

1.7 Was the Authority notified of same as required under Section 6 of the ICSP Act and Paragraph 7 of Schedule 2 of the ICSP Act? YES NO

Provide details of these changes and submit relevant supporting documents where necessary.

1.8 Are the Licensee's details as shown on the Authority's website accurate? YES NO

If No, advise accordingly.

1.9 Does the Licensee hold and maintain an insurance cover as required under Section 23 of Schedule 2 of the ICSP Act? YES NO

If Yes, provide a copy of the policy duly certified by an acceptable independent certifier.

If No, provide relevant explanations thereof.

2.0 Licensable Activities

2.1 Has the Licensee carried on the business it is licenced to conduct under Section 3 of the ICSP Act? YES NO

If No, provide relevant clarifications.

2.2 Is the Licensee satisfied that it has conducted its business at all times in accordance with the ICSP Act? YES NO

2.3 Was the Licensee given any directives(s) under section 26 of the FSA Act, which have not been complied with? YES NO

If Yes, provide details of any areas of non-compliance and the reasons thereof.

2.4 Was the Licensee given any direction(s) under section 32 of the FSA Act, which have not been complied with? YES NO

If Yes, provide details of any areas of non-compliance and the reasons thereof.

2.5 Has the control system as required in Section 5 of Schedule 2 of the ICSP Act been maintained to the appropriate level? YES NO

If No, provide the areas where control system has not been maintained.

3.0 Compliance Function

3.1 State the full name of the individual appointed by the Licensee and approved by the Authority as its Compliance Officer in accordance with section 23(2) of the FSA Act.

3.2 State the full name of the Licensee's Compliance and Reporting Officer appointed in accordance with section 15(1) of the Anti-Money Laundering Act 2006. Should the Compliance and Reporting Officer differ from the individual appointed pursuant to section 23(2) of the FSA Act, submit a certified true copy of the Customer Due diligence measures pertaining to the individual (same should include passport copy and proof of address).

3.3 Does the Licensee have and make available to employees written procedures incorporating rules of conduct reflecting the relevant laws, regulations, guidelines and codes? YES NO

If No, provide relevant explanation of reasons for same.

3.4 Has the Licensee adequately monitored the implementation of its written procedures during the previous year? YES NO

If No, provide relevant clarifications.

3.5 Is the Licensee satisfied that it took adequate actions to correct any deficiencies in its written procedures? YES NO

If Yes, give details of the actions that was undertaken.
If No, give details of the actions that will be undertaken.

3.6 Is the Licensee satisfied that its arrangements for ensuring compliance with the ICSP Act, any regulations, guidelines, codes and directives have been effective throughout the previous year? YES NO

If No, provide relevant clarifications.

3.7 Has the Licensee outsourced any of its functions to third parties? YES NO

If No, go to question, 3.9.
If Yes, specify the functions, which may include the information technology, human resources management or any other function, that is being outsourced and the parties it is being outsourced to.

3.8 Confirm the mechanisms in place to ensure that the outsourced functions are being undertaken in accordance with the relevant legislations.

3.9 Is the Licensee's compliance manual updated? YES NO

If yes, provide copy of the Licensee's updated compliance manual, unless same has already been submitted.

If No, provide reason why the manual is not updated.

3.10 Have there been any compliance monitoring findings identified excluding the Licensee's compliance by specified entities, and foundation with the record keeping requirements as per paragraph 12.2 of the Code? YES NO

If No, go to question 3.13.

3.11 Has the Licensee's board of directors and management been made aware of the findings? YES NO

Provide relevant details.

3.12 Provide details of any remedial action undertaken in respect the compliance findings identified.

3.13 Have there been any instances of breach of the ICSP Act, any regulations, guidelines, codes and directives? YES NO

If No, go to question 3.15.

3.14 Have the breaches been properly recorded? YES NO

3.15 Are there any material or significant findings that should be drawn to the attention of the FSA? YES NO

If Yes, provide relevant details.

3.16 Provide a summary describing the manner in which the Licensee has implemented Section 1 of Schedule 2 of the ICSP Act. Please include any mechanism being used for this purpose (E.g. Search Engines, World Check).

3.17 Does the Licensee hold or control client's monies or other assets? YES NO

If No, go to question 3.22.

3.18 Does the Licensee have adequate control systems in place to enable it to comply with Section 8(1)(e) and (f) of the ICSP Act in respect to client's monies? YES NO

If No, provide relevant explanation.

3.19 Was the Licensee in compliance with the requirements relating to client's monies during the previous year? YES NO

If No, provide relevant clarifications.

3.20 Does the Licensee have adequate control systems in place to enable it to comply with Section 8(1)(d) of the ICSP Act in respect to client's assets? YES NO

3.21 Was the Licensee in compliance with the requirements relating to client's assets during the previous year? YES NO

If No, provide relevant clarifications.

3.22 Is there any employee and/or affiliated company (being a subsidiary or branch) of the Licensee that currently holds a criminal record (excluding traffic offences)? YES NO

If yes, state the full name and post title of the individual.

