

1 PURPOSE

The purpose of this policy is to establish the compliance framework within Impact Financial Services Limited and ensure that the firm operates in accordance with applicable regulatory requirements.

The firm is committed to maintaining a culture of compliance and ensuring that all regulated activities are conducted in a manner that protects customers and maintains market integrity.

This policy outlines how the firm:

- identifies regulatory obligations
- monitors compliance with regulatory requirements
- manages regulatory risks
- maintains appropriate governance and oversight

2 SCOPE

This policy applies to:

- Mortgage Advisers
- Protection Advisers
- Managers and Supervisors
- Directors
- All employees and contractors involved in the firm's operations

All individuals associated with the firm are responsible for complying with regulatory requirements and internal policies.

3 REGULATORY FRAMEWORK

Impact Financial Services Limited operates within the regulatory framework established by the Financial Conduct Authority.

The firm ensures compliance with relevant regulatory rules including but not limited to:

- Principles for Businesses
- Consumer Duty requirements
- Mortgage Conduct of Business rules
- Insurance Conduct of Business rules
- Senior Management and governance expectations

The firm monitors regulatory developments and updates internal policies where necessary.

4 COMPLIANCE CULTURE

Impact Financial Services Limited promotes a culture in which compliance is considered a core responsibility of all individuals within the firm.

Employees and advisers are expected to:

- act honestly and professionally
- follow regulatory requirements and internal procedures
- prioritise customer interests
- report any potential compliance concerns

Compliance is integrated into the firm's day-to-day operations and decision-making processes.

5 ROLES AND RESPONSIBILITIES

Senior Management

- overseeing regulatory compliance
- ensuring appropriate governance structures
- addressing compliance risks

Senior management is responsible for ensuring that appropriate compliance systems and controls are in place.

T&C Manager – Andželika Dubij

- supervision of advisers
- file reviews
- monitoring advice quality
- identifying compliance risks related to advice

The T&C Manager is responsible for overseeing adviser competence and ensuring that advice standards comply with regulatory requirements.

Advisers and Staff

- comply with regulatory rules
- follow internal policies and procedures
- maintain professional standards
- report potential breaches or compliance concerns

6 COMPLIANCE MONITORING

The firm monitors compliance through a range of activities including:

- file reviews
- supervision of advisers
- complaint analysis
- monitoring of policy retention
- internal compliance reviews

These activities help identify potential risks and ensure appropriate corrective actions are taken.

7 BREACH IDENTIFICATION AND REPORTING

Any suspected regulatory breach must be reported promptly in accordance with the firm's Breach & Incident Reporting Policy.

Examples of breaches may include:

- failure to follow advice procedures
- failure to provide required disclosures
- inappropriate recommendations
- data protection incidents

Where appropriate, breaches may be escalated to senior management for further assessment.

8 TRAINING AND AWARENESS

The firm ensures that advisers and staff receive appropriate training to maintain regulatory competence.

Training may include:

- regulatory updates
- compliance guidance
- product knowledge training
- participation in the firm's internal development programmes

Training activities support the firm's Training & Competence framework.

9 RECORD KEEPING

The firm maintains records demonstrating compliance with regulatory requirements.

Examples of records include:

- client advice documentation
- file review outcomes
- training records
- complaints records
- breach reports

These records support regulatory oversight and internal governance.

10 MANAGING REGULATORY RISK

The firm actively manages regulatory risks by:

- identifying potential compliance issues
- implementing appropriate controls
- reviewing internal procedures
- addressing issues identified through monitoring activities

Where necessary, the firm may introduce additional controls or training.

11 CONTINUOUS IMPROVEMENT

Impact Financial Services Limited recognises that compliance is an ongoing process.

The firm continuously reviews its policies, procedures and monitoring processes to ensure they remain effective and aligned with regulatory expectations.

12 POLICY REVIEW

This policy will be reviewed:

- annually
- following regulatory changes
- following identification of significant compliance issues

The firm remains committed to maintaining strong governance and regulatory compliance.