



Application for Consumer Credit Limited Permissions Authorisation

Core details form

Full name of applicant firm

Important information you should read before completing this form

We require all applicant firms to provide these core details as part of their application for authorisation (known as Part 4A permission).

Please keep a copy of the forms you complete and the supporting documents that you include with this application pack for your future reference.

The notes that accompany this form will help you complete the questions and they also explain why we require the information we ask you for.

For the purposes of complying with the Data Protection Act 1998, please note that any personal information provided to us will be used to discharge our statutory functions under the Financial Services and Markets Act 2000 (FSMA) and other relevant legislation and may be disclosed to third parties for those purposes.

It is important that you provide accurate and complete information and disclose all relevant information. If you do not, it will call into question your suitability to be authorised, and you may be committing a criminal offence and could face prosecution under section 398A of the FSMA regardless of the status of your application.

Terms in this application pack

In this application pack we use the following terms:

- 'you' refers to the person(s) signing the form on behalf of the applicant firm;
- 'the applicant firm' refers to the firm applying for authorisation;
- 'we', 'us' or 'our' refers to the appropriate regulator;
- 'the FCA' refers to the Financial Conduct Authority;
- 'the PRA' refers to the Prudential Regulation Authority; and
- FSMA refers to the Financial Services and Markets Act 2000.

Purpose of this pack

We will only authorise a firm if we are satisfied that it meets conditions known as the threshold conditions (COND 2.2). The information in this pack is required to enable us to assess whether the applicant firm satisfies the threshold conditions.

Contents of this form

1	Contact details and timings for this application	3	3	Personnel	12
2	About the applicant firm	5	4	Systems and controls	13



Filling in the form

1 If you are using your computer to complete the form:

- use the TAB key to move from question to question and press SHIFT TAB to move back to the previous question; and
- print out all the parts of the form you have completed and sign the declaration in the 'checklist and declaration' form.

2 If you are filling in the form by hand:-

- use black ink;
- write clearly; and
- sign the declaration in the 'checklist and declaration' form.

3 If you think a question is not relevant to you, write 'not applicable' and explain why.

4 If you leave a question blank, do not sign the declaration or do not attach the required supporting information without telling us why, we will have to treat the application as incomplete. This will increase the time taken to assess your application.

5 If there is not enough space on the forms, you may need to use separate sheets of paper. Clearly mark each separate sheet of paper with the relevant question number.

6 Post the application consisting of:

- this core details form;
- one supplement;
- any appendices you need to complete;
- the checklist and declaration form;
- supporting documents; and
- the application fee to either the FCA or PRA at:

**Credit Authorisations Division
The Financial Conduct Authority
25 The North Colonnade
Canary Wharf
LONDON
E14 5HS**

1

Contact details and timings for this application

We need this information in case we need to contact you when assessing this application.

Contact for this application**1.1 Contact details of the person we will get in touch with about this application.**

This must be someone who works for the applicant firm, and not a professional adviser.

Title	
First names	
Last name	
Job title	
Address line 1	
Address line 2	
Address line 3	
Town	
County	
Postcode	
Country	
Telephone number	
Mobile number	
Fax number	
Email address	

Details of professional advisers

1.2 Have you used a professional adviser to help with this application?

- No ▶ Continue to Question 1.7
 Yes ▶ You must fill in the rest of this section

1.3 Name of professional adviser's firm

--

1.4 Name and contact details of professional adviser

Title	
First names	
Surname	
Business address	
Postcode	
Phone number (including STD code)	
Fax number (including STD code)	
Mobile number (optional)	
Email address	

1.5 Do you want us to copy all correspondence to the professional adviser?

- No
 Yes

1.6 If the applicant firm becomes authorised will it use a professional adviser (the adviser listed above or another one)?

- No
 Yes

1.7 Is there a date you would like this application to be approved?

Yes	
No	

Enter date required**Please explain why**

We cannot guarantee to determine your application by a specific date but we will try to take into account any timings above when assessing your application(s). We must determine an application within the statutory timescales that relates to the application that has been submitted.

