

RDR Implementation

About the firm

Please complete the following information:

Name of person completing this request:

.....

Position in Firm:

.....

Name of person who was overall responsible for implementing the changes introduced by the RDR (if different from above):

.....

Position in Firm (if different from above):

.....

Are services offered by your firm to retail clients subject to the RDR requirements?

(Specifically, does your firm offer personal recommendations to retail clients in relation to any retail investment product*?)

Please exclude Basic Advice or advice by a firm to an employer regarding their group personal pension scheme or stakeholder personal pension scheme)

Yes

No

***From 31 December 2012 a retail investment product is:**

- a) a life policy;**
- b) a unit;**
- c) a stakeholder pension scheme (including a group stakeholder pension scheme);**
- d) a personal pension scheme (including a group personal pension scheme);**
- e) an interest in an investment trust savings scheme;**
- f) a security in an investment trust;**
- g) any other designated investment which offers exposure to underlying financial assets, in a packaged form which modifies that exposure when compared with a direct holding in the financial asset;**
- h) a structured capital-at-risk product; whether or not any of (a) to (h) are held within an ISA or a Child Trust Fund (CTF)**

Please describe why the firm is no longer subject to RDR requirements:

.....

.....

.....

.....

Clients - firm's target market

Has the firm carried out an exercise to identify its retail target market for RDR products?

- Yes
- No

What is the target market?

.....

.....

.....

.....

Why did you choose this market?

.....

.....

.....

.....

Is this different from the firm's client base pre-RDR?

- Yes
- No

Where you have answered 'yes' to the question above please provide further detail in the space below.

.....

.....

.....

.....

The firm's scope of service

Which of the following describes the services your firm offers retail clients? (Please tick all that apply)

- Independent advice (unbiased and unrestricted advice on the full range of retail investment products)
- Independent with a “narrower” relevant market, (e.g. ethical)
- Restricted advice: limited types of products (e.g. pensions only)
- Restricted advice: the products of one provider
- Restricted advice: the products of a limited number of providers
- Basic advice (a specific way of giving advice on stakeholder products)
- Non-advised services (including execution only sales)

Other Non-RDR (Please specify):

.....

Please provide detail of your relevant market:

.....

.....

.....

.....

Independent

Please provide approximate detail of the proportion of your firms business that is through your firm's independent scope of business:

- 0-25%
- 26% - 50%
- 51% - 75%
- 76% or above

Where a firm is independent it should demonstrate that it carries out a comprehensive and fair analysis of the relevant market that is unbiased and unrestricted. A firm may provide services which meet the independence requirements for particular investments alongside other RDR services where the firm offers 'restricted advice'. We have asked that you provide copies of documentation your firm uses to disclose its status but are also interested in your answers to the questions below.

What services does the firm provide under its independent scope of business? Please answer yes or no to indicate whether you offer those services, and please also provide the rough percentage of your independent RDR transactions, you estimate will be represented by those services in the calendar year 2013?

| | Yes | No | Approx % |
|--|-----------------------|-----------------------|----------|
| Model portfolio/ range of model portfolios | <input type="radio"/> | <input type="radio"/> | |
| Multi-manager (manager of manager or fund of funds) | <input type="radio"/> | <input type="radio"/> | |
| Discretionary investment management (referring the client to an external discretionary fund management firm) | <input type="radio"/> | <input type="radio"/> | |
| Discretionary investment management (via in house manager(s)) | <input type="radio"/> | <input type="radio"/> | |
| Distributor influenced fund | <input type="radio"/> | <input type="radio"/> | |
| Products/funds selected individually for client | <input type="radio"/> | <input type="radio"/> | |
| Panels/buy list | <input type="radio"/> | <input type="radio"/> | |
| Other (if yes, please enter below) | <input type="radio"/> | <input type="radio"/> | |

If you have entered 'yes' to 'other' above, please describe below

.....

.....

.....

.....

