



ALREADY LIVING TOGETHER OR MARRIED? 4-STEP CHECKLIST FOR SPOUSES AND SPOUSAL EQUIVALENTS



STEP 1 - Consult the list of financial interests that need to be recorded within our global compliance system (called Global Independence Monitoring System, or GIMS for short) on the next page of this document. This will let you know the items you should be thinking about for the steps below.

STEP 2 – Record your **current** financial interests within GIMS. It is a requirement for all individuals in Deloitte to record all relevant financial interests on their GIMS record within 10 days of acquisition. It is also a requirement for your interests (as an IFM) to be recorded on GIMS within the 10 day period too.

(In practice you can do this by supplying the information to your family member who works in Deloitte so they can update for you, or you can contact the GIMS team directly and provide your information that way. Contact details can be found in the ‘Who can I contact?’ section)

This secure system records only the name of the underlying investment (e.g. shares in Company X, investment in Y Fund) and any account/wrapper, if applicable. No personal, values or other information is required. It doesn’t matter if you have £1 or £1million in shares in Company X, we just need to know you have shares in Company X.

STEP 3 – prior to making any **new** financial interests, check whether or not that investment is restricted from an independence perspective. This process of checking in advance is called pre-clearing. It is mandatory for individuals working in Deloitte and their IFMs to pre-clear investments before acquisition.

STEP 4 – My Financial Provider Network (or MFPN) is a network of over 30 leading financial providers that Deloitte partners with to provide its people with a simplified way to maintain their independence records. With each provider, Deloitte **either** has in place an automated data feed to transfer (limited, relevant information) directly to our independence systems **and/or** a pre-cleared portfolio of investments (referred to as ‘DPIP’) which have already been verified as permissible for investment without any checks required prior to acquisition.

It is mandatory for individuals at Deloitte to use one of the MFPN providers when making any new investments or changes to underlying holdings in existing investments. However – **IFMs have the option of using MFPN** too.

For more information please get in touch with the Deloitte team using “Who to contact?” option on the homepage.



What needs to be recorded on Global Independence Monitoring System (GIMS)?



MANDATORY	Pensions – both the provider / scheme, and the underlying funds	Debentures
	Shares / Share Options	Stocks and Shares ISAs - both the provider and the underlying funds
	Brokerage Accounts	Child Trust Funds/Junior ISAs - both the provider and the underlying funds
	Notes / Bonds / Structured Products	Life Assurance / Endowment Policies
	Investment Funds	Insurance Products underwritten by Lloyds Banking Group or any affiliates
	Illiquid Investments (e.g. EIS/VCT/Crowdfunding)	Cryptocurrency Exchanges
	Bank / Building Society Accounts (Partners and Audit & Assurance Staff Only)	<i>Cryptocurrency tokens if they are registered with the local financial regulator</i>
	Investment Accounts	

VOLUNTARY	Insurance Products not underwritten by Lloyds Banking Group or any affiliates
	Mortgages
	Loans
	Credit Cards
	Store Cards
	Cash ISAs
	Cryptocurrency Coins

Don't forget...

All holdings must be recorded on GIMS within the **10-day rule** of acquisition to comply with our regulators and firm policy!



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