SPECIMEN

2 About the applicant firm

We need to know general information about the applicant firm so we can process this application as efficiently as possible. We also need the applicant firm's details for the Financial Services Register, which is our public record of authorised firms:

www.fca.org.uk/Pages/register/

2.1 Firm Name

Note: If you are applying as a sole trader this must be your personal name. If this is an incorporated firm then this must be the full current name registered at companies house. If the firm is a sole trader, the registered name of the firm that will appear on the FCA register will be the individual's name and not the trading

2.2 Does the Applicant have an interim permission (IP) for consumer credit? (Please note that IP holders are unable to submit an application for authorisation until their application period or "landing slot" commences but that they are able to use the system to draft their application in advance of this).

Note: An interim permission to continue business may have been granted to a firm between the period of September 2013 to April 2014. A consumer credit interim permission reference number will have been provided

- Yes
 No

2.2.1 Please provide the Applicant's consumer credit interim permission reference number (or former OFT licence number)

2.3 Has the applicant completed any credit agreements with consumers prior to becoming authorised or that are outside of the scope of its current Consumer Credit interim permission (if applicable)?

- Yes
 No ▶ 2.4

2.3.1 Has the applicant applied (or is the applicant going to apply) for a validation order relating to these agreements? (a validation order also covers an application for compensation / to keep repayments of an unauthorised loan)

- Yes
 No

Please provide an explanation

Note: please include the number or agreements (total and different types), dates of the events, how they came to carry this out when not authorised, if not applying why not and what is happening to the debts. There is no need to repeat information given in a validation application

2.3.2 Does the Applicant have their own legal assessment?

- No
- Yes ▶ Please attach a copy of the applicant's legal assessment document
- Attached

Firm address details**2.4 Principal Place of Business of Firm**

Address line 1	
Address line 2	
Address line 3	
Address line 4	
Town	
County	
Postcode	
Country	
Phone number (including STD code)	

Fax number (including STD code)	
---------------------------------	--

Email address	
---------------	--

Note: This email address is not copied to the email associated with user account on the GABRIEL reporting system. Users must update email details for reporting directly within the GABRIEL reporting system.

Date on which this change becomes effective	
---	--

2.12 Head Office Address?

Please tick the box if the head office address is the same as the principal place of business

Please tick this box if the head office address is the same as the registered office

Address	
Postcode	

Date on which this change becomes effective	
---	--

2.13 If the Applicant has a website, provide details below. If the Applicant is intending to launch a website, provide the address and launch date (if known)

Please tick the box if the invoicing address is the same as the principal place of business

Please tick the box if the invoicing address is the same as the registered office

Website address	
Website launch date	

2.14 If the Applicant has a UK branch address provide details below

Address	
Postcode	

Date on which this change becomes effective	
---	--

Confirmation**2.15 You must confirm that all of the Applicant's relevant details match Companies House records**

Yes

No ▶ Give details below

N/A

--

3 Firm Contact details

Firm contact details

3.1 Contact person's details for the Financial Services Register

Note: We will also send an email to this person confirming that their details are to be used for this purpose. However you must confirm that they have been informed of this before submitting this application for Data Protection reasons.

This individual will be displayed as the complaints contact on the Financial Services Register.

If the applicant firm is a sole trader, these should be the sole trader's details. If the applicant is not a sole trader this individual must be the senior manager of the applicant firm.

Please tick the box if the contact person's details are the same as the Principal Place of Business

Title	
-------	--

First names	
Surname	

Job title	
Address line 1	
Address line 2	
Address line 3	
Address line 4	
Town	
County	
Postcode	
Country	

Phone number	
--------------	--

Mobile number	
---------------	--

Fax number	
------------	--

Email address	
---------------	--

- 3.2 Please tick to confirm that the person named above has been informed that their details will be displayed on the Financial Services Register**

- 3.3 Details of the auditor/ reporting accountant**

Firm name of auditor or reporting accountant	
--	--

Date on which this change becomes effective	
---	--

- 3.4 Details of professional adviser?**

Firm name of professional	
---------------------------	--

Date on which this change becomes effective	
---	--

- 3.5 Please tick this box if the Applicant wants us to copy all correspondence to the professional adviser**

- 3.6 Please tick this box if the Applicant- if it becomes authorised- plans to use a professional adviser**

- 3.7 Please tick this box if the Applicant is dependent on a single key person**

Note: If your firm is solely dependent upon one individual to run the business, you will need to have arrangements in place with another firm who has the same permissions as yourself, to assist your clients on a temporary basis due to unforeseen circumstances that might befall your firm

- 3.8 Locum details**

Firm name	
Firm Reference Number	

Firm name of adviser	
----------------------	--

4 Other Names

Trading names and Other names

If the name(s) given in 5.1 and 5.2 contain(s) a word or expression that requires the FCA's approval under the Company, Limited Liability Partnership and Business names (Sensitive Words and Expressions) Regulations 2009. We will contact you if you meet the criteria.

