



INVESTMENT FIRM QUESTIONNAIRE

For SIPP and SSAS



curtisbanks.co.uk

One Investment Firm Questionnaire per firm is required. If your firm uses an external Stockbroker or Platform, they must also be approved by Curtis Banks.

About Curtis Banks

Curtis Banks Ltd and Curtis Banks Pensions (Curtis Banks) have a regulatory requirement to formalise the services provided to its SIPP and SSAS clients by Discretionary Managers, Platform Providers and Stockbrokers (Investment Firms). The Investment Firm and Curtis Banks will sign a Global Investment Agreement.

Before issuing the GIA, Curtis Banks will require all Investment Firms to complete this Investment Firm Questionnaire (IFQ). This questionnaire allows Curtis Banks to understand the corporate and regulatory status of the Investment Firm and the nature of its services. Curtis Banks will assess each application against its own due diligence requirements and reserves the right to request further information as part of the process.

Regulatory Considerations

Curtis Banks will only accept new Investment Firms and their custodians if all parties are regulated by the Financial Conduct Authority (FCA) and have professional indemnity insurance (PII) in proportion with the size of their business, financial resources and the investment profiles adopted for their clients. All Curtis Banks SIPP and SSAS clients must be classified as a retail client by default unless they are able to elect and evidence their professional client status. If investment services are restricted to professional clients, we will require further details to understand the complex nature of the underlying investments, strategy or services and to determine who is responsible for undertaking both suitability and appropriateness assessments of clients.

Investment Services & Acceptable Investments

Curtis Banks' SIPP products are registered pension schemes and are regulated by the FCA. The corporate trustee will hold all the assets of the scheme in accordance with the trust deed and rules. SIPP and SSAS products are governed by HMRC rules and the FCA guidance on investments within SIPPs is applied equally to Curtis Banks SIPP and SSAS products. All SIPP and SSAS products are subject to a strict list of permitted investments compiled and maintained by Curtis Banks. Investments which are deemed by us to be specialist investments will be a subject to additional due diligence and must be approved on a case by case basis by Curtis Banks.

Promotion

Curtis Banks will only consider an Investment Firm for clients or prospective clients that are introduced to them through a regulated financial adviser. Curtis Banks does not allow Investment Firms to use a GIA as a means of endorsement or promotion of any investment services offered by the Investment Firm.

Investment Partners

Curtis Banks operates a list of Investment Partners. The list is made up of firms with which we have effective systems in place so that our lower annual SIPP administration fee can apply. Typically these systems include automated data feeds, a streamlined application process and the ability to process instructions electronically. Any investment Firm looking to invest in, or provide complex investment services or who cannot provide a data feed will not be considered for Investment Partner status.

Global Investment Agreement (GIA)

The Investment Firm will be required to sign and return a copy of the GIA to Curtis Banks together with a sample of data reporting files. Curtis Banks cannot accept any investment business until the GIA has been completed. Curtis Banks reserves the right to charge a fee for processing an application from an Investment Firm.

How do I submit the Investment Firm Questionnaire?

You can submit the Investment Firm Questionnaire to us using the following contact details:

Curtis Banks, 153 Princes Street, Ipswich, Suffolk, IP1 1QJ

Contents

Section	Page
1 Investment Firm Details	3
2 Summary of Investment Services	6
3 Governance and Controls	10
4 Data Reporting	11
5 Contacts	12
6 Investment Firm Declaration	14
7 Investment Firm Checklist	16

1.2 Directly Authorised Firms (continued)

Do you operate under a different trading name?	Yes	No	If Yes, please provide trading name(s) in the section below
Trading Name(s)	1		
	2		
Please tick all the types of service you provide:	<input type="checkbox"/>	<input type="checkbox"/>	Discretionary
	<input type="checkbox"/>	<input type="checkbox"/>	Model Portfolio
	<input type="checkbox"/>	<input type="checkbox"/>	Advisory
	<input type="checkbox"/>	<input type="checkbox"/>	Execution-only
	<input type="checkbox"/>	<input type="checkbox"/>	Investment platform
1	Name of Custodian(s)		
	Financial Services Register firm reference number		
	Name of Custodian(s)		
2	Financial Services Register firm reference number		

Curtis Banks can only accept FCA regulated custodians located in the UK

1.3 Appointed Representatives or Trading Styles

This section is for firms who act as an Appointed Representative or Trading Style of a FCA authorised firm.

