

What you should be asking us about our business

(and why it's important)



As our client, or potential client, it is vital that you know as much about our business as possible. This is important for two reasons;

1. You know what you can expect from us, how we work, and the level of professionalism that we work with. This helps us ensure a smooth, professional and enjoyable working relationship.
2. As a regulated business you will know that it is a regulatory requirement to have appropriate systems and controls in place. This expands to all areas of your business, but is particularly important when it comes to the outsourcing of your paraplanning.

To help you with both of these points we have put together this document to allow you to get to know us, and to give you comfort and peace of mind that we operate our business in a way that is effectively risk managed, and takes into consideration the regulatory requirements that you are bound by.

How should you use this document?

We've set this document out in a way that means it is very easy for you to implement the contents into your own systems, controls and/or risk frameworks. We have purposely set out the questions we believe you should be asking us for your own due diligence purposes, the answer to those questions, and then vitally, why the information is important and what you should do with it. As it is the interpretation and implications of the information provided in this document that is important, not just the information alone.

ISO 27001 Certification

We Complement is ISO 27001 certified, the internationally recognised standard for Information Security Management Systems. This certification provides independent assurance that we manage information security through a robust, structured framework covering our people, processes, and systems.

ISO 27001 certification is rare within the outsourced paraplanning and consultancy market. Achieving this standard reflects our commitment to operating to the highest levels of data protection, governance, and risk management, and to safeguarding both client and end-client information.

For regulated firms, this offers added confidence that our information security controls meet a globally recognised benchmark and support your regulatory obligations around outsourcing.

The nitty-gritty of our business

Business structure & the legal matters

What is the company legal structure and who is involved in that structure?

We Complement is a company registered in England under company number 13689379. The registered address is Old Brewery Business Centre, Castle Eden, Co. Durham, TS27 4SU. The company is a private limited company with one director:

- Anthony Slimmings

The director does not hold any other directorships or interest in any other entity that could be deemed to be in competition or create a conflict with any regulated UK financial planning business.

Why is this important?

It is important to understand whether there are any conflicts of interest that could cause a potential issue with impartiality, or impact in any way the nature of the relationship or outcome of services. As neither director has any other business interest there is limited risk of a conflict of interest arising between We Complement and your firm.

Is the company regulated?

We Complement Limited is not a regulated entity, but we do have to run our business in line with UK company law given that we are a private limited company.

Why is this important?

This is important because as a regulated business yourself, there are certain rules and requirements that you must adhere to. As we aren't regulated, we do not have the same requirements, and therefore the responsibility for the advice will always ultimately sit with your firm. However, to be able to provide an effective service we run our business as close as possible to how we would operate if we were regulated. We do this to ensure you have peace of mind that we are operating to the same standards as you must operate to wherever possible. The detail across this document outlines in detail how we do this.

Are your company accounts publicly available?

As a limited company we must publish our accounts following the end of each company year. Our accounts are publicly available via Companies House.

Why is this important?

By accessing and downloading our company accounts you are able to demonstrate to the FCA that you have verified and gained evidence of our financial security. You are also able to evidence that you have verified that we are a legitimate UK based company. This is key to evidencing your own robust systems and controls around outsourcing and minimising the risk of financial crime.

About the team

How many people do you employ?

Our Founding Director, Tony Slimmings, is a Chartered Financial Planner with over 30 years' experience in financial services, including 24 years as an active financial adviser.

Paul Kenworthy has worked in financial services for 13 years, with over eight years' experience in paraplanning. He is diploma qualified with both the CII and CISI and has been with We Complement since early 2021.

Hannah Keane has worked in financial services since 2015 and has been a paraplanner since 2020. She is diploma qualified with CISI and is currently working towards the CFP qualification. She joined We Complement in August 2020.

Lucy Wylde-Weston has worked in financial services since 2016 and has been a paraplanner since 2018. She is diploma qualified with CISI and has been with We Complement since July 2021.

Claire Robertson joined We Complement in August 2025 and brings over 25 years' experience in financial services. She is diploma qualified with the CII and also holds mortgage and equity release qualifications.

Nicola Porter has worked in financial services since 2017 and joined We Complement in January 2023. She is currently studying with CISI to achieve diploma qualification.

The team has experience across all core case types, including annual reviews, pension switches, and legacy planning. We also have particular expertise in tax-efficient investments such as Business Relief, EIS, and VCTs. This experience has led to We Complement being a recommended paraplanning and suitability consultancy within the ValidPath network for these types of cases.

Why is this important?

