

# **Farringdon Asset Management Pte Ltd**

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<https://www.farringdon.com.sg/>

*"This brochure provides information about the qualifications and business practices of Farringdon Asset Management PTE Ltd. If you have any questions about the contents of this brochure, please contact us at 65 6911 6606 and/or e mail [myoung@farringdon.com.sg](mailto:myoung@farringdon.com.sg)*

Additional information about Farringdon is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Farringdon Asset Management is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.



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## **Item 2 - Material Changes**

Any changes made to this brochure from previous versions will be highlighted in this section. As this is the first version of this brochure we have produced there are no changes to highlight.



***FARRINGTON ASSET MANAGEMENT PTE. LTD.***

**Item 3 - Table of Contents**

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	4
Item 6 – Performance-Based Fees and Side-By-Side Management	5
Item 7 – Types of Clients	5
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9 – Disciplinary Information	11
Item 10 – Other Financial Industry Activities and Affiliations	11
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Training	11
Item 12 – Brokerage Practices	12
Item 13 – Review of Accounts	12
Item 14 – Client Referrals and Other Compensation	13
Item 15 – Custody	13
Item 16 – Investment Discretion	13
Item 17 – Voting Client Securities	13
Item 18 – Financial Information	13
Item 19 – Requirement for State-Registered Advisers	13
Annex A – CVs of Farrington Executive Officers and Representatives	14



**FARRINGDON ASSET MANAGEMENT PTE. LTD.**

**Item 4 - Advisory Business**

Farringdon Asset Management Pte Ltd was founded on the 1<sup>st</sup> of October 2015. The company is owned by two individuals Mr Stuart Anthony Yeomans and Mr Martin James Young.

The company has a Capital Market Service License issued by the Monetary Authority of Singapore to provide fund management services. The company specializes in providing bespoke portfolio management services to High Net Worth Individuals.

Farringdon Asset Management provides investment supervisory services and portfolio management to a broad range of investors including institutions, corporates and high net worth individuals on a discretionary and non-discretionary basis.

Our total assets under management as of the 31<sup>st</sup> of December 2018, are broken down as follows:

Discretionary Management	USD 24,987,268
Non- Discretionary	USD 0
Total	USD 24,987,268

For our managed accounts, we formulate and implement an investment program that is considered prudent, appropriate, and suitable to the nature of the account our general understanding of the client's needs and risk tolerance.

Farringdon also provides comprehensive financial planning services to its clients as we understand it is important to look at your investment in relations to other aspects of your life to provide you with the most comprehensive solutions possible.

**Item 5 - Fees and Compensation**

Farringdon charge an annual management charge of 0.2% per quarter of the value of your investments. This fee is deducted quarterly in arrears.

**Other Types of Fees and Expenses**

Farringdon's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that can be charged by the custodian (example advantage life) which shall be incurred by the client. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Farringdon's fee, and Farringdon does not receive any portion of these commissions or other charges. Client fees are generally deducted directly from client accounts on a quarterly basis. Clients do have the option to pay their fees direct via bank transfer.

Refunds upon termination of the contract are made pro rata based upon time remaining in the quarter for which payment has been received. Contracts may be terminated by either party upon written notice.



***FARRINGDON ASSET MANAGEMENT PTE. LTD.***

Financial planning services as well as advice and counsel for specific advice issues not involving an ongoing relationship will be billed at the hourly rate of \$350; payable when the service is rendered.

All fees are subject to negotiation.

**Termination Policy**

A client agreement may be cancelled at any time, by either party, for any reason, upon receipt of written notice.

**Item 6 - Performance Based Fees and Side-By-Side Management**

We charge a performance based fee of 8% of the value of any investment returns generated. This return will be deducted on a quarterly basis.

Fees will be deducted automatically from client's investment accounts at the end of each quarter.

We do not charge upfront fees. All fees are taken in arrears at the end of the quarter.

Our company does not accept any compensation for the sale of securities or other investment products.

**Item 7 - Types of Clients**

Farringdon Asset Management exclusively deals with clients who are classed as "Accredited Investors" by the Monetary Authority of Singapore (MAS).

In Singapore, Accredited Investor is defined in Section 4A(1)(a) of the Securities and Futures Act (SFA), Chapter 289.

