Annual Fit and Proper Declaration

**This Fit and Proper Declaration is important and the firm will use it to evidence that it has undertaken the fit and proper assessments required by the FCA.**

**For your own protection you should read and understand this Declaration thoroughly before signing it.**

**If you have any queries or concerns over this declaration you should seek clarification from our Compliance Officer.**

[ ]  Senior Manager Function holder

[ ]  Non-Executive Director

[ ]  Other ‘Directory’/Certificated Person

To comply with the requirements of the FCA under ‘SUP10’ and ‘FIT’, fitness and propriety checks should be made:

* Upon application to carry out a Senior Manager Function, a Certification Function or a NED role;
* Before issuing or renewing a certificate to a Certified Person
* To assess, on an ongoing basis, those performing Senior Manager Function and NED roles

The FCA itself considers several factors when assessing fitness and propriety. The most important considerations are the person’s:

* Competence and capability to undertake the role
* Honesty, integrity and reputation in dealing with clients’ affairs
* Financial security

**Honesty, Integrity & Reputation**

I confirm that I have not, within my knowledge, been subject to any of the following in respect of any aspect of my life:

* Charges or convictions in respect of any criminal offence of dishonesty, fraud, wrongful trading, financial crime, violence or other offence under legislation. *(Senior Managers and NEDs should disclose spent and unspent convictions. Directory Persons are only required to disclose unspent convictions.)*
* The subject of civil proceedings or litigation, including judgement debts or arbitration.
* Any investigation into allegations of misconduct or malpractice in connection with any business activity.
* Any civil action which has resulted in findings again me by a Court.
* Any disciplinary investigation by the FCA or any other regulator, professional body, government body or other agency.
* Contravention of any of the requirements and standards of the FCA regulatory system or any other regulator, professional body, government body or other agency.
* The subject of a justified complaint relating to any regulatory activities.
* Refusal, revocation, withdrawal or termination of any registration, authorisation, membership, licence or application to carry out a trade, business or profession.
* Involvement as a director or partner or concerned in the management of a business which has gone into insolvency, liquidation or administration.
* Involvement in any other business which has been investigated, disciplined, censured, suspended or criticised by a regulatory body, professional body, Court or Tribunal whether publicly or privately.
* Been dismissed, asked to resign or resigned from employment, or from a position of trust, fiduciary appointment or similar.
* Disqualified from acting as a director or other managerial role.

Principles and Rules of the Financial Conduct Authority

I confirm that I understand and agree to abide by the requirements and standards of the Financial Conduct Authority and in particular the FCA’s Conduct Rules.

I confirm that I have always been candid and truthful in my dealings with the FCA and any other regulator with whom I have had dealings in the past.

Conflicts of Interest, other Business Interests and / or other Directorships

I confirm that I do not have any conflicts of interest or other business interests, which may affect my role other than those business interests already notified to and approved by the firm’s management body.

Financial Security

I confirm that I am not subject to any undue financial pressures and I am able to service my liabilities as they fall due. I also give my express agreement to the firm obtaining a credit check as independent verification of this.

I also confirm I have not:

* Been subject to any bankruptcy order,individual voluntary agreement/trust deed or arrangement with creditors
* Been involved with any business that has been put into liquidation, been wound up, had a petition for bankruptcy, been declared bankrupt or had an arrangement with creditors

Reduction of Financial Crime

I am aware of my duties and responsibilities under the Anti-Money Laundering and UK Financial Sanctions guidance & legislation and the Firm’s Anti Financial Crime proceedures and will comply with the requirements at all times.

**General Data Protection Regulation**

I am aware of my duties and responsibilities under General Data Protection Regulation.

**Insider Dealing / Personal Account Dealing**

I agree not to act on any inside information that may come to my attention, nor pass on such information except as a report to the Compliance Officer. I also confirm that all personal account dealings will be conducted in accordance with the agreed procedures and reported to the Compliance Officer at the required times.

**Complete the declaration(s) that relate to the role(s) being assessed.**

**Certificated Person Declaration**

I agree to report any material changes in my circumstances to the designated Senior Manager as soon as possible.

I also confirm that I am not aware of any other reason, which would affect my ongoing status as a fit & proper person to carry out a Certificated Function.

**Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

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

Assessment of Competence and Capability completed on \_\_\_\_\_

Based on our assessments the above-named individual is fit and proper to carry out the role(s) of a Certificated Person as identified in their Certificate of FIT.

Certificate Issued \_\_\_\_

Renewal Date \_\_\_\_

**Senior Manager: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date:**

**Senior Manager Function Declaration**

I agree to report any material changes in my circumstances to the designated Senior Manager as soon as possible.

I also confirm that I am not aware of any other reason, which would affect my ongoing status as a fit & proper person to carry out a Senior Manager Function.

**Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date:**

**Non-Executive Director Declaration**

I agree to report any material changes in my circumstances to the designated Senior Manager as soon as possible.

I also confirm that I am not aware of any other reason, which would affect my ongoing status as a fit & proper person to carry out a Non-Executive Director role.

**Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date:**

Assessment of competencies demonstrated when carrying out the role including Board Meetings attendance

**Senior Manager: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Date:**

|  |
| --- |
| **FINANCIAL SOUNDNESS** |
| **NAME: DATE:**  |
|  | **Assets** | **Liabilities** |  |
|  |  | **£** |  |  |  | **£** |  |  |
|  | Principle Residence |  |  | Mortgage |  |  |  |  |
|  | Other Property |  |  | Loans |  |  |  |  |
|  | Bank etc deposits  |  |  | HP |  |  |  |  |
|  |  |  |  | Credit Cards |  |  |  |  |
|  | National Savings |  |  | Potential Tax Liability |  |  |  |  |
|  | OEIC/Unit / Investment Trusts |  |  | Other – please detail |  |  |  |  |
|  | Investment Bonds |  |  |  |  |  |  |  |
|  | ISA |  |  |  |  |  |  |  |
|  | VCT / EIS |  |  |  |  |  |  |  |
|  | Stocks / Shares |  |  |  |  |  |  |  |
|  | Other – please detail |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  | ***Total Assets £*** |  |  | ***Total Liabilities*** | ***£*** |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| ***Additional Notes - Please provide any further details here if necessary.*** |