3.23 Is there any affiliated company (being a subsidiary or branch) of the Licensee that has been involved in any legal proceeding? YES NO

If yes, state the full name of the company.

4.0 Notices to the Authority

4.1 Has any notice been given under Section 8 of Schedule 2 of the ICSP Act? YES NO

If Yes, provide relevant details.

4.2 Has any notice been given under Section 9 of Schedule 2 of the ICSP Act? YES NO

If Yes, provide relevant details.

4.3 Has any notice been given under Section 10 of Schedule 2 of the ICSP Act? YES NO

If Yes, provide relevant details.

4.4 Has any notice been given under Section 11 of Schedule 2 of the ICSP Act? YES NO

If Yes, provide relevant details.

4.5 Has any notice been given under Section 12 of Schedule 2 of the ICSP Act? YES NO

If Yes, provide relevant details.

4.6 Has any notice been given under Section 13 of Schedule 2 of the ICSP Act? YES NO

If Yes, provide relevant details.

4.7 Has there been any cases where the Licensee has failed to file a required notice under Section 8 to 13 of Section 2 the ICSP Act? YES NO

If yes, provide relevant details.

5.0 Business Contingency & Resumption

5.1 Does the Licensee have adequate business resumption or contingency provisions as required under Section 22 of the ICSP Act? YES NO

If Yes, provide details of such arrangements.

If No, provide clarifications for non-compliance by the Licensee.

5.2 Is the Licensee's business resumption and contingency plan updated? YES NO

If yes, unless otherwise, please provide an updated copy of the Licensee's business resumption and contingency plan.

If No, provide reason why the business resumption and contingency plan is not updated.

5.3 Has the Licensee's business resumption or contingency arrangement been tested during the previous year? YES NO

If Yes, provide details of same (including relevant dates on which such tests were carried out, whether it was a full or partial test, whether any deficiencies were identified, and whether such deficiencies have been resolved).

If No, provide reason why the business resumption or contingency arrangement has not been tested.

6.0 Statistical Information

6.1 Pursuant to section 3(1)(ii)(a) and (c) of the ICSP Act, are any fit and proper employee or director of the Licensee acting as a director for a specified entity (including specified entity(ies) under the administration of another Licensee) or acting as a councillor of a foundation?

YES

NO

If Yes, provide, **in a tabular format as provided hereunder**, the following information on each of the individual acting as director or councillor:

- full name of the individual;
- the position of the individual within the Licensee;
- the type of specified entity;
- the number of specified entities on which the individual is acting as director; and/ or
- the number of foundations on which the individual is acting as a councillor

Full Name of Individual	Position of Individual	No. of International Business Companies (IBCs)	No. of Companies (Special License) (CSLs)	No. of Limited Partnerships (LPs)	No. of Foundations
1.					
2.					
3.					
...					

Table 1.0

6.2 Pursuant to section 3(1)(ii)(a) of the ICSP Act, are any fit and proper employee or director of the Licensee serving as a nominee shareholder to any specified entity to which the Licensee provides international corporate services including any other specified entity(ies) under the administration of another Licensee?

YES

NO

If yes, provide, **in tabular format as provided hereunder**, the following information on the individual serving as a nominee shareholder:

- full name of the individual;
- position of individual within the Licensee;
- indicate the type of specified entity; and
- the number of specified entity on which the individual is serving as a nominee shareholder

Full Name of Individual	Position of Individual	No. of International Business Companies (IBCs)	No. of Companies (Special License) (CSLs)
1.			
2.			
3.			
...			

Table 2.0

6.3 Are any fit and proper employee or director of the Licensee serving as a general partner on any Limited Partnerships to which the Licensee provides international corporate services?

YES

NO

If yes, provide, in tabular format as provided hereunder, the following information on the individual acting as general partner:

- full name of the individual
- position of individual within the Licensee
- number of Limited Partnerships on which the individual is acting as general partner

Full Name of Individual	Position of Individual	No. of Limited Partnerships
1.		
2.		
3.		
...		

Table 3.0

6.4 Are any fit and proper employee or director of the Licensee serving as a nominee founder on any Foundation to which the Licensee provides foundation services?

YES

NO

If yes, provide, in tabular format as provided hereunder, the following information on the individual acting as a nominee founder or a councillor:

- full name of the individual
- position of individual within the Licensee
- number of Foundations on which the individual is acting as the nominee founder

Full Name of Individual	Position of Individual	No. of Foundations
1.		
2.		
3.		
...		

Table 4.0

6.5 Pursuant to section 3(1)(ii)(b) of the ICSP Act, are there any IBC which is wholly owned and managed by the Licensee that is acting as a director (directly or indirectly) for an IBC to which the Licensee provides international corporate services including any other IBC under the administration of another Licensee.

YES

NO

If Yes, provide, in a tabular format as provided hereunder, the following information in respect to the IBC acting as a director (directly or indirectly) for a specified entity;

- name of the IBC
- IBC number
- number of specified entities on which the IBC is acting as a director

Name of IBC	IBC Number	No. of specified entities (IBC)
1.		
2.		
3.		
...		

