



| CARLTON JAMES MARKETING AGREEMENT – GUIDANCE FOR AGENTS |  |  |  |   |   |                                |
|---|--|--|--|---|---|--------------------------------|
| REQUIREMENTS  | ADVISED  | NOT ADVISED  |  |   |   |                                |
|   |  | HIGH-NET WORTH INDIVIDUAL  | SOPHISTICATED INVESTOR   |   | LESS THAN 10% (RESTRICTED INVESTOR)   | PROFESSIONAL INVESTOR          |
|   | MUST TAKE INDEPENDENT ADVICE FROM FCA AUTHORISED ADVISOR   | £100,000 NET INCOME OR<br>£250,000 NET ASSETS (NOT INCLUDING PRIMARY RESIDENCE, INSURANCE CONTRACTS OR PENSION BENEFITS) | SUFFICIENTLY KNOWLEDGEABLE TO UNDERSTAND THE RISKS ASSOCIATED WITH THE INVESTMENT            | INVESTED IN UNLISTED COMPANY IN LAST 2 YEARS, WORK IN PRIVATE EQUITY SECTOR, DIRECTOR OF £1M T/O COMPANY, 'BUSINESS ANGELS' | INVESTING LESS THAN 10% NET ASSETS (NOT INCLUDING PRIMARY RESIDENCE, INSURANCE CONTRACTS OR PENSION BENEFITS) | FCA AUTHORISED FIRM/INDIVIDUAL |
|   | NAME AND CONTACT DETAILS FOR FINANCIAL ADVISOR<br><br>CONFIRMATION THAT ADVICE HAS BEEN PROVIDED (IF POSSIBLE) | STATEMENT SIGNED BY INVESTOR<br><br>(DOCUMENT 1)   | CERTIFICATE SIGNED BY AUTHORISED PERSON AND STATEMENT SIGNED BY INVESTOR<br><br>(DOCUMENT 2) | STATEMENT SIGNED BY INVESTOR<br><br>(DOCUMENT 3)  | STATEMENT SIGNED BY INVESTOR<br><br>(DOCUMENT 4)  | COPY OF FCA REGISTER           |
|   | PROVIDE INFORMATION REQUIRED FOR APPROPRIATENESS ASSESSMENT (SEE EXPRESSION OF INTEREST FORM)                  |  |  |   |   |                                |

**IMPORTANT:** THIS NOTE CONTAINS GUIDANCE ONLY AND DOES NOT CONSTITUTE ADVICE OR AN EXHAUSTIVE SUMMARY OF THE RELEVANT PROVISIONS OF THE FINANCIAL SERVICES AND MARKETS ACT 2000 (TOGETHER WITH ALL ASSOCIATED LEGISLATION, REGULATIONS AND GUIDANCE) AND ALL MARKETERS SHOULD ENSURE THAT THEY ARE FAMILIAR WITH AND OPERATE IN COMPLIANCE WITH ALL RELEVANT LEGISLATION AND REGULATIONS AS PER THE TERMS OF THE MARKETING AGREEMENT ENTERED INTO BETWEEN MARKETERS AND PRODUCT ISSUERS

## EXPRESSION OF INTEREST FORM

### CATEGORY OF INVESTOR (TICK & COMPLETE):

#### ☐ ADVISED INVESTOR

The investor has confirmed that they are a retail client of another FCA authorised firm that will comply with the suitability rules (COBS 9) in relation to the Product(s).

Name of FCA authorised financial advisor:.....

#### ☐ NOT ADVISED INVESTOR

Category (tick one):

Evidence provided (tick one and enclose copies):

|   |  |
|---|--|
| <input type="checkbox"/> High-Net Worth<br>Document 1                           | <input type="checkbox"/> Statement in the required form (that is less than 12 months old) confirming <u>EITHER</u> annual income of at least £100,000 <u>OR</u> net assets of at least £250,000 (not including primary residence, rights under insurance contracts or pension benefits) during the preceding financial year  |
| <input type="checkbox"/> Sophisticated<br>Authorised Certificate and Document 2 | <input type="checkbox"/> Certificate signed by FCA authorised person confirming sufficiently knowledgeable to understand the risks associated with the Product(s)<br><u>AND</u><br>Statement in the required form for a 'Certified' sophisticated investor, signed by Investor (that is less than 12 months old)   |
| <input type="checkbox"/> Document 3   | <u>OR</u>  |
| <input type="checkbox"/> Investing less than 10%<br>Document 4                  | <input type="checkbox"/> Statement in the required form for a 'Self-Certified' sophisticated investor, signed by Investor (that is less than 12 months old) confirming that they<br>(1) have made more than one investment in an unlisted company in the last 2 years (2) have worked, in a professional capacity in the private equity sector or in the provision of finance for small or medium enterprises (3) are a director of a company with an annual turnover of at least £1m <u>OR</u> (4) are a member of a network of business angels |
| <input type="checkbox"/> Professional Investor                                  | <input type="checkbox"/> Statement in the required form signed by the Investor (that is less than 12 months old) confirming that they have not in the last 12 months invested more than 10% of their net assets (not including primary residence, rights under insurance contracts or pension benefits) in non-readily realisable securities and that they will not do so in the next 12 months  |
|   | <input type="checkbox"/> Copy of FCA register confirming the Investor is an FCA authorised firm/person   |

