  |  |  |
|  |  | you will enter into a written agreement which contains the minimum content as set out under section 7.2 of the Code of Conduct for Approved Securities Registrars with users of your service facilities before making the facilities available to them; and |  |  |  |  |
|  |  | no holdmail instructions from registered holders will be accepted or acted upon? |  |  |  |  |

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| **4.5** | **Who will be responsible for overseeing your user onboarding function? (Please specify title and name if available.)** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **4.6** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
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| **4.7** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
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| **4.8** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 4, please do so here.)** | |  |  |  |  |
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| **Part 5 – Managing Conflicts of Interest** |

|  |  |  |  | **Yes** | **No** | **N/A** |
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| **5.1** | **Do you have any written Chinese Walls policies, including wall crossing procedures, to** | |  |  |  |  |
|  |  | ensure appropriate separation of relevant staff / functions (eg, between counter services staff and back-office staff who handle matters relating to the updating of registers of securities holders); and |  |  |  |  |
|  |  | prevent the misuse or misappropriation of price-sensitive or otherwise confidential information relating to any investor or securities holder (eg, ensure information relating to any corporate action intended by an issuer-client is only available to staff members assisting in the handling of the action and is not available to other staff members, except on a need-to-know basis). |  |  |  |  |
|  |  |  |  |  |  |  |
| **5.2** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | the potential for the existence of conflicts of interest between you or your staff members and issuer-clients is minimised, and further, in circumstances where actual or apparent conflicts of interest cannot reasonably be avoided, that clients are fully informed of the nature and possible ramifications of such conflicts and are in all cases treated fairly; and |  |  |  |  |
|  |  | other conflicts of interest issues (such as employee dealing) are properly addressed? |  |  |  |  |

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| **5.3** | **Who will be responsible for monitoring and reviewing the policies and control procedures over conflicts of interest? (Please specify title and name if available.)** | |  |  |  |  |
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|  |  |  |  |  |  |  |
| **5.4** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
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| **5.5** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **5.6** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 5, please do so here.)** | |  |  |  |  |
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| **Part 6 – Safeguarding of Third-Party Assets** |

|  |  |  |  | **Yes** | **No** | **N/A** |
| --- | --- | --- | --- | --- | --- | --- |
| **6.1** | **Do you have any written policies and control procedures to ensure proper handling or movement of third-party assets retained or kept on behalf of an issuer-client, including in respect of the following areas?** | |  |  |  |  |
|  |  | handling of documentation (such as blank title instruments or cheques), securities, seals and impressions and information relating to issuer-clients and securities holders |  |  |  |  |
|  |  | clear identification of staff members and representatives of issuer-clients with authority to make additions, deletions or changes or otherwise part with possession of third-party assets, and the parameters of such authority |  |  |  |  |
|  |  | use of standardised and sequentially numbered documents or other appropriate methods to acknowledge and account for asset movements |  |  |  |  |
|  |  | secure storage of your assets and third-party assets, as well as other important documents and controlled forms (eg, cheque books, title instruments, etc) which are kept at your premises |  |  |  |  |
|  |  | prompt depositing of cheques, cashier orders and other negotiable instruments and securities into appropriate account(s) |  |  |  |  |
|  |  | payments or refunds in relation to dividends, public offer applications, rights issues or other corporate actions, and whether payable to an issuer-client or securities holder |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.2** | **Do you have any written policies and control procedures to ensure that all payments and refunds to issuer-clients or securities holders are appropriately processed by** | |  |  |  |  |
|  |  | obtaining proper instruction from the relevant issuer-clients or securities holders; |  |  |  |  |
|  |  | verifying the authority of the person sending the instruction (eg, by verifying the signature on the instruction or adopting appropriate authentication methodologies); |  |  |  |  |
|  |  | obtaining management approval; and |  |  |  |  |
|  |  | ensuring payment is only made in accordance with the relevant instruction. |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.3** | **Do you have any written policies and control procedures to** | |  |  |  |  |
|  |  | ensure that cash or third-party cheques for making payments to issuer-clients or securities holders are |  |  |  |  |
|  |  | (i) authorised in writing; and |  |  |  |  |
|  |  | (ii) approved by a designated senior staff member; and |  |  |  |  |
|  |  | identify third-party cheques deposited by issuer-clients or securities holders. |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.4** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | any registers of holders of securities that you are responsible for maintaining are properly maintained and updated in a timely and accurate manner; |  |  |  |  |
|  |  | any statements, confirmations or other documents sent or made available to a securities holder regarding their securities balances or transactions (including any information made available via any electronic/online facility) are prepared on the basis of, and consistent with, entries made in the relevant register of holders of securities; and |  |  |  |  |
|  |  | any statements, confirmations or other documents sent or made available to an issuer-client regarding: (i) any securities issued by them; or (ii) any registered or prospective holder of such securities, are prepared on the basis of, and consistent with, entries made in the register of holders of those securities? |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.5** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | bank reconciliation is performed regularly; |  |  |  |  |
|  |  | discrepancies identified in a bank reconciliation are promptly followed up; |  |  |  |  |
|  |  | securities reconciliation is performed regularly; and |  |  |  |  |
|  |  | discrepancies identified in a securities reconciliation are promptly followed up? |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.6** | **How often will you conduct bank reconciliation for segregated accounts?** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.7** | **How often will you conduct bank reconciliation for other bank accounts?** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.8** | **How promptly will you follow up on discrepancies identified in bank reconciliations?** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.9** | **How often will you conduct securities reconciliations?** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.10** | **How promptly will you follow up on discrepancies identified in securities reconciliations?** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.11** | **Do you have any written policies and control procedures** | |  |  |  |  |
|  |  | with respect to access to internet and facsimile transmission, where such devices or channel are used to transmit important information; and |  |  |  |  |
|  |  | regarding confidentiality of passwords (eg, passwords are changed regularly, and relevant passwords are disabled upon a staff member leaving you)? |  |  |  |  |

|  |  |  |  |  |  |  |
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| **6.12** | **Who will be responsible for overseeing the third-party assets handling function? (Please specify title and name if available.)** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.13** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.14** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **6.15** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 6, please do so here.)** | |  |  |  |  |
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| **Part 7 – Compliance** |

