1. INTRODUCTION

Our Senior Managers are:	
Name of Senior Manager	**Senior Management Function held**
SOHAL, Sandeep Singh	SOHAL, Sandeep Singh
SOHAL, Sandeep Singh	SOHAL, Sandeep Singh

COMPLETION OF THIS PLAN

Responsibility
The senior personnel will ensure that the firm has sufficient resources and management information in the areas of compliance and training and competence (T&C) and that both are kept under review. It is noted that this information will be required in reporting to the FCA during desk-based audits or focused visits i.e. where the FCA reviews a specific area, for example, T&C, systems and controls, etc.

The firm's senior personnel are ultimately responsible for the ongoing monitoring and review of compliance within the firm and will agree and allocate specific responsibility for producing an annual compliance review in addition to this annual compliance plan. The review will cover the firm's actual compliance performance over the 12 months covered by this plan and will be given to the individuals named on page one of this document.

'By whom'
Senior personnel and other individuals within the firm, e.g., accounts administrators, supervisors, have delegated compliance responsibilities, whereby they are responsible for applying and enforcing the firm's policies, as well as periodically reviewing their suitability, adequacy and effectiveness. Each individual responsible for the relevant area is named within this plan in the 'By whom' column. These individuals will report to the senior personnel within the timescales detailed in this plan regarding their delegated responsibilities.

Frequency of review
The firm is aware that some areas of compliance planning will require more regular review than others; the 'Frequency' column details whether the review period is monthly, quarterly, bi-annually, or annually.

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2. SYSTEMS AND CONTROLS

2.1 Continuity provisions		**By whom**	**Frequency of review**
Key personnel			
Should an individual responsible for a Senior Management Function be absent, the following will assume temporary responsibility:		SMF	Bi-Annually
<<Name of business function>>	**Person temporarily responsible**		
<<eg Operations Director>>	SOHAL, Sandeep Singh		
Should circumstances arise which could result in the appointment continuing, other than as an emergency measure, ie for a period longer than 12 weeks, a permanent appointment will be required for these functions and prior approval will be sought from the FCA. Any individual responsible for a Senior Management Function in an absence situation will be informed of the requirements of the role and will be party to all relevant procedures and responsibilities.			
Business Continuity			
The firm maintains a business continuity plan which is intended to ensure that: ● Contingency plans (fire, flood, etc) are in place ● Systems & IT (security, software licences, etc) are reviewed Copies of the business continuity plan are retained off site and can be easily accessed if an unforeseen event occurs. Business Continuity Plans will be tested and reported on to senior management.		SMF SMF	Annually Annually

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2.2 Internal controls and reporting	By whom	Frequency of review
Compliance meetings involving all senior individuals within the firm are held on a regular basis. In addition, compliance is a standing agenda item at Director meetings. Compliance actions are minuted at such meetings, any requirements identified, and notes made and circulated to all relevant individuals. Additional informal meetings will be held as and when required – for example, where a Director may be aware of a specific compliance risk which requires immediate action.	SOHAL, Sandeep Singh	<<How often do these meetings take place>>

2.3 Business development	By whom	Frequency of review
The Sales Manager / Sales Director is responsible for the firm's business development and they will liaise with the Directors regarding the compliance implications for any change or enhancement to the firm's business strategy. The firm will, through an agenda item at Director meetings, ensure that there are sufficient resources to: ● Support any business development activity and ● Ensure relevant notification is provided to the FCA where required [eg change in shareholdings, new director, etc]	SOHAL, Sandeep Singh	<<How often do these meetings take place>>

2.4 Regulatory updates	By whom	Frequency of review

The firm has access to the FCA (www.fca.org.uk) & FCA notifications newsletters The firm will ensure appropriate staff are kept aware of regulatory changes. Bulletins and other updates will be circulated to advisers and other staff, as relevant, and discussed at regular adviser/staff meetings.	SMF	As notifications are made & weekly review of FCA website – Dissemination across appropriate staff as and when required.

2.5 Reporting to the FCA	**By whom**	**Frequency of review**
• All reporting to the FCA via Reg Data / Gabriel will be completed and forwarded to FCA within the prescribed timescales of 30 business days at the end of the reporting period.	SMF	Reporting Timescales as confirmed by FCA.

