



## COFI Implementation Checklist

# COFI IMPLEMENTATION CHECKLIST

*Client working document for conduct-focused implementation planning*

<b>Client name</b>		<b>FSP number</b>	
<b>Prepared by</b>		<b>Date</b>	

### Purpose

Use this checklist to help your business implement practical COFI-aligned conduct controls. It is designed to help management identify gaps, assign actions, set priorities, and keep evidence of what has been implemented.

### How to complete this checklist:

- Read each implementation area and discuss it practically within your business.
- Tick one status option: Needs work, Unsure, or Meets requirement.
- Use the Action / Notes column to record what still needs to be done, who is responsible, and by when.
- Use the Priority Action Plan at the end to rank the most important actions as High, Medium, or Low.

**Practical reminder:** Where clients may struggle to understand industry wording, staff should explain key points in plain language. Example: instead of saying 'the product may lapse on cessation of premium', say 'if you stop paying, your cover may end'.

## COFI Implementation Checklist

### Implementation checklist

No.	Implementation area	Practical checklist question	Why this matters	Needs work	Unsure	Meets requirement	Action / Notes
1	<b>CoFI applicability assessment</b>	Has the business assessed whether conduct-focused requirements apply to its products, services, distribution model and customer base?	The business must first understand why COFI matters to it and where conduct risk can arise in its current model.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	<b>Fair conduct principle</b>	Can the business show how it will treat customers fairly across marketing, onboarding, advice, servicing, claims support, complaints and cancellations?	Fair treatment must run through the full customer journey, not only at point of sale.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	<b>Fair conduct programme</b>	Has the business created a practical fair conduct programme or framework that explains how fair	This should be more than a statement of intent; it should guide daily operations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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		outcomes will be delivered and monitored?					
4	<b>Incentives and remuneration</b>	Have incentives, commissions, targets and sales rewards been reviewed to make sure they do not encourage unsuitable sales or unfair outcomes?	Poorly designed incentives are a common cause of conduct failures.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5	<b>Implementation in practice</b>	Has the fair conduct framework actually been rolled out in the business through training, supervision and operating procedures?	A document that is not used in practice does not reduce conduct risk.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6	<b>Policies, systems and controls</b>	Are there policies, systems, processes and internal controls in place	Controls help the business apply the framework	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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		to support and maintain fair conduct standards?	consistently and detect failures early.				
7	<b>Ongoing compliance with the programme</b>	Can the business show that it follows its own fair conduct approach consistently, with monitoring, file reviews or management oversight?	The test is not whether a policy exists, but whether it is followed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8	<b>Public summary of approach</b>	Has the business prepared a simple summary of its conduct approach that can be shared with clients or provided on request?	Clients should be able to understand, in plain language, how the business approaches fair treatment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9	<b>Licence conditions readiness</b>	Has the business identified the conduct-related conditions that may attach to licensing, and	If a licence condition applies, the business must know what it is and how compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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		documented how these will be met?	will be maintained.				
10	<b>Authorised bodies / linked structures</b>	If the business uses related entities, branches, tied channels or authorised bodies, has it considered how these will be supervised and reflected in its compliance model?	Conduct responsibility becomes harder to manage when multiple structures are involved.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11	<b>Licensing information pack</b>	Has the business prepared the governance, operational and supporting information it would need for conduct-focused licensing or regulatory review?	Preparation avoids delays, rushed submissions and incomplete records.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12	<b>Timing and</b>	Is the business in a	Knowing the deadline	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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	<b>readiness to submit</b>	position to meet implementation timelines and submit any required conduct-related information on time?	is not enough; the business must be practically ready.				
13	<b>Ongoing post-implementation obligations</b>	Does the business have ongoing processes for training, complaints oversight, monitoring, recordkeeping, management reporting and periodic review after implementation?	Implementation is not a once-off exercise; it must be maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14	<b>Vulnerable customers and communication</b>	Has the business adjusted its scripts, disclosures and communication so that clients with language, literacy or comprehension challenges can still make	Plain language and practical explanations reduce customer harm and complaints.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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		informed decisions?					
15	<b>Evidence and action tracking</b>	Does the business keep evidence of what has been implemented and maintain an action plan for any identified gaps?	If it is not documented, it is difficult to prove that implementation happened.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

### Priority actions arising from this checklist

Action required	Priority	Responsible person	Target date	Status / comments
	<i>High / Medium / Low</i>			
	<i>High / Medium / Low</i>			
	<i>High / Medium / Low</i>			



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Action required	Priority	Responsible person	Target date	Status / comments
	<i>High / Medium / Low</i>			
	<i>High / Medium / Low</i>			

Prepared by Nkwali Compliance Consultants