4.1 If the applicant intends to change the registered name, provide details below

Current Firm Name	
New Firm name	
Effective Date	

4.1.2 Has the change been approved on Companies House?

- Yes
 No

4.2 If the Applicant intends to use any trading names as well as the registered name provide details below:

Sole traders will always appear on the FCA Register under the name of the principal, with any other names used shown as a trading name. For example, an individual called William Bloggs, a sole trader firm, trades under the name of Bill's Cars. The name that will appear on the FCA Register will be William Bloggs, with a separate trading name entry of Bill's Cars.

Trading Name(s)	
Effective Date	

5

Scope of Permission required

It is the applicant firm's responsibility to ensure the scope of permission it requests will cover all the activities that it wants to do.

5.1 Limited Permission lending

Note: A supplier is a person whose main business is to sell goods or supply services but does not carry on a regulated activity. For more details, please see the Guidance Notes

The following regulated activities and limitations are associated with this profile: 'entering into regulated credit agreement as Lender (Excluding high-cost short-term credit, bill of sale loan agreement, and home collected credit loan agreement)'

The following limitation will be applied to this activity:

Limited permission lending - This permission is limited to lending which the firm carries on as a supplier and

- (i) no charge (by way of interest or otherwise) is payable by the borrower in connection with the provision of credit under the regulated credit agreement;
- (ii) the regulated credit agreement is not a hire-purchase agreement or a conditional sale agreement; and
- (iii) unless the firm is a not-for profit body, the obligation of the borrower to repay is not secured, and is not to be secured, by a legal mortgage on land

And: 'Exercising or having the right to exercise lender's rights and duties under a regulated credit agreement (excluding high-cost short-term credit, bill of sale loan agreement, and home collected credit loan agreement)

The following limitations will be applied to this activity:

Right to limited permission lending - This permission is limited to exercising the rights and duties of loans which the firm carries on as a supplier - and

- (i) no charge (by way of interest or otherwise) is payable by the borrower in connection with the provision of credit under the regulated credit agreement;
- (ii) the regulated credit agreement is not a hire-purchase agreement or a conditional sale agreement; and
- (iii) unless the firm is a not-for profit body, the obligation of the borrower to repay is not secured, and is not to be secured, by a legal mortgage on land

5.2 Consumer Hire

The regulated activities associated with this profile are entering into a regulated consumer hire agreement as owner and exercising or having the right to exercise the owner's rights and duties under a regulated consumer hire agreement

The following limitation will be applied to these regulated activities:

Unless the firm is a not-for profit body, this permission is limited to regulated consumer hire agreements under which the obligations of borrowers are not, or are not to be, secured by a legal mortgage on land

5.3 Limited Permission credit broking

Note: A domestic premises supplier is a supplier who sells goods or supplies services to customers whilst they are present in their home, for example a double glazing firm offering credit to an individual

The regulated activity associated with this profile is 'Credit Broking'

The following limitation will be applied to this regulated activity:

Limited to secondary broking - This permission is limited to credit broking as a supplier of goods or services (other than a domestic premises supplier) carried on the for the purposes of, or in connection with, the sale of goods or supply of services by the firm to a customer (who need not be the borrower under the credit agreement or the hirer under the consumer hire agreement) and, unless the firm is a not-for profit body, under which the obligation of the borrower to repay is not secured, and is not to be secured, by a legal mortgage on land.