EXPRESSION OF INTEREST FORM

INVESTOR'S DETAILS:

Investor's Title and Full Name: Roy Keegan

Investor's Address: Mr Roy Keegan  
13A The Avenue  
Old Winsor  
Berkshire  
SL4 2RS

Investor's Telephone Number: 07900278202

Investor's Email Address: roy.keegan@bp.com

Name of Agent / Agency: Paul Davey

Product(s): Carlton James Capital Markets Fund

Amount: GBP £ 9,384.26

INVESTOR INFORMATION (to be completed by the Investor):

Have you invested previously? Yes ☐ No ☐

If Yes:

What products have you invested in: .....

How often do you invest in these products: .....

How recently have you invested in these products: .....

Please provide details of any education/qualifications that you have and/or current or previous professional experience that is relevant to investing in financial products:

.....  
.....

☐ I elect not to provide the investor information requested above.

## EXPRESSION OF INTEREST FORM

### DECLARATION TO BE COMPLETED BY MARKETER/AGENT:

*I hereby confirm and undertake, as or on behalf of the Marketer, that:-*

- (1) the Marketer has complied with all relevant legislation and regulations in relation to this introduction of Investors to the Issuer in respect of the product(s) detailed above; and*
- (2) an appropriateness assessment (in accordance with COBS 10) has been conducted in relation to the suitability of the above mentioned products for the Investor OR the Investor has been informed in writing that it has not been possible to assess whether the above mentioned products represent a suitable investment for the Investor\*; and*
- (3) the Marketer HAS/HAS NOT\* provided advice to the Investor in connection with an investment in the Product(s).*

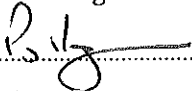
Signed: Paul Davey ..... (Marketer/Agent)

Date: 11/04/19 .....

(Name:  .....

### DECLARATION TO BE COMPLETED BY CLIENT/INVESTOR:

*Please accept this form as confirmation of my intention to enter into a contract with the issuer of the product(s) detailed above on receipt of the full invitation documentation. I confirm that the information provided above is true and accurate, in particular in relation to my categorisation as an investor. This is not classified as a binding document between the parties.*

Signed:  ..... (Client/Investor)

Date: 1.4.19 .....

(Name: Roy Keegan .....

*\*delete as appropriate*



## DOCUMENT 1

### Statement for Certified High Net Worth Individual.

I declare that I am a certified high net worth individual for the purposes of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005.

I understand this means:

- a) I can receive financial promotions that may not have been approved by a person authorised by the Financial Services Authority;
- b) The content of such financial promotions may not conform to rules issued by the Financial Services Authority;
- c) **By signing this statement I may lose significant rights;**
- d) I may have no right to complain to either of the following-
  - (i) the Financial Services Authority; or
  - (ii) the Financial Ombudsman Scheme;
- e) I may have no right to seek compensation from the Financial Services Compensation Scheme.

I am a certified high net worth individual because **at least one of the following applies-**

- a) I had, during the financial year immediately preceding the date below, an annual income to the value of £100,000 or more;
- b) I held, throughout the financial year immediately preceding the date below, net assets to the value of £250,000 or more. Net assets for these purposes do not include-
  - (i) the property which is my primary residence or any loan secured on that residence;
  - (ii) any rights of mine under a qualifying contract of insurance within the meaning of the Financial Services and Markets Act 2000 (Regulated Activities) Order 2001;or
  - (iii) any benefits (in the form of pensions or otherwise) which are payable on the termination of my service or on my death or retirement and to which I am (or my dependants are), or may be, entitled.