Table 5.0

6.6 Pursuant to section 3(1)(ii)(b) of the ICSP Act, is there any IBC which is wholly owned and managed by the Licensee serving as a nominee shareholder to specified entities to which the Licensee provides international corporate services including any other IBC under the administration of another Licensee?

YES NO

If Yes, provide, in a tabular format as provided hereunder, the following information in respect to the IBC serving as a nominee shareholder for a specified entity;

- name of the IBC
- IBC number
- number of specified entities on which the IBC is serving as a nominee shareholder

Name of IBC	IBC Number	No. of specified entities (IBC)
1.		
2.		
3.		
...		

Table 6.0

6.7 Has any individual entered into an agreement with the Licensee to provide directorship services to specified entities to which the Licensee provides registered agent services (i.e. Professional Officers) pursuant to clause 21.8 and 21.9 of the Code for International Corporate Service Providers (“the Code”)?

YES NO

If Yes, provide, in a tabular format as provided hereunder, the following information in respect to the individual providing directorship services to specified entities to which the Licensee provides international corporate services;

- full name of the individual including the certified copy of relevant due diligence documents;
- occupation of the individual; and
- number of specified entities on which the individual is acting as director.

Name of Individual	Occupation	No. of International Business Companies (IBCs)	No. of Companies (Special License) (CSLs)
1.			
2.			
3.			
...			

Table 7.0

6.8 Provide, in a tabular format, the details of any Anti-Money Laundering training provided by the Licensee to its employees during the previous year?

Name of employee	Status (ongoing or completed)	Institution/Presenter	Type of Training / Topic	In-house training or External
1.				
2.				
3.				
...				

Table 8.0

6.9 Provide, in a tabular format, the details of any compliance related training provided by the Licensee to its employees during the previous year? (E.g. ICA Advance Certificate). Please note that all submitted certificates must be certified by an acceptable independent certifier.

Name of employee	Status (ongoing or completed)	Institution/Presenter	Type of Training / Topic	In-house training or External
1.				
2.				
3.				
...				

Table 9.0

6.10 Provide, in a tabular format, the details of any other trainings undertaken by the employees and relevant qualifications obtained in the previous year. (E.g. ICSA Level 4 Certificates). Note that all submitted certificates must be certified by an acceptable independent certifier.

Name of employee	Status (ongoing or completed)	Institution/Presenter	Type of Training / Topic	In-house training or External
1.				
2.				
3.				
...				

Table 10.0

6.11 Are there any directors, shareholders, beneficial owners or members of managerial staff within the Licensee that are politically exposed persons as defined by Regulation 6 of the Anti-Money Laundering Act, 2006 as amended. YES NO

If yes, provide in a tabular format the following information:

Name of individual	Prominent Public Function held	Country/Institution	Time in position	Position in Licensee
1.				
2.				
3.				
...				

Table 11.0

6.12 Pursuant to section 18 of Schedule 2 of the ICSP Act, have any complaints been acknowledged and recorded in the complaint register during the course of the previous year? YES NO

If No, go to question 7.

If Yes, provide a copy of the complaints register.

6.13 Provide the number of complaints, if any, that have been left unresolved and a summary of each case.

7. The following information is to be provided by fully-fledged service providers only.

Provide the following, in respect of the Licensee:

- a. an updated organisational structure which clearly indicates the name and post title of all directors and employees. In the event that there have been no changes to the last submitted organisational structure of the Licensee, provide a confirmation of same;
- b. the total number of staff employed;
- c. a breakdown of Seychellois and Expatriate employees;
- d. the full list of all the individuals which has been determined fit and proper by FSA;
- e. the full list of all the individuals currently fulfilling minimum dual control requirement;
- f. the shareholders of the Licensee and their respective interest; and
- g. the beneficial owners and their respective beneficial interest in the Licensee.

8. The following information is to be provided by Managed Service Providers only.

Provide the following, in respect of the Licensee:

- a. an updated organisational structure which indicate clearly the:
 - i. full name of all directors;
 - ii. shareholders and their respective interest in the Licensee; and
 - iii. beneficial owners and their respective beneficial interest in the Licensee.
- b. the full name and email address of the contact person of the managed service provider as per section 22.8 of the Code for International Corporate Services Providers.
- c. Confirm whether any individual(s) that are not based in Seychelles (apart from fit and proper directors of the Licensee) are providing services to the Licensee which may be considered as being in the employment of the Licensee.

DECLARATION

We, the undersigned being directors of the Licensee declare as follows:

- a) we have truthfully and fully answered the relevant questions in this Compliance Form and disclosed any information which might reasonably be considered relevant to the Authority;
- b) we will promptly notify the Financial Services Authority (“FSA”) of any changes in the information provided herein and any supporting documents supplied; and
- c) we fully understand and acknowledge that failure on our part to provide correct and accurate information herein, may lead to suspension or revocation of the licence.

We hereby understand that the FSA may wish to make enquiries – both now and on a continuing basis. Accordingly, we consent to any person, body or institution which FSA may approach, to provide such information as FSA believes may be relevant for the conduct of its enquiries.

Signature:

Name of Director:

Date:

Signature:

Name of Director:

Date: