

Farringdon Asset Management Pte Ltd

10 COLLYER QUAY #03-06 OCEAN FINANCIAL

CETNRE SINGAPORE 049315

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

5th March 2021

"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 65316180 and/or e mail myoung@farringdon.sg

Additional information about Farringdon is also available on the SEC's website at 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.

Item 2 - Material Changes

Any changes made to this brochure from previous versions will be highlighted in this section.

This is the fourth version of this Brochure.

Notification

In 2021 Farringdon Asset Management Pte Ltd has closed its Branch in the Dubai International Financial Centre (DIFC) following the launch on a new subsidiary of Farringdon Singapore called Farringdon Capital Ltd in the DIFC.

The company has moved into expanded premises from March 2021 at 10 COLLYER QUAY #03-06 OCEAN FINANCIAL CENTRE SINGAPORE 049315.

Changes and Updates

Changes have been made in the following sections

Item 4

Revised AUM figures

Item 8

We have updated our investment strategy with our new Barbell Investment Strategy in addition to our method based algorithmic approach and multi asset strategy.

We have included additional risk warnings for each investment strategy

Item 10

Update on other Financial Industry Activities

Item 19 Annex A

Updating of CVs for key staff members and representatives

Ana Isabel Gonzalez Encinas - Chief Investment officer and Director

Stuart Yeomans - CEO of Farringdon Capital Ltd

Martin Young - CEO Singapore

Mahalakshmi Rengaraju - Chief Compliance Officer

Stephen John Young -Senior wealth advisor

David Azenga - Portfolio & Operations Manager

Elena S. Okhonko - Associate Director, Portfolio Manager

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 Farringdon Executive Officers and Representatives	14

Item 4 - Advisory Business

Farrington Asset Management Pte Ltd was founded on the 1st 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.

Farrington 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 31st of December 2020, are broken down as follows.

Discretionary Management	\$ 157,755,659.84
Non Discretionary Management	\$ 1,024,724,682.00
Total	\$ 1,182,480,051.84

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.

Farrington 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

Farrington charges 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

Farrington'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 Farrington's fee, and Farrington 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.

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

Farrington 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 as an individual with:

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;

