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Karen Northey
Asset Management and Funds Policy
Financial Conduct Authority
25 The North Colonnade
Canary Wharf
London E14 5HS

20 September 2017

Dear Ms Northey

Consultation on Implementing Asset Management Market Study Remedies and Changes to Handbook

I am writing on behalf of the Pensions Committee of the 100 Group of Finance Directors with regard to the above-named consultation.

The 100 Group

The 100 Group represents the finance directors of the FTSE 100, several large UK private companies and some UK operations of multinational groups. Our member companies represent the vast majority of the market capitalisation of the FTSE 100, collectively employing 7% of the UK workforce, and in 2016 paid, or generated, taxes equivalent to 13% of total UK government receipts. Our overall aim is to promote the competitiveness of the UK for UK businesses, particularly in the areas of tax, reporting, pensions, regulation, capital markets and corporate governance. The 100 Group represents companies sponsoring defined benefit (DB) pension schemes with assets of approximately £500bn and membership of 3.6m.

Whilst this letter expresses the views of the 100 Group of Finance Directors as a whole, these views are not necessarily those of our individual members or their respective employers.

Response

In our response to the Interim report of the Asset Management Market Study, we said that, as sponsors of some of the largest DB schemes in the country, we welcomed the FCA's moves towards improving the competitiveness of the asset management market, increasing the transparency of charging information and improving the communication of investment information.

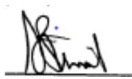


Pensions Committee

We therefore support the measures set out in Chapter 3 of the latest consultation to improve the governance standards of the boards of authorised fund managers. We agree with the range of measures being proposed, including a requirement for the board to act in the best interests of investors, the use of a value-for-money assessment and a requirement for independent directors to be appointed to the board of fund managers. Taken together, we think that these measures should help to ensure that the asset management market works more efficiently for pension schemes and that there is greater scrutiny of the way in which fund managers are fulfilling their obligations to investors.

We hope that you find these comments useful. Please do not hesitate to contact me if you would like to discuss any of the points raised.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alan Stewart', is written over a thin horizontal line.

Alan Stewart
Chairman
The 100 Group Pensions Committee