2.6 Notifications to the FCA	**By Whom**	**Frequency of Review**
The firm will ensure that it provides timely and accurate information to the FCA. During the ongoing monitoring of the company, if any material breach of any FCA requirement or prohibition occurs (eg failing to comply with Threshold Conditions), the Breaches Register will be completed and the breach reported immediately to the FCA. Where changes to the firm's permitted activities, approved Senior Managers, is required, prior approval will be sought from the FCA before implementation of any such change. If a breach of a conduct rule (as set out in COCON) occurs which results in disciplinary action being taken, breaches committed by an approved Senior Manager will be reported to the FCA within 7 business days of disciplinary action being concluded. If the breach is committed by anyone other than an	SMF	**Bi-Annually**

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approved Senior Manager, the COCON breaches register will be completed and it will be reported to the FCA annually as part of reporting requirements. Firm Details – previously referred to as Standing Data (e.g. firm name, registered office, permissions, name and, if applicable, address of auditor, ARD, etc) - will be checked at least annually within 30 business days of the financial year end by checking the Financial Services register. The firm will either confirm to the FCA, the data is correct or advise of any changes to firm details not previously notified. Directory Data (e.g. names of Certification Employees, Executive and Non-Executive Directors (not approved as a Senior Manager) including date of commencing and ceasing relevant roles) will be notified to the FCA within 7 business days of a change occurring.		

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3. PRUDENTIAL REQUIREMENTS, THRESHOLD CONDITIONS, HANDLING MONEY AND LICENCES

3.1 Regulatory capital	By whom	Frequency of review
The firm is required to maintain adequate capital resources at all times and will do so by ensuring it has accounting systems which clearly identify all income from regulated activities. The firm must retain a capital resource requirement of: the greater of £5,000 or 2.5% of annual regulated income.	Accounts Department	Monthly Review of Accounts.

3.2 Professional Indemnity Insurance (PII)	By whom	Frequency of review
The firm will ensure that PII is in place at the required level each year and is subject to the correct provisions in line with the IDD requirements.	**SMF**	**Annual**

3.3 Threshold Conditions	By whom	Frequency of review

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The firm will ensure continuing compliance with all Threshold Conditions and will make a timely notification to the FCA of any changes to: ● Location of offices ● Effective Supervision ● Appropriate resources ● Suitability ● Business Model <u>Maintaining appropriate resources (TC4)</u> To ensure the firm retains sufficient financial and non-financial resources to support its current and anticipated FCA regulated activities, the firm will undertake a TC4 Review.	**SMF**	**Quarterly**

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3.5 Maintaining other licences	By whom	Frequency of review
The firm will ensure it maintains current and appropriate licenses with the relevant authorities, for example: ● Information Commissioner's Office (for data use)	SMF	Annually

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4. STAFF AND SUPERVISION

4.1 Approved Senior Managers	By whom	Frequency of review
The firm will maintain a record of any disciplinary action taken against any approved Senior Manager. Where disciplinary action is taken as a result of a breach of a COCON requirement, it will be reported to the FCA within 7 days of disciplinary action being concluded. Approved Senior Managers complete a Statement of Responsibility, an annual fit and proper declaration and are subject to a documented annual competency review.	SMF	Annually

4.3 Recruitment and termination	By whom	Frequency of review
The firm has detailed recruitment procedures and supporting documentation and will ensure that all staff are appointed in accordance with these procedures. New staff will be required to sign a declaration form to confirm their understanding of the regulatory requirements.	SMF	Review of Policies & Procedures – Updated Annually.

4.4 Training and competence (T&C) procedures	By whom	Frequency of review

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The firm has detailed T&C procedures which are set out in the firm's T&C plan. The firm's T&C procedures apply to all staff involved in regulated activities Access to the Catalyst-DBC platform is used to assist in the provision of the required frequent regulatory training, the effectiveness of all training activity & material is also evaluated and updated or changed if appropriate.	SMF	Annually

4.6 Outsourced Service Providers	**By whom**	**Frequency of review**
The firm does not yet outsource any services however should this become a requirement, when regulated activities are outsourced to a third-party, vigorous due diligence will be performed. The third party will then be subject to ongoing monitoring and review.	SMF	(Dependant on nature of services they are providing)

5. DEALING WITH CUSTOMERS

5.1 Financial promotions/Stationery	**By whom**	**Frequency of review**
The firm will ensure that all promotions and stationery are given formal approval before they are used. The firm will ensure that its financial promotions/stationery procedures are followed to ensure that they meet CONC 3 regulations, including completion of the Stationery and financial promotions register. Amendments to stationery, must be approved prior to printing to ensure the correct status disclosure statement is used and the item is clear, fair and not misleading in line with Principle 7.	SMF	As & when Financial Promotions are created.

