



MIFID II Roles and Responsibilities

Product Governance and Target Market

MiFID II brings changes to the design and ongoing monitoring of new to market financial instruments. Distinctions are applied in regards to the different roles and responsibilities of the product manufacturer and the product distributor.

The product manufacturer is responsible for identifying the target market of end investors, assessment of all relevant risks associated with the target market & consistency of the intended distribution strategy with such market. Also the product manufacturer is responsible for taking reasonable steps to distribute the product to the target market.

The distributor has obligations to review the product marketed or offered to assess whether the product remains consistent with the need of the target market and whether the distribution strategy remains appropriate.

Transfer agents will not have involvement in the design of financial instruments. Transfer agents may be requested to forward and provide information in relation to certain target market criteria, where held, for example Client Classification. However the transfer agent will be neither a product manufacturer nor a product distributor and therefore will have only a limited role.