



Variation of Permission (VOP) Application Home Finance Mediation and General Insurance Distribution Activities

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Firm Reference Number

Important information you should read before completing this form

Purpose of this form

This form is **only** for firms wishing to change the scope of their permission for **Home Finance Mediation and/or General Insurance Distribution Business**.

If your application is for Investment business, or Insurance Business, Banking, E-Money, Lloyds Market and Funeral Plan Providers, there are specific forms for this purpose. If you are completing more than one of these forms (i.e. if your application is for more than one type of business), **you do not have to complete any sections or questions that are duplicated**, e.g. pages 2, 6, 11-13.

The notes that accompany the forms will help you complete the questions. They also explain why we need the information that we are asking for.

We will only grant an application to vary the permission of a firm if we are satisfied it meets conditions known as the threshold conditions. We need the information in this form so we can assess whether the applicant firm continues to satisfy the threshold conditions.

It is important that you give accurate and complete information and disclose all relevant information. If you do not, you may be committing a criminal offence, it may increase the time taken to assess your application and may call into question your suitability to be authorised.

Submit your application by post to:

If the appropriate regulator is the FCA send to:

Variation of Permission Team The Financial Conduct Authority 12 Endeavour Square London E20 1JN

Declaration and Signature

If the appropriate regulator is the PRA send to:

Assessment and Monitoring Team The Prudential Regulation Authority 20 Moorgate London EC2R 6DA

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Contact details and timings for this application

We need this information in case we need to contact you when we assess this application.

Contact for this application

1.1 Details of the person we should contact about this application.

Title	
First names	
Surname	
Job title	
Business address	
Postcode	
Phone number (including STD code)	
Email address	

Timings for this application

We will attempt to process your application as quickly as possible. If you wish your application to be granted by a specific date, we will try to do so. If we cannot, we will contact you with the reason why. However, please note that we must determine an application for a variation of permission once we have received it and deemed it to be complete within six months of it becoming complete.

Variation of Permission – Home Finance Mediation and General Insurance Distribution activities

Tell us what it is you wish to do to change your firm's permission.

2.1 Answer this section if you wish to do the following:

- add a new investment business activity to your permission;
- add a customer type or investment type to a current activity on your permission;
- delete an activity from your permission; or
- change, add or delete a limitation.

If you wish to add or amend several activities in different ways, copy this page and attach it to this form.

Select ac	ivity(ies) Amend			
new	current	Delete		
activity	activity	activity		
			Home Finance Activities	
			Advising on regulated mortgage contracts	
			Arranging (bringing about) regulated mortgage contracts	
			Making arrangements with a view to regulated mortgage contracts	
			Entering into regulated mortgage contracts (mortgage lending)	
			Administering regulated mortgage contracts	
			Advising on home reversion plans	
			Arranging (bringing about) home reversion plans	
			Making arrangements with a view to home reversion plans	
			Entering into a home reversion plan	
			Administering a home reversion plan	
			Advising on home purchase plans	
			Arranging (bringing about) home purchase plans	
			Making arrangements with a view to home purchase plans	
			Entering into a home purchase plan	
			Administering a home purchase plan	
			Advising on regulated sale and rent back agreements	
			Arranging (bringing about) regulated sale and rent back agreements	
			Making arrangements with a view to regulated sale and rent back agreements	
			Entering into a regulated sale and rent back agreement	
			Administering a regulated sale and rent back agreement	
			General Insurance Activities	
			Advising on investments (except pension transfers and opt outs)	
			Arranging (bringing about) deals in investments	
			Making arrangements with a view to transactions in investments	
			Dealing in investments as agent	
			Assisting in the administration of insurance	
Calast su	-1	/a\		
Select cu Add	stomer type Delete	(S)		
customer		•		
	2 2		Finance Activities	
		Custor		
			al Insurance Activities	
			(General Insurance business only)	
l Ħ	Ħ		ercial (General Insurance business only)	
Onlantina			The state of the s	
Select inv	estment typ Delete	Je(S)		
Auu	Delete	Home	Finance Activities	
		_	ated mortgage contract	
H	H		reversion plan	
H	H		purchase plan	
			al Insurance Activities	
			vestment insurance contract	
Ħ	Ħ		licy (assisting in administration only)	

Variation of Permission – Home Finance Mediation and General Insurance Distribution activities (cont'd) Tell us what it is you wish to do to change your firm's permission.

