|  |  |
| --- | --- |
|  | Temporary Permissions RegimeClient Assets Questionnaire |

This form applies to firms that receive or hold client assets in connection with investment business or insurance mediation.

Please note that:

* References in this form to client assets are to both ‘client money’ and ‘custody assets’ unless otherwise stated.
* MiFID II refers to client money and assets as ‘client funds’ and ‘financial instruments’ respectively. IDD refers to client money as ‘customers’ monies’.

Part 1 – To be completed by all TP firms

 **1.1 Which of the following activities did the firm receive or hold client assets in connection with in the last 12 months?**

[ ]  Investment services or activities

[ ]  Insurance distribution activities

[Note: more than one answer can be selected]

 **1.2** **Did the firm obtain an external auditor’s report on the adequacy of the firm's arrangements under its client assets obligations in the last 12 months?**

[ ]  Yes

[ ]  No

 **1.3 Have there been any issues with the firm's solvency in the last 12 months?**

[ ]  Yes

[ ]  No

 **1.4 Did the firm have any breaches of its obligations to segregate and/or keep records in line with its client assets obligations in the last 12 months noted by an external auditor, a regulator or the firm itself?**

[ ]  Yes

[ ]  No

Part 2 – For TP firms conducting investment services or activities (see Question 1.1)

 **2.1 What was the highest balance of client money held in connection with investment services or activities in the last 12 months? (Please convert in sterling using the exchange rate as at the date of this notification.)**

|  |
| --- |
| £      |

 **2.2 What was the highest value of custody assets held in connection with investment services or activities in the last 12 months? (Please convert in sterling using the exchange rate as at the date of this notification.)**

|  |
| --- |
| £      |

 **2.3 What percentage of the client money reported in Question 2.1 was deposited with a bank or a qualifying money market fund in the same group as the firm (article 4, MiFID Delegated Directive)?**

|  |
| --- |
|       % |

 **2.4 What is the firm’s frequency of reconciliations between the firm's internal accounts and records and those of any third party with whom the client money reported in Question 2.1 was held (article 2(1)(c), MiFID Delegated Directive)?**

[ ]  Daily

[ ]  Monthly

[ ]  Quarterly

[ ]  Annually

[ ]  Other⏵Please describe below

|  |
| --- |
|       |

 **2.5 What is the firm’s frequency of reconciliations between the firm's internal accounts and records and those of any third party with whom the custody assets reported in Question 2.2 was held (article 2(1)(c), MiFID Delegated Directive)?**

[ ]  Daily

[ ]  Monthly

[ ]  Quarterly

[ ]  Annually

[ ]  Other⏵Please describe below

|  |
| --- |
|       |

 **2.6 Did the firm resolve all discrepancies identified by its reconciliations referred to in Questions 2.4 and 2.5 (as applicable) in the last 12 months (article 2(1)(c), MiFID Delegated Directive)?**

[ ]  Yes

[ ]  No⏵Please provide reasons below

|  |
| --- |
|       |

 **2.7 Does the firm have an officer appointed under article 7 of the MiFID Delegated Directive responsible for compliance with client assets obligations?**

[ ]  Yes⏵Please provide contact details below

[ ]  No

|  |
| --- |
|       |

Part 3 – For TP firms conducting insurance distribution activities (see Question 1.1)

 **3.1 How did the firm protect client money in line with article 10.6 of the IDD?**

[ ]  Contractual risk transfer to the insurer

[ ]  Holding customers monies in segregated accounts

[ ]  Holding capital on a permanent basis

[ ]  A guarantee fund

[Note: more than one answer can be selected]

 **3.2 What was the highest balance of money held by the firm in connection with insurance distribution activities in the last 12 months? (Please convert in sterling using the exchange rate as at the date of this notification.)**

|  |
| --- |
| £      |