5.4 Green deal broking

The regulated activity associated with this profile is 'Credit Broking'

The following limitation will be applied to this regulated activity:

Limited to Green Deal broking - This permission is limited to credit broking in connection with Green Deal Plans as defined in section 1 of the Energy Act 2011 and, unless the firm is a not-for profit body, under which the obligation of the borrower to repay is not secured, and is not to be secured, by a legal mortgage on land

5.5 Broking vehicle consumer hire agreements

The regulated activity associated with this profile is 'Credit Broking'

The following limitation will be applied to this regulated activity:

Broking for consumer hire of a vehicle - This permission is limited to credit broking for the hire of vehicles and, unless the firm is a not-for profit body, under which the obligation of the borrower to repay is not secured, and is not to be secured, by a legal mortgage on land

5.6 Not for Profit Debt Counselling

The regulated activity associated with this profile is 'Debt-counselling'

The following requirement will be applied to your Firm:

"Not-for-profit firm - The firm, by virtue of its constitution or any enactment, must be:

- (i) required (after payment of outgoings) to apply the whole of its income and any capital it expends for charitable or public purposes, and
- (ii) prohibited from directly or indirectly distributing amongst its members any part of its assets (otherwise than for charitable or public purposes)

And the firm must not have any associate (other than a not-for profit debt advice body) which carries on debt adjusting or debt counselling or providing credit information services.

5.7 Not for Profit and debt Adjusting

The regulated activity associated with this profile is 'Debt Adjusting'

The following requirement will be applied to your Firm:

Not for profit firm - The firm, by virtue of its constitution or any enactment, must be:

- (i) required (after payment of outgoings) to apply the whole of its income and any capital it expends for charitable or public purposes, and
- (ii) prohibited from directly or indirectly distributing amongst its members any part of its assets (otherwise than for charitable or public purposes);

And the firm must not have any associate (other than a not-for profit debt advice body) which carries on debt adjusting or debt counselling or providing credit information services.

5.8 Limited to carry on a regulated activity

Under our permission regime, agreeing to carry on a regulated activity is a regulated activity in its own right. As a matter of course, a firm will carry on the regulated activity of "Agreeing to carry on a regulated activity" (which is limited to carrying on only the other regulated activities in its Scope of Permission Notice).

The form can only agree to carry on the regulated activities specified in this Notice

You must confirm that the applicant firm requests permission to carry on this regulated activity with this limitation

5.9 Additional regulated activities:

Debt Adjusting with the following limitation

Limited to relevant credit activities - This activity is limited to relevant credit activities as defined in paragraph 2G of Schedule 6 of the Financial Services and Markets Act 2000

Debt Counselling with the following limitation

Limited to relevant credit activities- This activity is limited to relevant credit activities as defined in paragraph 2G of Schedule 6 of the Financial Services and Markets Act 2000

Providing Credit Information Services with the following limitation:

Limited to relevant credit activities- This activity is limited to relevant credit activities as defined in paragraph 2G of Schedule 6 of the Financial Services and Markets Act 2000

Client money

5.10 Does the Applicant intend to hold client money?

- Yes
 No

You should only select yes if you are applying for the permissions in 5.6 or 5.7 above.

5.11 Please state for the Applicant, if it holds or has held client money, the highest amount in the last calendar year, or if it did not hold client money in the previous calendar year, the highest amount of client money it projects that it will hold in the current calendar year.

£

5.12 Is the Applicant affiliated with one of these bodies?

- Citizens Advice England & Wales
 Citizens Advice Scotland
 Citizens Advice Northern Ireland
 Law Centres Network
 Advice UK
 Christians Against Poverty
 None of the above

Sole trader

5.11 Does the applicant employ professional staff?

- No ▶ Continue to Question 5.13
 Yes
 the applicant is not a sole trader ▶ Continue to Question 5.13

5.12 How many professional staff does the applicant employ?

Appointed Representatives

5.13 Does the Applicant intend to appoint an Appointed Representative?

Note: An appointed representative (AR) is a person or firm who conducts regulated activities and acts as an agent for a firm directly authorised by the FCA.

- Yes
 No

5.14 How many appointed representatives is the Applicant firm intending to appoint at the point of authorisation?

5.15 Has the Applicant ever been refused – or has revoked – any license, membership, authorisation, registration of permission granted by a financial services regulator government body in the UK or overseas?

- Yes
 No

Please give a full explanation of the events in question. Make sure this includes:

- the question number the event relates to;
- the date of the event;
- the amounts involved;
- the outcome; and
- an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

SPECIMEN

5.16 Has the Applicant ever, after making an application to a regulatory body for:

- a licence;
- authorisation;
- registration;
- notification;
- membership; or
- other permission granted by a regulatory body?

decided not to proceed with it?

