

Contents

APPENDIX A1: SYSC RESPONSIBILITIES TABLE – APPROVED PERSONS REGIME 2

 Senior Management Systems and Controls – FCA (SYSC) Sourcebook 2

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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](#).

Each AR is required to have a Nominated Senior Manager as the main point of contact for the Firm on all activity. The Nominated Senior Managers of current ARs at 5th November 2024 are shown below.

Appointed Representative	Nominated Senior Manager
7percent Ventures Ltd	Andrew Scott
BGV Investment Management Ltd	Melanie Hayes
Genuine Capital Advisors Ltd	Michael Eisenberg
Infinium Partners LLP	Neil Lambert
Leafy Tunnel Ltd	Bek Muslimov
LTV Capital Ltd	Dario de Wet
MENA Investment Partners LLP	Richard Greer
NG Bio Ltd	Jason Goldstein
Pi Labs (Manager) Ltd	Faisal Butt
Saras Capital LLP	Nadav Rosenberg
Semantic Ventures LLP	Alex Shelkovnikov
Vectr7 Investment Partners LLP	Dominic Wilson

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 including regular financial forecasting
- 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 of and advice on potential clients/deals
- Arranging deals
- Maintaining records of investment advice
- Maintaining records of manager approvals of investment recommendations
- Maintaining transaction records