



FAQ: Distributor KPIs

Regulatory Requirements

- Principles-based regulations applicable to Product Manufacturers and Distributors in Europe and the UK set out a wide definition of “distribution”. Firms may therefore approach Product Governance using a proportionate, risk-based process appropriate for their own distribution model.
- For more information on which counterparty types, we consider to be distributing our Aberdeen Investments Funds see “**FAQ: Distributor Due Diligence**”.
- Product Manufacturers must oversee the activity of their appointed Distributors to ensure that financial instruments are reaching the clients for whose needs, characteristics and objectives they are considered compatible (i.e. the target market). In turn Distributors are required to provide due diligence information and data to assist in this.
- Aberdeen Investments continue to work across the industry to establish an agreed Industry Standard approach to Distributor Feedback. Until consensus is achieved Aberdeen Investments approach remains flexible; as a minimum Aberdeen Investments will request the following 5 KPIs from Distributors:

KPIs	1. Suspicious transactions	Number of suspicious transactions relating to Aberdeen Investments funds reported to local authorities by the Distributor in the reporting period. We do not look for details on individual cases (unless our involvement is required) but rather this KPI is intended to demonstrate that Distributor processes and controls are effective (or otherwise)
	2. Target market	Number of deviations from positive target market (or within negative) which relate to the distribution, marketing or promotion of Aberdeen Investments funds by the Distributor in the reporting period
	3. Complaints	Number of complaints received relating to the distribution, marketing or promotion of Aberdeen Investments funds or the funds themselves by the Distributor in the reporting period
	4. Marketing incidents	Instances of non-compliance with marketing country requirements and/or errors in marketing materials relating to the Aberdeen Investments funds in the reporting period
	5. Distribution in prohibited countries	Instances of non-compliance with distributing funds in any jurisdiction where the fund is not permitted to be distributed as determined by the product manufacturer
Format		To be submitted via the KPIs section of the ume portal, at no cost to the Distributor (or submitted by email to distributorkpis@aberndeenplc.com where the Distributor is unable to provide the data through ume)
Frequency		Required monthly in line with Aberdeen Investments Distributor Governance & Oversight Process. Where a Distributor is unable to submit KPIs monthly, we can accept quarterly or annually. Data must be broken down per month even if submitted less frequently.





Our process

The [ume portal](#) is free for Distributors. By completing one annual questionnaire, Distributors can send due diligence information to multiple asset managers with the click of a button. For help getting started please contact the Distributor Governance & Oversight team (details below).

Whilst our strong preference is to encourage Distributors to engage with us via ume, creating efficiencies and consistency of approach for all parties, we can accept KPIs via email where required in line with the Distributor's process. Aberdeen Investments has created a simple excel template which is available upon request. Alternatively, we can accept the Distributor's preferred format. Once completed please send to distributorKPIs@aberdeenplc.com

UK Distributors Only: Aberdeen Investments have witnessed a growing industry trend in the adoption of the Investment Associations Distributor Feedback Template (DFT) to support Conusumer Duty obligations. It is our preference that Distributor Feedback is shared in this format and on at least a 6monthly basis.

Contact us

The Aberdeen Investments Distribution Governance & Oversight Team is ready to assist you with any queries. You can also reach out to your dedicated Aberdeen Investments Client Relationship Manager.

Distributors of UK Funds:	Distributors of Luxembourg Funds:	Send us your KPIs:
UKDistributorGovernance@aberdeenplc.com	LuxDistributionOversight@aberdeenplc.com	distributorKPIs@aberdeenplc.com