Does the firm provide products through a joint venture with an investment management firm? (E.G. via a new firm set up as an ACD for an OEIC)

- Yes
- No

Restricted

Where a firm has not classed its scope of service as independent it is then defined as restricted. You are answering the following questions as you have indicated earlier in the questionnaire that you provide services on a restricted basis.

What services does the firm provide under its restricted scope of business? Please answer yes or no to indicate whether you offer those services, and please also provide the rough percentage of your restricted RDR transactions, you estimate will be represented by those services in the calendar year 2013?

| | Yes | No | Approx % |
|--|-----------------------|-----------------------|----------|
| Model portfolio/ range of model portfolios | <input type="radio"/> | <input type="radio"/> | |
| Multi-manager (manager of manager or fund of funds) | <input type="radio"/> | <input type="radio"/> | |
| Discretionary investment management (referring the client to an external discretionary fund management firm) | <input type="radio"/> | <input type="radio"/> | |
| Discretionary investment management (via in house manager(s)) | <input type="radio"/> | <input type="radio"/> | |
| Distributor influenced fund | <input type="radio"/> | <input type="radio"/> | |
| Products/funds selected individually for client | <input type="radio"/> | <input type="radio"/> | |
| Panels/buy list | <input type="radio"/> | <input type="radio"/> | |
| Other (if yes, please enter below) | <input type="radio"/> | <input type="radio"/> | |

If you have entered 'yes' to 'other' above, please describe below

.....

.....

.....

.....

Does the firm provide products through a joint venture with an investment management firm? (E.G. via a new firm set up as an ACD for an OEIC)

- Yes
- No

What is the nature of the firm's restriction and, if applicable, how does this differ from the firm's scope of business pre-RDR?

.....

.....

.....

.....

How does the firm provide disclosure to the client on the nature of restriction?

.....

.....

.....

.....

At what stage of the advice process do you disclose the nature of the firm's restriction?

.....

.....

.....

.....

What training and/or guidance has the firm provided to its advisers to ensure they provide the correct disclosure during the advice process to disclose the firm's status?

.....

.....

.....

.....

How does the firm monitor that advisers are providing the appropriate disclosure?

.....

.....

.....

.....

Has the firm carried out an exercise to assess what type of client the restricted service is not suitable for?

- Yes
- No

How does the firm ensure that its advisers are aware in what circumstances their service is not suitable for a particular client and that advisers turn these clients away where appropriate? (E.G. systems and controls in place such as training and guidance)

.....

.....

.....

.....

Charges

Adviser charging structure

For the purpose of this questionnaire the adviser charging structure is the document which sets out the firm's standard adviser charge. Has your firm produced a standard adviser charging structure? (Please tick one only)

- Yes
- No but this will be produced within 1 month
- No but this will be produced within 2 months

Other (please specify):

How do you disclose to individual clients what the specific adviser charges will be for the advice/services for them?

.....

.....

.....

.....

At what point of the advice process does the firm disclose the specific adviser charges for the individual client?

.....

.....

.....

.....

How do you record that the adviser charge relevant for the client has been disclosed and agreed with the client in line with the FSA's requirements for disclosure?

.....

.....

.....

.....

Initial adviser charges

What choice is the client given for method of payment of the initial adviser charge? Where a payment method is allowed please provide the rough proportion (%) of clients who you expect to use this through 2013.

| | Yes | No | Approx % |
|---|-----------------------|-----------------------|----------|
| Direct Payment (Eg, cheque, card, cash etc) | <input type="radio"/> | <input type="radio"/> | |
| Facilitated through platform | <input type="radio"/> | <input type="radio"/> | |
| Facilitated through product provider | <input type="radio"/> | <input type="radio"/> | |
| Don't know/Unsure | <input type="radio"/> | <input type="radio"/> | |
| Other | <input type="radio"/> | <input type="radio"/> | |

If you have entered 'yes' to 'other' above, please describe below

.....

.....

.....

.....

Does your firm allow clients to pay the initial adviser charge by instalments for advice on regular payment investments?