**Compliance function**

|  |  |  |  | **Yes** | **No** | **N/A** |
| --- | --- | --- | --- | --- | --- | --- |
| **7.1** | **Do you have a compliance function which** | |  |  |  |  |
|  |  | is independent of all operational and business functions; |  |  |  |  |
|  |  | reports directly to your senior management; |  |  |  |  |
|  |  | covers all relevant aspects of your operations; and |  |  |  |  |
|  |  | has unfettered access to necessary records and documentation? |  |  |  |  |
|  |  |  |  |  |  |  |
| **7.2** | **Do you have compliance policies and control procedures to ensure that** | |  |  |  |  |
|  |  | all applicable legal and regulatory requirements are covered, including |  |  |  |  |
|  |  | 1. financial, systems and other resources requirements; |  |  |  |  |
|  |  | 1. record keeping requirements; |  |  |  |  |
|  |  | 1. audit, reporting and notification requirements; |  |  |  |  |
|  |  | 1. business practices (eg, code of conduct) requirements; and |  |  |  |  |
|  |  | 1. prevention of bribery requirements and related guidance issued by the Independent Commission Against Corruption; |  |  |  |  |
|  |  | staff members performing the compliance function promptly escalate all occurrences of material non-compliance by you or your staff members with legal and regulatory requirements as well as with your own policies and procedures; |  |  |  |  |
|  |  | notification is promptly made to the Commission, and any applicable clearing house, central securities depository or exchange of occurrences of material non-compliance by you or your staff members with relevant legal and regulatory requirements; and |  |  |  |  |
|  |  | all compliance issues that are not resolved within established time frames are reported to senior management? |  |  |  |  |
|  |  |  |  |  |  |  |
| **7.3** | **Do you have any written policies and control procedures to ensure that your staff members performing the compliance function are independent of the core business functions and reporting directly to an independent and high level of authority?** | |  |  |  |  |

|  |  |  |  |  |  |
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| **7.4** | **Who will be responsible for overseeing your compliance function? (Please specify title and name if available.)** |  |  |  |  |
|  |  |  |  |  |  |

**Complaints handling**

|  |  |  |  | **Yes** | **No** | **N/A** |
| --- | --- | --- | --- | --- | --- | --- |
| **7.5** | **Do you have any written policies and control procedures to ensure that** | |  |  |  |  |
|  |  | complaints from issuer-clients and securities holders relating to your business are handled in a timely and appropriate manner; |  |  |  |  |
|  |  | steps are taken to investigate and respond promptly to complaints; |  |  |  |  |
|  |  | where a complaint has been received, the subject matter of the complaint is properly reviewed; and |  |  |  |  |
|  |  | where possible, complaints are investigated by staff members performing the compliance function who are not directly involved in the subject matter of the complaint? |  |  |  |  |

|  |  |  |  |  |  |  |
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| **7.6** | **Who will be responsible for overseeing your complaint handling function? (Please specify title and name if available.)** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **7.7** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **7.8** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
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| **7.9** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 7, please do so here.)** | |  |  |  |  |
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| **Part 8 – Personnel and Training** |

|  |  |  |  | **Yes** | **No** | **N/A** |
| --- | --- | --- | --- | --- | --- | --- |
| **8.1** | **Do you have any arrangements to ensure that** | |  |  |  |  |
|  |  | operational and control policies and procedures which should include those relating to internal controls and employee dealing are communicated to new recruits; |  |  |  |  |
|  |  | updated operational and control policies and procedures are distributed to staff members and accessible at all times; and |  |  |  |  |
|  |  | any changes to operational and control policies and procedures are communicated to staff members? |  |  |  |  |
|  |  |  |  |  |  |  |
| **8.2** | **Do you have employee training policies and procedures to ensure that** | |  |  |  |  |
|  | (a) | adequate training, which is suitable for the specific duties that staff members perform, is provided both initially and on an ongoing basis; and |  |  |  |  |
|  | (b) | staff members possess or acquire appropriate and practical experience through **“**on-the-job” training and, where appropriate, structured courses? |  |  |  |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **8.3** | **Who will be responsible for overseeing your personnel and training matters? (Please specify title and name if available.)** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **8.4** | **Where the answer to any question above is “No”, please describe in detail in the space provided below any alternative or compensating controls which can meet the same objective as the controls mentioned in the question.** | |  |  |  |  |
|  |  | |  |  |  |  |
|  |  |  |  |  |  |  |
| **8.5** | **Where the answer to any question above is “N/A”, please explain in the space provided below why the question is not applicable.** | |  |  |  |  |
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|  |  |  |  |  |  |  |
| **8.6** | **Supplementary information (If you wish to provide any additional or supplementary information regarding the matters under this Part 8, please do so here.)** | |  |  |  |  |
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