Yes

No

Please give a full explanation of the events in question. Make sure this includes:

the question number the event relates to;

the date of the event;

the amounts involved;

the outcome; and

an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

SPECIMEN

6 Fees and levies

We require this information so that we can calculate the Applicant's annual FCA fees once authorised. We will also use this information to calculate the fees for the Money Advice Service (MAS) and the levies for the Ombudsman Service.

For further help on this section please see the Guidance Notes, the fees section of the Handbook, or refer to the FCA website, which includes an approximate fee calculator (<http://www.fca.org.uk/firms/being-regulated/fees/calculator>)

6.1 Projected annual income

What is the applicant firm's projected annual income from activities as applied for in the permissions sections of this application

Number (GBP)	
Confirm amount in words	

Note: For Not for Profit applications - you have indicated that the applicant firm is not for profit firm so an annual fee is not applicable in this instance.

Declaration of ongoing FCA fees liability

- 6.2 You must confirm that the Applicant understands that they are liable- and remain liable- to pay fees until such a time that the FCA cancels its permissions (this is irrespective of whether they are trading, they have notified us of intention to cease trading or they have submitted an application to cancel).

Yes

7

Regulatory business plan

Why we ask the questions in this section

We need to know about the business the applicant firm intends to carry on so we can assess the scope of the authorisation it will need, the adequacy of its resources and its suitability.

Background

You must confirm you have available a regulatory business plan.

It is important that this is tailored to the applicant firms business, otherwise it may lead to delays.

As a guide, the business plan should include:

All firms

- the background to the business;
- why the applicant firm wishes to carry on regulated activities at this time;
- whether the applicant firm has identified a particular business opportunity or identified a specific customer base;
- any long-term strategy and expansion plans for the business generally;
- where customers will be sourced from (e.g. existing client base or purchase of existing book of business) including the use of any lead generators or brokers;
- the applicant firms plans in relation to financial promotions and communications. This should include how they will ensure these are compliant with CONC 3;
- current business lines being transacted with any existing clients;
- the types of products or credit a lender or broker offers and the types of services or debt solutions that a debt manager offers and any other services (both regulated and non-regulated) that the applicant firm will be selling. You should identify the areas that the applicant firm may specialise in;
- what experience the governing body or senior management of the applicant firm have of the type of regulated activities the applicant firm wishes to carry on;
- the background and experience of all the persons performing significant influence controlled functions and how this will help them with their role. This should include employment background. You must enclose copies of any relevant qualifications/examinations; and
- details of all fees that could be payable by the customer and how they are explained to the customer.

All lenders

- a summary of the positioning of your firm in the credit market and how your credit products compare to your competitors;
- a summary of any security or guarantees the applicant firm will be taking and how this is notified to customers;
- details of how you are going to deal with any customers who are in arrears on their repayment (including methods to contact the customer, assessments of whether the customer is in financial difficulties and details of forbearance);
- details of any second charge mortgage business;
- full details of how employees or agents of the applicant firm will be remunerated; and
- details of any payments to be made to lead generators or brokers.
- if the applicant is an interim authorised firm please provide details of the applicants current loan book, including the proportion of this (by value and by number of debts) which are in default or arrears.

Brokers

- full details of the applicants procedures. This should include details of how the applicant will assist customers to shop around for credit.

Counselling, Adjusting and Credit Information

- full details of the applicants plans to promote their debt management activities or other services. Please include copies of any drafts you may have; and
- full details of the applicants debt counselling process and copies of the documents you will provide to the customers.

Firms which are intending to be a principal

- full details of the applicants plans relating to appointed representatives, including how these will be recruited, the initial and ongoing assessment of these, the staff to carry this out, the fees to be charged to the appointed representatives and the numbers and geographical spread of the appointed representatives.

7.1 Please tick this box to confirm that the Applicant has a business plan in place that covers the above points

Yes

Scale of Business

- 7.2 How many clients does the applicant firm expect to have in relation to its regulated activities?

At authorisation	
12 months after authorisation	

Business Risks

- 7.3 Please tick this box to confirm that the Applicant has considered key business risks and has mitigation plans to support these risks

Examples of business risks include key person risk, ongoing financial solvency not being met, clients being given unsuitable advice, inadequate systems and controls, economic factors, competitors and their reaction to the applicant firm's presence in the market.