1. NET Personal assets exceeding SGD 2 million (or equivalent in foreign currency). Or
2. Income in preceding 12 months of not less than SGD 300,000 (or equivalent in foreign currency). Or
3. A corporation with net assets exceeding SGD \$10 million in value (or its equivalent in a foreign currency) or such other amount as the Authority may prescribe, in place of the first amount, as determined by —  
(A) the most recent audited balance-sheet of the corporation; or (B) where the corporation is not required to prepare audited accounts regularly, a balance-sheet of the corporation certified by the corporation as giving a true and fair view of the state of affairs of the corporation as of the date of the balance-sheet, which date shall be within the preceding 12 months;



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**Item 8 Methods of Analysis, Investment Strategies and Risk Loss**

**Option #1 – Cautious**

**Objective:** Seeks the preservation of principal with moderate current income and limited appreciation potential.

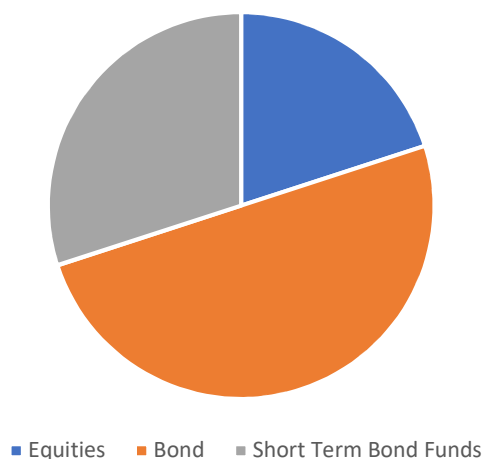
**Investor Profile**

- Investors with short-to intermediate-term goals (2-3 years)
- Those who are interested in protecting the amount of money they invest
- Those who want some growth as a hedge against inflation

**Model Allocation**

Equities	20%
Bonds	50%
Short-Term Bond Funds	30%

**Asset Allocation**





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**Option #2 – Balanced–Cautious**

**Objective:** Seeks the protection against inflation through intermediate-term asset growth.

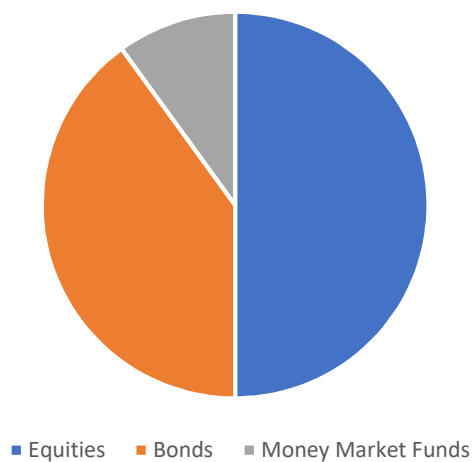
**Investor Profile**

- Investors with intermediate-term goals (4-6 years)
- Those seeking more stability in “up” and “down” markets than stocks alone provide
- Investors who want to build their capital and protect the value of their portfolio against inflation without experiencing large swings in portfolio value

**Model Allocation**

Equities	50%
Bonds	40%
Money Market Funds	10%

**Asset Allocation**





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**Option #3 – Balanced**

**Objective:** Seeks long-term capital appreciation, recognizing that short-term fluctuation in portfolio value may occur.

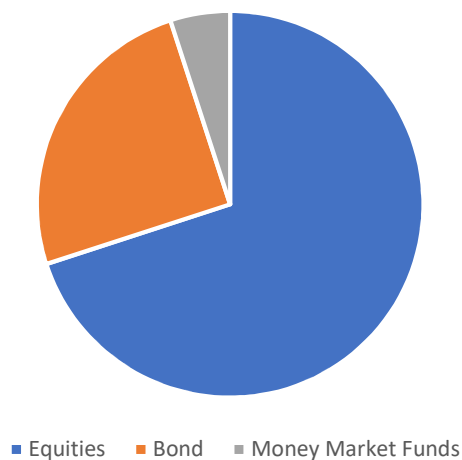
**Investor Profile**

- Customers with long-term goals (7+ years)
- Those more interested in beating inflation
- Those less concerned with current income
- Investors seeking a diversified approach to wealth accumulation

**Model Allocation**

Equities	70%
Bonds	25%
Money Market Funds	5%

**Asset Allocation**







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**Option #4 – Balanced–Aggressive**

