

Bloomsbury Associates Ltd.

CEFEX Investment Advisor Certification



Investment Advisor Definition

A fiduciary who is responsible for managing a client's overall investment strategy, which may include deciding on the client's asset allocation, developing the client's investment strategy, implementing the strategy with appropriate Investment Managers, and monitoring the strategy, on a one-time or ongoing basis. The term refers to those who provide specific or comprehensive investment advice including financial advisors, broker-consultants, investment consultants, wealth managers, financial consultants trust officers, financial planners and fiduciary advisers.

Note to Report

The information contained in this report is a summary of an assessment conducted by CEFEX, Centre for Fiduciary Excellence, LLC. The report is suitable for public distribution at the discretion of the certified firm. To confirm the registration of this firm, please visit www.cefex.org, where a listing of all currently registered firms can be viewed.

SECTION 1 – COMPANY INFORMATION

CEFEX File No.: CFX10316

Company Name: Bloomsbury Associates Ltd.

Address: P.O. Box 28107, Wellington, New Zealand

Phone: 64 4 499 6979

SECTION 2 – ASSESSMENT DETAILS***Dates and Participants Representing CEFEX:***

Date of Registration: 2014.11.19

Type of Assessment: Initial

Assessment Team:

| Position | Name | Company |
|-----------------|-------------|----------------|
| Lead Analyst | Ross Fowler | fi360, Pacific |

Attestation

The Lead Analyst is independent of the registered firm. He/she has not been employed or compensated by the registered firm for a period of at least 2 years prior and 6 months following this assessment, for the purposes of providing fiduciary consulting services.

The Lead Analyst is an Accredited Investment Fiduciary Analyst (AIFA®) and has the adequate expertise and proficiency to perform this assessment.

Purpose and Scope of this Assessment:

To evaluate the Advisor's conformance to the practices and associated criteria as defined in the document "*Prudent Practices for Investment Advisors*" (the Standard) for the declared scope of registration.

The scope of registration is as follows:

Investment Advisory Services delivered in affiliation with Consilium, for individuals, personal trusts, charitable entities and foundations

Summary of Assessment Methodology:

The assessment was conducted using a 'multi-site' procedure where a) certain practices are reviewed at Consilium and b) the balance of practices are reviewed at a sample of advisors within the Consilium group. For each sampled advisor, the assessment requires that the Analyst plan and perform a review of a representative sample of the Advisor's written records, interviews with appropriate personnel of the Advisor and, on a test basis, evidence supporting the actions taken by the Advisor in providing services to its clients. Sampling of records was conducted in accordance with the statistical guidelines used by the International Organization for Standardization, which required a review of records equal to the square root of the total available records. Assessment elements include:

- Document review including Investment Policy Statement, Investment Committee minutes, client performance reports, RFP's in the selection of service providers, written evidence of Investment Manager reviews, and service agreements.
- Comparison of capital market inputs for asset allocation model assumptions to a benchmark
- Comparison of risk and return models to a benchmark
- Comparison of investment due diligence screens to a standard thresholds
- Review of arrangements with custodians, brokers and other service providers.

SECTION 3 - ASSESSMENT FINDINGS

All of the Practices within the Standard were assessed and considered to be adequately implemented, as listed below. A full copy of the Standard, which includes criteria for the fulfillment of each Practice, can be downloaded from www.cefex.org, or viewed by clicking on the Advisor's on-line CEFEX certificate.

| No. | Practice | Conformity |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| 1.1 | The Investment Advisor demonstrates an awareness of fiduciary duties and responsibilities. | √ |
| 1.2 | Investments and investment services provided are consistent with applicable governing documents. | √ |
| 1.3 | The roles and responsibilities of all involved parties (fiduciaries and non-fiduciaries) are defined and documented. | √ |
| 1.4 | The Investment Advisor identifies conflicts of interest and addresses conflicts in a manner consistent with the duty of loyalty. | √ |
| 1.5 | Agreements, including service provider agreements under the supervision of the Investment Advisor, are in writing and do not contain provisions that conflict with fiduciary standards of care. | √ |
| 1.6 | Client assets are protected from theft and embezzlement. | √ |
| 2.1 | An investment time horizon has been identified for each investment objective of the client. | √ |
| 2.2 | A risk level has been identified for each client. | √ |
| 2.3 | An expected return to meet investment objectives has been identified. | √ |
| 2.4 | Selected asset classes are consistent with the client's time horizon and risk and return objectives. | √ |
| 2.5 | Selected asset classes are consistent with implementation and monitoring constraints. | √ |
| 2.6 | The investment policy statement contains sufficient detail to define, implement, and monitor the client's investment strategy. | √ |
| 2.7 | When socially responsible investment strategies are elected, the strategies are structured appropriately. | √ |
| 3.1 | A reasonable due diligence process is followed to select each service provider in a manner consistent with due care obligations. | √ |
| 3.2 | When statutory or regulatory investment safe harbors are elected, each client's investment strategy is implemented in compliance with the applicable provisions. | √ |
| 3.3 | Decisions regarding investment strategies and types of investments are documented and made in accordance with fiduciary due care obligations. | √ |
| 4.1 | Periodic reports compare investment performance against appropriate index, peer group, and investment policy statement objectives. | √ |
| 4.2 | Periodic reviews are made of qualitative and/or organizational changes of Investment Managers and other service providers. | √ |
| 4.3 | Control procedures are in place to periodically review policies for trading practices and proxy voting. | √ |
| 4.4 | Periodic reviews are conducted to ensure that investment-related fees, | √ |

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| | compensation and expenses are fair and reasonable for the services provided. | |
| 4.5 | There is a process to periodically review the organization's effectiveness in meeting its fiduciary responsibilities. | √ |

Comment on Practices 1.4 and 1.5:

Responsible fiduciaries should review information regarding fees and potential conflicts when engaging an Investment Advisor (Advisor). CEFEX-certified Advisors have been assessed using a checklist modeled after the disclosure requirements in the US Department of labor Regulation § 2550.408b-2(c). The CEFEX assessment includes a review of the Advisor's service agreement(s) including a sampling of the Advisor's client files to verify deployment of the service agreement, and appropriate disclosures. The Advisor's service agreement and disclosures are reviewed along with the Advisor's regulatory submissions to assure consistency.

SECTION 4 - ASSESSMENT CONCLUSIONS AND RECOMMENDATION

Based on the findings obtained during the Assessment, the Company is in substantial conformity to the Standard, and is recommended for CEFEX registration. This assessment has been reviewed by the CEFEX Registration Committee in order to maintain impartiality and consistency in the registration process. For details on the complete assessment process, please visit www.cefex.org.

Note regarding CEFEX certification:

The CEFEX certificate has been awarded following the successful completion of an assessment to the standard referenced above. It may not address all of the products/services provided by the firm. The terms and conditions governing the issuance of the CEFEX certificate are contained in the Agreement between CEFEX and the firm. The certificate is the property of CEFEX, is valid for 1 year from the Date of Current Registration shown, and can be renewed annually.

The certification is not a source of legal or investment advice, a financial audit or expression of opinion regarding the completeness or accuracy of financial statements, a compliance or regulatory audit, a guarantee that the firm is in compliance with applicable fiduciary laws or standards, or a guarantee that the firm is adhering to the standard with respect to any specific client.