Item 8 Methods of Analysis, Investment Strategies and Risk Loss

MULTI ASSET PORTFOLIOS

Option #1 – Cautious

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

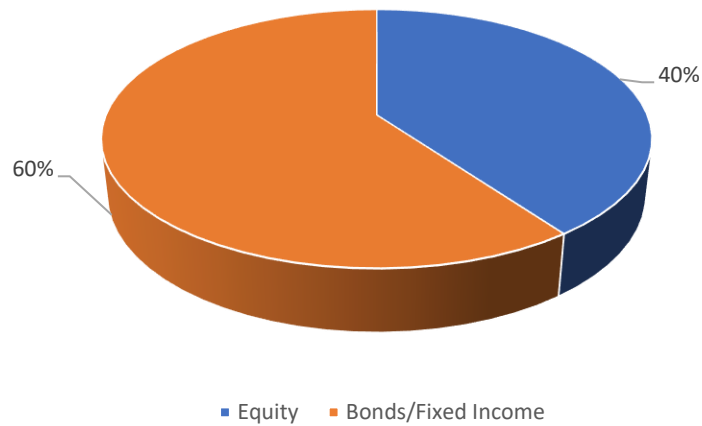
Investor Profile

- 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

Equity	40%
Bonds/Fixed Income	60%

Asset Allocation



Option #2 – Balanced–Cautious

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

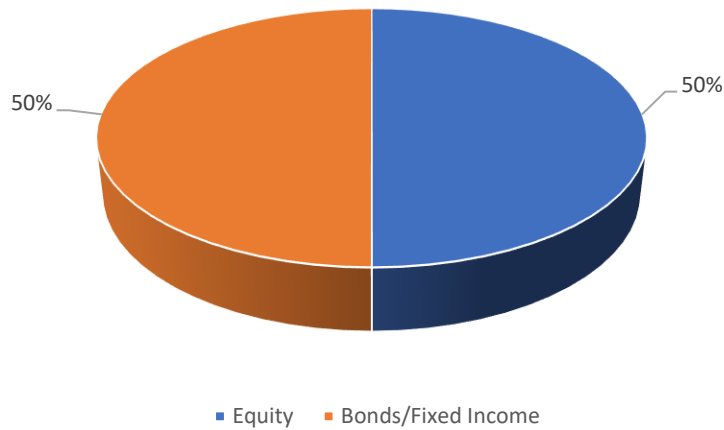
Investor Profile

- 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

Equity	50%
Bonds/Fixed Income	50%

Asset Allocation



Option #3 – Balanced

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

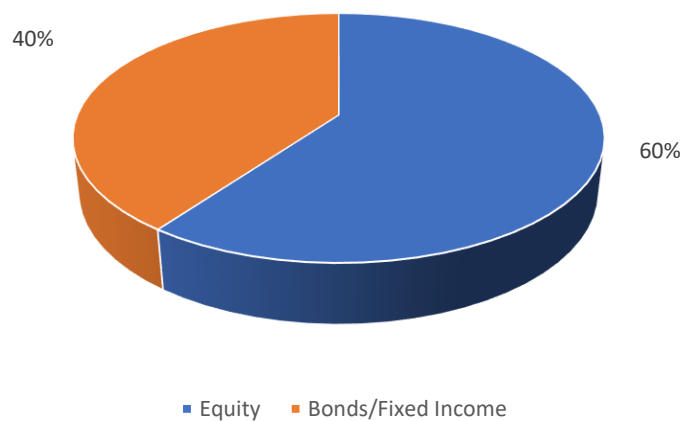
Investor Profile

- 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

Equity	60%
Bonds/Fixed Income	40%

Asset Allocation



Option #4 – Balanced–Aggressive

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

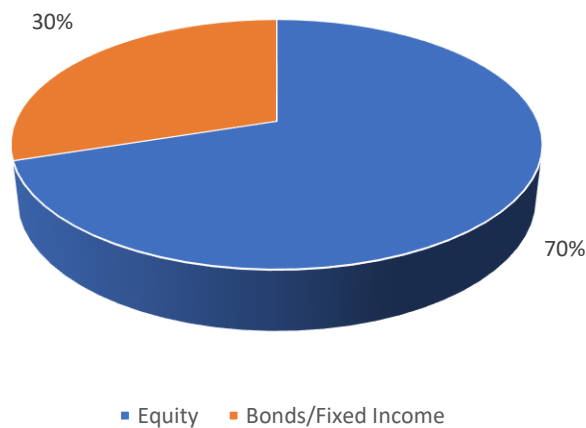
Investor Profile

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

Model Allocation

Equity	70%
Bonds/Fixed Income	30%

Asset Allocation



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.

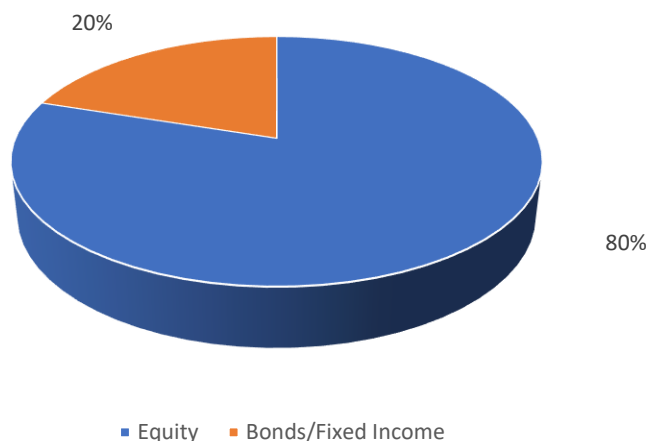
Investor Profile

- 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

Equity	80%
Bonds/Fixed Income	20%

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.