**Objective:** Seeks capital appreciation over a long investment horizon with a goal to incur lower market volatility.

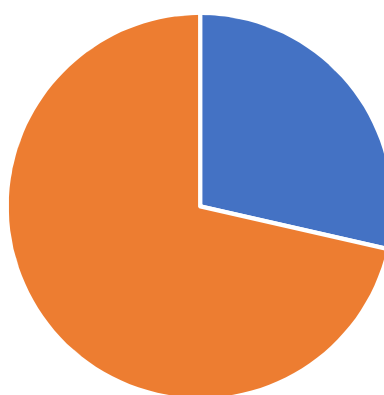
**Investor Profile**

- Investors with long-term goals
- Investors who want lower market volatility

**Model Allocation**

Equities	80%
Bonds	20%

**Asset Allocation**



■ Equities ■ Bond



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**Option #5 – Aggressive**

**Objective:** Seeks capital appreciation over a long investment horizon; the aggressive mix of 100% equity securities will produce high short-term fluctuation in account value.

**Investor Profile**

- Investors with long-term goals
- Investors with other investments providing adequate diversification
- Those who can ride out frequent shifts in portfolio values
- Those seeking maximum growth of their assets
- Those who want the highest potential return from a long-term investment

**Model Allocation**

Equities	100%
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**Asset Allocation**



All equity positions outlined in are portfolio models represent a maximum equity exposure. Depending on market conditions we may opt to replace equity exposure with short money market instruments or funds.



**FARRINGDON ASSET MANAGEMENT PTE. LTD.**

**Item 9 – Disciplinary Information**

A full record of the company and its representatives' disciplinary history can be obtained from our regulator's website.

To access the information on the website: [www.mas.gov.sg](http://www.mas.gov.sg)

Click on "Register of Representative" and enter the MAS representative number.

Click on the representative name and click on "MAS Enforcement Actions".

Farringdon Asset Management's CMS License number: CMS100560-1

**Item 10 – Other Financial Industry Activities and Affiliations**

All of our Registered investment representatives are required to disclose all material facts regarding any other financial industry activities and affiliations that may result in a conflict of interest.

**Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Farringdon Asset Management has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All Representatives of Farringdon Asset Management must acknowledge the terms of the Code of Ethics annually, or as amended Farringdon Asset Management anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over Farringdon Asset Management has management authority to effect, and will recommend to investment advisory 8 revised December 31, 2014 clients or prospective clients, the purchase or sale of securities in which Farringdon Asset Management, its affiliates and/or clients, directly or indirectly, have a position of interest. Farringdon Asset Management employees and persons associated with Farringdon Asset Management are required to follow Farringdon Asset Management Code of Ethics.

Subject to satisfying this policy and applicable laws, officers, directors and employees of Farringdon Asset Management and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Farringdon Asset Management clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Farringdon Asset Management will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Farringdon Asset Management clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee.

Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Farringdon Asset Management and its clients. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Farringdon Asset Management obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive



***FARRINGDON ASSET MANAGEMENT PTE. LTD.***

securities at a total average price. Farringdon Asset Management will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Farringdon Asset Management clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Joyce Kam. It is Farringdon Asset Management policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Farringdon Asset Management will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser.

**Item 12 - Brokerage Practices**

Farringdon Asset Management requests that it be provided with written authority to determine which securities are bought or sold and the amounts thereof for discretionary clients. In certain situations, we may also be given the authority to determine the broker or dealer used and the commission rate paid. For selection of the broker or dealer and the commission rates paid, Farringdon Asset Management will select those brokers or dealers which will provide the best services at the lowest commission rates possible. Brokers are chosen to execute transactions for a variety of reasons. Brokers who provide ongoing services such as price quotations, stock information, etc. are used. The reasonableness of commissions are based on the broker's ability to provide professional services, e.g. best execution, competitive commission rates, research or other services which will help the applicant in providing investment management services to the clients. Ongoing research on a wide range of securities is obtained from broker(s) who maintain large research departments. An annual level of commissions required to obtain such services is agreed upon.

