

INVESTING IN THE CLEAR

STREAMLINING THE EMPLOYEE PERSONAL ACCOUNT DEALING (PAD) EXPERIENCE AT FINANCIAL INSTITUTIONS

NOVEMBER 2026

Endowus

QUINLAN &ASSOCIATES

TABLE OF CONTENTS

SECTION	TITLE	PAGE
SECTION 1	A SHACKLED EXISTENCE	6
SECTION 2	FREE TO FUND	32
SECTION 3	CASE STUDY – ENDOWUS	43
SECTION 4	HOW WE CAN HELP	48

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FOREWORD

Employees at regulated Financial Institutions (“FIs”) in Hong Kong and Singapore generated an estimated USD 9.38 billion in annual investable income in 2025. Despite their earning power, they remain severely constrained in their investment options, facing a poor investor experience and regulatory compliance overhang due to stringent personal account dealing (“PAD”) restrictions.

The pain points aren’t just limited to employees. In addition to heightened operational strain, their FI employers bear sizeable direct and indirect costs related to PAD compliance, with the risk and consequence of PAD violations remaining very real.

With employees wanting greater employer support for their financial well-being on the one hand, while employers struggle to manage rising benefits costs on the other, the two essentially inter-dependent stakeholders appear to be at an impasse.

Open-ended mutual funds and batch-executed ETFs that carry lower compliance risk, require less operational effort, and enable better building of a diversified portfolio may offer the silver bullet that both employees as well as employers have been waiting for.

Taking individual investment decisions from the hands of employees and putting them into the hands of a professional fund manager or passive index mitigates self-dealing risks and frees up employee productivity, while at the same time helping diversify employees’ investment exposure. To achieve this, employers may consider offering a pre-approved funds-based investing platform that is operationally compliant, streamlined for ease of implementation, and user-friendly.

We hope you enjoy the report and look forward to discussing how we can enhance your employee PAD compliance strategy.



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EXECUTIVE SUMMARY (1/2)

The finance industry accounts for the 1st and 3rd largest shares of the Hong Kong and Singaporean economies, respectively, employing 318,450 professionals across both markets in roles offering not only 1.7-3.0x higher compensation compared to the average worker, but also involving strict PAD compliance regulations. While these regulated industry professionals were estimated to earn a sizeable USD 9.38 billion worth of investable income in 2025, they experience significant investment restrictions across the pre-, during, and post-investment stages of their investment journey that leave them with:

1. **Limited Choices:** A significantly smaller investment universe hampers employees' ability to adequately diversify their portfolio. Moreover, many employees are frequently forced to close their account with their existing broker when changing employers if it's not on their employers' approved broker list;

2. **Heightened Risk:** Complex PAD policies can confuse employees and carry a constant compliance overhang due to risk of potential PAD policy violation(s), even if by accident, with minimum holding period requirements adding a liquidity risk to the mix, leading regulated FI employees to frequently invest more conservatively; and

3. **Inferior Experience:** Compared to the average individual, employees at regulated FIs experience slower transaction speed, lack of access to advice, and a need to put in greater administrative effort.

The negative impact of stringent PAD compliance requirements isn't just limited to employees, as it has a domino effect on their employers, who suffer four notable pain points:

1. **Operational Strain:** FIs, irrespective of their size, are required to have an operating model that is compliant with regulations, placing a sizeable strain on their resources;

2. **Lingering Risks:** FIs are continuing to experience instances of PAD violations despite their best efforts, highlighting that vulnerabilities remain, with compliance lapses carrying significant consequences for violating firms;

3. **Higher Costs:** FIs bear a sizeable cost burden due to PAD regulations, with an estimated 30-40% of costs being attributable to staff compensation, 10-20% to RegTech software, and 5-15% to external consultant spend, with an additional hidden bankroll cost burden of 40-55% due to employees managing their PAD obligations while at work; and

4. **Employee Dissatisfaction:** Employees continue to struggle to save adequately for retirement. Many want more support from their employers. However, employee benefit costs remain the #1 concern for employers, creating a significant gap between employee expectations and employer offerings.

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EXECUTIVE SUMMARY (2/2)

Different financial instruments carry different levels of PAD compliance risk. While single security investments (e.g., options, futures, stocks, and bonds, etc.) carry a significant level of risk pertaining to misuse of Material Non-public Information ("MNPI"), front-running, and market abuse, open-ended mutual funds and batch-executed ETFs that can be pre-approved by employers are often not classified as "Covered Securities" due to key investment decisions (e.g., when and what security to buy / sell, etc.) being outsourced from the employee to the fund manager or index, thereby mitigating the risk of self-dealing.

In addition to substantially reducing compliance risk for their employer, open-ended mutual funds and batch-executed ETFs' adoption by employees also reduces the operational burden by shifting the compliance focus from an individual security transaction-level with infinite possibilities to the product-level consisting of a finite set of pre-approved funds, reducing risk (and effort) for both employees and employers. This can lead to:

1. **Improved Workforce Outcomes:** Improved employee financial preparedness is found to result in greater employee satisfaction (82%), productivity (78%), and loyalty (71%); and

2. **Improved Financial Outcomes:** Employers may enjoy a positive P&L impact as a result of cost savings (e.g., lower operating expenses to maintain regulatory compliance, staff attrition-related costs, etc.) and revenue gains (e.g., higher talent quality, employee productivity, etc.).

To unlock these gains, we believe there is an opportunity for employers to explore a third-party funds-based employee investment solution that allows them to seamlessly offer their employees an easy-to-use platform with a broad – and pre-approved and compliant – set of fund options for building a suitably diversified investment portfolio.

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SECTION 1

A SHACKLED EXISTENCE

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EMPLOYEES EXPOSED TO SELF-DEALING RISK

KEY TAKEAWAYS

Individuals employed in sensitive parts of the economy may possess access to MNPI that carries self-dealing risks (e.g., potential front-running exposure).

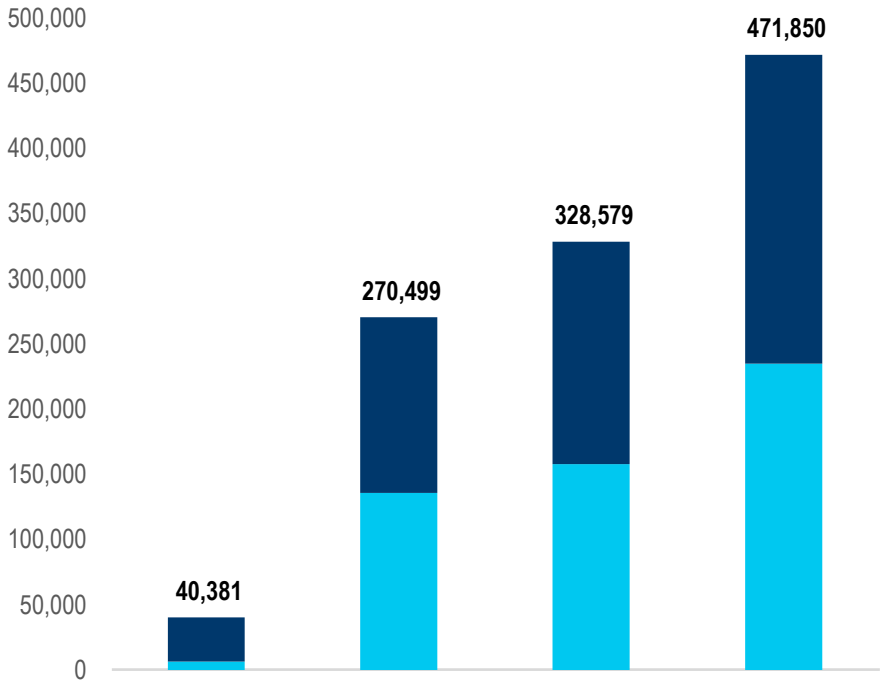
These include Directors and C-suite-level employees at listed companies, professional services providers, civil service officers of the government, and financial services employees.

Employees at financial services firms stand out in particular due to both their vast numbers in Hong Kong and Singapore, as well as their relative proximity to financial markets with potential for gaining access to MNPI.

Up to 1.1 million employees across different types of institutions in Hong Kong and Singapore are subject to varying degrees of PAD restrictions, with financial services employees being most impacted

Number of Potentially PAD Restricted Employees

#, 2025E



	LISTED COMPANIES*	PROFESSIONAL SERVICES	GOVERNMENT CIVIL SERVICES	FINANCIAL SERVICES
Hong Kong	33,923	134,650	170,579	236,850
Singapore	6,458	135,849	158,000	235,000
Total Employees	**40,381**	**270,499**	**328,579**	**471,850**

Level of PAD Risk

By Category

FINANCIAL SERVICES
Proximity to financial markets, which experience significant shifts due to non-public pieces of information, exacerbates employee self-dealing risks

LISTED COMPANIES
Listed company personnel, holding directorships and other senior roles (e.g., CXOs), in possession of sensitive information pose a front-running risk

PROFESSIONAL SERVICES
Certain niche roles supporting financial market transactions (e.g., M&A-focused lawyers) may possess MNPI that can facilitate front-running

GOVERNMENT CIVIL SERVICES
Top ministry personnel (e.g., Tier I and Tier II civil service officers in Hong Kong) may possess access to MNPI and thereby carry self-dealing risk

PAD Risk: Low — High — Most Significant

*Includes Directors and CXOs at non-financial services firms

Source: Census and Statistics Department, HKEX, SGX, TradingView, Civil Service Bureau, Singapore Department of Statistics, Careers@Gov, Singapore Institute of Directors, Singapore Council for Board Diversity, Quinlan & Associates estimates

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IMPORTANCE OF THE FINANCE INDUSTRY

KEY TAKEAWAYS

The finance industry accounts for 26.4% of Hong Kong's GDP and 14.0% of Singapore's, up from 21.2% and 13.9% in 2019, respectively.

This translates into the industry accounting for the 1st and 3rd largest share of the Hong Kong and Singaporean economies, respectively.

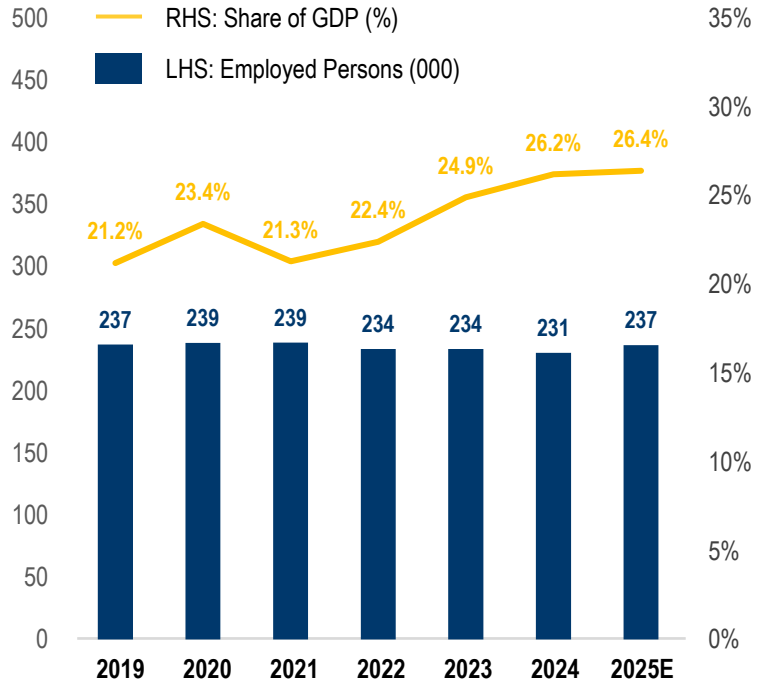
With the industry playing such an important role for both economies, it is no surprise that Hong Kong and Singapore are home to a collective 471,800 financial services employees, representing 7.6% of their combined labour force.

The finance industry plays an outsized role in terms of its contribution to gross domestic product ("GDP") and employment in both Hong Kong and Singapore

Economic Impact of Finance Industry

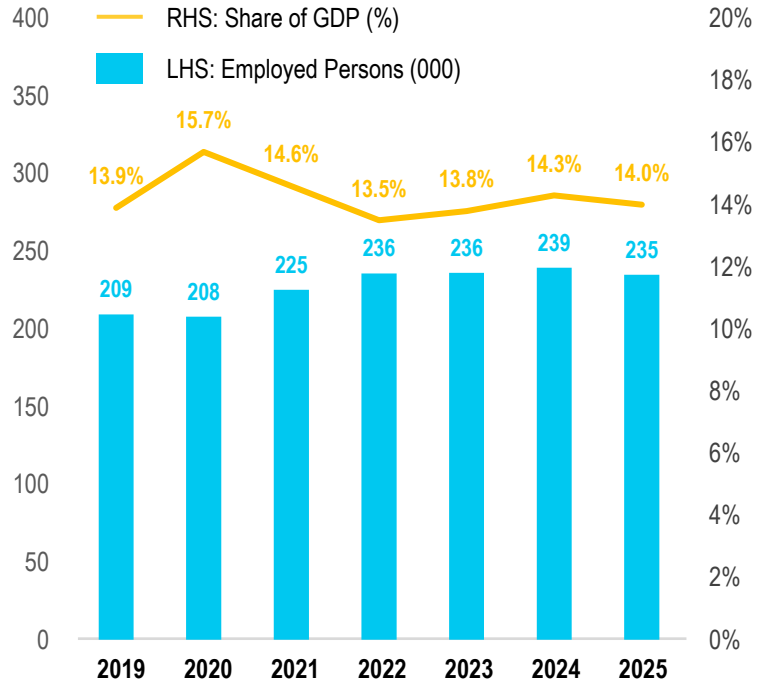
2019-25

HONG KONG



	2019	2020	2021	2022	2023	2024	2025E
Share of Labour Force Employed	6.7%	6.9%	7.0%	7.1%	7.0%	7.0%	7.1%

SINGAPORE



	2019	2020	2021	2022	2023	2024	2025
Share of Labour Force Employed	6.1%	6.1%	6.7%	6.8%	6.5%	6.5%	6.2%

Source: Census and Statistics Department, MAS, Ministry of Trade & Industry, Singapore Business Review, World Bank, Quinlan & Associates estimates

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EMPLOYEES AT STRICTLY REGULATED FIs

KEY TAKEAWAYS

Approximately one in every twenty (5.1%) residents of Hong Kong / Singapore belonging to the labour force is estimated to be employed in an FI that imposes investment restrictions.

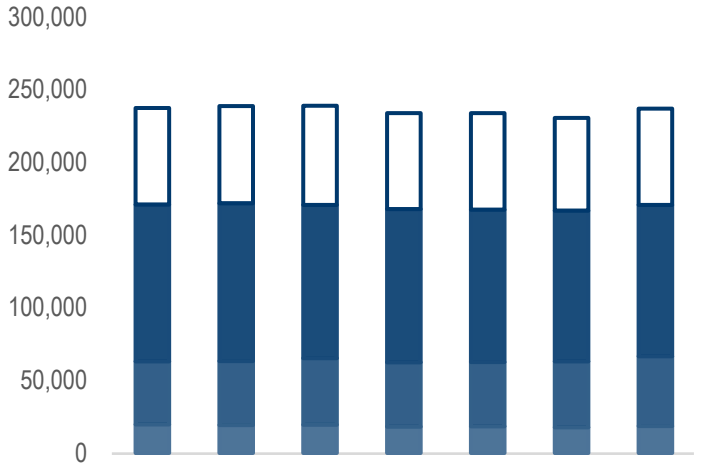
Totalling 318,450 employees across both markets, this figure has grown by roughly 2,390 employees p.a. on average since 2019, composed of individuals employed by banks (61%), asset managers (28%), and brokers / dealers (11%) of various types, belonging to heavily regulated FIs.

Of the 471,850 people employed in the Hong Kong and Singaporean finance industry in 2025, 318,450 work in strictly regulated FIs that impose significant investment restrictions on their employees

Finance Industry Employees

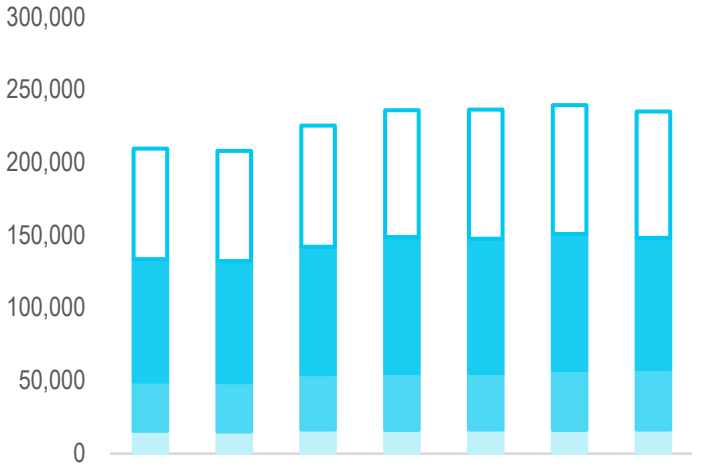
#, 2019E-25E

HONG KONG



	2019E	2020E	2021E	2022E	2023E	2024E	2025E
Banks	107,940	108,490	105,470	105,530	104,870	103,680	104,020
Investment Managers	43,310	44,070	45,920	44,210	44,270	45,460	47,930
Brokers / Dealers	19,650	19,170	19,340	18,080	18,220	17,570	18,580
Strictly Regulated FIs	**170,900**	**171,730**	**170,730**	**167,820**	**167,360**	**166,710**	**170,530**
Other FIs	**66,360**	**66,920**	**68,140**	**66,020**	**66,500**	**63,900**	**66,320**
Total FIs	**237,260**	**238,650**	**238,870**	**233,840**	**233,860**	**230,610**	**236,850**

SINGAPORE



	2019E	2020E	2021E	2022E	2023E	2024E	2025E
Banks	84,134	83,380	87,568	93,366	92,254	93,678	90,228
Investment Managers	33,758	33,870	38,126	39,114	38,944	41,075	41,575
Brokers / Dealers	15,316	14,733	16,057	15,996	16,028	15,875	16,117
Strictly Regulated FIs	**133,208**	**131,983**	**141,750**	**148,476**	**147,227**	**150,628**	**147,920**
Other FIs	**76,192**	**75,917**	**83,450**	**87,324**	**88,973**	**88,772**	**87,080**
Total FIs	**209,400**	**207,900**	**225,200**	**235,800**	**236,200**	**239,400**	**235,000**

Note: Banks include restricted / licensed banks, investment banks, local offices of foreign banks, other deposit-taking companies; investment managers include fund management firms, investment advisory service providers, investment / holding companies, trustees / custodians; brokers / dealers include securities brokerages, foreign exchange brokers / dealers, commodity futures brokers / dealers, securities / commodities marketplaces; other FIs include insurance agents, non-deposit-taking non-bank lenders, etc., with less strict employee investment policies

Source: Census and Statistics Department, Singapore Department of Statistics, Quinlan & Associates estimates

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INVESTABLE INCOME OF REGULATED EMPLOYEES

KEY TAKEAWAYS

Individuals employed at highly regulated FIs in Hong Kong and Singapore earn between 1.7x and 3.0x the median income of the general employed population, and more than those employed in the broader financial services industry, generating an estimated USD 9.38 billion in investable income in 2025 alone.

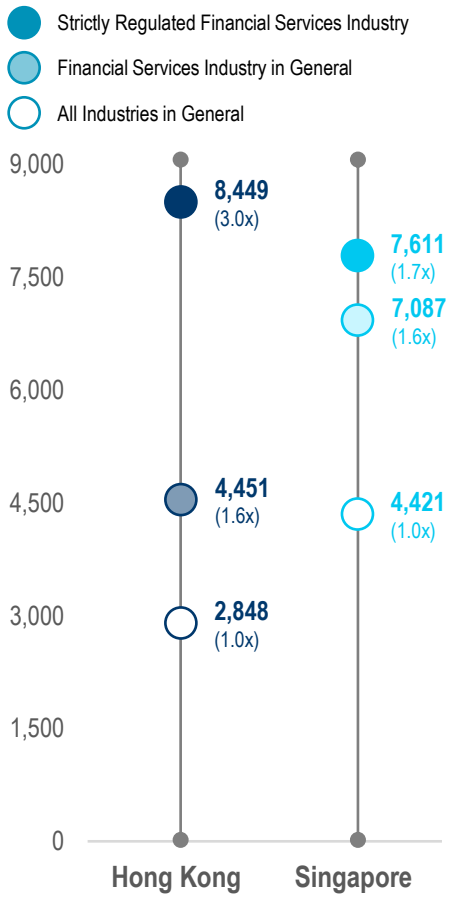
It is particularly notable that Singapore has leapfrogged Hong Kong in recent years on the back of a higher wage growth rate, combined with a higher savings rate.

Altogether, the annual investable income of Hong Kong- and Singapore-based employees at highly regulated FIs has grown at a CAGR of 7.1% from 2019-25.

Employees working at these regulated FIs generate billions of dollars of investable income per year, reaching an estimated USD 9.38 billion in 2025

Average Monthly Income

USD, 2025



Annual Investable Income of Employees at Strictly Regulated FIs

USD Billion, 2019E-25E



	2019E	2020E	2021E	2022E	2023E	2024E	2025E
Hong Kong	3.83	3.88	3.96	4.02	4.14	4.32	4.62
Singapore	2.39	3.41	3.49	3.92	4.17	4.52	4.76
Total	**6.22**	**7.28**	**7.45**	**7.94**	**8.31**	**8.84**	**9.38**

Note: Annual investable income is defined as the estimated total annual savings of employees at strictly regulated FIs, computed based on their estimated population, average income, and savings rate

Source: Census and Statistics Department, Singapore Department of Statistics, LegCo, Quinlan & Associates estimates

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REGULATED EMPLOYEE INVESTING JOURNEY

KEY TAKEAWAYS

Despite having sizeable investable assets, employees working at heavily regulated FIs face notable friction across their investment journeys.

This includes cumbersome disclosure requirements and restrictions on what brokerage platform(s) they can use to make investments.

Each security that the employee wishes to invest in also requires pre-approval, with checks in place for material non-public information, front-running, and other risk screening, that can result in disapproval or delayed execution of investment ideas. In certain cases, if the trade gets delayed beyond the approved execution period, such as due to being de-prioritised vis-à-vis client or firm orders, the employee may need to re-apply for approval.

Post-investment, employees are also subject to reporting requirements. Taken together, these factors lead to sizeable administrative burdens across the entire investment journey.

Furthermore, every time an employee switches between FIs, they have to re-adjust as per their new employer's differing policies.

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However, these employees' pre-, during, and post-investment journeys are fraught with friction due to significant investment regulatory restrictions that are placed upon them by their employers

Employee Restrictions
Across Investment Value Chain

PRE-INVESTMENT

From the point of joining, employees must adhere to stringent disclosure requirements

ACCOUNT DECLARATION
Disclose both own investment accounts and ask related parties (e.g., spouse, children) for theirs

HOLDINGS DECLARATION
Source, consolidate, and disclose details of various investments from across different platforms

APPROVED BROKER USE
Use either an employer-approved broker or submit an application to use a different broker

DURING INVESTMENT

Investments require approval, facing restrictions and/or execution delays

RESTRICTIONS CHECKING
Avoid investing in securities and IPOs[1] on the firm's restricted list or during blackout periods

APPROVAL SOLICITING
Apply for approval in advance of executing trades, with supporting investment rationale

DELAYED EXECUTION
Experience a delay in trade behind client / firm orders, with risk of approval expiring before execution

POST-INVESTMENT

The administrative burden continues, with follow-on reporting required

CONFIRMATION SHARING
Share a confirmation of the trade executed and its details with the firm in a timely manner

MINIMUM HOLDING PERIOD
Hold onto the investment for a statutory minimum period and ask for approval in case of an early sale

UPDATES SHARING
Share statements of investment accounts and any related-party changes on a regular basis

The **process repeats every time an employee switches their employer** as every FI may have different approved brokers, restricted lists, holding periods and disclosure forms, potentially being required to transfer accounts, re-clear / liquidate holdings, or restart a minimum holding period

END-TO-END INVESTMENT JOURNEY FRICTION

[1]Initial Public Offerings
Source: Quinlan & Associates analysis

IMPACT ON EMPLOYEES

KEY TAKEAWAYS

These restrictions negatively impact employees' investments by limiting their choices, creating a poor experience while heightening the risks being faced by them.

At the outset, employees cannot freely choose their preferred broker or security without the express approval from their employer.

In doing so, they experience administrative burdens, struggle to receive salient advice, and are unable to optimally time their investments.

Employees also face notable liquidity and compliance risks, in case they need to suddenly sell their holdings (e.g., due to an emergency or because of conducting an erroneous trade).

The resulting investment process is fundamentally worse for employees of strictly regulated FIs, who face: (1) Limited Choices; (2) Heightened Risk; and (3) Inferior Experience

IMPACT CATEGORY	NEGATIVE IMPACT EXPERIENCED	SELECT LIST OF CAUSES	LEVEL OF IMPACT
Limited Choices Employees' choices are much more limited, from choosing which broker to trade with to what to trade	**Constrained Broker Options** User interface familiarity and cost compromises due to inability to select favoured broker	• Limited list of approved brokers • Application required for any other brokers	
	Smaller Investment Universe Fewer securities to choose from when building / managing a diversified portfolio	• Restricted list of securities • Barring from certain IPOs • MNPI-based exclusions	
Heightened Risk Employees face uncertainty around potentially complex liquidity and compliance risks	**Lower Liquidity** Limited access to funds, post-investment, due to restrictions placed upon selling	• Minimum holding period • Blackout periods • Pre-sale approval requirement	
	Compliance Overhang Concerns around potential compliance violations and associated ramifications	• Unfamiliarity with complex rules • Accidental trading activity • Unauthorised trading activity	
Inferior Experience Employees' investing experience gets dampened by higher administrative burden, difficulty in accessing professional advice, and a slower transaction speed	**Higher Administrative Effort** Need for devotion of time towards unproductive administrative burdens	• Investment disclosures • Account statements submissions • Related-party account updates	
	Slower Transaction Speed Delayed investment timing due to compliance roadblocks	• Approval delays • Blackout periods • Preferred routing of client / firm order	
	No Room for Wealth Advice Lack of access to suitable wealth advice due to compliance restrictions	• MNPI cross-flow risks • Security selection restrictions • Market timing restrictions	

Employees' retirement planning capability is compromised by hampered access to wealth advice

Low High Most Impacted

Source: Quinlan & Associates analysis

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KEY AFFECTED EMPLOYEE PERSONAS

KEY TAKEAWAYS

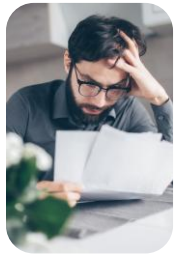
Employees are likely to fall into one of four most commonly observed categories, each with significant drawbacks of its own:

- **The Confused Conservative:** Avoids investments that may come under scrutiny due to uncertainty with regard to the rules;
- **The Cavalier Rule Breaker:** Places top priority on maximising investment performance, including by potentially circumventing controls;
- **The Lazy Rule Follower:** Invests within compliance guardrails, but half-heartedly fulfils admin requirements, resulting in tracking / reconciliation challenges; and
- **The Distracted Compliant:** Fully compliant while investing within boundaries but suffers from lower productivity.

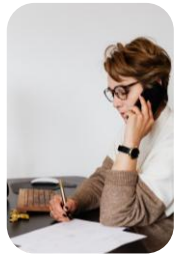
Impacted employees tend to fall into one of four key personas: (1) The Confused Conservative; (2) The Cavalier Rule Breaker; (3) The Lazy Rule Follower; and (4) The Distracted Compliant

Four Types of Employee Investor Profiles

Underpinned by Three Root Causes



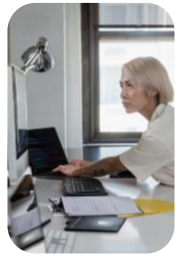
The Confused Conservative



The Cavalier Rule Breaker



The Lazy Rule Follower



The Distracted Compliant

	The Confused Conservative	The Cavalier Rule Breaker	The Lazy Rule Follower	The Distracted Compliant
Description	Unsure of investment rules, finding them to be complex and wary of compliance risks	Prioritises optimising investment performance at the cost of bearing compliance risk	Respects compliance guardrails, but does not give much time or importance to admin reporting	Fully meets investment and admin compliance needs, but at the cost of core responsibilities
Segmentation Criteria				
Has Clarity Around Rules	✗	✓	✓	✓
Avoids Restricted Investments	✗	✗	✓	✓
Fulfils Administrative Burdens	✗	✗	✗	✓
Maintains Work Productivity	✓	-	-	✗
Outcome	*Parks money conservatively to avoid mental gymnastics of checking what's allowed*	*Seeks to circumvent rules & regulations for optimal investment flexibility*	*Invests within boundaries, but may complete admin requirements imperfectly*	*Invests within boundaries & fulfils all admin requirements by taking extra time & effort*

✓ Favourable - Dependent ✗ Unfavourable

Source: Quinlan & Associates analysis

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PERSPECTIVES FROM EMPLOYEES

Pain Points Experienced

Interviewed employees at regulated financial institutions on the investment constraints experienced:

"Trading as an employee at a financial institution is a compliance nightmare. Not only am I limited in terms of what I can invest in, but (also) when I can do so. Lagging friends' investment returns despite working in the industry; feels awkward."