**I accept that I can lose my property and other assets from making investment decisions based on financial promotions.**

I am aware that it is open to me to seek advice from someone who specialises in advising on investments.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

8.4.19.

Name: Roy Keegan

## DOCUMENT 2

### Requirements for Sophisticated Investors

50.

(1) "Certified sophisticated Investor", in relation to any description of investment, means a person-

a) who has a current certificate in writing or other legible form signed by an authorised person to the effect that he is sufficiently knowledgeable to understand the risks associated with that description of investment; and

b) who has signed, within the period of twelve months ending with the day on which the communication is made, a statement in the following terms:

"I make this statement so that I am able to receive promotions which are exempt from the restrictions on financial promotion in the Financial Services and Markets Act 2000. The exemption relates to certified sophisticated investors and I declare that I qualify as such in relation to investments of the following kind [list them]. I accept that the contents of promotions and other material that I receive may not have been approved by an authorised person and that their content may not therefore be subject to controls which would apply if the promotion were made or approved by an authorised person. I am aware that it is open to me to seek advice from someone who specialises in advising on this kind of investment".

#### Statement:

*I make this statement so that I am able to receive promotions which are exempt from the restrictions on financial promotion in the Financial Services and Markets Act 2000. The exemption relates to certified sophisticated investors and I declare that I qualify as such in relation to investments of the following kind:*

.....  
*I accept that the contents of promotions and other material that I receive may not have been approved by an authorised person and that their content may not therefore be subject to controls which would apply if the promotion were made or approved by an authorised person. I am aware that it is open to me to seek advice from someone who specialises in advising on this kind of investment.*

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Name: Roy Keegan

## DOCUMENT 4

### Statement for Certified Restricted Investor

A certified restricted investor is an individual who has signed, within the period of twelve months ending with the day on which the communication is made, a statement in the following terms:

|   |   |
|---|---|
| <b>"RESTRICTED INVESTOR STATEMENT</b><br>I make this statement so that I can receive promotional communications relating to non-readily realisable securities as a restricted investor. I declare that I qualify as a restricted investor because:  |   |
| (a)   | In the twelve months preceding the date below, I have not invested more than 10% of my net assets in non-readily realisable securities; and   |
| (b)   | I undertake that in the twelve months following the date below, I will not invest more than 10% of my net assets in non-readily realisable securities.  |
| Net assets for these purposes do not include:   |   |
| (a)   | The property which is my primary residence or any money raised through a loan secured on that property;   |
| (b)   | Any rights of mine under a qualifying contract of insurance; or   |
| (c)   | Any benefits (in the form of pensions or otherwise) which are payable on the termination of my service or on my death or retirement and to which I am (or my dependants are), or may be entitled. |
| <br>I accept that the investments to which the promotions will relate may expose me to a significant risk of losing all of the money or other property invested. I am aware that it is open to me to seek advice from an authorised person who specialises in advising on non-readily realisable securities.<br><br>Signature: _____ Date: _____<br><br>Name: <u>Roy Keegan</u> |   |

### **DOCUMENT 3**

#### **"Statement for Self-Certified Sophisticated Investor"**

I declare that I am a self-certified sophisticated investor for the purposes of the Financial Services and Markets Act (Financial Promotion) Order 2005.

I understand that this means:

- a) I can receive financial promotions that may not have been approved by a person authorised by the Financial Services Authority;
- b) the content of such financial promotions may not conform to rules issued by the Financial Services Authority;
- c) **by signing the statement I may lose significant rights;**
- d) I may have no right to complain to either of the following-
  - i. The Financial Services Authority; or
  - ii. The Financial Ombudsman Scheme;
- e) I may have no right to seek compensation from the Financial Services Compensation Scheme.

I am a self-certified sophisticated investor because **at least one of the following applies-**

- a) I am a member of a network or syndicate of business angels and have been so for at least the last six months prior to the date below;
- b) I have made more than one investment in an unlisted company in the two years prior to the date below;
- c) I am working, or have worked in the two years prior to the date below, in a professional capacity in the private equity sector, or in the provision of finance for small and medium enterprises;
- d) I am currently, or have been in the two years prior to the date below, in a professional capacity with an annual turnover of at least £1 million.

**I accept that I can lose my property and other assets from making investment decisions based on financial promotions.**

I am aware that it is open to me to seek advice from someone who specialises in advising on investments.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Name: Roy Keegan





CARLTONJAMES

## Standard Privacy Notice

This privacy notice explains how we use the personal information collected from you in relation to administering your application and investments processed by us.