RISK Warning

Multi Asset Portfolios contain both equity and fixed interest investments. While holding a mixture of non-correlated or low correlated assets may include help to reduce associated market volatility it cannot remove this risk of loss in portfolios. As with all investments you may lose part or all of your investment.

ABACUS

In addition to offering standard multi asset strategies Farrington Asset Management also offers a methodology driven algorithmic investment approach that we call ABACUS.

The goal of this methodology is to have a solid based for the picks independent of the market conditions.

This criterion is valid to pick stocks on the market or buy their debt through fixed income and takes into consideration various factors such as:

- a. Interest rates modifications
- b. Changes in the consumer tastes or path
- c. Cycles of the economy
- d. Geographical growth/expansion
- e. Scalability
- f. Competitive advantages and entry barrier.

1. Goals:

- a. Long term portfolio based on fundamentals under the following criteria:
 - Upside > 2 times price of purchase.
 - Under eventual changes in the cycles, selling positions with 20-30% profit
 - Stop-loss 17%
- b. Short term portfolios, volatility case and not clear the trends of the market
 - Profit target 10-20%
 - Stop loss 10%
 - Fibonacci, mail average, Bollinger bands

c. Restriction:

- No short positions are allowed
- No investments in Europe
- No investments in Mainland China
- No investments in indirect investments
- No derivative used except to cover the currency or interest rate in case of fixed income

2. Portfolio diversification:

What we are looking for is:

1. Company can repeat the success it has previously demonstrated, there are no market barriers to this.
2. Low capital to growth

Portfolio constructions:

	40% Faster Growers Growth > 20%	40% Stalwarts Growth 10%	10% Slow Growers Growth < 10%	5% Turns around's	5% Bargains
Gross Margin	+	Slow down	Slow down	Slow down	
Revenue	+	+	Slow down	+	
Profit	+	+	=	=	

3. Methodology

We use filters to create a small universe of stocks. Majority of the stocks will be USA based, due to the high regulations in the market that provide almost perfect information about balance sheet and market price movement. The risk of price being manipulated by insiders or another lack of information is minor.

a. Choose the sector based on Market trends

We analyze daily basics changes in 50 top positions for the 250 biggest funds of the world, this gives us an indication of trends.

We analyze 15 sectors.

Geographical trends are also analyzed under this premises to calculate weightings between North America and Asia.

b. First screening: high predictability Rank

"Buffett-Munger" based on his theories, and Graham Net-net, we focus on finding companies with high quality business at undervalued or fair-valued prices:

1. On the results of Buffett, we have added companies that have high Predictability Rank, that is, companies that can consistently grow its revenue and earnings. After pass the filter of Teradata, (1998-2008) we have found strong correlations between predictability of business and the long return of stocks. We score from 1 to 5, being 5 the biggest achievement for the companies. The annualized gain is after minus the % of loss with the 10 years holdings.

2. Companies that have competitive advantages so it can maintain or even expand its profit margin while growing its business.
3. Companies that incur little debt while being able to grow rapidly.
4. Companies that are fair valued or under-valued. We use PEPG as indicator. PEPG is the P/E ratio divided by the average growth rate of EBITDA over the past 5 years.

From the back-testing study from 1998-2008 we have found strong correlations between the Predictability of Businesses and the long-term return of stocks, the group of undervalued highly predictable companies performed the best. This group had an annualized gain of 20%, while the market just averaged 2.7% a year.