5.3 Sales process review	**By whom**	**Frequency of review**

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The firm provides an <<advise /non-advised>> service to customers. The firm maintains records of its sales processes and these will be reviewed to ensure they remain compliant with FCA requirements and to reflect any issues identified as a consequence of monitoring activity (eg reviews of complaints, T&C, etc). Any changes to the sales processes must be approved prior to their introduction and a written record will be maintained confirming the change(s) made and when they took effect.	SMF	Bi-Annually or as and when required.

5.4 Management information	**By whom**	**Frequency of review**
The firm's management information (MI) will be retained in a manner which allows key data to be produced, when required, to assess the risks posed to the firm in terms of individual personnel and products.	SMF	Monthly

5.5 Complaints procedure and register	**By whom**	**Frequency of review**
The firm will ensure that: ● All complaints are properly dealt with in accordance with the firm's internal complaints procedure ● All staff are made aware of, and have access to, the internal complaints procedure and have confirmed their understanding of its contents ● A copy of the firm's external complaints procedure is available to, and is given to, any customer on request ● The complaints register is updated in line with the firm's internal complaints procedure The MI relating to complaints recorded in the complaints register will be reviewed to identify any trends and, where appropriate, remedial action will be taken.	SMF	Monthly

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6. Responsible Lending	By whom	Frequency of review
In Compliance with Responsible Lending, our policy and processes are reviewed on a Bi-Annually Basis. Monthly audits will take place in the following areas: ● Customer Creditworthiness ● Affordability Where audits take place, this will ensure that the correct processes have been followed when it comes to Responsible lending.	SMF SMF	Bi-Annually Monthly

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7. TCF AND CONDUCT RISK	By whom	Frequency of review
The firm will ensure it follows the principle of Treating Customers Fairly (TCF) throughout its practices and procedures and consider conduct risk matters. TCF will be a standard agenda item at for discussion and review at <<monthly/quarterly/annual>> Director meetings. Senior personnel are required to contribute appropriate TCF/ Conduct Risk management information for review at these meetings. TCF is considered as part of all change projects/decisions at senior management level. <u>Competence of staff</u> We will also monitor staff performance through our T&C scheme (see 4.3 above). **Vulnerable Customers** – Policies and procedures to be updated and maintained – Staff Training	SMF SMF	Monthly Bi-Annually or as required.

8. CONFLICTS OF INTEREST	By whom	Frequency of review
In line with the Principles for Businesses and SYSC 10, the firm will ensure that it can demonstrate its ability to manage conflicts of interest fairly, both between itself and its customers and between a customer and another client. The firm maintains a conflicts of interest policy and a conflicts of interest register. The conflicts of interest register will be reviewed to ensure that any conflicts are being recorded and handled appropriately. The firm's conflicts of interest policy will be reviewed to ensure it remains relevant and is up to date.	SMF	Quarterly

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9. FINANCIAL CRIME	By whom	Frequency of review
In compliance with various legal and regulatory responsibilities, the firm will ensure that it can evidence its efforts to prevent and tackle financial crime. This will include evidence of specific monitoring activity to ensure the effectiveness of relevant systems and controls and periodic risk assessments. Specifically: ● The firm's Anti-bribery & Corruption Policy, the Gifts, Inducements & Hospitality Policy, and the Financial Sanctions Policy will be reviewed to ensure they remain relevant and are up to date . ● The Gifts, Inducements & Hospitality Register will be reviewed to ensure that gifts, inducements and hospitality (whether offered or received) are being correctly recorded and approved.	SMF SMF	All policies are reviewed Annually, unless otherwise stated. G, H & I Register to be reviewed on a monthly basis.

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