Trading Name	
Financial Services Register firm reference number	
Company Registration Number (CRN)	
Date of Incorporation	
How many years has the firm been trading?	years
In which year did the firm last file its accounts?	
Date of FCA authorisation	
	Please enclose a list of the firm's FCA permissions
Are there any FCA warnings or limited permissions?	Yes No
	If yes, please give details in the box below

1.3 Appointed Representatives or Trading Styles (continued)

Registered Address

Trading Address (if different to registered address above)

Telephone

Email

Website

Please tick all the types of service you provide:

Discretionary

Model Portfolio

Advisory

Execution-only

Investment platform

Name of FCA authorised Principal

Principal FCA Number

Expiry Date of Agreement with Principal

The Principal must provide written confirmation that they are happy for the appointed representative to open SIPP and SSAS accounts.

1 Name of Custodian(s)

Financial Services Register firm reference number

2 Name of Custodian(s)

Financial Services Register firm reference number

1.4 Professional Indemnity Insurance (PII)

Do you have professional indemnity insurance (PII) cover commensurate with the size of your business, financial resources and the investment profiles adopted for your clients?

Yes - PII cover of £10m or more

Yes - PII cover of less than £10m

Please provide us with details of the cover held (including a copy of the policy document) and justification of the level of cover.

No PII held

Our standard policy is to decline applications where no PII is in force.

Please provide further details on the levels or type of PII cover within your business.

1.5 Cash Management

This section is for details of how cash funds will be held.

Do you or your custodian use a UK deposit taker?	Yes	No
Will funds be held in a pooled account?	Yes	No
Will funds be held in an individual account?	Yes	No

Please note: We will require details of the Investment Firm's standard settlement instructions

2 Summary of Investment Services

2.1 Types of Services

Managed Investment Services (Discretionary, Model Portfolio)	Yes	No	Please complete sections 2.2 to 2.6
Executions Only (Advisory, Stockbroker and Platform)	Yes	No	Please complete sections 2.3 to 2.6

2.2 Managed Investment Services

This section is for firms managing investments on a discretionary basis or through model portfolio solutions.

Name or description of investment service(s)

Target Market & USP

Minimum Investment

Maximum Investment

Are investment services restricted to professionals

Yes

No

If yes, please provide details below

How do you market services?

Who is required to assess appropriateness or suitability of investments and services?

Investment Firm

Financial Adviser

Client

Do you invest a significant proportion of an account into a particular asset type, jurisdiction or sector?

Yes

No

If yes, please provide details below

2.2 Managed Investment Services (continued)

Do you have a rebalancing policy or procedure? Yes No [If yes, please provide details below](#)

Do you use algorithms or automated trading solutions? Yes No [If yes, please provide details below](#)

2.3 Investment Services

Do you provide any of the following services or account features?

- CFD
- FX
- Non correlated assets
- Leveraging
- Power of Attorney/Authority to Deal [To nominate a third party representative to provide instructions on the account other than the SIPP member](#)

Do you allow investment in specialist investments (please see the relevant Schedule of Allowable Investments, available on our website, www.curtisbanks.co.uk)? Yes No [If yes, please provide details below](#)

Are you able to hold equities or bonds in local custody, outside of Crest? Yes No [If yes, please provide details below](#)

Do you restrict trading by venue, jurisdiction or asset type? Yes No [If yes, please provide details below](#)

Do you perform due diligence on unregulated funds? Yes No [If yes, please provide details below](#)

2.4 Custodian Services

Please note: This section is to be completed with details of custodians responsible for holding client cash and assets.

How will investments be held?

- Custodian's Nominee
- Pension Trustee
- Other

Please note: We will only allow investment firms to use FCA regulated custodians located in the UK

2.5 Investment Literature and Documentation

A full checklist of the documentation required is provided in section 7.

Please confirm what documentation is available to support your investment services.

Service Brochure	Yes	No
Factsheet(s)	Yes	No
Terms and Conditions	Yes	No
Prospectus	Yes	No
Key Features	Yes	No
Fees and Charges	Yes	No

Please confirm what documentation is provided to financial advisers.

Adviser Terms of Business	Yes	No
Risk Warnings	Yes	No
Target Market Guidance	Yes	No

Please confirm what documents are in place for account opening.

Application Form	Yes	No
Client Terms & Conditions	Yes	No

Please confirm what documents are in place for complex/professional client services.

Professional Client Declaration	Yes	No
NMPI Declaration	Yes	No

Please include any other specific literature or documentation in the section below.

Other

Please note: We will require copies of all documentation.

2.6 Enhanced Services

This section is for investment Firms to provide details of their enhanced electronic services.

Please confirm which enhanced services are available through your investment proposition?

Electronic Applications	Yes	No
Electronic Withdrawals	Yes	No
Electronic Statements	Yes	No
Electronic Tax Vouchers	Yes	No
Other Services		

3 Governance and Controls

3.1 Company Information

This section is to be completed by the directly authorised firm.