We pick companies that have a score of 5.

c. Second Screening: Magic formula by Greenblatt

The magic formula based on two financial ratios: the earnings yield, which is defined as earnings before interest and taxes (EBIT) divided by enterprise value, and the return on capital, which is defined as EBIT divided by the sum of net fixed assets and net working capital. To select the top-ranked stocks, the magic formula ranks all stocks based on a combination of earnings yield and return on capital: Stocks with the highest earnings yield and return on capital receive a higher rank organized also from 1-5

We pick companies with a score of 5.

d. Third Screening: coding in fundamentals

- i. Faster growers and Stalwarts

Severe approach

- Constant revenue growth: More than 10 years of growth of the company growth
- Operating income > net interest income
- Interest cover > 10 times
- ROIC > 10%
- Positive cash flows in the last 10 years.
- Operating margin average 10%, >20% very good
- Roe > 20%
- EPS >15 %
- Growth rates to earning >2%
- Equity to Debt 75/25
- Market cap > 2 bio
- Current assets x 2 > liability
- Never reduced or suspend dividends
- No concentrations share under institutions
- No earning deficits

ii. Slow growers

Non-Severe approach

- Current assets > 1/2 liability
- Debt < 10% net current assets (for non-industrial companies)
- Non-earning deficits for the last 5 years
- Earning growth > n-1
- ROIC 6-7%

In this third screening. All the companies result of the screening are analyzed due to the criterion restrictions

4. Research

Once the coding has filtered the universe of stocks, we do the second filter which includes sectorial information, management, and market behavior

Just fundamentals	YES	NO
I. Does the company have stable profit during last 10 years?	1	0
II. Light business? How are their capex low, operating cash flows, more than 2 digits?	1	0
III. Eps more than 2 digits?	1	0
IV. Did it have growth during the last 10 years even on the crisis event?	1	0
V. Operative margin more than 2 digits?	1	0
VI. Does its ROE > 15% during the last 15 years?	1	0
VII. The growth of the turnover and profit is more than 2 digits	1	0
Sectorial		
I. Does the company have any protection to still selling the following 5 years? (patents...etc.)	1	0
II. Is the company adapting to the industry changes?	1	0
III. Are their clients diversified?	1	0
IV. Fixed assets are light?	1	0
V. Are cyclical business	1	0
VI. Do the company have space for growth, diversifications, or client acquisitions?	1	0
Management		
I. Does the executive have shares in the company?	1	0
II. How are the executives paid in the company related to others in the industry?	1	0
III. How are the current valuations related to the historical	1	0
IV. How the price share changes in recession	1	0
V. Are the executive buying shares of the companies?	1	0
Market behavior		
I. Does the institutions acquire positions of more than 3%?	1	0
II. Does the company buy back shares?	0	1
III. Does the shares concentrate in institutional investors hands?	0	1

From this last filter we pick the ones that have the highest point score then look at the valuations of the company.

5. Company fair price:

Once the universe is clear then we fixed the price for the market order, based on the following criterion

Price of the company should be

1. ≤ 15 times the earnings of the 3 years
2. ≤ 1.5 book value
3. Or $15 \times P/E$

Risk Warning

ABACUS is an equity only strategy and as such will not derive a risk adjusted and well diversified portfolio. As a pure equity strategy ABACUS portfolio may experience significant downside and volatility in certain market conditions. ABACUS is specified as a Special Situations Investment approach and investors in ABACUS should ensure that they have enough assets in other non or low correlated assets classes such as fixed interest securities to mitigate any downside risk. As with all investments you may lose part or all of your investment.

BARBELL GLOBAL MACRO STRATEGY

Farrington Asset Management has expanded its investment portfolio strategies to include a Barbell Asset Allocation model portfolio. The portfolio will be managed by Elena Okhonko. The portfolio will be allocated on a global macro basis and will offer a balanced risk profile suitable for an investor looking for longer term capital appreciate and willing to accept volatility in near term prices.

The underlying asset may include equities, bonds, commodities, precious metals, derivatives, and alternative asset classes including digital assets traded through exchange traded funds on recognised exchanges.

Global Macro Strategy is based on tracking the following macro indicators:

- Nominal Yields
- Real Yields
- Inflation
- GDP growth/contraction
- FX rates
- USD Dollar cycle
- Business cycle
- Credit cycle
- Liquidity conditions
- The Fed Policy
- Volatility in Asset Classes
- Leverage/Debt in the system
- Market Underlying Structure



FARRINGTON ASSET MANAGEMENT PTE. LTD.