Limita	ition(s) o	n your firm's activity(ies)
	Delete a	ew limitation a current limitation a current limitation
Enter t	the limitat	ion(s) below, clearly indicating the amendments if applicable.
_		
Req	uireme	nt(s)
2.2	Answer	this question if you wish to add a new requirement, or amend or delete a current
	require	
221	If you a	re adding a new requirement to your firm's permission, select either a standard requirement
2.2.1		opendix A in the notes that accompany this form, or enter a non-standard requirement:
		Other dead as an increase of forces Arman disc.
	Ш	Standard requirement from Appendix A:
Ref Nu	umber	Short description
		Non-standard requirement:
2.2.2		re amending a current requirement on your firm's permission, enter it along with the
		ed changes in the box below. re deleting a current requirement on your firm's permission, enter it in the box below.
	n you u	to determine a current requirement on your min a permission, enter it in the box below.

Variation of Permission – Client Money Tell us what it is you wish to do to change your firm's client money permission.

3.1					
	☐ No > Continue to Section 4.☐ Yes > Answer the relevant questions in	n this section.			
3.2	What is the firm able to do now, and how does it	wish to change its permission for client money?			
	Firm is currently able to:	Firm wishes to be able to:			
	Hold and control client money for home finance business only	Hold and control client money for home finance business only			
	Hold and control client money for Insurance	Hold and control client money for Insurance			
	Distribution only Control but not hold client money	Distribution Control but not hold client manay			
	Not hold and not control client money	Control but not hold client money Not hold and not control client money			
3.3	Are you applying to stop holding client money?	<u>, </u>			
	No > Continue to next question.Yes > Continue below.				
	 Please tick this box if you have included a report and it has either been paid back to the clients or authorised to hold it. 	t from your auditors confirming that you have done this oncerned or transferred to another entity that is			
	Transfers in place, and you have NEVER held of	oney for Insurance Distribution as you have Risk or controlled client money, please tick here to confirm the lirer covers ALL Client Money. This includes any claims premiums.			
	If you cannot answer 'Yes' to either of the above two	options, explain further below.			
3.4	Are you applying to hold client money?				
	No > Continue to Section 4.Yes > Continue to next question.				
3.5	What type of account will your firm use to hold c	lient money? (tick one)			
	☐ Statutory trust > Continue to no	ext question.			
	Non-statutory trust > Continue to no	•			
	☐ Other > Provide furthe	r details below.			
3.6	Is the account held at an approved bank that me	ets the requirements imposed under CASS?			
	☐ Yes > Continue to next question.				
r	□ No > Explain why below.				
3.7	Have you read and understood the Client Money	rules that you are required to follow?			
	☐ Yes > Continue to Section 4.☐ No > Explain why below.				



Reason for Variation

Tell us why you are applying to change your firm's permission.

We need to know why your firm is applying to change its permission. You should give as much information as possible, including:

- how this change will affect your firm and the long-term strategy for your business;
- any new operational, legal, market risks that you have identified and will need to consider; and
- details on any outsourcing.

Threshold Conditions

We need to know whether the firm will continue to satisfy the threshold conditions as a result of the change in its permission.

The threshold conditions are the minimum conditions a firm is required to satisfy, and continue to satisfy, to be given and retain Part 4A Permission. The firm must satisfy us these conditions will continue to be met if we grant the application.

You may be asked to provide documentary evidence to support of your answers, either during the application process or at a later point.

Tables B and C of the document **'Home Finance and General Insurance Mediation Business- Notes'** gives details on what we may ask you to provide to support your application.

5.1		Have you reviewed Tables B and C of the Notes, and submitted the supporting information as indicated by your type of application?					
		Yes No	Continue to next question.Submitting the information now will significantly speed up the application process.				
	Locat	ion of (Offices				
5.2	- if y He	ad Office	owing: body corporate, that your firm's Registered Office (or if you have no Registered Office, you) is located within the United Kingdom; atural person, that your Head Office is in or you are resident in the United Kingdom.				
		Yes No	> Continue to next question. > Give further details below.				
	Effect	ive Sur	pervision				
5.3		sult of th	nis application, will there be any impact on the appropriate regulator's ability to rely supervise the firm?				
		No	> Continue to next question.				
		Yes	> Give further details below.				
	Appro	priate	resources				
5.4	Pruden	tial cate	gory				
5.4.1	What i	s your fil	rm's current prudential category?				
5.4.2	Will the	e firm's p	rudential category change as a result of this application?				
		No Yes	Continue to question 5.5.What prudential category will your firm be in?				
5.4.3	What w	ill be the	e firm's new capital resource requirement?				
5.4.4	Is the f	irm curre	ently able to meet this new capital requirement?				
		Yes No	Continue to next question.Explain why below.				