– MD, BULGE BRACKET BANK

LIMITED INVESTMENT UNIVERSE

"The administrative hoops that I need to jump through, irrespective of the investment amount involved, are not only cumbersome and frustrating, but (also) take precious time away from my core responsibilities at work, making it a lose-lose for both me and my employer."

– VP, GLOBAL ASSET MANAGER

CONSIDERABLE ADMIN BURDEN

"The whole point of seeking financial advice from the wealth manager offered by my bank is nullified due to investment restrictions that I face. I don't know if I can act on any input until I receive pre-clearance, with quick trades out of the question."

– DIRECTOR, BROKERAGE

CONSTRAINED ACCESS TO ADVICE

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RESULTING EMPLOYER PAIN POINTS

KEY TAKEAWAYS

The compliance burden drives operational strain, as FIs have to put in place an operating model that is in line with complex regulatory requirements.

Despite the operational resources committed, risks still remain, as diverse types of violations continue to be reported year after year, often coming to light several years after the fact.

As such, whether compliant or non-compliant, firms have to bear a number of tangible and intangible costs, with no revenue upside to show for it.

Amidst these frictions, employee dissatisfaction hampers FIs' ability to attract, engage, and retain top talent.

The investment pain points are not just limited to employees; there is a negative domino effect being experienced by their employers as well

Problems for Employers
Key Pain Points



Operational Strain

FIs need to have a complex operational set-up in place to ensure that they are compliant

- **Small FIs:** Senior management personnel at small firms are forced to **dedicate time away from revenue-generating activities** to handle compliance
- **Mid-sized FIs:** **General compliance staff have to stretch** to cover otherwise low-priority regulatory compliance matters related to employee investing
- **Large FIs:** A multinational presence warrants spending sizeable sums on a **dedicated compliance team** for this single non-revenue-generating activity



Lingering Risks

Despite their best efforts, firms still experience vulnerabilities that expose them to downside risk

- **Growing Cases:** Regulatory infringements continue to experience a **consistent rise, with incidents growing from just one a year to several**
- **Impacted Stakeholders:** Repercussions may impact not just the **individual offending employee**, but also the **management team and firm** itself
- **Types of Sanctions:** Sanctions imposed may be strategic, operational, or financial in nature, leading to **cessation of business in the worst case**



Higher Costs

There are various tangible and intangible costs associated with compliance or non-compliance

- **Cost per Firm:** Depending on size, it may cost **USD 25,000-550,000+ p.a.** to be operationally compliant, a hefty price for a pure cost centre
- **Industry-wide Expense:** Collectively, the industry is estimated to be directly spending **USD 258 million a year** on remaining compliant, **growing at 5% p.a.**
- **Hidden Cost:** A larger hidden bankroll cost worth **USD 5.3 billion p.a.** due to lower productivity of distracted employees is further estimated

Employee Dissatisfaction

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SECTION 1.1

OPERATIONAL STRAIN



EMPLOYER COMPLIANCE REGULATIONS

KEY TAKEAWAYS

FIs are required to establish suitable governance protocols from the get-go that include policies dictating whether and what their employees may invest in and mechanisms to safeguard against illicit flow of MNPI across business functions (e.g., investment banking and sales & trading).

For each employee hired, FIs need to identify their present investment holdings and brokerage accounts belonging to both themselves and related parties (e.g., spouse, children).

Employee trades should adhere to restricted lists of securities and blackout periods of time, with FIs required to determine appropriate position sizes, similar to how they do for clients, based on an employee's bespoke financial position, investment objective, and strategy.

After a trade takes place, FIs need to regularly monitor activity and check that a trade didn't cross any regulatory red lines.

Over time, FIs are required to maintain an audit trail and review their records to look out for any irregular activity.

The nature of FI employees' role exposes them to sensitive information that results in regulators imposing stringent PAD regulations onto the FIs that are employing them

Regulatory Requirements
By Stage

STAGE 1 FIRM-WIDE SET-UP	STAGE 2 INDIVIDUAL EMPLOYEE CHECKS			STAGE 3 FIRM-WIDE REVIEW
RECURRING CHECKS	RECURRING CHECKS	RECURRING CHECKS	RECURRING CHECKS	RECURRING CHECKS
ACTIVITY MONITORING	ACTIVITY MONITORING	ACTIVITY MONITORING	ACTIVITY MONITORING	ACTIVITY MONITORING
TRADE APPROVAL	TRADE APPROVAL	TRADE APPROVAL	TRADE APPROVAL	TRADE APPROVAL
EMPLOYEE ONABOARDING	EMPLOYEE ONBOARDING	EMPLOYEE ONBOARDING	EMPLOYEE ONBOARDING	EMPLOYEE ONBOARDING
POLICY ESTABLISHMENT	POLICY ESTABLISHMENT	POLICY ESTABLISHMENT	POLICY ESTABLISHMENT	POLICY ESTABLISHMENT
1 ORGANISE GOVERNANCE	**2 SOLICIT EXISTING INVESTMENTS' INFO**	**3 CONDUCT PRE-TRADE CHECKS**	**4 MONITOR POST-TRADE ACTIONS**	**5 IMPLEMENT REGULAR REVIEW**
• Clarify whether employees may trade securities, futures contracts, leveraged FX, etc. • Specify the conditions on which employees may deal for their own accounts • Segregate business functions to regulate the flow of MNPI by installing a Chinese Wall	• Require disclosure of existing investment holdings upon joining the firm • Require identification and reporting of all self and related-party accounts • Require dealing through only approved, licensed, and/or registered brokerages	• Maintain a watchlist and restricted list with appropriate systems in place • Mandate "blackout periods" for trading of securities before and after issuance of research • Set limits on position size based on each employee's financial health, objectives, and strategy	• Arrange for duplicate trade confirmations to be provided for each transaction • Record and monitor each employee's account and their related accounts • Ensure trades are not prejudicial to the interests of clients (e.g., front-running)	• Maintain an audit trail of transactions and approvals / denials • Arrange for statements of account to be provided on a regular basis • Conduct reviews of employee investment records from time to time to check for irregularities
INITIAL ONE-OFF	**PER INSTANCE OF EMPLOYEE JOINING OR TRADING ACTIVITY**			**PERIODIC UNDERTAKING**

Source: SFC, HKMA, MAS, Quinlan & Associates analysis

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COMPLIANT OPERATING MODEL SET-UP

KEY TAKEAWAYS

Employers must establish requisite policies, rules, organisational structures, systems, and vendors when setting up an operationally compliant firm infrastructure.

They then need to explain key developments or information to notable stakeholders, including employees, senior management, and regulators, while themselves staying up-to-date with any regulatory policy changes.

Upon establishing and explaining their stance, employers then need to enforce relevant policies and behaviours by instituting processes, surveillance mechanisms, data management, auditing, and controls.

As the regulatory landscape evolves, employers must continue to evolve as well, following these steps in an iterative cycle of constant improvement.

To comply with regulations, FIs need to establish, explain, and enforce 15 key aspects that together form the foundation of a fundamentally compliant personal account dealing ("PAD") operating model

Iterative Evolution Cycle

Three Steps



1. ESTABLISH...

…the requisite foundation of a compliant operating model by constituting:

- Policies (e.g., documentation)
- Rules (e.g., prohibited activities)
- Organisational structure (e.g., escalation matrix)
- Systems (e.g., broker data flows connectivity)
- Vendors (e.g., software providers)

2. EXPLAIN...

…allowances, restrictions, conditions, performance, data, and incidents via:

- Employee orientation (e.g., training and query handling)
- Management reporting (e.g., performance data sharing)
- Regulatory reporting (e.g., reporting of incidents)
- Regulatory policy changes (e.g., consultation paper review)
- Firm policy changes (e.g., change management)

3. ENFORCE...

…appropriate restrictions by instituting checks and balances, including:

- Processes (e.g., onboarding declaration, pre-clearance, reconciliation)
- Surveillance mechanisms (e.g., trading activity monitoring)
- Data management (e.g., record-keeping, audit trail, cybersecurity)
- Auditing (e.g., internal and external testing and review)
- Controls (e.g., MNPI barriers' installation)

Source: Quinlan & Associates analysis

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HUMAN CAPITAL REQUIREMENTS

KEY TAKEAWAYS

The operational requirements place a significant strain on FIs' human resource capacity.

Large banks, such as HSBC and BNP Paribas, with a global presence that warrants complying with differing rules across various jurisdictions, maintain specialist teams of compliance personnel that are dedicated to PAD at a sizeable fixed overhead expenditure.

Mid-sized firms that are unable to afford dedicated PAD teams often stretch their general compliance function staff to cover PAD compliance responsibilities as well.

Small FIs, who are generally under-resourced, typically task senior management personnel with key compliance decision-making, serving as a notable distraction from their core responsibilities and revenue-generating activities.

As such, no matter the size of the FI, operational compliance carries a significant direct or indirect human capital cost.

Managing employee investments requires considerable investments in human capital; from senior management double-hatting at smaller firms to dedicated PAD teams at large FIs

Human Resource Allocation by Firm Size

Small, Medium, and Large FIs

Responsible Entity by Firm Size	# of Staff Allocated	% of Time Allotted	Responsibilities	Key Takeaway
SMALL Senior Management Staff	1-3	~5-15%	**AD-HOC** • Investigate discrepancies and manage any breaches • Monitor mailbox and respond to staff queries • Monitor local processes / policies to identify areas for improvement to update policies and processes	*Senior mgmt. staff are distracted from their core responsibilities*
MEDIUM General Compliance Team	3-10	~15-25%	**REGULAR** • Prepare reports as per firm / regulatory policies • Prepare, record, visualise, and present data • Review and approve vendors	*Compliance teams are being stretched thin on their non-core activities*
LARGE Global PAD Compliance Team	40-60	~100%	**CONTINUOUS** • Review and validate employee requests, follow up on outstanding requirements, and flag exceptions • Conduct reconciliation between account movements and dealing approval and update results • Maintain accurate records for audit	*Dedicated PAD teams require a sizeable fixed overhead cost to be borne*

Source: Quinlan & Associates estimates

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SECTION 1.2

LINGERING RISKS



CASE STUDIES OF GLOBAL PAD VIOLATIONS

KEY TAKEAWAYS

With even bulge bracket banks experiencing cases of PAD policy violations despite their best efforts to remain compliant with multiple different jurisdictions' strict regulatory frameworks, it is clear that this is a major issue being faced across the world.

PAD policy violations of different types have been observed all around the globe, including at top FIs with a multi-jurisdictional presence

TYPES OF VIOLATIONS

	Undisclosed Personal Brokerage Account	Market Abuse & Insider Trading	Front-running of Impending Trades	Minimum Investment Holding Period Violation
WHO — Financial Institution	RBC Capital Markets	Goldman Sachs	BMO Wealth Management (BMO Nesbitt Burns)	J.P.Morgan (J.P. Morgan Securities)
WHO — Employee Title	Junior Analyst (investment bank)	Vice President	Managing Director	Licensed Banker
WHY — PAD Violation	Used undisclosed account to earn ~USD 100,000 using MNPI	Passed MNPI to a friend for trading via their brother's account	Conducted front-running in government bond futures	Falsely indicated that he'd held a security for >30 days when he'd not
WHAT — Employer Penalty	Reputational damage to the firm's brand	Reputational damage to the brand and USD 393,149 in legal costs	~USD 193,069 in fine & related costs, & reputational brand damage	Reputational brand damage and potential costs to investigate case
WHAT — Employee Penalty	Sentenced to 5 years of probation & ~USD 126,000 in fine & forfeiture	36-month prison sentence & ~USD 550k in fine, forfeiture, & restitution	~USD 10,562 fine and reputational damage	Discharged, followed by a ~2.5-year period of unemployment

VIOLATIONS AT GLOBAL BANK BRANDS POINT TO PAD AS A PERVASIVE MULTI-JURISDICTIONAL ISSUE

Source: US DOJ, Bloomberg, Reuters, SEC, SFC, FINRA, Quinlan & Associates analysis

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PERSISTING PAD VIOLATIONS

KEY TAKEAWAYS

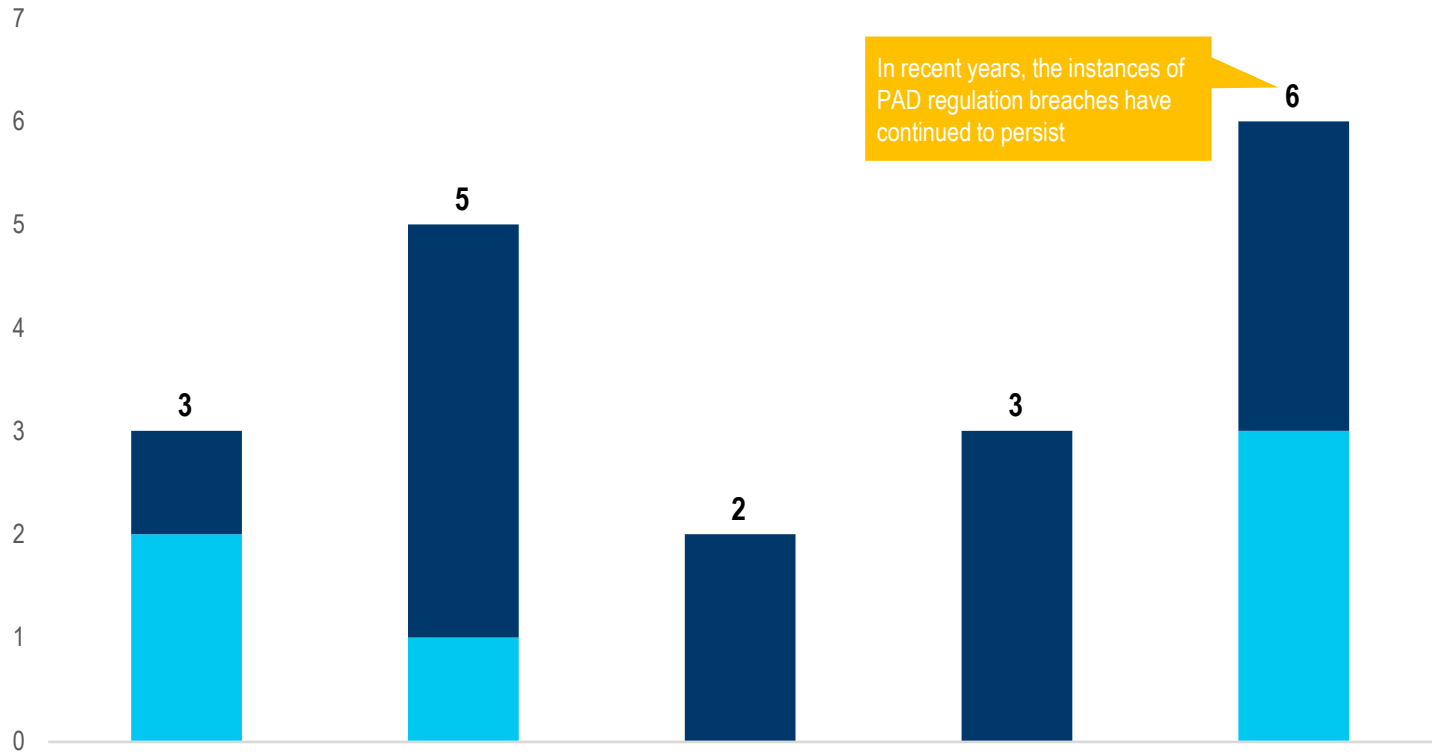
The frequency of PAD breaches coming to light has persisted in recent years in both Hong Kong and Singapore.