It is important for us to demonstrate that we have the appropriate resource available to be able to deliver services to you in the expected service level agreement, and for you to see the size of the overall team. As you can see, with a large and growing team, we have enough resource to deliver to our SLA's.

Is your team appropriately qualified?

All paraplanners are qualified to at least the equivalent of Diploma level 4.

As a firm we believe that technical knowledge is absolutely pivotal for the role of a paraplanner, and therefore we encourage and support all paraplanners to continue to further their knowledge and qualifications beyond the level 4 standard.

Why is this important?

We need to be able to demonstrate to you as client that our paraplanners are technically able to produce the advice that you require. Therefore, we believe that all paraplanners should meet the same minimum standards as those expected of financial advisers by the FCA. By ensuring we operate to the same minimum standards that you operate to, you have comfort that the individual producing the work you require has the technical ability to do so.

How do you ensure that your employees are fit & proper?

As a first step, we have in place a robust recruitment process that verifies an individual's qualifications, past work experience, their character via a character reference, as well as their right to work in the UK. We ask all individuals to complete a fit and proper self- assessment as part of the latter stages of the recruitment process and verify their answers with external checks including a review of credit history and a criminal records check (DBS check). We also request as part of the reference request that past employers disclose whether the individual has ever been subject to disciplinary action or breached any of the FCA's conduct rules. Although we aren't a regulated business, we still expect all individuals within the business to adhere to the tier 1 conduct rules as set out in COCON of the FCA handbook.

Why is this important?

There are a number of reasons why it is important to ensure individuals are fit and proper. Firstly, in relation to our own business risk, we need to ensure that we are employing people who are honest, act with integrity, and have the right character to work in a role such as this. The risk of employing the wrong type of person is significant to us and could result in reputational damage or financial damage. So we must ensure we have our own risk management in place to effectively mitigate this risk.

Secondly, we appreciate that as a regulated business, you also must ensure that your staff, particularly your advisers, are fit and proper to undertake the role they do. Therefore, we believe that we should also demonstrate to you that we operate to that same high standard. Giving you peace of mind that we undertake the same level of checks on our employees. As your client data will be shared with us, and our paraplanners will be working on your client files, it is vital that you have the confidence that those individuals are fit and proper.

How do you ensure that your employees are competent in the role (and remain competent)?

We operate a comprehensive Training & Competence (T&C) scheme aligned with the FCA's requirements for retail investment advisers. This framework ensures our paraplanners meet the same professional and regulatory standards expected of advisers within authorised firms.

Under the T&C scheme, all paraplanners must:

- Hold (or be working towards) a minimum Level 4 qualification. Those not yet qualified work under supervision with a formal sign-off process.
- Complete at least 35 hours of Continuing Professional Development (CPD) each year, including:
 - 21 hours of structured CPD
 - 15 hours relating to activities covered by the Insurance Distribution Directive (IDD)
- Tailor CPD to reflect any specialist qualifications (e.g. Long-Term Care advice, Complex Trusts & Estate Planning for STEP members).
- Maintain and provide evidence of completed CPD annually.

The firm also ensures that:

- Each paraplanner's training needs are assessed on joining and reviewed regularly, with appropriate training and support provided.
- Competence is reviewed at least annually—or sooner where regulatory or legislative changes occur - covering:
 - Technical knowledge assessments
 - Understanding of market, product, and regulatory developments

Additionally, individual performance is monitored using clear quality measures, including:

- Accuracy of written work (spelling and grammar)
- Timeliness of report delivery
- Overall quality of output

Why is this important?

The competence of our paraplanners is possibly one of the biggest risks to our business. We must ensure that every individual who works on a piece of financial advice, or other work related to the financial planning process, is competent to do so. We must ensure that these individuals remain competent and produce accurate and timely work. Inaccuracies in work, particularly technical inaccuracies, can be significant to both us and you if these aren't picked up before the advice is provided to a client. Although the advice provided to the end client always remains the responsibility of the regulated firm (you), we need to ensure that we provide you with technically accurate work to ensure you aren't at risk.

Therefore, our training and competence scheme is a significant risk management tool within our business, and acts to mitigate both risk to us, and will act to reduce risk to your firm too.

How do you look after your employees and consider factors such as well-being?

As a business, we take employee well-being incredibly seriously. Our employees are our greatest asset, and therefore they are our priority. We have taken many steps to ensure the well-being of our employees, and these include:

- Undertake a 'working from home robustness assessment' as part of the recruitment process. This helps both the business and the candidate understand whether working from home is the right thing for them. The business appreciates that working from home can be psychologically tough, and therefore it is important that individuals who apply for these roles are psychologically robust enough, and prepared, for the challenge.
- The firm provides a generous holiday allowance of 27 days plus bank holidays and Christmas close-down, which is above industry standard.