Based on the reading of all the above macro indicators, a cohesive macro-outlook is formed and the portfolio is constructed in the following manner:

- Sectors/Asset Classes that are expected to outperform – up to total of 100% of the portfolio, but not more than 10-15% for each individual asset class
- Sectors/Asset Classes that are expected to underperform – 0% allocation of the portfolio.

At all times, total portfolio beta should not exceed 1 or should not be higher than the market beta – for all assets combined in the portfolio.

The target portfolio beta in line with average/medium risk profile of all clients – is 0.50 beta compared to the market beta of 1 or in other words total risk/volatility of the portfolio should be around 50% of the market.

The following methods can be used to achieve the target of 0.50 beta:

- Barbell method – 25-30% of portfolio invested in 1.5 beta assets and 70% is in cash with beta 0.
- Negative correlation method – 25-30% of portfolio invested in 1.5-2 beta assets + 30% in negatively correlated assets with beta 0.50 or lower + 30% is in cash with beta 0.
- Optionality/Tail Risk method – up to 20% of the total portfolio can be invested in put/call options and tail risk protection strategies that have deep negative correlation to the rest of the assets in the portfolio and allow to reduce total portfolio beta below 1.

RISK Warning

Multi Asset Portfolios contain both equity and fixed interest investments. While holding a mixture of non-correlated or low correlated assets may include help to reduce associated market volatility it cannot remove this risk of loss in portfolios. As with all investments you may lose part or all of your investment. In addition, alternative assets such as crypto currencies and commodities traded through Exchange Traded funds may present issues of liquidity and other aspects not associated with traditional asset classes and may represent additional risk to consider before investing.

Item 9 – Disciplinary Information



FARRINGDON ASSET MANAGEMENT PTE. LTD.

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

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

Neither the company or any of its representatives have had any disciplinary actions taken against them at the time of comprising this brochure as specified by either MAS or SEC regulations and guidelines.

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.

None of our Supervised person are currently engaged in other investment related businesses with the exclusion of Martin Young CEO of our Singapore office and Stuart Yeomans CEO of Farringdon Capital Ltd who are both Directors of our Associated business Farringdon Group Ltd. This has been ascertained to present no conflicts 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



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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 Farrington Asset Management and its clients. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Farrington Asset Management obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Farrington 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.

Farrington Asset Management clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Maha. It is Farrington Asset Management policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Farrington 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

Farrington 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, Farrington 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.

Farrington does not aggregate trades. Clients should be aware that in incidents of clients directed brokerage accounts that clients may be charged additional transaction costs and may not receive favorable execution costs.

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. Farrington 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



FARRINGDON ASSET MANAGEMENT PTE. LTD.

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.

All reviews will be conducted by a supervised individual.

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

Farringdon 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, Farringdon 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, Farringdon 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 Farringdon Advisors in writing.

Item 17 - Voting Client Securities

Proxies are received in the mail and are voted at 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 Farringdon's complete proxy voting policies and procedures upon request.

Item 18 - Financial Information



FARRINGTON ASSET MANAGEMENT PTE. LTD.

Farrington Asset Management is required to maintain a base capital position of no less than SG\$250,000 at all times as part of its 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.

Annex A - CVs of Farrington Executive Officers and Representatives

[Martin James Young, Executive Director & CEO](#)

MAS Representative Number: MJY100095175

Farrington Asset Management Pte Ltd

May 2016 – Present



FARRINGDON ASSET MANAGEMENT PTE. LTD.

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

Martin does not work in a supervised capacity for any other business but is a director of our associated business Farringdon Group and receives director's salary for this.

Stuart Anthony Yeomans, Director

MAS Representative Number: SAY300399430

Farringdon Asset Management Pte Ltd

2016 – Present

Marketing Director



FARRINGDON ASSET MANAGEMENT PTE. LTD.

