



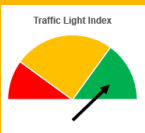
# Fund Manager Code of Conduct ('FMCC') - How effective is your risk and control function?

## Overview

In order to comply with the FMCC, fund managers are expected to maintain an independent and objective audit function to report on the adequacy, effectiveness and efficiency of their management, operations and internal controls. Small to medium-sized managers, however, may lack the resources or budget to implement an internal audit function, or to undertake regular comprehensive internal control reviews. This is where third party professionals such as PwC and Tiang & Partners may be able to provide an effective, and affordable solution.

## How can we help?

We provide two types of internal control reviews – **Mock Inspection** and **Rapid Review** to effectively manage fund managers' risk and ensure compliance.

Time length			
	 <b>Mock Inspection</b>	 <b>Rapid Review</b>	
Approach	In-depth	Streamlined	
Objective	Simulate an external review conducted by a regulator and covers a wide spectrum of review scopes that are covered under the FMCC and other applicable rules and regulations for asset managers.	Provide streamlined and bespoke health check for a quick review of the readiness and adequacy of complying with FMCC requirements. The risk level of findings will be indicated in different colours.	
Scope	<ul style="list-style-type: none"> <li>• Organisation and governance structure</li> <li>• Risk management framework</li> <li>• Compliance</li> <li>• Valuations</li> <li>• Operational processes</li> <li>• Outsource</li> <li>• Staff ethics and dealing</li> </ul>	A combination of at least three selected review areas of your choice	
Deliverables	A long form written report with detailed findings and observations and specific recommendations	A high-level summary report with findings and observations rated with 'traffic light' indicators	
Comprehensiveness			

## Our service offerings

- Understand your needs and determine whether a mock inspection or rapid review is more appropriate to your business scale;
- Perform gap analysis to assess whether the existing policies, procedures and documentation are in compliance with applicable regulatory requirements;
- Evaluate the effectiveness of internal controls over the business and operational processes and detect deficiencies;
- Provide recommendations to management to rectify any deficiencies;
- Draft, review and amend legal and fund documentation, and internal policies for compliance with relevant laws and regulations;
- Advise on the interpretation of laws, such as the Securities and Futures Ordinance and its subsidiary legislation, and SFC regulations, codes, guidelines, FAQs, circulars etc.;
- Provide insights on market and best practices to achieve efficiency and minimise compliance costs.

## Why us?



### Market-leading resources

We work in a global network with local expertise. We also have strong connections with industry associations and regulatory bodies. We have a fully integrated and multi-competent team to support all areas of your complex issues.



### Regulatory awareness

We deliver up-to-date current industry practice and market insights, and identify key risk factors allowing you to mitigate risks and focus on your core business.



### Market intelligence

We have broad industry perspectives and market intelligence in benchmarking best industry practice about regulatory compliance to develop appropriate internal control systems that are commensurate with the business nature, size and complexity.

## Contact us

### Financial Services Risk And Regulation – PwC Hong Kong

**Michael Footman**  
Partner, FSRR Leader  
+852 2289 2747  
[michael.hc.footman@hk.pwc.com](mailto:michael.hc.footman@hk.pwc.com)

**Helen Li**  
Partner  
+852 2289 2741  
[helen.l.li@hk.pwc.com](mailto:helen.l.li@hk.pwc.com)

**Arthur Mok**  
Partner  
+852 2289 1160  
[arthur.sw.mok@hk.pwc.com](mailto:arthur.sw.mok@hk.pwc.com)

**Michael Atkinson**  
Partner  
+852 2289 1119  
[michael.ma.atkinson@hk.pwc.com](mailto:michael.ma.atkinson@hk.pwc.com)

### Legal\* – Tiang & Partners

**Gaven Cheong**  
Partner, Head of Investment Funds  
+852 2833 4993  
[gaven.cheong@tiangandpartners.com](mailto:gaven.cheong@tiangandpartners.com)

**Esther Lee**  
Registered Foreign Lawyer  
+852 2833 4950  
[esther.yt.lee@tiangandpartners.com](mailto:esther.yt.lee@tiangandpartners.com)

\* Legal services will be provided by Tiang & Partners. Tiang & Partners is an independent Hong Kong law firm with a close relationship with PwC.

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