Yes

Treating Customers Fairly

- 7.4 Treating Customers Fairly (TCF) - We expect customers' interests to be at the heart of how firms do business. Customers can expect to get financial services and products that meet their needs from firms that they can trust. Meeting customers' fair and reasonable expectations should be the responsibility of firms, not that of the regulator.

TCF focuses on six consumer outcomes (<http://www.fca.org.uk/firms/being-regulated/meeting-your-obligations/fair-treatment-of-customers>) which financial services firms must deliver to consumers.

While not a requirement for authorisation, we recommend that all new firms complete the TCF self assessment using the tool available on the website.

Please tick this box to confirm that the Applicant has procedures and Management Information to support they're Treating Customers Fairly

Yes

8

Financial Resources

Why we ask the questions in this section

All authorised firms must meet certain financial resource requirements. We need to be satisfied that the applicant firm will meet these requirements from the date of authorisation and will continue to meet them.

8.1 You must confirm that the applicant is solvent

Yes

8.2 You must confirm that you are able to provide evidence that the applicant firm is solvent

Yes

SPECIMEN

9

Systems and controls

We must be satisfied that the applicant firm has appropriate systems and controls to meet its regulatory obligations.

Regulatory returns – Gathering Better Regulatory Information Electronically (GABRIEL)

All regulated firms have to supply regular regulatory returns.

GABRIEL is the mandatory reporting tool that you must use when completing and submitting the majority of these regulatory returns. To complete your returns you must have access to a personal computer with an internet connection.

- 9.1 Please tick this box to confirm that the Applicant has the ability to complete its regulatory returns via GABRIEL
- Yes
- 9.2 Please tick this box to confirm that the Applicant agrees to submit to us, at regular and stated intervals, financial information that can be used to help supervise and assess the firm on an ongoing basis, as specified in the Handbook
- Yes
- 9.3 Please tick this box to confirm that the Applicant agrees to submit this information using GABRIEL in a timely manner
- Yes

SPECIMEN

10

Personnel

We will ask you for more information on the applicant firm's personnel in the supplement you will complete.

Staff organisational structure chart

11.1 Please tick this box to confirm that the Applicant has an organisational structure chart available

Yes

SPECIMEN

11

Compliance arrangements

Why we ask the questions in this section

We need to be satisfied that the applicant firm has the appropriate compliance arrangements in place to meet its regulatory obligations.

Compliance procedures

You are not required to send compliance procedures with this application, but the applicant firm must be able to produce a copy at any time while we are assessing the application or in the future.

11.1 Please tick this box to confirm that the Applicant has documented compliance procedures in place.

Yes

Compliance monitoring programme

The Applicant must establish, maintain and carry out a programme of actions to check that you comply and continues to comply with your compliance procedures. This is called a compliance monitoring programme, which you must send with this application.

The compliance monitoring programme must be relevant to the regulated activities you want to carry on and to your business, so the compliance monitoring programme must be tailored to the Applicant's business.

A compliance monitoring programme must describe the actions the holder of the compliance oversight function and their staff will take to ensure the firm complies with the FCA's rules and guidance at all times, in particular:

- what checks will take place
- how often the checks will take place, as appropriate to the procedure being checked – this might be daily, weekly, monthly, quarterly, annually or another period specified by the FCA
- who will carry out the checks – this is the role of the person who will make the check, such as the Compliance Officer, Training and Competence Officer, Money Laundering Reporting Officer
- what records of the checks will be kept to confirm they have taken place.

11.2 Please tick this box to confirm that the Applicant has a compliance monitoring programme document

Yes

Financial crime

- 11.3 You must briefly describe the procedures the applicant firm has put in place to counter the risks that it might be used by third parties to further financial crime (this includes any offence involving a) fraud or dishonesty, b) misconduct in, or misuse of information relating to, financial markets or c) handling the proceeds of crime (SYSC 3.2.6 and 6.3).**

Please include the following:

- the steps the applicant firm will take to ensure its Money Laundering Reporting Officer (MLRO) knows their duties and is able to perform their controlled function effectively
- the procedures that will be in place to ensure that the applicant firm will obtain sufficient evidence of the identity of and undertake all necessary due diligence exercises in relation all its clients
- the systems and controls that will be in place to ensure that know your business information see SYSC 3.2.6 and 6.3) is made available to the applicant firm's MLRO
- the anti-money laundering training the applicant firm will provide for all its relevant staff
- the disciplinary procedures for any member of staff who fails to report promptly to the MLRO any suspicions or belief that money laundering is occurring.

