



Culture and Conduct Programme

The Cummings Pepperdine Culture & Control Programme is an innovative, independent service which performs due diligence on the governance systems of asset managers to ensure compliance with the FCA's requirements.

What's included?

- A documented review of governance systems mapped against FCA requirements
- A step-by-step programme to remedial implementation
- A quarterly review programme
- A report to included in due diligence procedures
- On-going support
- On-going training via our specialist learning management system

We provide managers with on-going support to successfully complete due diligence requests and train staff for FCA and allocator interviews.

"A firm must have robust governance arrangements, which include a clear organisational structure with well defined, transparent and consistent lines of responsibility and effective processes to identify, manage, monitor and report the risks it is or might be exposed to." FCA Handbook

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