5.5	Professional Indemnity Insurance					
	Are you required to have in place professional indemnity insurance (PII)?					
	No > Continue to question 5.7. Yes > Do you hold a valid quote or policy for PII that covers the current business of the and the proposed change in business, if applicable, for which the firm is applying?					
	☐ Yes > Continue to next question. ☐ No > Explain why below.					
	Suitability					
5.6	Compliance A firm must establish, maintain and carry out a Compliance Monitoring Programme of actions to checemplies, and continues to comply, with regulations.					
5.6.1	Do you have in place a Compliance Manual and a Compliance Monitoring Programme that reflo he firm's current business and the proposed change in business, if applicable, for which you applying?					
	Yes > Continue to next question. No > Explain why below.					
5.7	Conduct of Business Requirements – Mortgage Business (MCOB) and Insurance Distribution ICOBS) Sourcebooks					
5.7.1	s the firm ready, willing and organised to comply with the relevant provisions in MCOB and/or COBS (delete as appropriate), and, if relevant to this application, does the firm have in place t elevant customer documentation, such as Key Facts and Initial Disclosure Requirements Documentation and the Insurance Product Information Document, for the permission you are applying for?					
	Yes > Continue to next question. No > Explain why below.					
5.8	Systems and Controls (SYSC) Requirements					
5.8.1	Does the firm continue to meet the SYSC requirements?					
	Yes > Continue to next question. No > Explain why below.					

Insurance Distribution Applications only:

SUP 6 Ann 5D: VoP: HF & GI

5.9	are al activit activit ability emplo and o such	I the peop ty(ies) and ties. It must in order to byees with ther perso	on insurance distribution activities must ensure that certain people are of good repute ble in its management structure and any staff directly involved in insurance distribution of those within the management structure responsible for any staff directly involved in the stalso ensure that certain employees and persons possess appropriate knowledge are to complete their tasks and perform their duties adequately. These are persons and pain the management structure responsible for its insurance distribution activities, employens that are directly involved in it, and those within the management structure responses and persons. Is the firm compliant with the Insurance Distribution Directive	hose nd oyees
		Yes	> Continue to next section.	
		No	> Explain why below.	

We may contact you for more detailed information to support your application, especially if you are applying to significantly change your firm's current business.



Insurance Distribution Activities: shareholders and close links We are required by the Insurance Distribution Directive to collect information about shareholders and close links

This section applies only where a firm applies to add an insurance distribution activity for the first

5A.1 You must provide the following information for any individual shareholder or member who has a holding in the firm that exceeds 10%.

Name	Date of Birth	National Insurance Number	Address	% Holding

5A.2 You must provide the following information for any legal person who has a holding in the firm that exceeds 10%.

Name	Address	Incorporation details	Is the entity regulated?	% Holding
			☐ Yes	
			□No	
			☐ Yes	
			□No	
			☐ Yes	
			□No	
			☐ Yes	
			□No	
			☐ Yes	
			□No	
			☐ Yes	

					1	
				No		
				Yes		
				No		
				Yes		
	,			No		
				Yes		
_				No		
				Yes		
				No		
5A.3		ve close links? nue to Section 6 inue to Question 5A.4				
5A.4	which shows the		It the close links below ship between the firm a lose links).			
	□ C+	rt provided on congrete c	shoot			
	□ Structure chai	i provided on Separate s	rieel			
	☐ Structure char	t provided on separate s	ileet			
	Natural persons	t provided on separate s	sileet			
		Date of Birth	National Insurance Number	Address		
	Natural persons		National Insurance	Address		
	Natural persons		National Insurance	Address		
	Natural persons		National Insurance	Address		
	Natural persons		National Insurance	Address		
	Natural persons		National Insurance	Address		
	Natural persons		National Insurance	Address		
	Natural persons		National Insurance	Address		
	Natural persons		National Insurance	Address		
	Natural persons Name		National Insurance		e entity regulated?	
	Natural persons Name Legal persons	Date of Birth	National Insurance Number		es	
	Natural persons Name Legal persons	Date of Birth	National Insurance Number	Is the	es D	

			☐ Yes ☐ No
5A.5	ink is likely to prevent o	ggest that any holding (iden our effective supervision of	

Approved Persons

If a firm changes its permission it may need new Controlled Functions and Approved Persons or it may no longer require certain Controlled Functions.