From just 3 cases in 2021, the number of enforcement notices involving PAD breaches rose to 6 across both markets in 2025 (and 18.8% of all enforcement actions in Singapore in 2025, up from 6.9% in 2021), representing a material increase in non-compliance.

In Hong Kong and Singapore, cases of PAD violations appear to persist, with notices growing from just 3 in 2021 to 6 in 2025, highlighting that the risk of a breach remains real

FI PAD Regulation Breach Notices

#, 2021-2025 (HK & SG)



Share of Enforcement Notices	2021	2022	2023	2024	2025
Hong Kong	1.2%	7.3%	2.1%	5.1%	5.6%
Singapore	6.9%	3.7%	0.0%	0.0%	18.8%

Note: The PAD regulation breaches at FIs are tallied based on when an enforcement notice pertaining to them was released

Source: SFC, MAS, Quinlan & Associates analysis

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CASE STUDIES OF PAD VIOLATIONS IN HK & SG

KEY TAKEAWAYS

From a senior-level RO / CFO / Representative to a Research Analyst, cases of PAD violations are being witnessed across the employee hierarchy.

These cases are found to involve vastly different types of violations, requiring FIs to cast a wider net when looking to prohibit or catch breaches.

The risk of failure isn't just limited to direct financial fines by regulators but also extends to intangible brand damage that can hamper an FI's ability to attract and retain both clients as well as talented employees.

For firms that have built their reputation over several years of spotless service, a single case can serve to undo years-long progress.

The nature of PAD violations in Hong Kong and Singapore vary widely in terms of the type of illicit trading activity, size of organisation, and seniority of staff involved

TYPES OF VIOLATIONS

	Procedural Circumvention	Market Abuse & Insider Trading	Prohibited Security Trade	Prohibited Period Trade
WHO — Financial Institution	RHB	REIT SASSEUR	元大證券 Yuanta Securities	IMPRESSION Investment Limited
WHO — Employee Title	Research Analyst	Chief Financial Officer	Responsible Officer ("RO")	Director, MIC,[1] & RO
WHY — PAD Violation	Traded via father's undisclosed account	Purchased REIT units while possessing MNPI	25 personal trades matched while trading for the firm	Didn't hold investments for min. 30 Days, 29 times*
WHAT — Employer Penalty	Reputational damage to the firm's brand	Reputational damage to the firm's brand	Reputational damage to the firm's brand	HKD 2 million fine and reputational brand damage
WHAT — Employee Penalty	1-year ban and reputational damage	SGD 200,000 fine and 10 weeks' imprisonment	4.5-year ban and HKD 1 million fine	8-month ban and reputational damage

SIGNIFICANTLY VARYING TYPES OF VIOLATIONS POINT TO WIDESPREAD OPERATIONAL COMPLIANCE DEFICIENCIES

[1]Manager-in-Charge

*The individual was found to have also conducted several other breaches explored deeper in a later slide, including 2,500 personal transactions without prior approval, trading securities which were also traded on the same day in the fund he/she managed 200+ times, participating in 12 IPOs using personal accounts and subscribing for same IPO shares that were also in the fund that he/she managed

Source: SFC, MAS, Quinlan & Associates analysis

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POTENTIAL ENFORCEMENT ACTIONS

KEY TAKEAWAYS

In case of a regulatory violation coming to light, the repercussions need not be limited to any single level in the hierarchy, as enforcement actions can carry penalties against the FI, its management team, or specific employees involved.

These penalties can be strategic, operational, financial, or a mix of them in nature.

For instance, even in cases wherein only an employee is explicitly sanctioned by a regulator, their employer still experiences a loss of trust in their brand due to the reputational damage that takes place.

Thus, in the event of a breach, stakeholders may suffer both tangible and intangible damage.

Enforcement actions against parties found to be in breach can be in the form of strategic, operational, and/or financial sanctions at the firm-, management-, and/or employee-level

Enforcement Actions
Levels and Types of Impact

REPERCUSSIONS CAN REVERBERATE FROM TOP-TO-BOTTOM

FIRM-WIDE	MANAGEMENT TEAM	EMPLOYEES
Firms may face sanctions if they fail to maintain suitable controls in place to prevent illicit PAD trades by their employees	If key management personnels, such as the Responsible Officer / Representative, are found to have been negligent / ineffective / involved, they may face action	Employees who conducted / facilitated illicit PAD may face individual repercussions for having breached regulatory and firm restrictions

STRATEGIC IMPACT

Licensing Restrictions
License revocation or difficulty in obtaining other future licenses

Public Reprimand
Brand trust loss from reputational damage suffered

OPERATIONAL IMPACT

Prohibition Order
Senior management being held liable for operational lapses

Controls Enhancement
Be required to invest in remedial measures and stricter controls

FINANCIAL IMPACT

Monetary Fine
A monetary penalty or disgorgement of illicit earnings may be levied

Legal Liability
Criminal charges and/or civil lawsuits requiring legal expenses may be filed

EXAMPLES


HSBC Business / Banking & Finance

SFC fines HSBC HK$2.5 million for breaching trading rules

The bank lacked adequate internal controls to ensure it remained compliant with the regulations


The Standard

BUSINESS > FINANCE

SFC fines Bright Smart Securities $2.8m for internal control failures in monitoring wash trades

FINANCE 27-07-2026 17:19 HKT


THE BUSINESS TIMES 50

One Asia Investment Partners' ex-director jailed for bond misconduct


cna

Singapore

Police, MAS investigate online trading platform Samtrade FX, 3 men arrested

Source: Quinlan & Associates analysis

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CASE STUDY – IMPRESSION INVESTMENT

KEY TAKEAWAYS

Established in 2013, Impression Investment Limited was reprimanded for lacklustre supervision, ineffective controls, and lack of proper enforcement with respect to staff trading activities.

These failures saw an individual at the firm, who was serving in multiple senior capacities, including as Impression Investment Limited's Director, Responsible Officer, and Manager-in-Charge, engage in several improper trading activities.

The individual was on multiple occasions found to have made transactions without securing prior approval, traded restricted securities (e.g., IPOs the fund managed by them was participating in), and did not conform to the minimum investment holding period.

In 2026, in Hong Kong, SFC sanctioned a Type 9-licensed asset manager and its senior employee for a whole host of improper staff trading activities, imposing hefty fines and a prohibition period

Case Overview
Description

IMPRESSION Investment Limited

Impression Investment Limited is an investment management and advisory firm licensed to carry on Type 9 (asset management) regulated activities which received a reprimand and fine due to improper staff trading activities.

Employer Sanctions
Fine and List of Causes

USD 255,000

Fine Imposed by Hong Kong SFC due to…

1. LACKLUSTRE SUPERVISION
…failure to diligently supervise its staff to ensure compliance with staff dealing policies & other applicable regulatory requirements

2. INEFFECTIVE CONTROLS
…failure to maintain effective internal controls over staff trading activities, including for monitoring and detecting irregularities

3. LACK OF PROPER ENFORCEMENT
…failure to appropriately implement staff dealing policies prior to 2021, despite having established them in writing

Employee Sanctions
Who, What, and Why

1 WHO?

A SENIOR EXECUTIVE

The individual was a Director, Responsible Officer, and Manager-in-Charge at Impression Investment Limited

2 WHAT?

PROHIBITION ORDER

The individual was prohibited by the SFC from re-entering the industry for a period of eight months

3 WHY?

IMPROPER TRADING ACTIVITIES

The individual was found to have conducted a broad range of improper trading activities:

- Trading Without Pre-Clearance: Conducted 2,500+ personal trades without prior written approval from a designated officer;
- Trading Restricted Securities: Traded 200+ times in the same securities on the same day as the fund and subscribed for the same IPO shares as the fund; and
- Selling Within the Minimum Holding Period: Failed to hold personal investments for at least 30 days on 29 occasions

Source: SFC, Quinlan & Associates analysis

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SECTION 1.3

HIGH COSTS



KEY PAD-RELATED COST CATEGORIES

KEY TAKEAWAYS

PAD compliance requirements represent a sizeable cost to regulated FIs.

Staff compensation remains the largest direct cost component; from diverted senior management and compliance personnel time at small-to-mid-sized FIs to considerable fixed salary overheads for dedicated PAD compliance teams at global firms, some of which can be as large as 50+ employees.

RegTech software and external consultants represent two further meaningful direct cost components.

FIs belonging to all three size classifications are further incurring a high hidden cost due to employees spending a share of their at-work hours towards PAD and associated administrative / compliance obligations. This is most acute in the case of large FIs with a sizeable employee base.

We have identified four key cost categories with varying impact across different sizes of FIs: (1) Staff Compensation; (2) RegTech Software; (3) External Consultants; and (4) Hidden Bankroll Cost

Cost Categories
Direct and Indirect

VISIBLE COSTS

HIDDEN COSTS

COST CATEGORY	SHARE OF COSTS	KEY TAKEAWAYS
STAFF COMPENSATION Wages attributed to staff time allocated by the FI towards PAD compliance work	30-40%	Small FIs require senior management to divert time away from their core responsibilities, while large FIs often hire dedicated off-shore PAD compliance teams
REGTECH SOFTWARE Fees incurred for use of software to monitor and analyse employee trades	10-20%	While small FIs can cover their needs with cheaper plans, mid-to-large sized FIs tend to have more stringent PAD policies that necessitate substantial outlays on advanced RegTech vendors
EXTERNAL CONSULTANTS Fees borne for hiring external regulatory compliance consultants	5-15%	Firms of all different sizes typically engage third-party consultants to review and validate their PAD regulatory compliance efforts on a regular basis
HIDDEN BANKROLL COST Lost productivity due to general staff time spent on PAD compliance tasks	40-55%	FIs, especially larger firms employing scores of individuals, inadvertently end up bankrolling salary expenses for employee time spent on PAD investments / compliance while at work

Source: Hays, Vendr, Consult Fees, SoFi, eFinancialCareers, Hays, Census and Statistics Department, Singapore Department of Statistics, Quinlan & Associates estimates

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SECTION 1.4

EMPLOYEE DISSATISFACTION



EMPLOYEE DEMAND FOR MORE SUPPORT

KEY TAKEAWAYS

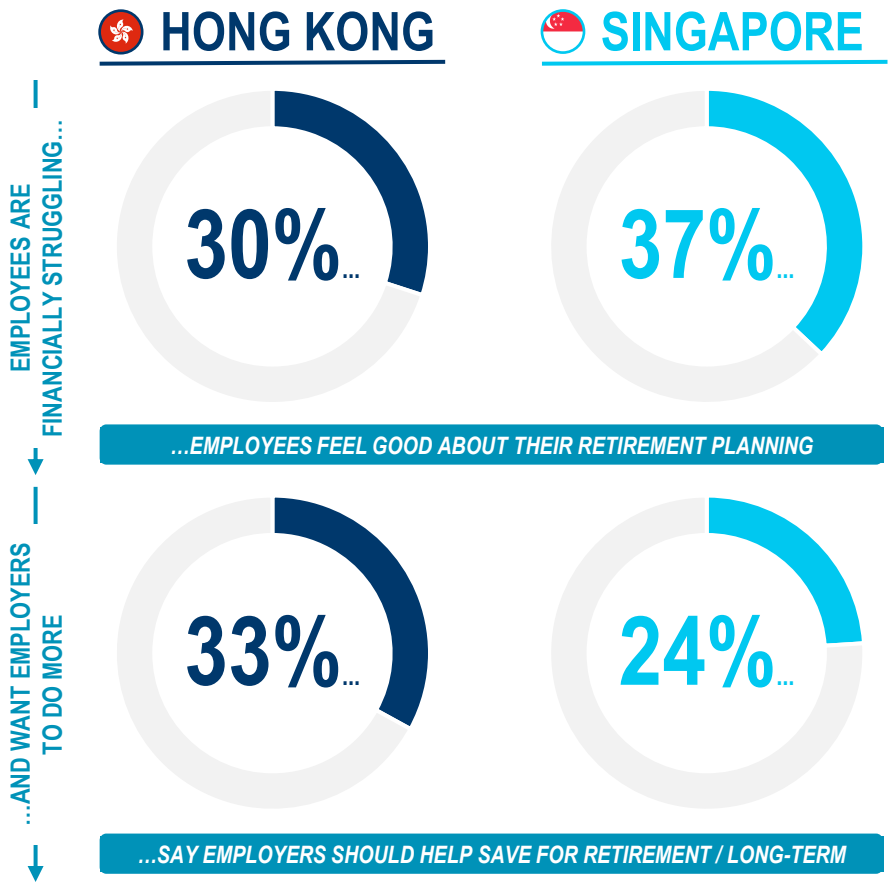
The vast majority of employees do not feel good about their retirement planning, pointing to financial strain that is contributing to employees' lack of productivity at work.

It is no surprise then that a notable share of employees want more support from their employers and of various different types, ranging from 1-on-1 financial wellness coaching to firm-wide retirement investment plans sponsored / endorsed by the employer.

