AEVITIUM LTD
RISK & COMPLIANCE WITH PURPOSE

A Guide for Successful FCA Authorisation

KEY PERSONNEL ASSESSMENT CHECKLIST FOR FCA COMPLIANCE

01 General Fitness and Propriety

- [ ] Verify relevant industry experience and qualifications for all senior personnel.
- [ ] Document continuous professional development (CPD) for all key roles.
- [ ] Confirm technical and operational knowledge required for the role.

02 Defined Roles and Responsibilities

- [ ] Prepare detailed job descriptions outlining responsibilities and regulatory expectations for all key roles (e.g., MLRO, compliance officer, CEO).
- [ ] Clearly outline accountabilities and escalation processes for Senior Management Functions (SMFs).
- [ ] Include an updated chart displaying reporting lines and governance structure.

03 Background Checks

- [ ] Verify through Disclosure and Barring Service (DBS) or equivalent.
- [ ] Validate past employment and qualifications.
- [ ] Perform financial integrity checks.
- [ ] Ensure there are no unresolved regulatory issues; address prior concerns transparently.

04 Training and Certification

- [ ] Provide tailored training on FCA expectations and responsibilities.
- [ ] Maintain documentation of completed training and certifications.
- [ ] Align senior staff on regulatory requirements and application readiness.

05 Governance Structure

- [ ] Include a mix of independent directors and subject-matter experts.
- [ ] Highlight governance diversity in terms of expertise and background.
- [ ] Prepare documents detailing the governance framework and its alignment with FCA requirements.
- [ ] Ensure appropriate checks and balances in the governance structure.

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06 Mitigation Actions for Identified Risks

- [ ] Address any gaps in experience or qualifications through training or role adjustments.
- [ ] Document measures to resolve historical regulatory issues or other concerns.
- [ ] Prepare a detailed mitigation plan for any areas of potential FCA scrutiny.

07 Key Documentation for FCA Submission

- [ ] CVs and Personal Statements: Emphasise qualifications, industry experience, and fitness for the role.
- [ ] Statements of Responsibility (SoRs): Clearly define individual duties and accountabilities.
- [ ] Criminal Background Checks: Include evidence of a clean criminal record.
- [ ] Professional References: Collect and validate reference letters from reputable professionals or previous employers.
- [ ] Board Composition Summary: Provide details on expertise, independence, and diversity of the board.

09 Deliverables

A comprehensive People Assessment Report including:
- [ ] CVs and qualifications.
- [ ] Role descriptions and governance structure.
- [ ] Background check results and mitigation measures.

Supporting governance documents:
- [ ] Organisational structure chart.
- [ ] Governance framework and policies.

This checklist is designed to help you address potential FCA concerns, reduce application risks, and strengthen governance and accountability. It does not constitute legal or regulatory advice.