

Single Rulebook Q&A

Question ID	2021_6036
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - FINREP (incl. FB&NPE)
Article	430
Paragraph	3
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) 2021/451 - ITS on supervisory reporting of institutions
Article/Paragraph	Annex V, para. 285
Date of submission	15/06/2021
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Disclose name of institution / entity	No
Type of submitter	Competent authority
Subject matter	Template F 22.02: Assets involved in the services provided
Question	Third party investment products distributed by an institution should be reported under "Assets Management" (F 22.02, r0010, c0010), "Custody Assets" (F 22.02, r0060, c0010) or "Customer resources distributed but not managed" (F 22.02, r0130, c0010)?
Background on the question	An institution has a strategic partnership with an external provider of equity and bond funds, and sells the products of this external provider (e.g. CIUs, funds or life insurance policies which are promoted by specialised asset management companies or insurance companies) within its network. The institution categorizes these assets as under management in its financial statement because, when distributing these products, consultancy and advisory are provided to the customers, and therefore this activity is distinguished from mere custody. For the purpose of reporting in FINREP template F 22.02 though, it is not clear how to interpret the reporting instruction to determine the allocation of such assets across the different rows.
EBA answer	As they are not managed by the reporting institution, the products cannot be categorized in "Assets management" (row 0010 of F 22.02). As they are

	distributed by the reporting institution, they cannot either be categorized merely as “Custody”, The products should be reported as “Customer resources distributed but not managed” (F 22.02, r0130, c0010).
Link	https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2021_6036

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