Employees are voicing a crystal-clear desire and need for greater quality and quantity of support from their employers

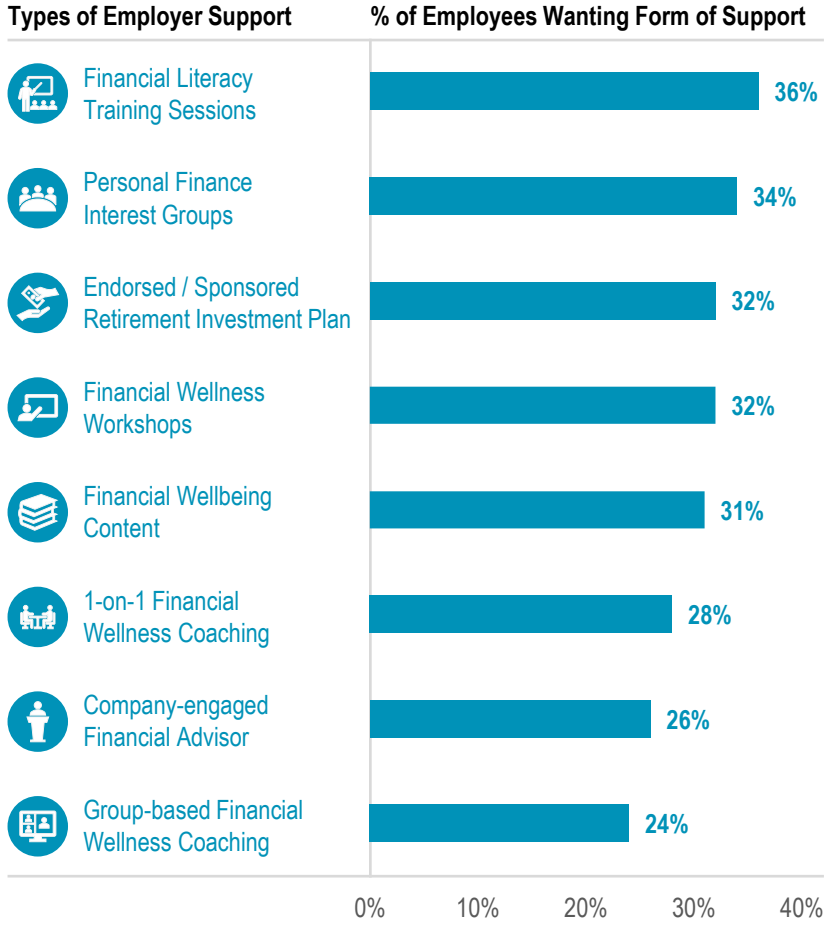
Employee Perspective

%, 2025



Support Desired by Employees

%, 2024 (sample size = 500)



Source: Fidelity, Aon, Endowus, Quinlan & Associates analysis

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CONTRASTING EMPLOYER CONCERNS

KEY TAKEAWAYS

In contrast to employee expectations, supporting their financial wellbeing (e.g., debt support, retirement plans, etc.) is the primary motivation of only 11-16% of employers when designing employee benefits programmes.

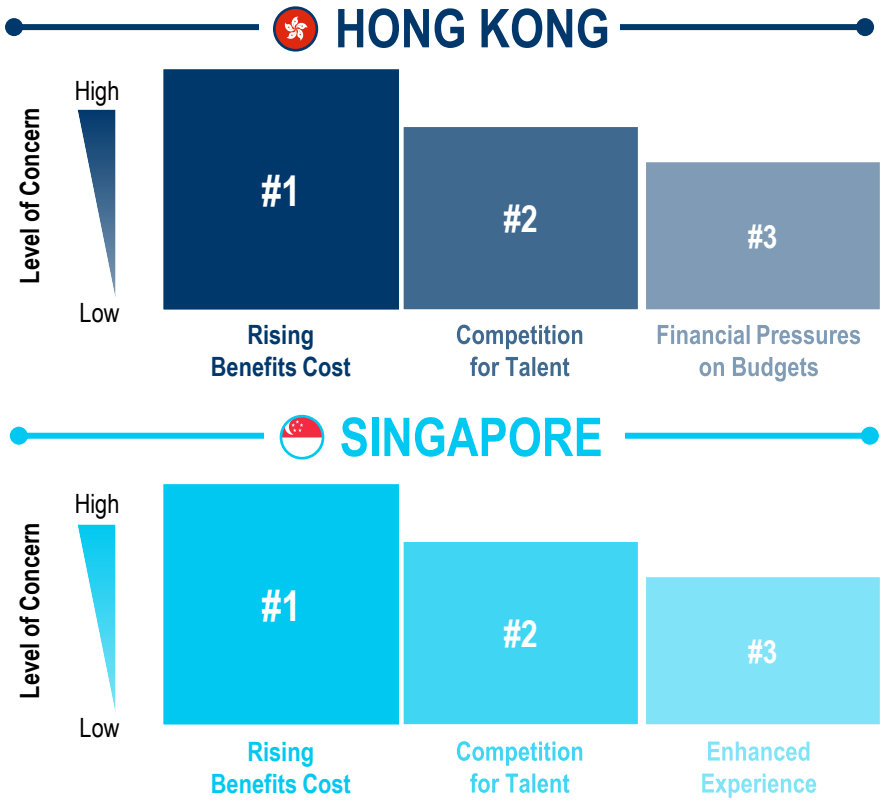
A key reason for this is the rising benefits cost, identified as the #1 concern for employers in both Singapore and Hong Kong, ahead of other concerns such as competing for talent or delivering an enhanced experience for employees.

This divergence of concerns between employees and employers has ultimately led to a mismatch between employer offerings and employee expectations.

However, employers' concerns differ, as rising cost of benefits programmes is currently top-of-mind, drastically relegating employee financial well-being as a factor when designing programmes

Biggest Issues Shaping Benefits Strategy

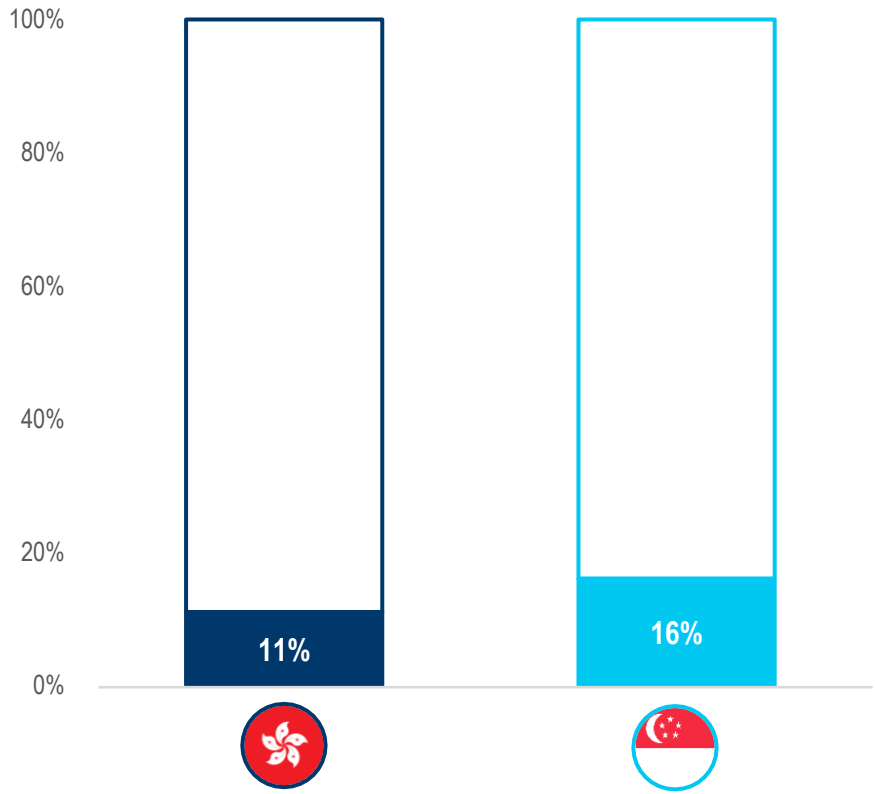
Ranked by Level of Concern, 2025



Rising benefits cost is employers' number one concern, ahead of competing for talent…

Employer Perspective

% with Employee Financial Well-being as Main Goal of Benefits Programmes, 2025



…leading to financial well-being being very few employers' core motivation when designing benefits programmes…

Source: Willis Towers Watson, The Chartered Institute of Personnel and Development, Quinlan & Associates analysis

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THE WAY FORWARD

KEY TAKEAWAYS

With employers and employees having conflicting concerns, adopting a lower-cost solution that cuts employee support or a higher-cost solution that leaves a burning hole in employers' pockets is sub-optimal.

Employers need to find a solution to the white space posed by the lack of a route that offers both lower costs for themselves and higher support for their employees.

As such, there is a need for a solution that can meet both stakeholders' requirements by providing employees with their desired support while still being economical for employers to afford

Matrix of Potential Routes

Employer Costs vs. Employee Support



Source: Quinlan & Associates analysis

Comparative Analysis

Employee Preference vs. Employer Preference

	Employer Preference	*Employee Preference*	***Overall Preference***	
ROUTE 1	Higher Costs	Higher Support	**Moderate**	Preferred by employees for its stronger support, but not by employers due to high costs
ROUTE 2	Higher Costs	Lower Support	**Low**	Preferred by neither employers for its higher cost nor employees due to weaker support
ROUTE 3	Lower Costs	Lower Support	**Moderate**	Preferred by employers for its more economical cost, but not by employees due to weaker support
ROUTE 4	Lower Costs	Higher Support	**High**	Preferred by both employers for its economical cost and employees due to stronger support provided to them

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SECTION 2

FREE TO FUND

Endowus QUINLAN &ASSOCIATES

RISK & COVERAGE BY FINANCIAL INSTRUMENT

KEY TAKEAWAYS

The level of regulatory compliance risk varies by type of financial instrument, with derivatives, due to their sizeable asymmetric upside on offer, being the riskiest, followed by stocks and bonds, which can be affected by market manipulation or access to confidential information, collective investments offering lower risk.

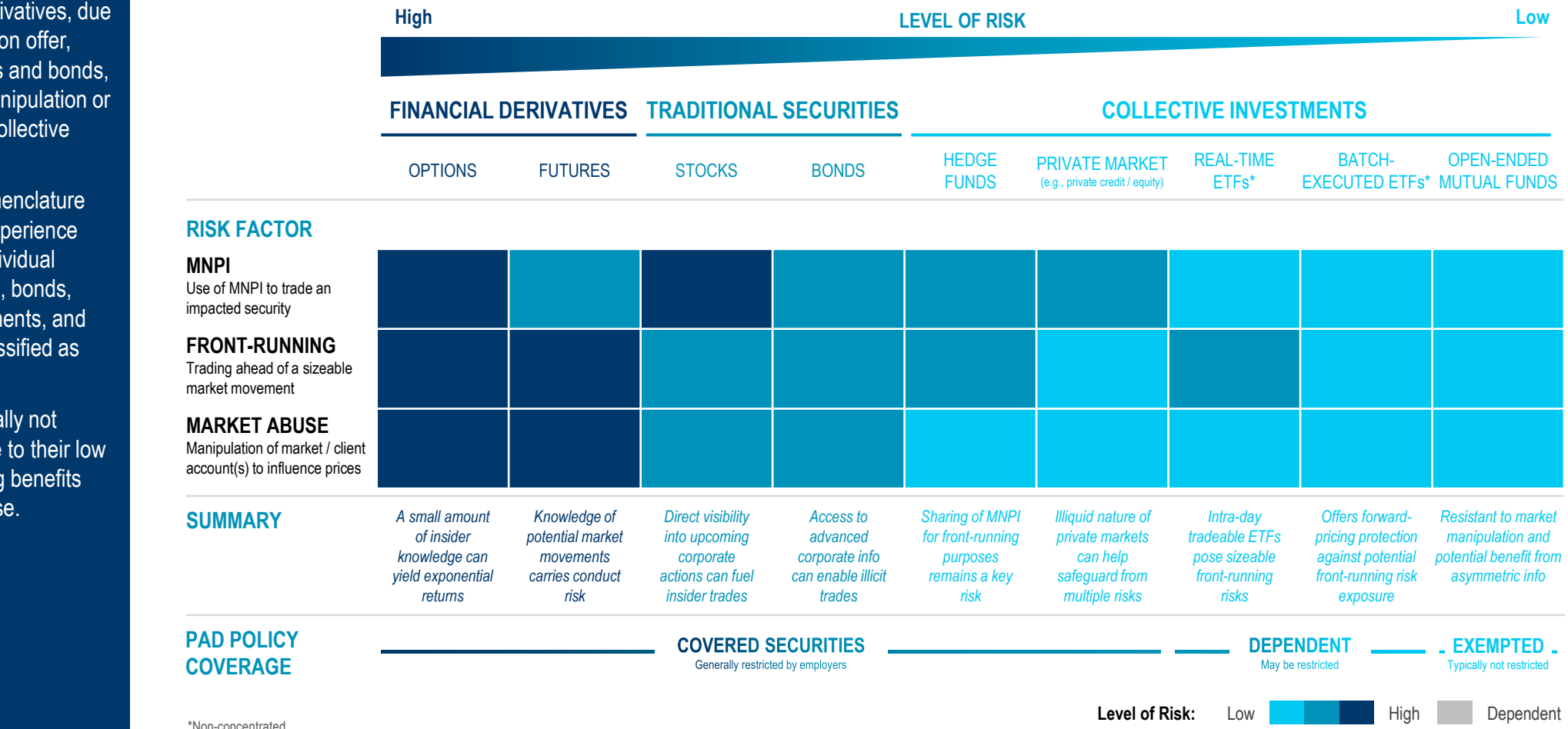
"Covered Securities" is industry nomenclature for those securities that generally experience employee PAD restrictions (e.g., individual stocks), with options, futures, stocks, bonds, hedge funds, private market investments, and potentially ETFs generally being classified as Covered Securities.

Open-ended mutual funds are typically not classified as Covered Securities due to their low risk of yielding MNPI or front-running benefits and lack of potential for market abuse.

Not all financial instruments carry the same PAD compliance risk, with financial derivatives, traditional securities, and some collective investments being classified as "Covered Securities" due to high risks

Types of Financial Instruments

Level of Risk and Type of PAD Policy Coverage



*Non-concentrated

Source: Quinlan & Associates analysis

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OPEN-ENDED MUTUAL FUNDS

KEY TAKEAWAYS

Open-ended mutual funds without any conflict of interest (e.g., not sold or managed by the employer) are generally exempt from the restrictions, such as pre-clearance and minimum holding periods, faced by employees when investing in other Covered Securities.

This results in a much lower compliance burden for both employees and their employers when the former invests in unrestricted open-ended mutual funds.

Open-ended mutual funds, not classified as a "Covered Securities", grant employees an exemption from typical investment compliance requirements, thereby lowering the regulatory burden

Open-Ended Mutual Funds

Regulatory Standing of Hong Kong SFC

> Q45: Can employees trade in open-ended mutual funds without reporting to senior management of the firm as required in **para. 12.2(b)(vi)?**
>
> A: Some firms generally encourage their employees to invest in open-ended mutual funds. Such investments do not require pre-clearance by the senior management of the firm as employees do not have discretion to direct fund as to individual security purchases. We agree that the reporting to senior management may not be necessary for the trading of open-ended mutual funds. However, we believe that a firm must, in order to guard against any possible impropriety related to employees dealing, put in place adequate preventive internal controls. These should include and are not limited to:
>
> 1. procedures to govern the flow of price sensitive information between divisions/departments;
> 2. procedures to ensure that employees do not deal in securities or futures contracts where there is probable front-running or use of non-public information which can reasonably be expected to materially affect prices of those securities and futures contracts upon release to the market; and
> 3. a system to explain concerns/implications to employees, such as the need to refrain from investment in sector funds in case of conflicts of interest.

