

Responsible Manager Policy

4XHub Ltd

Company:	4XHub Ltd
Registration No:	LL16731
License No:	MB/20/0055
Date Updated:	November 2022

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VERSION CONTROL

Version Number	Date Updated	Notes
1	August 2021	Original document prepared and finalised in consultation with Sophie Grace Pty Ltd.
2	November 2021	Modified for 4XHUB Ltd. (Labuan)
3	November 2022`	Revised by Marcus Tan & Co. for Labuan

SECTION A – INTRODUCTION

1. INTRODUCTION

- 1.1 This Responsible Manager Policy (“**Policy**”) outlines 4XHub Ltd’s (“**4XHub**”) policies and procedures to ensure 4XHub’s Responsible Manager(s) (“**RM(s)**”) maintain an appropriate level of competence to carry out their duties required under 4XHub’s Labuan Financial Services Authority (“**LFSA**”) Licence.
- 1.2 This Policy has been developed in accordance with the requirements outlined by LFSA. This Policy outlines measures to ensure ongoing compliance with the monitoring, supervision, and training requirements of representatives, including RMs, outlined in the guidelines issued pursuant to Labuan Financial Services and Securities Act 2010.

2. ORGANISATIONAL COMPETENCE

- 2.1 The Board of Directors must ensure 4XHub has a sufficient number of appropriately qualified and experienced RMs to enable 4XHub to meet its obligations and responsibilities.
- 2.2 A RM must meet the education standards set out by LFSA. A RM must comply with one (1) of the five (5) options for demonstrating knowledge and skills in order for 4XHub to comply with its organisational competence obligation.
- 2.3 The RM must be of good fame and character in line with the corporate profile of 4XHub. If a RM fails to maintain their good fame and character, the RM may be required to resign and notify LFSA of this at the request of 4XHub.
- 2.4 Apart from the competencies required to meet the requirements of LFSA, 4XHub ensures a RM has those skills and competencies to hold a senior position within a business. A RM must have the appropriate knowledge and skills to cover the financial products and services on 4XHub’s LFSA, or those authorisations which 4XHub may seek to add.
- 2.5 The Compliance Officer reviews the organisational competency of 4XHub at least annually and report the findings to the Board of Directors.
- 2.6 Where 4XHub receives notification that a RM intends to resign from their role as RM, the Compliance Officer must immediately review the organisational competency of 4XHub and report the findings to the Board of Directors including whether another RM is required to be appointed.

3. WHEN DOES THIS POLICY APPLY?

- 3.1 This Policy applies to all RMs of 4XHub at all times, and the requirements remain in force on an ongoing basis.

SECTION B – RESPONSIBLE MANAGERS

4. APPOINTMENT OF RESPONSIBLE MANAGERS

- 4.1 RMs are appointed on the basis of the nature, scale and complexity of 4XHub.
- 4.2 The detailed checks listed below are conducted on the nominated individual prior to their appointment as RM of 4XHub. This is to ensure they are of good fame and character and possess the requisite knowledge and experience. The competence of 4XHub's RM must be maintained at all times. The detailed checks are as follows:
- (a) review resumes and checks obtained of any proposed RM, including references, evidence of qualifications and experience;
 - (b) initial interview conducted by 4XHub's management;
 - (c) perform a search of LFSA's registers to determine the existence of any banning orders;
 - (d) request evidence of any existing appointments to other licensees;
 - (e) perform a bankruptcy check;
 - (f) be satisfied the proposed RM is suitably qualified and experienced.
- 4.3 All files are kept for seven (7) years after the resignation or removal of the RM.
- 4.4 In the event that one (1) or more of 4XHub's RMs changes, or another RM is added, 4XHub must be able to show that they are still able to comply with the LFSA conditions.
- 4.5 The Compliance Officer must ensure the change is recorded in 4XHub's records.

5. REMOVAL OF RESPONSIBLE MANAGER

- 5.1 Where a RM has retired, resigned, or is otherwise removed, the Compliance Officer must ensure 4XHub continues to have enough appropriately qualified and experienced RMs to enable it to meet its obligations and responsibilities and maintain its organisational competence.
- 5.2 The Compliance Officer must ensure the change is recorded in 4XHub's records.

7. KEY PERSON APPOINTMENTS

- 7.1 This section only applies to a RM who is listed on 4XHub's LFSA as a "key person".
- 7.2 An application to vary the key person condition on 4XHub's LFSA must address the following matters:
- (a) the date the key person named on the LFSA ceased to be an officer, RM or representative of the licensee or to perform duties on behalf of 4XHub with respect to its financial services business;
 - (b) the name, address, date of commencement, educational qualifications and experience of any replacement RM 4XHub has appointed to perform duties on behalf of 4XHub with respect to its financial services business;
 - (c) if 4XHub does not have a replacement RM, then the application must outline detailed reasons as to why 4XHub has not nominated a replacement; and
 - (d) a detailed description of how 4XHub continues to comply with the relevant laws and regulations and the conditions by LFSA following the key person ceasing to be a RM of 4XHub or to perform its duties on behalf of 4XHub with respect to its financial services business.

SECTION C – CONCLUSION

8. REVIEW PROCESS

- 8.1 This Policy is reviewed regularly by the Compliance Officer of 4XHub, in conjunction with an external compliance consultant, having regard to the changing circumstances of 4XHub, any relevant regulatory changes and to ensure the procedures in place to appoint, remove and train RMs are adequate. Any changes to this Policy are advised to all RMs at the time.
- 8.2 The Compliance Officer must undertake the following reviews:
- (a) Appointment and removal of RMs – annual review to confirm the procedures to appoint or remove a RM have been performed in accordance with sections 4 to 6.
 - (b) Training plan – annual review of the training plan for each RM to ensure adequate training is scheduled to be undertaken.
 - (c) Training register – annual review to ensure each RM has completed adequate training.
- 8.3 The Compliance Officer reports the findings to the Board of Directors. Where the review uncovers a breach of 4XHub's obligations as an LFSA license holder, the breach is reported in accordance with 4XHub's Breaches and Incidents Reporting Policy.

9. AUDITS AND RECORDS

- 9.1 The policies and procedures outlined in this Policy are audited as part of any 4XHub compliance audit.

9.2 All records of these audits and any other records in relation to this Policy must be kept for seven (7) years, or as otherwise stipulated in the 4XHub's Document Retention Policy.

Issued by 4XHub Ltd

November 2022