The following privacy notice references the below topics:

- What information do we collect about you?
- How we use the information we collect
- How we store and share your information
- How long do they hold your information for
- Access to your information and correction
- Changes to privacy notice

### What information do we collect about you?

We collect personal information from you and your introducing agent when you apply for our services. We use this information to supply services to you to maintain and administer your investments once established. We may also receive information about you from third parties appointed by you to offer the best service possible.

### How we use the information we collect

We collect information about you to for the purposes of administering your application and investments processed by us, dealing with your enquiries and requests as well as regulatory or law enforcement purposes (including, without limitation, complying with anti-money laundering and anti-terrorism laws).

We will rely on the necessity of processing to perform our services, the necessity of processing to fulfil our obligations and business interests, on a lawful basis, for processing the information we collect from you. These provisions are detailed in sections 1(a), 1(b) and 1(c) of Article 6 of the General Data Protection Regulation (GDPR).

Examples of our business interests include good governance, accounting, monitoring of communications, and managing business operations.

### How we store and share your information

All information held by the Carlton James Private & Commercial Ltd is stored on encrypted servers, kept at a secure physical location with your information being available to staff employed by Carlton James Private and Commercial Ltd.

Where data is shared with a third party they are required to implement organisational measures and processes to ensure the security of data transmitted.

### **How long we hold your information for**

We will hold your information for the period for which we report to you as a client and for seven years after you terminate your relationship with us. It must be noted that if you terminate your relationship with us, information on your account closure will be provided to your investment provider.

### **Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please request this in writing to Carlton James Private & commercial Ltd, Lime Kiln House, Lime Kiln, Royal Wootton Bassett, SN4 7HF.

It is important to us to ensure that personal information held about you is accurate and up to date. We would encourage you to ask us to correct or remove information about you that you think is inaccurate. If any documentation/information is supplied to us, by you and reflects differing personal information held on file, we will prompt you to change this information on our records.

If you believe that we have not complied with your data protection rights, please contact us and we will endeavour to resolve this with you. If you remain dissatisfied, you can complain to the Information Commissioner. Details of how to proceed can be found via their website, <https://ico.org.uk/concerns/>.

### **Changes to this Privacy Notice**

We keep this Privacy Notice under regular review and we will make you aware of any changes.

Our Data Protection Officer is Adam Holmes, who can be contacted on 0800 233 5626 or at [Info@carltonjames.co.uk](mailto:Info@carltonjames.co.uk)

Carlton James Private and Commercial Ltd, UK registered company (No. 09074495) at Lime Kiln House, Lime Kiln, Royal Wootton Bassett, SN4 7HF.



CARLTONJAMES

Please check the information detailed below to ensure we hold the correct data. Any incorrect information could result in the delay of trade and/or investment instructions, additionally, it could also limit our ability to communicate with you. Please contact us at your earliest convenience if any of the below details to be corrected by calling 0800 233 5626; alternatively, you can email us at [info@carltonjames.co.uk](mailto:info@carltonjames.co.uk).

## Confirmation of Investment Instruction for

Carlton James Capital Markets Fund

| Correspondence Address:   | Account Registration Address:   | Data Capture  |
|---|---|---|
| Mr Roy Keegan<br>13A The Avenue<br>Old Winsor<br>Berkshire<br>SL4 2RS | Mr Roy Keegan<br>13A The Avenue<br>Old Winsor<br>Berkshire<br>SL4 2RS | Account Contact Number: 07900278202<br>Account Email Address: <a href="mailto:roy.keegan@bp.com">roy.keegan@bp.com</a><br>Medium of Exchange: GBP £<br>Date: 27/03/2019 |
| Account Name  |   | : V & P Property Pension Fund   |
| Account Type  |   | : Pension   |
| Investment Value  |   | : GBP £ 9,384.26  |

In accordance with your instructions we will confirm receipt of your investment application. Your balance following your transaction will be confirmed by the investment administrator associated with the product and will be provided to the person(s) who supplied the instruction.

Carlton James Private & Commercial Ltd - Lime Kiln House, Lime Kiln, Royal Wootton Bassett, SN4 7HF  
T - +44 (0) 800 233 5626 F - +44 (0) 1793 858102 E - [info@carltonjames.co.uk](mailto:info@carltonjames.co.uk) W - [www.carltonjames.co.uk](http://www.carltonjames.co.uk)  
Carlton James Private & Commercial Ltd. Registered in England & Wales No. 09074495.  
Registered office: Lime Kiln House, Lime Kiln, Royal Wootton Bassett, SN4 7HF