Why is this important?

Ensuring our employees are at the heart of what we do means we are more likely to retain staff, and those people are more likely to enjoy their job. Individuals who enjoy their role are more likely to be productive and produce work of a good standard. Overall improving our staff retention and staff turnover rate.

This is important for you as you know that as a business we make every effort to retain staff providing you with consistency, and us with consistency. The retention of staff is also a positive for us financially, and means we are able to develop and train good people within the business.

How do you consider diversity in relation to your team?

Diversity brings a variety of thinking, perspectives, and ideas, all of which strengthen a business.

For regulated firms, the FCA has emphasised the importance of fostering diversity and inclusion. We believe this extends to the relationships we hold with other firms, and we welcome clients who share this commitment. Demonstrating an understanding of our approach to diversity shows that you value fair and inclusive practices too.

We recognise that unconscious bias can influence recruitment decisions, for example when a hiring manager naturally gravitates toward someone similar to themselves. To mitigate this, we ensure our recruitment processes are fair, transparent, and inclusive. This includes reviewing the diversity of our existing team, encouraging applications from underrepresented groups, and ensuring all candidates are assessed objectively against the skills and experience required for the role.

Our goal is to attract and retain the best people for each role while continually promoting equality of opportunity and a diverse workplace.

Why is this important?

Diversity not only brings a variety of thinking and perspective to a business, but also brings a diversification in ideas. This is a positive for any business.

As a regulated business like yours, the FCA have talked about the importance of considering diversity within your business, and therefore we believe that it is also important that you think about how the firms you work with tackle this area too. By demonstrating that you have a good understanding of our approach to diversity then you demonstrate that you too take this area seriously.

How do you consider inclusion in relation to your team?

Inclusion means ensuring every employee has equal opportunities and experiences a fair, supportive working environment. No individual should be disadvantaged for any reason. All roles within the business are open to anyone with the appropriate qualifications and experience. We do not exclude or discriminate based on personal characteristics such as age, gender, background, race, religion, or disability.

We also ensure that our policies and procedures are inclusive and accessible to all. This includes standard areas such as maternity, paternity, adoption, and surrogacy policies, as well as broader measures that support equity in practice. For example, we allow significant expenses - such as exam fees or business travel - to be paid directly by the company rather than reimbursed, helping to remove potential financial barriers.

We believe inclusion is achieved not just through policy, but through practical actions that ensure everyone can contribute fully and confidently in their role.

Why is this important?

As with well-being, ensuring we are an inclusive employer is more likely to ensure our employees remain happy in their role. We do not want to disadvantage a person based on a factor that could have been prevented. We want to encourage all employees to take up all opportunities we make available to them, and do not want unnecessary barriers in place to prevent this from happening.

For you as a client, knowing that we take inclusivity seriously should give you the comfort that, again, we take staff retention seriously.

How we operate

Maintaining Up-to-Date and FCA-Compliant Templates and Processes

We have an in-house team responsible for conducting regular file audits and ensuring all reports and documentation meet FCA requirements. The team continuously monitors updates from the FCA and other relevant regulatory bodies to ensure our templates and processes reflect the latest guidance and best practice.

To maintain consistency and quality, any regulatory changes are reviewed by senior members of our team before being incorporated into our templates and procedures. We also hold periodic internal workshops and knowledge-sharing sessions to ensure all staff remain informed and competent in applying any new or updated requirements.

Our approach ensures that our documentation and processes remain accurate, relevant, and fully aligned with current regulatory expectations.

Why This Is Important

Ensuring our templates and processes remain up to date is vital because our clients rely on us to produce accurate, consistent, and compliant reports. By regularly reviewing and refining our documentation, we minimise the risk of error and ensure our work reflects the most current regulatory standards. This proactive approach to quality and compliance gives our clients confidence that every report we produce is reliable, well-structured, and aligned with the latest FCA expectations.

What are your service standards, including turnaround times?

We will aim to produce your required report within 7 working days of receiving a complete client file, unless otherwise agreed. In addition, we offer an enhanced turnaround of 3 working days if required. We do however retain the right to extend this turnaround time if you unexpectedly and suddenly increase the volume of reports required. However, we will discuss this with you at the time and agree a strategy if needed. We do ask that you provide us with a full client file immediately where possible, as the SLA will only begin once that client file has been assessed as full and complete.