- Yes: over a 0 – 4 month period
- Yes: over a 4 – 12 month period
- Yes: over 12+ months (where this isn't the defined term of the product)
- Yes: over the term of the product where it has a defined term (eg pension)
- Yes: term of the instalments is open ended
- Yes: other instalment period
- No

Are there any other circumstances in which you will allow adviser charging to be paid in instalments?

- Yes
- No

Where you have answered 'yes' to the question above, please provide further detail:

.....

.....

.....

.....

What arrangements does the firm have for recouping adviser charging where payment is by instalments and the policy is cancelled before all the adviser charges have been paid?

.....

.....

.....

.....

Are your firm's initial adviser charges solely contingent on the advised product being taken up?

- Yes
- No

Ongoing services for new and existing clients

Does your firm have an ongoing advice charge?

- Yes
- No

If you have answered 'yes' to the question above, please describe below:

.....

.....

.....

.....

For this questionnaire ongoing adviser charging is the charge applied by the firm for the ongoing services provided to the client. What choice is the client given for method of payment when ongoing adviser charging is applied? Where a payment method is allowed please provide the rough proportion (%) of clients who you expect to use this through 2013.

| | Yes | No | Approx % |
|---|-----------------------|-----------------------|----------|
| Direct Payment (Eg, cheque, card, cash etc) | <input type="radio"/> | <input type="radio"/> | |
| Facilitated through platform | <input type="radio"/> | <input type="radio"/> | |
| Facilitated through product provider | <input type="radio"/> | <input type="radio"/> | |
| Don't know/Unsure | <input type="radio"/> | <input type="radio"/> | |
| Other | <input type="radio"/> | <input type="radio"/> | |

If you have entered 'yes' to 'other' above, please describe below

.....

.....

.....

.....

What ongoing service(s) do you provide to clients in consideration for the ongoing adviser charge?

.....

.....

.....

.....

Do you provide ongoing services to those with products paying ongoing trail commission (on products sold pre-31.12.12)?

Yes

No

Where you have answered 'yes' to the above question, what ongoing service do you provide to clients for existing products/portfolio where you receive a legacy trail commission?

.....

.....

.....

.....

Where you provide ongoing service(s) for your ongoing charge and/or for trail commission received, how do you ensure that clients receive that service?

.....

.....

.....

.....

Non-RDR services (eg mortgage and general insurance)

Where you offer both non-RDR and RDR services, how do you ensure it is clear to the client how they are paying for the different services offered by the firm?

.....

.....

.....

.....

Dealing costs of product providers and platforms

How many platforms does your firm currently use for new clients?

- 0
- 1
- 2
- 3
- 4
- 5+

Please use the table below to detail which platforms you use and to indicate the approximate proportion of your business split between each platform you use (largest first). Please also indicate the approximate proportion of your business advised off a platform (by transaction).

| | Name of platform | Approx % |
|----------------|------------------|----------|
| Platform 1 | | |
| Platform 2 | | |
| Platform 3 | | |
| Platform 4 | | |
| Platform(s) 5+ | | |
| Off platform | | |

Does the firm advise on products where the platform and/or product provider offers the option of facilitation for same product/scale of investment?

- Yes
- No

Where facilitation is offered by a product provider and/or platform provider do you allow the client to pay their adviser charge by an alternative method?

- Yes
- No

How do you record the client's consent for the adviser charge to be facilitated by the platform or product provider?

.....

.....

.....

.....

What information do you provide to the product or platform provider in relation to the client's consent for facilitation? (E.g. copy of signed client consent)

.....

.....

.....

.....

How do you ensure that the amount facilitated by the platform or product provider matches the amount agreed with the client?

.....

.....

.....

.....

Where adviser charging facilitation is used do adviser charges payable by a client vary from where this is not used?

- Yes - Higher
- Yes - Lower
- No

Please provide further detail on how the charges vary

.....

.....

.....

.....

You previously indicated that you are carrying out services within the scope of the RDR. If this is the case please press 'previous' and amend your previous answer. If you are not carrying out services within the RDR click 'next' to end the survey