While all clients may benefit from such research, commissions to pay the agreed upon sum may come from only a portion of the accounts under management. All commissions are negotiated. Commissions are continuously checked to insure that the agreed upon rate is being maintained. A smaller discount may be applied to transactions of small size and/or difficult to market securities. Farringdon Asset Management does not receive research soft dollars or other products and services (other than execution) from a broker-dealer or a third party in connection with client securities transactions.

**Item 13 - Review of Accounts**

We place great importance in clients being kept up to date with their portfolio holdings. We review client accounts on a quarterly basis to ensure that the assets in your account reflect your ongoing financial needs. Investment representative will conduct a personal review with you via telephone, face to face meeting or via e mail.

A quarterly PDF portfolio review will be sent to you via secure electronic drop box that the company will establish for you. This is to enhance security and prevent any electronic interception of your personal financial information.



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**Item 14 - Client Referrals and Other Compensation**

We may compensate a limited number of other professional individuals and firms for referring business to us. Any referrals solicited from external parties will be made in accordance with SEC rule 206(4)-3. Also in accordance with SEC regulations, pursuant to paragraph (b) of the Rule, the solicitor's disclosure document will include the name of the solicitor, the name of the investment adviser, and the nature of the relationship between the solicitor and the investment adviser. This document will disclose the fact that the solicitor will receive compensation, the terms of the compensation arrangement, and indicate whether the client will pay a specific charge or a higher advisory fee as result of the solicitor recommending the investment adviser to the client. In addition to SEC regulations and guidelines we will also be subject to the compliance and disclosure aspects set forth by the Monetary Authority of Singapore regarding business introducers. Where one or both sets of rules conflict, we will not enter into a referral agreement with any third party.

**Item 15 – Custody**

Farrington Asset Management does not provide custodian service. Clients receive a Quarterly statement from the broker dealer's, bank's or other qualified custodian institutions as well as online portfolio viewing services that can be accessed any time.

**Item 16 - Investment Discretion**

For our discretionary clients, Farrington Asset Management requires that it be provided with written authority to determine which securities are bought or sold and the amounts thereof. When selecting securities, and establishing amounts, Farrington Asset Management takes account of the investment objectives, limitations and restrictions of the clients for which it advises.

In certain situations, we may also be given the authority to determine the broker or dealer used and the commission rate paid. Investment guidelines and restrictions by the client must be provided to Farrington Advisors in writing.

**Item 17 - Voting Client Securities**

Proxies are received in the mail and are voted at [www.proxyvote.com](http://www.proxyvote.com) In most cases we will vote in favor of the proxy unless the proxy involves an unusual vote that requires additional research as determined by the Compliance Officer and Investment Committee. Clients may obtain a copy of Farrington's complete proxy voting policies and procedures upon request.

**Item 18 - Financial Information**

Farrington Asset Management is required to maintain a base capital position of no less than SG\$250,000 at all times as part of is regulatory requirement outlined by the Monetary Authority of Singapore in the Securities and Futures act 2005. As we do not require clients to make any prepaid fees we are not required to provide access to company accounts to individuals' clients.

**Item 19 – Requirements for State-Registered Advisers**

Farrington Asset Management is not based in and does not operate in any US State or Territory.



**FARRINGDON ASSET MANAGEMENT PTE. LTD.**

**Annex A - CVs of Farringdon Executive Officers and Representatives**

**Martin James Young, Executive Director & CEO**

MAS Representative Number: MJY100095175

**Farringdon Asset Management Pte Ltd**

**May 2016 – Present**

CEO / Executive Director / Representative

- Insuring timely implementation of all compliance procedures as directed by the Monetary Authority of Singapore and the company's compliance officer.
- Preparation and implementation of the company's annual budget.
- Overseeing of marketing and sales process.
- Recruitment of additional sales staff as well as analysts and business development.
- Chairing the Investment Panel.

**Promiseland Independent**

**Nov 2014 – Feb 2016**

FA Director

- Worked as a licensed FA representative in Singapore.
- Managing staff and advising clients.

**Farringdon Group Limited**

**Dec 2007 – Nov 2010**

Director

- Co-founder of Farringdon Group
- Managing staff and operations.
- Portfolio management.
- Investment analysis and client advise.

**Montpelier, Malaysia**

**Sep 2006 – Dec 2007**

Consultant Financial Adviser

- Business development.
- Advising clients and managing portfolio

**HSBC Investment, London**

**Dec 2005 - Sep 2006**

Customer Services Representative

- Leasing with HSBC Investment customers
- Financial advisors on range of HSBC investment products.