Why is this important?

By providing you with this SLA you are able to prioritise your own workloads and diarise client meetings appropriately.

How do you manage risk within your business?

We operate within a structured risk management framework designed to identify, assess, and control risks across all areas of the business. This approach ensures we are aware of potential risks and take proactive steps to manage, avoid, or transfer them where appropriate.

Our framework follows the same principles and standards expected of a regulated firm and aligns with the FCA's SYSC (Systems and Controls) requirements where relevant to our operations.

Examples of our risk management in practice include:

- **Quality assurance:** All reports and technical calculations undergo a four-eyes review before being issued to clients. This process reduces the likelihood of errors and ensures accuracy before advice is returned to your firm.
- **Management information (MI):** We collect and analyse data across all business areas, including HR, recruitment, data security, finance, and training. Our internal systems produce MI reports that help us identify trends, monitor performance, and address risks before they escalate.
- **Professional indemnity insurance:** We maintain comprehensive PI cover to protect against the financial impact of a potential complaint.

Why is this important?

Effective risk management is critical to the long-term success and resilience of any business. A firm that actively identifies and manages risk is better placed to maintain operational stability, safeguard clients, and deliver consistent quality.

As a service provider to FCA-regulated firms, we believe it is essential that our own operations reflect the same high standards. Our structured approach to risk management gives you confidence that the risk we pose to your business as your outsourced partner is minimal.

Do you ever sub-contract paraplanning work to external paraplanning contractors?

Unlike some outsourced paraplanning firms, We Complement Limited never sub-contracts work to any other external parties. All work is completed in-house by employees of We Complement Limited. If there was ever an occasion where you require an increased level of work from us at very short notice, we would either use other members of the existing team where resource is available to deliver the work required or discuss amending our standard SLA's and prioritise work to meet your needs. We would never sub-contract the work to any other parties.

Why is this important?

As a business we are focused on doing paraplanning properly, and we operate to our own high standards. We therefore do not feel that any sub-contractors can reliably operate to our standards without extensive training, and then robust oversight. Therefore, the risk to our business to sub-contract out work is too significant. And if the risk is too significant for us, then this too means the risk would be significant to you as a client. So we will not sub-contract any paraplanning work. This gives you the peace of mind that all work produced, and all parties involved in producing that work, meet our high standards as set out in this document.

Have you got a Disaster Recovery Plan in place?

Yes, as any good business should have, we have a formal disaster recovery plan. This plan covers both physical disaster recovery and personnel disaster recovery (such as key-person loss). Our disaster recovery plan is reviewed at least annually for continued suitability.

We also maintain an incident response process and a register of both incidents and potential incidents; these are reviewed during our formal annual management review process.

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How we keep yours and your client's data secure

Do you comply with GDPR UK?

Yes, we are GDPR UK compliant. In relation to our business relationship with you, we act as a data processor, and therefore comply with the GDPR UK requirements for data processors. When you become a client we will supply you with a data processor agreement, and this sets out our obligations to you. As a data controller it is your obligation to ensure that your documents are GDPR compliant in relation to the collection of your client data, and that your client is aware that you may share their data with a third party for the purposes of providing services.

Why is this important?

As the data controller you have stringent requirements that you must meet under GDPR UK. As a data processor, we also have requirements that we must meet. One of your requirements is to ensure that we as a data processor comply with the GDPR UK requirements, and that we have a legal agreement in place. You must be comfortable with our promise to you on how we will process data. Therefore the data processor agreement is a key element of the GDPR UK compliance for both of us.

Are you registered with the information commissioner's office (ICO)?

Yes, we are registered with the ICO under registration number ZB427271.

Why is this important?

It is a legal requirement under the Data Protection Act that any entity that processes personal information will need to register with the ICO and pay a data protection fee. This is the case for every type of company from sole traders and SMEs through to multinational corporations. Our registration with the ICO evidences compliance with this requirement, and demonstrates that we take data protection very seriously.

How do you share and save data as part of the delivery of your service offering?

We use a secure file sharing system to share your client data. This data is saved on a Microsoft server that is based within the geographical boundaries of the EU. We will not use email to send client data, and we ask that you do not use email to share with us any client data. We take the security of all client data extremely seriously, and expect our client firms to adopt the same standard.

Why is this important?

The physical location of a cloud-based server is vital under the GDPR UK legislation. If data is stored on a server outside of the EU there is a risk that the country in question does not have data protection laws that meet or exceed the standards under GDPR UK. This means there is a significant risk that data will not be treated as securely as required by GDPR UK. Therefore it is vital that the physical server location is either within the EU boundaries, or within a country that has formally been approved as meeting or exceeding the GDPR UK requirements.