Please tick this box to certify that the Applicant has the relevant financial procedures in place to counter the risk that it might be used by third parties to further financial crimes, as per requirements in SYSC 3.2.6 and 6.3

Yes

Market Conduct

- 11.4 Please briefly describe the steps the Applicant has put in place to counter the risk that it or its staff may engage in activity which constitutes market abuse**

You must include the following:

- the controls and procedures the applicant firm will have in place to mitigate the risk of market abuse;
- details of the anti-market abuse training the applicant firm will provide for its relevant staff;
- the arrangements for monitoring the market abuse controls and procedures;

12

Disclosure of Significant Events

Disclosure

12.1 Please specify how many previous firm names the Applicant has traded under

None	
0	
1	
2	
3	
4	
5	
Over 5	

Please provide a list of your previous firm names

Previous Names	Effective from Date

Note: If there have been more than five previous names, please provide the relevant information using the following template

<http://www.fca.org.uk/your-fca/documents/forms/Additional-Names>

12.2 Has the Applicant ever been regulated by us or any other financial services regulator before making this application?

- Yes ▶ please provide details below
 No

Name of regulator

Address of regulator

Address line 1	
Address line 2	
Address line 3	
Address line 4	
Address line 5	
Address line 6	
Postcode	
Country	

Applicant's identification number with that regulator (FRN if previously regulated by us)

12.3 Has the Applicant ever been presented with a petition for bankruptcy, a petition for compulsory winding up or creditors' voluntary arrangements?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.4 Is the applicant currently in administration?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.5 Does the applicant firm currently have any overdue debts or compromise or other arrangements over a debt with any of its creditors?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.6 Has the applicant firm ever been the subject of a corporate restructure, because of any form of insolvency, in the last five years?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.7 Has the Applicant ever been the subject of any criminal investigations or proceedings?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.8 Has the Applicant been the subject of any civil investigations or proceedings or arbitration in the last five years?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.9 Does the Applicant have any unsatisfied judgments, debts or awards outstanding against it?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.10 Has the Applicant entered into any material settlements in the last five years, whether or not on an ex gratia basis?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.11 Has the Applicant ever been convicted of fraud or other dishonesty?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.12 Has the Applicant ever been convicted of an offence under legislation (whether in the United Kingdom or not) relating to any of the following:

- companies;
- building societies;
- industrial and provident societies;
- credit unions;
- friendly societies;
- insurance;
- banking;
- mortgages;
- other financial services;
- insolvency;
- consumer credit;
- consumer protection;

Yes

No

If Yes, please give a full explanation of the events in question. Make sure this includes:

- the date of the event;
- the amounts involved;
- the outcome; and
- an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.13 Has the Applicant had any material written complaints made against it by its clients or former clients in the last five years which it has accepted, or which are awaiting determination, or have been upheld – by an ombudsman or a complaints scheme?

Yes

No

If Yes, please give a full explanation of the events in question. Make sure this includes:

- the date of the event;
- the amounts involved;
- the outcome; and
- an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.14 Has the Applicant ever been:

- criticised,
- censured,
- investigated,
- disciplined,
- suspended,
- expelled,
- fined, or
- been subject to any other disciplinary intervention action

by any financial services regulator or government body in the UK or overseas?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:

- the date of the event;
- the amounts involved;
- the outcome; and
- an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.15 Has the Applicant ever been found guilty of carrying on any unauthorised regulated activities or been investigated for the possible carrying on of unauthorised regulated activities?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:

- the date of the event;
- the amounts involved;
- the outcome; and
- an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.16 Is the Applicant currently involved in any proceedings, investigations or other events referred to in any of the questions above that are pending or not yet determined?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.

12.17 Are there any other significant events relating to the Applicant which we have not asked about in previous questions in this section that have happened – or are taking place – that are relevant to the Applicant's application for authorisation?

- Yes
 No

If Yes, please give a full explanation of the events in question. Make sure this includes:
the date of the event;
the amounts involved;
the outcome; and
an explanation of the circumstances

If your answer exceeds 4000 characters please attach a separate document.