- 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

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)

Stuart does not work in a supervised capacity for any other business but is a director of our associated business Farringdon Group and receives director's salary for this.

Ana Isabel Gonzalez Encinas Chief Investment Officer

Farringdon Asset Management Pte Ltd

Chief Investment officer

2017 – Present



FARRINGTON ASSET MANAGEMENT PTE. LTD.

Crossinvest Singapore Executive Advisor	2016 – 2017
EFG Singapore Executive Director International Markets	2014 – 2016
Bank of Singapore Head of LATAM Desk	2012 – 2014
Banco Cooperativo Espanol SA/ Dresdsner Bank Executive Director	2007 – 2012
CAIXANOVA Private Banking Director	2006 – 2007
Banco Popular Espanol SA Director Credit Analysts	1999 – 2006

QUALIFICATIONS

PhD Quantitative Economics Universidad Complutense de Madrid	Graduated: 2001
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Ana does not work in a supervised capacity for any other business's but does provide investment analysis for our associated company Farrington Group and receives remuneration for this.



FARRINGDON ASSET MANAGEMENT PTE. LTD.

Mahalakshmi D/O Rengaraju

**Farringdon Asset Management Pte Ltd
Compliance Officer**

Aug 2019 - Present

- Addressing the full spectrum of HR and Regulatory Risk Compliance in house
- Provide Operational and Accounting support if required

**Globaleye Pte Ltd (Wealth Management Group)
Compliance/HR/Office Manager**

Sept 2013 – July 2019

Spearhead HR and Compliance, Office Management

- Liaise with regulators (IRAS, MAS & MOM)
- Contact point for all complaint/feedback from Regulators/Clients/Business Partners/Building management
- Contact Point for all MAS online reporting (BSC, Surveys), complaints and misconduct reporting.
- Lead and contact personnel for MAS Financial Audit for 4 consecutive years.
- Collate, Prepare and submit Balance Score Cards.
- MAS Surveys
- Liaise with MAS officers on all related complaints/regulatory requirements on advisors/representatives.
- Clients KYC
- Maintain all company and employee related confidential documents.
- Manage Office expenses and assist in business operational activities
- Assist on quotations and approvals.
- Prepare GST on revenue and submissions.
- Payroll and revenue reconciliation.
- Employee on boarding and off boarding

QUALIFICATIONS

Diploma in Governance, Risk & Compliance Level 2
International Compliance Association UK
(awaiting certification ceremony)

Completed:2020

**Postgraduate Diploma
Business Management & Human Resources**
Wigan & Leigh College(UK), Singapore

Graduated:2001

NCC Diploma in Computer Studies and Organizational Behaviour
Informatics School of Business IT & Computing, Singapore

Graduated: 1994

Mahalakshmi does not work in a supervised capacity for any other business.



FARRINGDON ASSET MANAGEMENT PTE. LTD.

Stephen John Young -Senior wealth advisor

MAS Representative Number: (SJY100078838)

**Farringdon Asset Management Pte Ltd
Senior Wealth Advisor / Representative**

May 2019 – Present

- Managing and advising my clients on their investment needs.
- Overseeing of marketing and promotional events for my clients and prospects.
- Working with fund managers and specialists to provide data if my clients require detailed analysis.

**Globaleye Pte Ltd
Senior Wealth Advisor / Representative**

April 2018 -April 2019

- Managing and advising my clients on their investment needs.
- Overseeing of marketing and promotional events for my clients and prospects.
- Portfolio management.
- Investment analysis and bespoke client advice.

**International Financial Services Pte Ltd
Consultant Financial Advisor**

Oct 2005 -Jan 2018

- Managing and advising my clients on their investment needs.
- Overseeing of marketing and promotional events for my clients and prospects.
- Portfolio management.
- Business Development.
- Investment analysis and bespoke client advice.

