

Due Diligence 2021

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Walker Crips Structured Investments is a trading name of Walker Crips Investment Management Limited which is authorised and regulated by the Financial Conduct Authority (Registration Number 226344).

For more information on Walker Crips, you can contact Walker Crips Structured Investments on 020 3100 8880 or email wcsi@wcgplc.co.uk.

Who are Walker Crips?

Walker Crips' predecessors first bought and sold shares for clients on the London Stock Exchange in 1914, making it one of the City of London's oldest independent companies.

Today, Walker Crips Group PLC is a public limited company, listed on the London Stock Exchange. After more than a century, our core value remains unchanged; to serve our clients and to deliver good customer outcomes.

At Walker Crips, our mission is to make investment rewarding for our clients, our shareholders and our staff, and give our customers a fair deal.

We support our investment managers and our staff by being a technology driven financial services company.

Walker Crips provides a range of financial products and services to our customers; namely investment management, financial planning, pensions, share dealing and structured investments.

Established	1914
Annual Revenue	£31.4m
Operating Profit	£1.09m
Net Assets	£22.6m
Total Assets Under Management and Administration	£4.3bn
Offices	11
Divisions	Structured Investments Investment Management Financial Planning Pensions Share Dealing www.enoc.pro
Website	www.wcgplc.co.uk/wcsi
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Investment Management

Growing with clients to make investment rewarding

Private Client Division

Our London and York-based Private Client Division (“PCD”) teams shape our investment strategy guidelines, providing both Model Portfolio Services and Bespoke Discretionary Services to our client base.

Investment Management

Our eclectic collection of professional investment managers and advisers provide clients with investment expertise and retain meaningful relationships built on Walker Crips’ 106 years of experience. Our collectives model portfolio business continues to perform steadily for our clients.

Alternative Investments

Our Alternative Investment solutions provide innovative services and products for specific clients. Our (Tier 1) Investor Visa Programme serves high net worth individuals as they invest in the UK.

Structured Investments

Specialist products offered by Walker Crips Structured Investments provide carefully considered investment products to investors through professional financial intermediaries. Our Structured Investment plans are designed to complement traditional investment strategies, offering alternative exposure to a wide range of markets and counterparties.

Wealth Management

Preserving and nurturing client wealth

Our Wealth Management team deliver an individualised approach to financial planning. As focused independent financial advisers, Walker Crips Wealth Management provide guidance on an extensive range of financial concerns such as life assurance, pre-retirement planning, at-retirement advice, savings plans, tax efficient management of investments and estate planning.

Pensions

Serving clients to better care for their futures

Through Self-Invested Personal Pensions (“SIPP”) and Small Self-Administered Schemes (“SSAS”) our pensions administrative team assist clients in efficiently exercising control over their SIPP pension fund investments and also provide company directors the infrastructure using SSAS to grow pension funds for their retirement.

EnOC Technologies

Engineering out complexities

Our newly incorporated software company, EnOC Technologies Limited, provides cloud-based regulatory software to financial services firms. We aim to help smaller firms close the technology gap; and for larger firms, software without the need for hardware maintenance costs. The EnOC Pro Platform will allow for swift scalability with no expenditure on infrastructure; and its flagship service Accountability, is an easy-to-use solution for the Senior Managers & Certification Regime (“SM&CR”).

Key Statistics

106

Years looking after our clients

31,485

Clients across the UK

£31.4m

Total Revenue 2020

£4.8bn

Assets Under Management and Administration

Our Branches

Walker Crips operates eleven offices throughout the UK, headed and staffed by dedicated individuals working towards a fair deal for stakeholders.