You should consider the effect of this change on approved persons before submitting your application. If you require help, please from the FCA please call the FCA Approved Persons Helpline on+ 44 (0) 845 606 9966 or email iva@fca.org.uk. If you are a dual regulated firm and require help from the PRA, please call PRA Firm Enquiries on +44 (0) 203 461 7000 or email PRA.firmenquiries@bankofengland.co.uk

	is the name of the individual the	firm has appointed to be responsible for insurance
distri	bution?	
Insur nece:	ance Distribution business, been	form a new role, for the firm's Home Finance business of assessed as competent to apply the knowledge and skill activities without supervision? And do they have the nt) and experience?
	Yes > Continue to 6.3. No > Explain why below.	
requi		result in current controlled functions no longer being functions from the profiles of the relevant approved person accept this?
	Yes	> Continue to Section 7.
	N/A, as no change to controlled	functions. > Continue to Section 7. > Explain why below.
	No	

EEA Notifications and Third-Country Banking and Investment GroupsWe need to know about any connected firms outside the UK but within the EEA (European Economic Area). We also need to know whether the firm is a member of a third-country banking and investment group.

EEA Notifications

7.1	Is the firm connected with a firm outside the UK but within the EEA?					
		No > Continue to next question.Yes > Give details of each connection below.				
	Name of EEA Regulated Firm		egulated Firm	Name of EEA Regulator	Firm's Contact at EEA Regulator (include email address)	
	Third-Country Banking and Investment Groups					
7.2.1	1 Is the firm a BIPRU firm?					
		No Yes	Continue to Section 8.Continue to next question.			
7.2.2	Is the fi	rm a me	mber of a third-c	ountry (i.e outside of the EEA) ba	nking and investment group?	
	 No > Continue to Section 8. Yes > We will ask you to give further details once we have received this application. 			re received this application.		

Fees

Changing your firm's permission can generate an application fee and vary your periodic fee.

If an application fee is due, you must pay it in full at the same time as submitting your application (by cheque or credit/debit card). If the fee is not paid in full within **five working days** of the date that you submit this form, your application will be returned to you. This fee is non-refundable; and we do not issue invoices for it.

If the proposed application will move the firm into a new fee block, a fee will apply as listed below. If the firm moves into more than one new fee block, you should pay the highest fee.

We charge a fee of £250 for applications that will increase your firm's permitted business activities but which do not change your firm's fee blocks. There is no fee to reduce your permission.

8.1 V	Which fee block(s) is the firm currently in?	
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8.2 Indicate which of the following applies to your application.

Ne	ew Fee Block	Description	Application Fee
	A3	Friendly Societies	
	A4	Friendly Societies	
	A12	Advisory arrangers, dealers or brokers (holding or controlling client money and/or assets)	Ctual abtto my and
	A13	Advisory arrangers, dealers or brokers (not holding or controlling client money and/or assets)	Straightforward - £750
	A14	Corporate finance advisers	
	A18	Home finance providers, advisers and arrangers	
	A19	Insurance intermediaries	
	A1	E-money issuers only	
	A2	Home finance providers and administrators	
	A5	Managing agents at Lloyd's	Moderately
	A7	Fund managers (holding or controlling client money and/or assets)	complex -
	A9	Operators, trustees and depositories of collective investment schemes	£2,500
	A9	Operators of personal pension schemes	
	A10	Firms dealing as principal	
	A1 A3	Deposit acceptors (excluding e-money issuers and credit unions) Firms carrying on insurance activities subject only to prudential regulation (excluding friendly societies)	Complex -
	A4	Firms carrying on insurance activities subject to both prudential and conduct of business regulation (excluding friendly societies)	£12,500
	No change to fee block	Increase in scope of permission, but no change in fee block, e.g. only adding new customer or investment types to your activities, or removing a requirement or limitation	£250
	No new fee block	Reduction in scope of permission, e.g. only removing an activity, removing a customer or investment type from an activity, or adding a requirement or a limitation	No fee

8.3 Please confirm that you have enclosed a cheque for the correct application fee, where one is due.

Yes
No, I will pay using a credit card

Cheques should be made payable to the Financial Conduct Authority, with the firm name and reference number written on the back and enclosed with this form. To make a payment using a credit card, please do not enter the details on this form. We will contact you to ask for the details.