Qualifications

- **M5 – Rules & Regulations for Financial Advisory Services**
- **M8 – Collective Investment Schemes**
- **M9 – Life Insurance and Investment -Linked Policies**
- **M9a – Life Insurance and Investment -Linked Policies 11**
- **H1 – Certificate in Health Insurance**

Steve is also a director of a soft play children's play and special needs centre in Trowbridge Wiltshire (UK)



FARRINGDON ASSET MANAGEMENT PTE. LTD.

David Azenga, Portfolio & Operations Manager

Farringdon Asset Management Pte Ltd , Singapore
Portfolio / Operations Manager

Feb 2021 – Present

- Investment's Analysis and Dealing
- Risk Management and Trade Reconciliation
- Client Relationship Management

Farringdon Asset Management Pte Ltd, Singapore
Associate to Chief Investment Officer (Internship)

Feb 2020 – Feb 2021

- Research and reporting
- Client servicing

Independent Consultant, Kenya
Consultant, Corporate Finance

Mar 2019 – Sep 2019

- Investment analysis
- Debt Structuring
- Investor pitch and investment memorandum preparation

Commercial Bank of Africa, Kenya
Corporate Banking Relationship Manager

Jan 2019 – Mar 2019

- Focal contact point for all corporate banking needs
- Credit risk management and debt structuring

QInvest, Qatar
Portfolio Monitoring Officer

May 2016 - Apr 2018

- Risk Monitoring and Investments review – debt and equity
- Portfolio Reporting

Standard Chartered Bank, Kenya, Singapore, Thailand, UAE
Various roles

Jun 2009 – May 2016

- Corporate finance, cash management and project management

QUALIFICATIONS

Msc. Applied Economics
Nanyang Technological University, Singapore

Graduated: 2021

Bsc. Actuarial Science
Jomo Kenyatta University of Agriculture and Technology (Kenya)

Graduated: 2008

Passed the CFA Level II exam
Jomo Kenyatta University of Agriculture and Technology (Kenya)

Exam pass: 2019



FARRINGDON ASSET MANAGEMENT PTE. LTD.

David does not work in a supervised capacity for any other business.

Elena S. Okhonko, Associate Director, Portfolio Manager

MAS Representative Number: EO-300457757

Farringdon Asset Management Pte Ltd

July 2019 – Present

Associate Director / Portfolio Manager

- Providing a wide spectrum of portfolio and asset management services to the International HNWI clients based in Singapore.
- Product specialization: bonds, equities, FX, Bancassurance and Unit Trusts, mutual, smart beta, index funds, fixed income, alternatives, hedge funds, precious metals, structured notes and simple options strategies.

Financial Alliance (FA)

July 2017 – July 2019

Independent Financial Advisor

- Providing a wide spectrum of portfolio management and advisory services to the mass affluent and HNWI expatriate client segment.
- Product specialization: mutual, smart beta, index funds, alternatives, and hedge funds.

Synpulse Management Consulting Pte. Ltd

July 2017 – Dec 2017

Management Consulting / Researcher / Robo-advisory solutions

- Conducted research on robo-advisory services and portfolio asset allocation and investment optimization models, algos and functionality and created an independent ranking of top 4 B2B robo-advisors in the Asia Pacific region.

Mondelēz International, Singapore

Feb 2011 – Sep 2017

IT CRM Systems Regional Lead

- Implemented and oversaw APAC \$140M Global “Winning In Store Execution” (WISE) Sales Transformation Program Initiative, representing 76% of MDLZ net revenue, 61% IRR, \$102M NPV and 3.1 years Payback.

QUALIFICATIONS

Master of Science in Wealth Management

Graduated: 2017

Singapore Management University

Master of Business Administration (MBA)

Ongoing

North Park University, Chicago, IL, USA

Candidate for Chartered Financial Analyst (CFA) Level II

Ongoing

SCIENTIFIC PUBLICATIONS & ARTICLES

[Hubbis](#)

[Digfin Group](#)

[Fintech News](#)

Elena does not work in a supervised capacity for any other business.