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APPENDIX A1: SYSC RESPONSIBILITIES TABLE – APPROVED PERSONS REGIME

Senior Management Systems and Controls – FCA (SYSC) Sourcebook

A firm must take reasonable care to maintain a clear and appropriate apportionment of significant responsibilities among its partners and senior managers in such a way that:

1. It is clear who has which of those responsibilities.
2. The business and affairs of the Firm can be adequately monitored and controlled by the partners, relevant senior managers and the Governing Body of the Firm.

By virtue of Controlled Functions for ARs under [SUP 10A.1.15](#), the list of individuals approved under the Firm in respect of AR activity is shown on the Financial Services Register as detailed below:

https://register.fca.org.uk/ShPo_FirmDetailsPage?id=001b000000NMOyOAAX

Each AR is required to have a Nominated Senior Manager as the main point of contact for Firm activity. The Nominated Senior Managers of current Firm ARs at April 2021 are shown below.

| Appointed Representative | Nominated Senior Manager |
|--|---------------------------------|
| 7percent Ventures Ltd | Andrew Scott |
| ADG PrefCap LLP | Emma Barrat |
| Auxilium Financial Risk Management Ltd | Jonathan Lye |
| BGV Investment Management Ltd | Melanie Hayes |
| Infinium Partners LLP | Neil Lambert |
| Leafy Tunnel Ltd | Bek Muslimov |
| MENA Investment Partners LLP | Richard Greer |
| Pi Labs (Manager) Ltd | Faisal Butt |
| Rebel 54 Ltd | Andre Tegner |
| Saras Capital LLP | Nadav Rosenberg |
| Semantic Ventures LLP | Alex Shelkovnikov |
| Untitled Advisors LLP | Bertie Crawley |

FCA Controlled Functions for ARs

Key Responsibilities for Directors (CF1)/Partners (CF4)

- Appropriate allocation of responsibilities within the AR
- Identification, assessment and management of business risks
- Finance and controls
- Regulatory compliance

- Design, direction and regular review of the business strategy and model including appropriate resources
- Product governance
- Revenue growth
- Cost management
- Recruitment and supervision including performance management of personnel
- Record-keeping

Key Responsibilities for Non-Executive Directors (CF2)

- Setting and monitoring business strategy
- Scrutinising the approach of executive management, performance or standards of conduct
- Determining appropriate levels of remuneration of executive directors
- Helping connect the business and board with networks of useful contacts
- Maintaining robust risk management
- Regular monitoring of internal control systems and financial performance

Key Responsibilities for Customer Function Holders (CF30)

- Client relationship management
- Fund investor relationship management
- Identification and advice on potential clients/deals
- Maintaining records of investment advice
- Maintaining records of manager approvals of investment recommendations
- Maintaining transaction records