**Pacific Continental Securities, United Kingdom**

**Mar 2005 – Nov 2005**

Stockbroker

- Advising clients on stock purchases

**QUALIFICATIONS**

**BA Economics (Hons)**

**Graduated: 2003**

The University of Stirling



**FARRINGDON ASSET MANAGEMENT PTE. LTD.**

**Suresh Raj S/O Yogaraj, Non-Executive Director**

**Farringdon Group Limited**

**Sep 2009 – Present**

**Portfolio Manager**

- Computing reviews on performance of Client's Investment Portfolio.
- Portfolio investments are made through an open architecture Personal Portfolio Bond.
- Manage client's investment on a discretionary basis. (Farringdon's have approximately GBP100m of assets under management)
- Review and advice prospective clients on their current investments.
- Advice in house consultants on current investment outlook.
- Creating Proposal on investments funds for prospective clients.
- Planning of Financial strategies to meet client's long term and retirement objectives.
- Develop good customer relationship and responsive to clients' needs and queries.
- Meet with clients on a regular basis to update them on changes within their investment portfolio and provide outlook on markets.

**Montpelier, Malaysia**

**May 2008 – Aug 2011**

**Portfolio Manager**

- Computing reviews on performance of Client's Investment Portfolio.
- Managing a Savings Plans which is designed to buy undervalued funds offering potential for growth in the medium term, and then using the process of cost- averaging to build up positions in these securities (currently we have more than USD 50m under this plan).
- Creating Quarterly factsheets and updates on the Saving Plans. (Attached are latest fund factsheet and updates on the plan)
- Creating Proposal on investments funds for potential clients.
- Planning of Financial strategies to meet client's objectives.
- Develop good customer relationship and responsive to clients' needs.
- Review client investment portfolio by monitoring the investment performance

**QUALIFICATIONS**

**BA Finance (Hons)**

University of Hertfordshire, UK

**Graduated: 2008**



**FARRINGDON ASSET MANAGEMENT PTE. LTD.**

**Stuart Anthony Yeomans, Marketing Director**

MAS Representative Number: SAY300399430

**Farringdon Asset Management Pte Ltd**

**2016 – Present**

Marketing Director

- Advising the company on its marketing techniques and representative bringing new AI High Net worth clients.

**Farringdon Group Ltd**

**2008 - Present**

Director & CEO

- Integral in the recruitment and development of staff, growing the office from 5 to 15 employees
- Implemented a full 18-month Training Programme for new IFAs to further increase investment advice standards
- Organised Marketing Events and Seminars designed to not only promote the company but to also educate clients
- Instigated the community support and sponsorship programme involving Kiwanis Down Syndrome Association and the local Malaysian Orang Eire Gaelic Football Team and Merican Muay Thai Kickboxing Gym
- Promoted the honest and professional reputation of the company resulting in change of broker services to Farringdon hitting more than GBP3 million each year.

**RWE - Business Services (UK)**

**2006 – 2008**

Business Account Manager

- Responsible for managing all win-back clients and their new accounts
- Achieved the highest award for a new employee and was asked to manage a region for direct retail sales
- Appointed the Change of Occupancy Manager to build new relationships and contracts under management around the West Midlands area

**Creation Financial Services**

**2000 – 2002**

Account/Query Manager

- Managed large credit accounts for retail individuals in the UK; this role required relationship management skills and detailed analysis work of credit files for individuals available on Experian.
- Follow up advice was implemented for clients and queries about large accounts were rectified.

**QUALIFICATIONS**

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**GCSEs:** 9 GCSEs A-C (Lighthall School, Solihull)

**A-Levels:** Business Studies, Information Technology, Mathematics & Sociology (Solihull Sixth Form)

**BA Hons :** Economics & Financial Services (Nottingham Trent Business School)

**Int Cert:** International Cert in Financial Advice (Securities & Investment Institute UK)

**M5 :** Rules & Regulations (Singapore College of Insurance)

**M8 :** Collective Investment Schemes (Singapore College of Insurance)

**M9:** Life Insurance and Investment-Linked Policies (Singapore College of Insurance)

**QROPS :** Opportunities & Threats (LIIA)