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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.

Tables 1 and 2 below detail those individuals within the Firm who hold Senior Management Functions (SMFs) and/or Certification Functions (CFs). Table 3 shows the allocation of Prescribed Responsibilities (PRs) to Firm SMF holders. A more detailed list of responsibilities is maintained by the Compliance Officer and reviewed on a regular basis by the Governing Body.

Table 1 – Senior Management Functions

Senior Management Function	Description of Senior Management Function	SMF applied for or held				Name
		Limited scope firms	UK core firms	EEA core firms	Enhanced Firms	
SMF16	Compliance Oversight		X			Emma Jones
SMF17	MLRO		X			Agata Mackay
SMF27	Partner		X			Gillian Gallacher Kevin Gallacher

The list is also available on the [Financial Services Register](#).

Table 2 – Certification Functions

Certified Role	Description of Certified Role	CF held				Name
		Limited scope firms	UK core firms	EEA core firms	Enhanced Firms	
7	Client-dealing (SYSC 27.8.18R)		X			Kevin Gallacher Hari Selvam

Table 3 – Prescribed Responsibilities

Ref	Prescribed Responsibility (applicable to UK core firms)	Does this Prescribed Responsibility apply?	Who?	Is this Prescribed Responsibility shared?
a)	Performance by the Firm of its obligations under the Senior Managers Regime, including implementation and oversight.	Yes	Gillian Gallacher	No
b)	Performance by the Firm of its obligations under the Certification Regime.	Yes	Emma Jones	No
b-1)	Performance by the Firm of its obligations in respect of notifications and training of the Conduct Rules.	Yes	Emma Jones	No
d)	Responsibility for the Firm's policies and procedures for countering the risk that the Firm might be used to further financial crime.	Yes	Kevin Gallacher	No
z)	Responsibility for the Firm's compliance with CASS.	Yes	Kevin Gallacher	N/A
za)	Responsibility for an AFM's assessments of value, independent director representation and acting in investors' best interests (applies to AFMs only).	No	N/A	N/A