Timeline

- 1914** The stockbroking firm of Weddle Beck & Company was formed in June 1914, two months before the start of World War I.
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- 1923** In the early days of the firm a brisk arbitrage business was conducted with Paris and there was a banking business with the joint stock banks consisting of Barclays, Lloyds, Midland and National Provincial Banks.
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- 1933** In 1933 a department was established to deal with new issues. The shares of a number of established companies were brought to the stock exchange for quotation and the firm acted as official stockbrokers to these firms.
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- 1966** By the 1960s Dudley Weddle considered it would make sense to amalgamate with another stockbroking firm of a similar size.
- Nothing could be more natural, therefore, than a merger with Walker, Crips and Company, as the senior partners of both firms had been friends for some considerable years. The amalgamation of the two firms was effected on 28 November 1966 resulting in Walker, Crips, Weddle, Beck & Company.
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- 1996** Admitted to the London Stock Exchange as a fully listed plc.
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- 2001** Acquisition of Keith, Bayley, Rogers & Co stockbroking business.
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- 2005** Acquisition of London York group providing financial planning and pension management services.
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- 2008** Walker Crips Structured Investments established
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- 2015** Acquisition of Barker Poland Asset Management discretionary and advisory business.
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- 2019** Walker Crips Stockbrokers Limited changes its name to Walker Crips Investment Management Limited.

Security of client money and client assets

How does Walker Crips hold client money?

Walker Crips holds client money in segregated bank accounts, in accordance with the FCA client money rules.

Walker Crips performs daily client money reconciliations to ensure funds held in segregated bank accounts accurately reflect all client assets. It has in place a signed written undertaking from each of the underlying banks confirming that no right of offset exists between credit balances held on behalf of its clients and any indebtedness of Walker Crips, or any of its subsidiaries, held with the same institution.

In the event that any of the banks default, losses would be shared by each client in proportion to their share of total funds held with the bank which has failed. Where a shortfall is identified, investors may be entitled to claim compensation from the UK's Financial Services Compensation Scheme (FSCS).

How much protection is provided?

FSCS rules have fixed the maximum compensation limit at £85,000 per person, per authorised institution.

Investors should be aware however that all of their balances with any particular bank, including their personal accounts, would be aggregated in the event that the compensation scheme was triggered. More information on this is available on the FSCS website (<http://www.fscs.org.uk>).

What about assets held by nominee companies?

Walker Crips uses nominee companies to register and administer holdings on its clients' behalf. Each nominee company is a separate, non-trading legal entity, wholly owned by Walker Crips. Whilst legal title of the assets is held in the name of the nominee company, beneficial ownership is retained by the client.

Client investments are held in pooled accounts with those of other clients, meaning that individual entitlements may not be identifiable by either separate certificates, other physical documents of title or electronic record.

Any irrecoverable shortfall following the default of a custodian would be shared by each client in proportion to their original share of the assets in the pool.

Clients' assets that are registered in the name of one of our nominee companies are held in trust and are not regarded by third parties as belonging to Walker Crips. In the unlikely event that Walker Crips defaults, clients' assets would remain entirely separate from those of Walker Crips and could not be used to settle any debts accrued by Walker Crips.

Additional assurances and controls for safeguarding client money and client assets

In addition to the measures described above, Walker Crips offers the following assurances and controls for the safeguarding of Client assets:

Walker Crips client asset processes and compliance with FCA rules are audited annually with a report detailing findings shared with the FCA.

Walker Crips Appointed Auditor conducts an audit of the control environment (including client asset controls) and publishes a report demonstrating the systems and controls in place at Walker Crips. This report is available on request.

Walker Crips has established an internal audit function which is operated by Smith & Williamson LLP. Internal audit carries out client asset related work as directed by the WGG Audit Committee, with results and recommendations provided for consideration.

Walker Crips is required to submit a monthly Client Money and Assets return (CMAR) to the FCA. The purpose of the CMAR is to ensure that the FCA receives regular and comprehensive information from a firm which is authorised to hold clients assets.

The FCA capital adequacy regulations under the Capital Requirements Directive also requires that Walker Crips maintain a minimum level of financial resources at all times.

Walker Crips have specialist indemnity cover in place that will protect it and its clients in the event of fraud, misappropriation or theft of any clients' assets in its custody and control, including both cash and securities.