As we store all client data on a cloud-based server that is physically located within the EU this gives you peace of mind that the data storage will comply with GDPR UK.

Do you have an Information Security Policy?

Yes, we have a formal Information Security policy in place, which is communicated to all staff upon joining and re-communicated if significant changes are made. In addition, information security awareness training is mandatory for all employees and is refreshed annually to ensure high standards relating to data security are maintained, and our understanding and compliance is embedded.

As part of our risk management framework for information security, we have controls in place to prevent non-compliance with the policy. These include restrictions on attaching client data to emails and preventing employees from saving client data anywhere other than our secure cloud-based server. All systems operate on the principle of least privilege and ensure users have only the permissions necessary for their role during onboarding.

Our Information Security Policy is reviewed annually and signed off by our MD to ensure continued suitability.

Why is this important?

Having a formal Information security policy in place demonstrates our commitment to protecting your client data. The annual refresher training ensures our employees remain competent and up to date in this area. Our proactive risk management approach - preventing non-compliance through system restrictions - demonstrates that we have robust systems and controls in place to mitigate the most significant risks.

What happens to client data if a firm disengages from We Complement?

If a firm chooses to cease working with us, all data and documentation relating to that firm including any material stored on our secure SharePoint environment will be permanently deleted within 14 calendar days of disengagement. This deletion includes all client files, working papers, and shared folders, unless retention is legally required for record-keeping or compliance purposes.

Written confirmation of deletion can be provided upon request.

Why is this important?

This ensures that your firm's and your clients' data are not retained beyond the necessary working relationship, supporting our compliance with UK GDPR and ISO 27001 principles of data minimisation and secure disposal. It provides assurance that once our engagement ends, no residual information remains on our systems, protecting both parties from potential data breaches or misuse.

Have you got Cyber Essentials Certification in place?

Yes, the firm is Cyber Essentials certified. Cyber Essentials is a government-backed certification, awarded to companies that meet core principles of cyber security outlined by the scheme. This includes mitigation of risks such as malicious links, phishing attacks, and malware.

To receive the certification, an audit of our current security controls and strategy was undertaken to identify weaknesses and ensure implementation of best-practice protections.

Why is this important?

This reduces the likelihood of successful cyber-attacks, which directly lowers the risk of any client data breaches. Many businesses require this accreditation before engaging with third parties, so it also demonstrates our professionalism and commitment to data security.

Use of Third-Party Systems and Software Licences

While We Complement does not outsource any part of our paraplanning or consultancy work, we do use a small number of trusted software providers to support our research and reporting processes include: Defaqto, MiCap, Langcat Analyser, Ipipeline and FE Analytics.

Each of these systems operates under commercial licence and is used solely for analysis and research purposes. We regularly review these providers to ensure they meet recognised data-security and information-governance standards. No client data is stored permanently on these platforms beyond what is required to complete analysis, and data is removed or anonymised after use.

As part of our ongoing commitment to continual improvement, these systems have been incorporated into our Information Security Management System (ISMS). We have implemented controls to monitor access, ensure secure authentication, and verify that all software updates and licences remain current.

As part of our supplier oversight process, all third-party software and service providers are reviewed annual during the management review process and subject to audit.

Why is this important?

Although we do not use external subcontractors within the core processes of our business, our licensed use of research and analytics software introduces the same data-handling considerations as any other third-party relationship. By incorporating these systems into our ISMS, we can demonstrate that all external tools are subject to the same rigorous controls, oversight, and risk management as our internal systems. This ensures that client data remains secure at every stage of the paraplanning process and supports our compliance with ISO 27001 standards and best practice in information security.

Cyber Security Certification

We are proud to have achieved ISO 27001 certification, the internationally recognised standard for Information Security Management Systems (ISMS). This certification assesses not only technical controls but also governance, risk management, and the organisational processes that support information security across the business.

Why is this important?

ISO 27001 provides independent assurance that we operate within a globally recognised framework for managing information security risks. Achieving this certification demonstrates our ongoing commitment to best practice, continual improvement, and the highest standards of data protection. It also provides clients with confidence that their information is managed securely and responsibly.

Maintaining ISO 27001 Standards

Following certification, we continue to operate a formal Information Security Management System (ISMS) that includes defined security policies, internal audits, risk assessments, and regular staff training on data handling and information governance. This ensures our processes remain aligned with ISO 27001 requirements and that we maintain the highest levels of information security across the business.