EMPLOYEE-LEVEL COMPLIANCE

- **Pre-clearance** — May not require permission prior to trading open-ended mutual funds
- **Reporting** — May not need to report trading of open-ended mutual funds
- **Restricted Funds** — Funds with conflict of interest (e.g., sector-specific) to be avoided

EMPLOYER-LEVEL COMPLIANCE

- **Material Non-public Information** — Flow of price-sensitive information needs to be controlled
- **Front-running** — Procedures need to be in place to prevent front-running activities
- **Communication** — Proper communication to employees on concerns, implications, etc.

May Be Exempted Not Exempted

Comparative Regulatory Analysis

Open-Ended Mutual Funds vs. Other Covered Securities

COMPLIANCE EXEMPTIONS	OPEN-ENDED MUTUAL FUNDS*	OTHER COVERED SECURITIES**
Account Disclosure — Whether a dedicated trading account need not be disclosed	✓	✗
Trade Pre-clearance — Whether trades may take place without pre-clearance approval	✓	✗
Minimum Holding Period — Whether a minimum holding period may be waived	✓	✗
LEVEL OF COMPLIANCE BURDEN		
Regulated FI Employer — Lower with open-ended funds	Low	High
Regulated FI Employee — Lower with open-ended funds	Low	High

Preferred Typically Exempted Typically Not Exempted

*Excluding open-ended mutual funds wherein the employer serves as an investment adviser, sub-adviser, principal underwriter, asset manager, or in some other capacity that risks a conflict of interest (e.g., asset manager employees buying their own firm's funds)
**E.g., stocks, futures, options, etc.
Note: While Singapore MAS does not have an explicitly written policy on lighter regulations for open-ended mutual funds in particular, it has been observed based on PAD policies of firms to be less strict
Source: SFC, disclosures by various FIs, Quinlan & Associates analysis

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BROAD BATCH-EXECUTED ETFs

KEY TAKEAWAYS

When executed in real-time, ETFs can carry a front-running risk, with concentrated ones further posing MNPI-related risks.

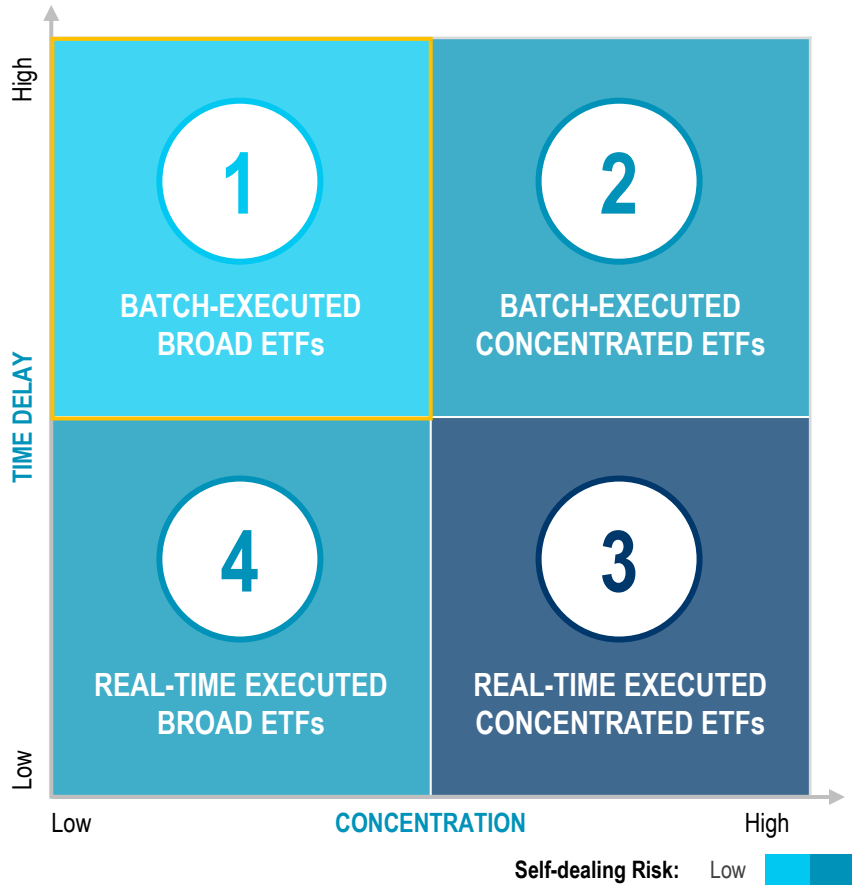
However, once-daily batched ETF execution, such that employees cannot choose the moment of execution or know the execution price when placing the order, further strengthened by no order cancellation or amendment requests being fulfilled past a cut-off deadline and a strict execution window being followed, can offer robust forward-pricing protection.

Excluding concentrated ETFs can further mitigate MNPI exposure, together making broad batch-executed ETFs another compliant investment option, besides open-ended mutual funds, that can also be pre-approved by employers for their employees to invest into.

Broad batch-executed ETFs can offer forward-pricing and MNPI exposure protection similar to open-ended mutual funds, making them another suitably compliant investment product choice

Matrix of ETF Types

Time Delay vs. Concentration



TIME DELAY (Y-AXIS)

Gap between time of order placement and time of execution

CONCENTRATION (X-AXIS)

Level of investment concentration in a single security

Classification and Implications

INCREASING LEVEL OF RISK

1 **BATCH-EXECUTED BROAD ETFs**
Employee doesn't choose the moment – or know the price – of execution, with broad-based nature curtailing MNPI risk

2 **BATCH-EXECUTED CONCENTRATED ETFs**
Offers forward-pricing protection, but concentrated ETFs (i.e., high investment in a single security) carry MNPI risk

3 **REAL-TIME EXECUTED BROAD ETFs**
Removes MNPI risk associated with concentration, but does not offer safeguards against front-running

4 **REAL-TIME EXECUTED CONCENTRATED ETFs**
Carries significant front-running and MNPI risk exposure in case of employee operating close to the market

Self-dealing Risk: Low — High Compliant ETF Products

Source: Endowus, Quinlan & Associates analysis

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MITIGATED SELF-DEALING RISK

KEY TAKEAWAYS

From determining what to buy to when to sell, key investment decisions that can be influenced by an employee's conflicts of interest (e.g., possession of MNPI, etc.) are outsourced to a fund manager or index.

This mitigates employee self-dealing risk, as sensitive calls are now being taken by a third-party, removing the need for employers to monitor individual trades and scrutinise timing, and for employees to worry about compliance requirements.

The self-dealing risk is being substantially reduced in case of fund / ETF products as sensitive investment decisions get outsourced by the employee to the fund manager / index

Investment Decision-making

Single Security Investment vs. Diversified Fund Investment

✓ Favourable / Low - Moderate / Medium ✖ Unfavourable / High

	SINGLE SECURITY INVESTMENT		DIVERSIFIED FUND / INDEX INVESTMENT	
STEPS	**RISK**	**RESPONSIBLE PARTY**	**RISK**	**RESPONSIBLE PARTY**
SECURITY SELECTION Which security to purchase	✖	EMPLOYEE Employee selects each individual security	✓	FUND MANAGER / INDEX Fund manager / index picks the securities
PURCHASE TIMING When to purchase the security	✖	EMPLOYEE Employee attempts to time the purchase	✓	FUND MANAGER / INDEX Fund manager / index times investment
INVESTMENT REBALANCING How to rebalance portfolio	✖	EMPLOYEE Employee manages portfolio diversification	✓	EMPLOYEE & FUND MANAGER / INDEX Both rebalance, but at different level*
CASH CALL How much dry powder to keep	✖	EMPLOYEE Employee determines the cash to keep	✓	EMPLOYEE & FUND MANAGER / INDEX Both take cash call, but at different level*
SECURITY DIVESTMENT Whether to sell off a security	✖	EMPLOYEE Employee decides which security to sell	✓	FUND MANAGER / INDEX Fund manager / index picks security to sell
SALE TIMING When to sell off and exit the position	✖	EMPLOYEE Employee attempts to time the sale	✓	FUND MANAGER / INDEX Fund manager / index times the divestment

THE EMPLOYEE IS PLAYING AN ACTIVE, HANDS-ON ROLE, RISKING POTENTIAL CONFLICT OF INTEREST

THE FUND MANAGER OR INDEX IS IN THE DRIVER'S SEAT, DISINTERMEDIATING THE EMPLOYEE FROM POTENTIAL CONFLICTS

*Employee at the overall portfolio level (e.g., distributing cash investments across different funds), fund manager at the fund-level, and the entity running the securities index at the index-level

Note: Sectoral funds, own-firm funds and stale-NAV situations are residual risks of fund investments; the default assumption is that the Fund Platform is compliant, however, employers should retain the option to ring-fence in or ring-fence out specific funds based on internal compliance policies or desired employee access

Source: Quinlan & Associates analysis

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FUNDS-BASED INVESTMENT SOLUTION

KEY TAKEAWAYS

Encouraging employees to invest in fund products that are pre-approved by a regulated third-party funds platform could offer a novel solution.

Employers may tie up with a vendor that provides access to a compliant list of funds that removes any self-dealing risk and communicates associated policies / rules to their employees, alongside the benefits of investing in them.

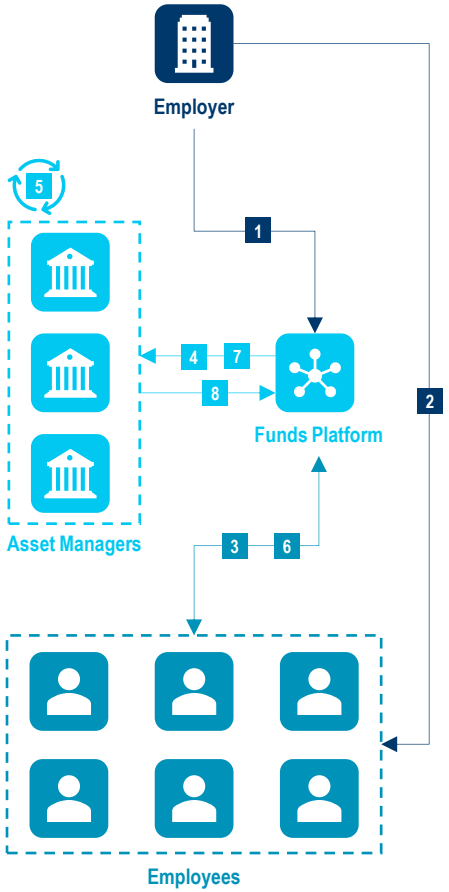
Employees, benefiting from a smoother investing experience and access to wealth advice, are likely to shift their investment allocation from individual securities that draw much scrutiny and require additional work to funds.

The asset manager in charge of the fund or index can invest the money independent from the employees, thereby substantially reducing PAD concerns.

A funds-based investment solution, wherein an employer first approves certain products or characteristics for an employee to then invest in, can solve pain points for both employers & employees

Process Flow

Involving Employer, Employees, and Third-parties



Employer | Employee | Third-party Entities

1 EMPLOYER TIES UP WITH A PLATFORM OFFERING COMPLIANT PRODUCTS
The employer pre-approves a select basket of fund products / characteristics screened by a third-party platform

2 EMPLOYER ORIENTS EMPLOYEES ON THE NEW FUND-BASED INVESTING PROGRAMME
The employer communicates the pre-approved funds initiative to employees, encouraging its uptake by them

3 EMPLOYEES INVEST IN PRE-APPROVED FUNDS VIA THE FUNDS PLATFORM
Employees receive wealth advice from the funds platform and transfer money to invest in its pre-cleared products list

4 FUNDS PLATFORM ROUTES MONEY TO THE ASSET MANAGER
The employees' investment amounts are routed by the funds platform to the corresponding asset manager

5 ASSET MANAGER MAKES INVESTMENT DECISIONS
The asset manager takes charge of investment decisions concerning the employees' invested money

6 EMPLOYEES PLACE REDEMPTION REQUEST
The employees may ask the funds platform to redeem their investment to finance purchases, switch investments, etc.

7 FUNDS PLATFORM FORWARDS REDEMPTION REQUEST
The employees' redemption request is routed by the funds platform to the corresponding fund's asset manager

8 ASSET MANAGER PROCESSES REDEMPTION REQUEST
The asset manager facilitates the redemption request by paying out the amount due to the employee

The Employer's Involvement is Minimised, Greatly Reducing Its Administrative Compliance Workload

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REDUCED COMPLIANCE WORKLOAD

KEY TAKEAWAYS

At present, with employees choosing to invest in individual securities, each trade needs to be particularly approved, monitored, and reconciled by employers, posing an infinite set of possible permutations (e.g., security selection, timing, quantity, etc.) that create heavy compliance workloads.

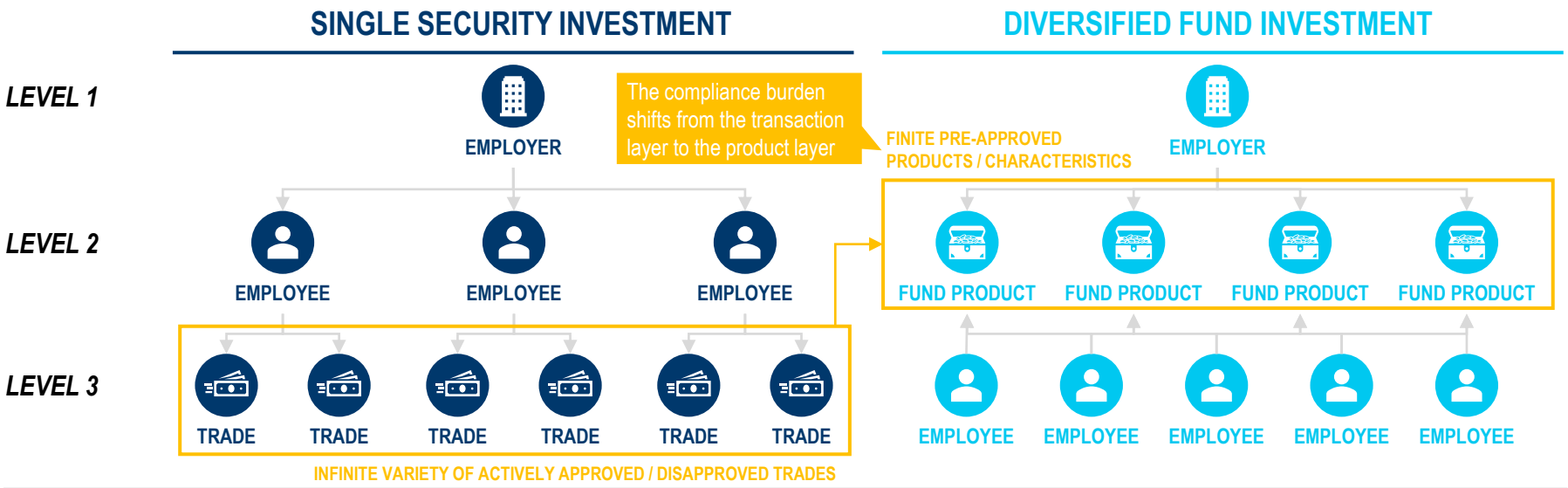
However, if employees instead invest in pre-cleared funds, then the compliance burden shifts from an infinite layer of unique trades to a finite layer of fund products that have already passed compliance checks before being opened to employees.