Client data policies

As a registered Data Processor with the Information Commission, Walker Crips Investment Management Limited is required to comply at all times with GDPR. Walker Crips business activities require it to hold personal data provided by its clients and obtained from other sources. In such capacity Walker Crips undertake that:

- (i) only use or process such Client Data for the purpose of serving its clients
- (ii) Client Data will be held securely until such time as it is not required for (i) above, when it will be destroyed in a secure fashion.

So that Walker Crips may comply with its responsibilities it will ensure that:

- (i) appropriate security measures are taken against unauthorised or unlawful processing of the personal data and against accidental loss or destruction of, or damage to, the personal data;
- (ii) take reasonable steps to ensure the reliability of any employee who has access to the personal data;
- (iii) in the event of accidental loss or destruction of, or damage to, any personal data a plan will be implemented without delay to ensure the integrity of its client data.

Governance

1. Data security is recognised as a key business risk. Walker Crips will adopt procedures to ensure this risk is both minimised and mitigated.
2. Data Security is recognized as an issue relevant to all business activities and is not restricted to areas such as IT.
3. Walker Crips will adopt an open and honest approach to data security to encourage all staff to report concerns and disclose data security breaches.
4. Walker Crips will ensure that data security policies will be adopted that are proportionate and appropriate to each business activity.

Training and awareness

1. Walker Crips will ensure that staff receive training on data security and are aware of all relevant policies and procedures.
2. Staff will be made aware of the legal and regulatory requirements to protect customer data.
3. Staff will receive guidance on how data security policies and procedures contribute to the fight against financial crime.

Staff recruitment and vetting

1. New recruits to Walker Crips will be vetted on a risk-based basis.
2. Data Protection issues will be addressed within the firm's Compliance Manual, a document that all staff must ensure they are familiar with during their probationary period.
3. All new staff will confirm they accept Walker Crips' risk based vetting procedure and will comply with the requirements of that procedure.

Access rights

1. Walker Crips will only grant access to IT systems where it is required for employees to carry out their duties.

Passwords and user accounts

1. All employees will receive unique user and password access to systems.
2. Multiple user access using the same password will not be permitted.
3. Sharing of passwords for system access will not be tolerated.

Access to customer data

1. Walker Crips will only grant access to client data where it is required for employees to carry out their duties.
2. The use of client data for anything other than required by the user to carry out their duties is forbidden and may lead to disciplinary action.

Authentication

1. Walker Crips will adopt a risk based approach to authenticating the validity of client data and instructions.
2. Client data will only be changed where authenticated and adequate supporting evidence is held.

Data back up

1. Data held in electronic format will be backed up and stored in secure external locations.
2. Data held on back-up systems will be tested regularly to ensure such data is capable of re-storing Core Systems as part of a Business Continuity Plan.

Internet access and firewalls

1. All incoming electronic data will pass through and be checked by firewall systems supervised by the IT department.

Physical security

1. All Walker Crips offices will adopt appropriate policies to restrict access to the premises by non-Walker Crips personnel.
2. Visitors will be supervised by Walker Crips personnel and their area of access will be restricted as appropriate.
3. Client data, wherever located, will be held securely at all times.

Storage and disposal of data

1. Client data will be retained in accordance with FCA and Data Protection requirements. Client Data no longer required will be disposed in a secure fashion.
2. Client data will only be stored with third parties where they have acknowledged that the data is subject to the provisions of GDPR.
3. Client data will be destroyed securely either by Walker Crips personnel using shredding machines or by third party providers in accordance with their terms of business.
4. Third party suppliers will be subject to visits by senior Walker Crips personnel to review their systems and controls over Walker Crips client data.

Walker Crips Structured Investments

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This document has been prepared solely for information purposes by Walker Crips Structured Investments (WCSI), a trading name of Walker Crips Investment Management Limited, which is a member of the London Stock Exchange and is authorised and regulated by the Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN. FCA Registration Number: 226344. Registered Office: Old Change House, 128 Queen Victoria Street, London, EC4V 4BJ, United Kingdom.

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