Declaration and Signature

It is a criminal offence, knowingly or recklessly, to give the appropriate regulator information that is materially false or misleading (see sections 398 and 400 FSMA). Even if you believe or know that information has been provided to the appropriate regulator before (whether as part of another application or otherwise) or is in the public domain, you must nonetheless disclose it clearly and fully in this form and as part of this application – you should not assume that the appropriate regulator will itself identify such information during the assessment of this application. If there is any doubt about the relevance of information, it should be included.

There will be a delay in processing the application if information is inaccurate or incomplete, and it may call into question the suitability of the applicant and/or lead to the appropriate regulator exercising its powers (including, but not limited to, taking disciplinary/ Enforcement action). You must notify the appropriate regulator immediately if there is a change to the information in this form and/or if inaccurate information has been provided.

I/We confirm that the information provided in this application is accurate and complete to the best of my/our knowledge. I/We will notify the appropriate regulator immediately if there is a material change to the information provided.

I/We authorise the appropriate regulator to make such enquiries and seek such further information as it thinks appropriate to identify and verify information that it considers relevant to the assessment of this application. These checks may include credit reference checks or information pertaining to fitness and propriety. I/We are aware that the results of these enquiries may be disclosed to the firm/employer/applicant.

I/We agree that the appropriate regulator may, in the course of processing this application, undertake a Police National Computer (PNC) check in respect of any or all of the persons to whom this application relates.

Where the signatory to this application has provided an address and/or email address in connection with the applicant's business, the signatory agrees on behalf of the applicant that the appropriate regulator may use such address and email address as the 'proper address for service' at which to give the applicant a 'relevant document' as those terms are defined in Financial Services and Markets Act 2000 (Service of Notice) Regulations (SI 2001/1420).

I have attached the relevant documents where requested or I have them fully ready and available on request and I have taken all reasonable steps to ensure they are correct.

I confirm that where I have certified that documents are ready they have been prepared to an appropriate standard and are available for immediate inspection by the appropriate regulator.

I understand that the appropriate regulator may require the applicant firm to provide further information or documents at any time.

I confirm that I am authorised to sign this form on behalf of the firm and/or controller(s) and (where applicable) to give each of the confirmations on behalf of the applicant set out in this declaration.

The FCA and the Bank of England process personal data in line with the requirements of the General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 2018. For further information about the way we use the personal data collected in this form, please read the privacy notices available on the FCA's website at: https://www.fca.org.uk/data-protection and the Bank of England's website at: https://www.bankofengland.co.uk/prudential-regulation/authorisations

In addition to other regulatory responsibilities, firms and approved persons have a responsibility to disclose to the appropriate regulator matters of which it would reasonably expect to be notified. Failure to notify the appropriate regulator of such information may lead to the appropriate regulator taking disciplinary or other action against the firm and/or individuals.

I am aware that, while advice may be sought from a third party (e.g. legal advice), responsibility for the accuracy of information, as well as the disclosure of relevant information, on the form is ultimately the responsibility of those who sign the application.

Review and Submission

The ability to submit this form is given compliance contact.	to an appropriate user or users by the firm's principal			
Tick here to confirm that the person submitting this Form on behalf of the Firm and (if applicable the Individual(s) named below - have read and understood the declaration. \Box				
Who must sign the declaration?				
	e person(s) who is responsible for making this application or one or two required signatures depending on the number of			
Is there more than one director / partr	ner as applicable to the legal status of the firm?			
☐ Yes ▶ Provide more than one signal ☐ No ▶ Provide one signatory below	atory below			
	s application, signed by myself and the signatories, will be inspection at the FCA/PRA's request.			
Name of authorised signatory				
Signature				
Date				
Name of authorised signatory				
Signature				
Date				