Instead of individually approving each fund product, employers can further choose to approve broad fund product characteristics (e.g., max single security exposure, etc.) to further cut down on operational strain, greatly reducing the volume, frequency, variation, and complexity of investments that need to be scrutinised by an employer for compliance purposes.

The compliance burden shifts from the transaction-level to the product-level, as employees no longer select from an infinite universe of individual securities, but rather from a finite list of compliant products

Regulatory Compliance Layer

Single Security Investment vs. Diversified Fund Investment



VOLUME	✗	Creating a diversified investment portfolio consisting of individual securities requires a greater volume of investing / divesting	✓	Buying a diversified product / set of products requires far less investment activity on the employee's end
FREQUENCY	✗	Purchase of individual securities may warrant market timing, necessitating timely purchase and sale	✓	A diversified fund may be expected to have a longer holding period as compared to an individual security
VARIATION	✗	There is an infinite universe of possible security investments in terms of selection of the particular security, timing, and quantity	✓	There is a finite universe of geographies, sectors, and other factors from which a concise list of funds may be pre-approved
COMPLEXITY	✗	Compliance checks on each unique individual trade can involve various complexities	✓	Clearing a pre-approved list of a few fund products that adhere to a template set of guidelines can provide simplicity

Approval Layer ✓ Favourable / Low - Moderate / Medium ✗ Unfavourable / High

Source: Quinlan & Associates analysis

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RISK & EFFORT REDUCTION

KEY TAKEAWAYS

A considerable decrease in the amount of regulatory compliance burden may be expected upon adoption of pre-approved funds, especially during and post-investment.

Employees will experience far fewer restrictions with no need to seek prior approval before investing in pre-approved funds, thereby mitigating any investment delays.

With no minimum holding period requirement, employees can seamlessly sell off their open-ended mutual fund / batch-executed ETF investments as well.

The administrative burden is further reduced by automatic, timely sharing of trade confirmations, account statements, and any other details by the fund platform with the employer.

The compliance effort required to be expended decreases across the employee investing lifecycle due to lower regulatory risk

Employee Investing Journey

Risk and Effort Reduction

SIZEABLE REDUCTION IN COMPLIANCE RISK AND EFFORT REQUIRED

PRE-INVESTMENT	DURING INVESTMENT	POST-INVESTMENT
ACCOUNT DECLARATION New employees will still be required to declare any existing investment accounts that they or related parties have	**RESTRICTIONS CHECKING** Restricted lists will be far shorter and less frequently changing, with a focus on sectoral and related fund products	**CONFIRMATION SHARING** Auto-forwarding of reconciliation information by the funds platform will help reduce risk of lag / missing information
HOLDINGS DECLARATION New employees will still be required to declare any existing investments that they have made	**APPROVAL SOLICITING** No pre-trade clearance will be required if employees are trading permissible fund products	**MINIMUM HOLDING PERIOD** No minimum holding period restrictions may be required to be placed on permissible fund products' sale
APPROVED BROKER USE New employees will still have to be nudged to use the employer-approved funds platform for transacting	**DELAYED EXECUTION** No execution delays for mutual funds, while ETFs will be transacted in batches	**UPDATES SHARING** The funds platform may automatically share relevant information on a periodic basis

Risk & Compliance Effort Reduction: High ↑ ↗ → ↘ ↓ Low ▭ Most Impacted

Source: Quinlan & Associates analysis

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KEY BENEFITS FOR EMPLOYEES

KEY TAKEAWAYS

Employees gain clarity around what products they can seamlessly invest in or divest without any timing restrictions, with no need for pre-trade clearance when transacting pre-approved fund products.

This enables them to enjoy greater flexibility of choice when choosing to rebalance their portfolio or seeking investment exposure to different geographies, themes, strategies, and asset classes.

The compliance overhang faced by employees is reduced due to the elimination or automation of associated administrative tasks, which, combined with outsourcing of investment decision-making to fund managers, greatly reduces time wastage, allowing for improved at-work productivity.

Employees' investing experience receives a major boost thanks to added: (1) Clarity; (2) Choice; and (3) Composure, saving them time, improving morale, and uplifting overall productivity

Employee Benefits
3Cs

CLARITY

PERMISSIBLE PRODUCTS
Transparency of which fund products are pre-approved versus which investments require pre-trade clearance

INVESTMENT TIMING
Certainty of which fund products may be invested in and divested out of at any time without delay

REGULATORY COMPLIANCE
No need to be afraid of accidental regulatory compliance violations due to a smoother investing journey

WHAT & WHEN CAN I INVEST IN?

Greater clarity around what investments are permissible and when

CHOICE

GREATER DIVERSIFICATION
Ease of making diversified investments across different geographies, themes, strategies, and asset classes

QUICKER RE-BALANCING
Ability to quickly re-jig allocation or deploy cash due to no pre-trade clearance or minimum holding period

BOOSTED LIQUIDITY
Lower liquidity risk due to no minimum holding period requirements, thereby allowing sale at any point in time

HOW CAN I OPTIMISE INVESTMENTS?

More flexible access to a wider variety of investment options without timing restrictions

COMPOSURE

NO PRE-TRADE CLEARANCE
No need to apply for pre-trade permissions before investing in pre-approved open-ended mutual funds / batch-executed ETFs

NO MANUAL SUBMISSIONS
Automatic sharing of reconciliation information by the funds platform reduces the need for manual sharing by employees

NO TIME WASTING
Saving of time otherwise spent on administrative compliance work or investment trades brainstorming

HOW CAN I STAY COMPLIANT?

Reduced unproductive time thanks to Improved simplicity of the administrative process

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RESULTING EMPLOYEE IMPACT

KEY TAKEAWAYS

With an improved financial situation thanks to their employer's initiative, employees are expected to be significantly more satisfied with their jobs.

This morale boost, along with a reduction in personal finance distractions, will lead to sizeable productivity gains that should result in improved employee performance levels.

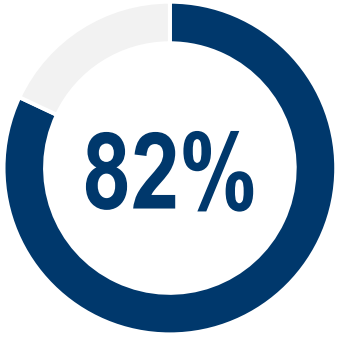
Furthermore, staff turnover may decrease as employee loyalty improves on the back of appreciation for their employer's effort and better financial health.

Consequently, employees' satisfaction, productivity, and loyalty towards their employer are all anticipated to receive a major boost

Quantitative Impact on Employees

%, 2024 (sample size = 500)

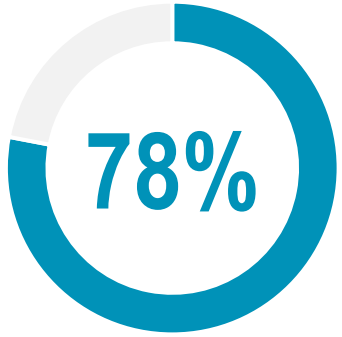
SATISFACTION



Agreed or strongly agreed that they would feel more satisfied in their job when they have good financial preparedness

Employee morale is expected to significantly improve on the back of their improved financial situation…

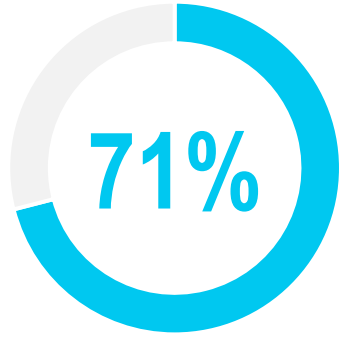
PRODUCTIVITY



Agreed or strongly agreed that being financially prepared would help them be less distracted and more productive at work

…allowing employees to better focus at work rather than being distracted by personal finance activities…

LOYALTY



Agreed or strongly agreed that they are less likely to consider leaving their jobs when their workplaces provide support to help them be financially prepared

…and improving their loyalty towards their employer, thereby leading to a likely reduction in employee turnover

Source: Endowus, Quinlan & Associates analysis

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POTENTIAL P&L IMPACT

KEY TAKEAWAYS

Adoption of a suitable pre-approved funds-based investing solution can unlock a plethora of cost-saving and revenue-boosting avenues for an employer.

On the cost front, the lower regulatory risk and administrative compliance burden will consequently also lower potential penalties and operating expenses, as fewer resources (e.g., manpower, technology, etc.) will be required.

The improved investing experience should make the workplace more attractive to both current and potential employees, thereby reducing staff attrition and heightening appeal to high-quality talent.

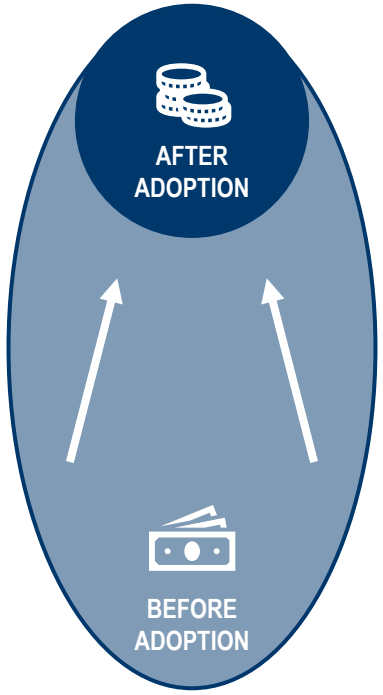
This should translate to revenue gains through higher staff productivity being unlocked via minimisation of administrative burdens, leading to improved client outcomes.

The employee gains translate to a net positive P&L impact for their employers as well, as a result of various cost savings and revenue gains

Financial Upside
Cost and Revenue Impact

COST IMPACT

EXPENSES



SOURCES OF COST SAVINGS

1. **LOWER REGULATORY COSTS**
   With reduced risk of compliance violations, the risk of potential fines by the regulator and legal expenses also gets reduced

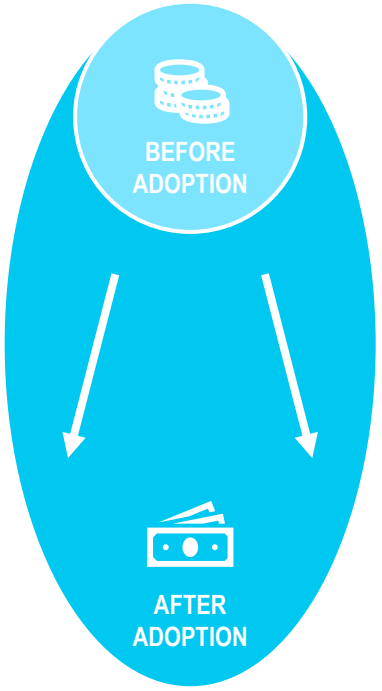
2. **LOWER OPERATING EXPENSE**
   There is a lesser need for staff, technology and other monitoring / review / surveillance resources when involving pre-approved funds

3. **LOWER STAFF ATTRITION**
   Improved employee satisfaction is likely to reduce churn, thereby saving costs on recruitment and training of replacements

REDUCTION IN COSTS

REVENUE IMPACT

EARNINGS



SOURCES OF REVENUE GAINS

1. **HIGHER TALENT QUALITY**
   On the back of a compelling employee investment proposition, the firm's ability to attract better talent should receive a boost

2. **HIGHER STAFF PRODUCTIVITY**
   With lower administrative compliance work required to be carried out, employees should have more time freed up to work

3. **HIGHER CLIENT SATISFACTION**
   Increased employee capacity for client-facing time / improved client output delivery should raise client satisfaction and revenue potential

UPLIFT IN REVENUES

Source: Quinlan & Associates analysis

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SECTION 3

CASE STUDY – ENDOWUS

Endowus QUINLAN &ASSOCIATES

ENDOWUS EMPLOYEE INVESTMENT SOLUTION

KEY TAKEAWAYS

Endowus is an independent, fee-only wealth and fund platform with USD 13 billion in assets under advice that helps facilitate compliant investments by employees working in roles posing conflicts of interest via its full-service digital wealth management platform that encompasses structural safeguards purposefully designed to protect client assets.

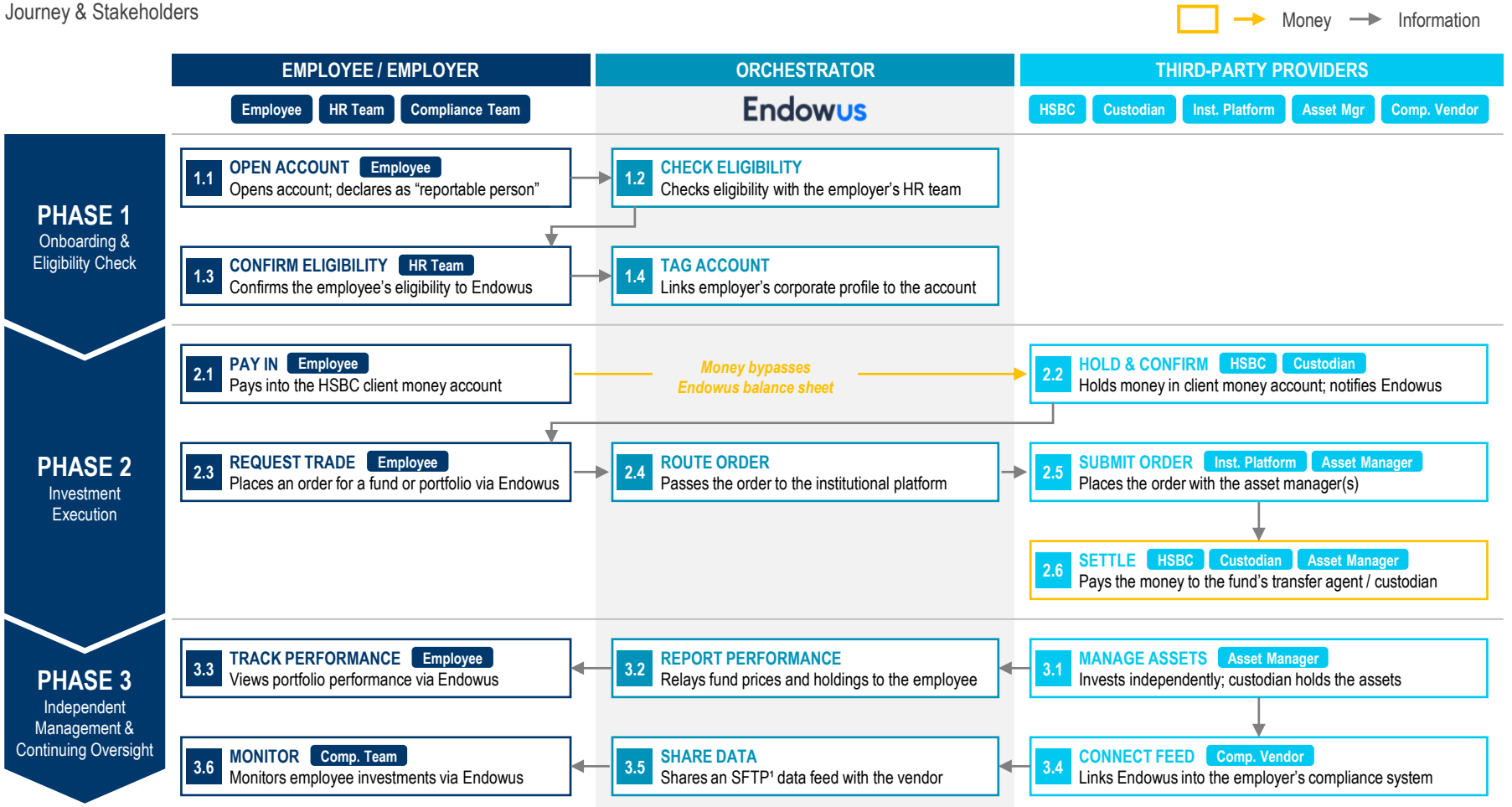
Following a seamless onboarding process, client deposits are kept in segregated "Client Money Accounts" and used for the sole purpose of growing employee investments, with all invested client assets ultimately being held by fund-appointed custodians, thereby being segregated from Endowus at every step of the way.

Fund managers / indices make investment decisions independently of both Endowus and the serviced employees, ensuring disintermediation of any conflicts of interest.

Endowus provides a one-stop-solution, orchestrating every step between employers and third-party providers, while employee money stays segregated from Endowus throughout

Endowus Employee Investment Solution

Journey & Stakeholders



[1]Secure File Transfer Protocol

Source: Endowus, Quinlan & Associates analysis

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KEY VALUE PROPOSITION

KEY TAKEAWAYS

Regulated by the Hong Kong SFC and Singapore MAS, Endowus offers a compliant solution for strictly regulated employers to improve their talent outcomes while also streamlining complex and manual operations through automation, integrated data feeds, and digitisation.

For employees, Endowus offers a more convenient, flexible, and easy-to-understand user experience that is quick to adopt, economical to utilise, and compliant from end-to-end, giving both employees and their employers real-world benefits coupled with regulatory comfort of mind.

Endowus' solution has been built with compliance in mind and is seamless to use for both employers as well as their employees

Stakeholder Benefits
Employers and Employees

EMPLOYER BENEFITS
(i.e., what you gain from Endowus' solution)

OPERATIONAL

AGILE
Ability to launch within just ~4-5 weeks of programme design confirmation (i.e., eligibility, fees, funds list, onboarding / offboarding procedure)

INTEGRATED
Easy integration with common third-party compliance vendors (e.g., StarCompliance, MyComplianceOffice) and in-house compliance systems.

ASSURED
Strict third-party assurance framework with regular penetration and continuous attack surface testing

AUTOMATED
Automated reporting and data feed (e.g., auto-forwarding of employee monthly statements, summarised quarterly holdings statements)

REGULATORY

LICENSED
Licensed in Hong Kong (SFC BQR225, MPFA IC00181) and Singapore (MAS 101051)

COMPLIANT
Provision of only compliant open-ended mutual funds and batch-executed ETFs, no single securities

RINGFENCED
Blacklisting capabilities to prevent specific employees from investing in certain funds that may pose a conflict of interest

EMPLOYEE BENEFITS
(i.e., what your employees gain from Endowus' solution)

OPERATIONAL

SEAMLESS
Simplified onboarding and reporting requirements for a quick and easy-to-understand user experience

SEGREGATED
No commingling of uninvested cash balances, with use of segregated client money accounts

EDUCATIVE
In-person financial wellness workshops to enable better financial decisions when making investments

AUTOMATED
Ability to set up automated recurring investment plans in desired funds to reduce repetitive manual effort

ECONOMICAL

NO ADDED FX SPREAD
Competitive FX rates with no added spread to wholesale rates received by Endows

LOW FEES
Preferential rates on offer (e.g., cash transfers to local HSBC account minimise telegraphic transfer charges)

REBATES
Potential 100% trailer fee rebate offering possible in case of in-house funds provided by employer

Source: Endowus, Quinlan & Associates analysis

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IMPACT ON EMPLOYEE FINANCIAL WELLNESS

KEY TAKEAWAYS

FS professionals on an employee investment programme tend to add more money to their investments than other finance professionals, showcasing a greater willingness to engage.

These investments are found to generate relatively higher average money-weighted returns as well, helping better set-up employees to meet their long-term financial needs (e.g., retirement).

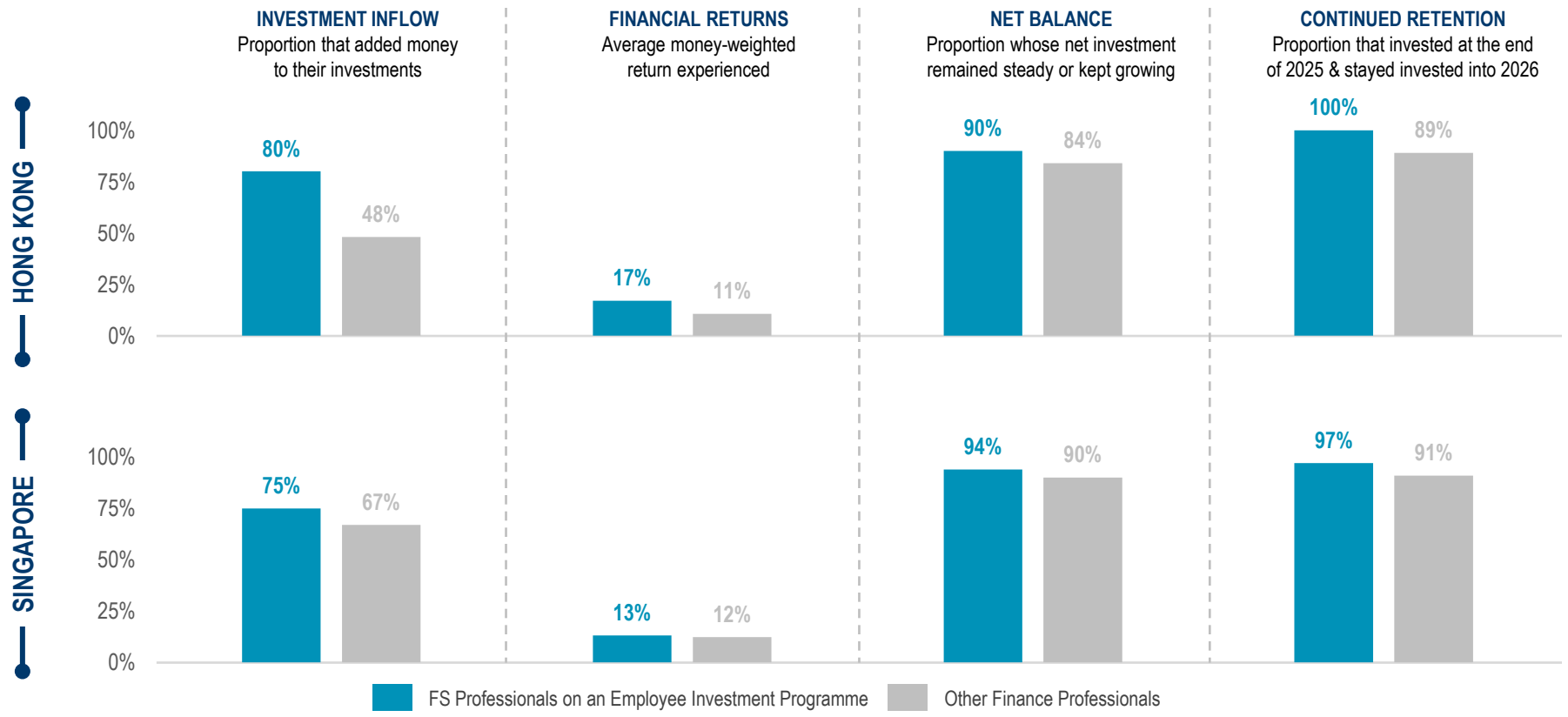
Their financial discipline also receives a boost, as a greater proportion of them maintains neutral / growing net investment balances and continues to stay invested into the following year as well.

With this gap holding true in both Hong Kong and Singapore, there is a clear positive impact of Endowus on employee investing habits.

When investing with Endowus, financial services ("FS") professionals on an employee investment programme experience much healthier financial outcomes compared to other finance professionals

Quantitative Impact Delivered

%, 2025



Note: Based on Endowus platform data for 31 Dec 2024 to 31 Dec 2025. Returns are average money-weighted returns (XIRR) in local currency (HKD), net of fees, excluding the top and bottom 1% of values. "Added money" refers to clients whose net new money in 2025 was positive. "Remained invested" refers to clients invested at the end of 2025 who were still invested in 2026. It is critical to note that these figures represent historical, aggregate performance across highly diversified portfolios and distinct asset risk profiles; they do not imply that the platform structure inherently guarantees superior returns, as individual outcomes remain entirely dependent on the specific underlying funds selected and broader market movements.

Source: Endowus, Quinlan & Associates analysis

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TRACK RECORD

KEY TAKEAWAYS

Endowus has become a preferred investment platform of choice for a growing number of FIs, with many live and in-pipeline clients across Hong Kong and Singapore, including global asset manager(s) and global bank(s).

With an estimated USD 80 million worth of annual cost savings, clients have experienced a tangible financial upside, with hundreds of their employees investing vast sums of their life savings via Endowus to greatly benefit from the compliant investing solution offered.

For instance, a single American fund manager client has witnessed 497 of its employees register with Endowus to invest a whopping USD 100 million of their hard-earned money, showcasing the significant on-ground appeal of the investing solution amongst employees.

Endowus is already trusted by several clients in the strictly regulated finance industry in both Hong Kong and Singapore, with a robust track record of delivering real-world value-add

Testimonials
Client Perspectives

"Endowus Employee Investment Platform **makes investing simpler, more accessible and more cost-effective**, helping our employees invest with their individuals goals in mind. Whether building wealth for the long term, planning for retirement or pursuing a personal milestone, it's about **giving our people greater confidence** to invest towards what matters to them and build a brighter future together."

CEO, Asia
Global Asset Manager

"The Endowus Employee Solution has **made accessing in-house funds more cost-effective** for our employees. It provides our staff the opportunity to invest in a wide range of our own funds in an efficient and digital-first manner."

CEO, South Asia
European Asset Manager

"**Our people are at the heart of what we do**, and we want to help them build wealth over the long term. Long-term investing rewards patience and discipline, and Endowus **makes it easy for our employees to get started and stay on track**. We are delighted to have such a good platform to help us do that."

Managing Director, Head of Distribution, Greater China
US Asset Manager

Client Case Study
US Asset Manager

PROBLEM	SOLUTION
PAPER-BASED INEFFICIENCY Paper-based programme made it difficult for staff to ascertain their investment positions & performance	**REAL-TIME & DIGITAL** Real-time access to performance and daily subscription / redemption information made available daily
NO RECURRING FACILITY Once a month subscription / redemption cadence with no recurring facility created friction	**RERCURRING PLANS** Recurring investment plans made available for repeat investment in desired funds
TIME DELAYS Delayed subscription / redemption monies occurred due to reconciliation / settlement mismatches	**IMMEDIATE RECOGNITION** Subscription / redemption is immediately recognised for execution in next applicable trade day
NEEDLESS FX COSTS Overseas telegraphic transfer even for HKD/SGD, resulting in unnecessary charges	**LOCALISED TRANSFERS** Use of cash transfers to local HSBC account to minimise telegraphic transfer charges
MANUAL INTENSIVENESS Manual work was required to facilitate the subscription process, any requests, and alumni management	**SEAMLESS PROCESSING** Effortless handling of operational and HR requirements, including employee onboarding, alumni management, etc.

497
Registered Employees

USD 100mn
Assets Under Advice

Source: Endowus, Quinlan & Associates analysis

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SECTION 4

HOW WE CAN HELP

Endowus QUINLAN &ASSOCIATES

WHERE WE CAN SUPPORT YOU

KEY TAKEAWAYS

Together with Endowus, Quinlan & Associates can support your organisation in boosting employee retirement preparedness, satisfaction, and retention across the following pillars:

1. PAD Compliance Framework
- Current-state Assessment
- Customised PAD Blueprint Design
- Transformation Roadmap
- Change Management

2. Employee Investing Solution
- Programme Design
- Compliance Data Feed Set-up
- Funds Onboarding *(only if applicable)*
- Workshop Delivery

Quinlan & Associates and Endowus can support regulated organisations in fine-tuning their employee investing policies and operating model by delivering compliant solutions tailored to their specific needs

PAD COMPLIANCE FRAMEWORK

QUINLAN & ASSOCIATES

CURRENT-STATE ASSESSMENT	CUSTOMISED PAD BLUEPRINT DESIGN	TRANSFORMATION ROADMAP	CHANGE MANAGEMENT
Assess current PAD policies and operating model vis-à-vis regulatory expectations and industry best practices, to identify areas of improvement	Develop a strategic PAD compliance blueprint tailored to each department's needs, aligned with the organisation's over-arching requirements	Recommend strategic roadmaps with tangible initiatives to drive PAD compliance transformation across the organisation	Deliver bespoke professional and/or technical training modules aimed at shifting employee behaviour and helping overcome inertia

EMPLOYEE INVESTING SOLUTION

Endowus

PROGRAMME DESIGN	COMPLIANCE DATA FEED SET-UP	FUNDS ONBOARDING *(ONLY IF APPLICABLE)*	WORKSHOP DELIVERY
Confirm programme requirements with HR/Compliance/COO office & relevant teams (e.g., compliance, reporting & data feed requirements, whether certain employees require blacklisting of specific funds)	Discuss data report specifications, set-up SFTP server, test files transfers in a test / staging environment and then in a live environment	Provide fund list, check eligibility of funds distribution with institutional partner platforms, conduct due diligence and complete onboarding *Only applicable to asset managers looking to offer in-house funds to employees.*	Deliver in-person financial wellness workshops to empower employees to make better financial decisions to invest for their future

Source: Endowus, Quinlan & Associates analysis

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