Name of Business

Parent Company or Individual Shareholders owning 25% or more of issue share capital

- 1
- 2
- 3
- 4

Number of Accounts Under Administration

Assets under Administration

Number of Office Locations

Number of staff

Are you a member of the London Stock Exchange

Yes No

Has the company been trading for less than 3 years?

Yes No

If Yes, a copy of the company's business plan and financial statements will be required.

Please provide a list of firms connected or associated with the firm

- 1
- 2

3.2 Regulatory Permissions & Advice

This section is for details of your firm's current regulatory permissions, waivers and restrictions.

Regulatory Status (e.g. authorised)

FCA Client Money Permissions

Yes No

If No, please confirm that all client monies are held via the custodian(s) named in section 2.4

Yes No

FCA Waivers

Yes No

FCA Warnings

Yes No

FCA fines or any other types of censure

Yes No

Does the firm or associated firm provide advice on pension transfers or opt outs

Yes No

Does the firm provide investment advice directly or via associated company?

Yes No

Summary of FCA permissions and further details on warnings, fines, waivers and restrictions

Please note: We cannot approve firms with pending applications or interim permissions.

3.3 Compliance

I/we confirm that the investment firm named in section 1, and any associated companies to the investment firm named in section 1, do not undertake any business with unregulated firms or individuals.

Are you and your custodians able to hold and invest SIPP & SSAS monies?	Yes	No			
Are you able to provide us with written valuations and cash transaction statements at least quarterly as at 31 March, 30 June, 30 September and 31 December each year?	Yes	No			
Do you have a documented Conflict of Interest Policy?	Yes	No			
Do you accept unadvised SIPP or SSAS Clients?	Yes	No			
Do you facilitate adviser charging?	Yes	No	If yes, do you have controls and/or limits over adviser charging?	Yes	No
Do you provide online access to clients, advisers and Curtis Banks?	Yes	No			
Do you provide EMIR reporting for SIPP and SSAS clients as part of your standard services?	Yes	No			
Do you have adequate resources to satisfy the regulator's capital requirements and a policy to monitor and maintain such resources?	Yes	No			
Have you completed a fair value assessment and concluded that your proposition represents value for money?	Yes	No			

If Yes, please provide information for distributors confirming the outcome of your fair value assessment.

4 Data Reporting

4.1 Data feed

Please note: Data feeds can provide a more streamlined and accurate method of reporting to us and allows us to update our records in a more efficient and timely manner.

An automated data feed will provide a cost benefit to our clients and is one of the mandatory requirements for admission to our list of Investment Partners. Full reporting requirements are set out in our Data Reporting Requirements document.

Daily Valuation File	Cash Transaction information	Stock/fund trade movements
Closing Cash Balances	Stock/fund holdings information (must include SEDOL or ISIN)	Capital Adequacy Investment Categorisation

Please note: All information provided above is at individual account level and must satisfy our format requirements.

If you believe you have the capabilities to provide this information in an electronic format, please provide details of who will provide this information:

Investment Firm	Platform/Stockbroker	Custodian
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Please provide your contact details for data feeds below:

Contact name

Address

Telephone

Fax

Email

5 Contacts

To help direct our enquiries to the most appropriate person or department, please provide details of the following contact points.

5.1 Relationship Management

Where appropriate, a dedicated person or department responsible for SIPP or SSAS services.

Contact name

Address

Telephone

Fax

Email

5.2 Administration

For day to day administrative enquiries and instructions.

Contact name

Address

Telephone

Fax

Email

5.3 Valuations/Statements

For regular and ad hoc valuation statements and reporting.

Contact name

Address

Telephone

Fax

Email

5.4 Compliance

For all compliance and regulatory related matters.

Contact name

Address

Telephone

Fax

Email

5.5 Business Development

Where appropriate, a person or department responsible for business development, to help us better understand your operating model and the key advisers that use your services, and to seek out further mutual opportunities.

One of our Business Development Managers may contact this person or department.

Contact name/department

Telephone

Email

6 Investment Firm Declaration

All investment Firms should read carefully the declaration below before signing in section 6.2 and 6.3. If you do not understand any point then please ask us for further information.

6.1 Signature(s) and Declaration

Please note: Two representatives will be required to sign on behalf of each firm.

Directly Authorised Firms
Please complete section 6.2

Appointed Representatives or Trading Styles
Please complete section 6.3

6.2 Signature(s) of Directly Authorised Firms

Data Protection

This section sets out how the Curtis Banks Group would expect you ('the firm' below) to comply with the General Data Protection Regulations (GDPR). Please review the following clauses and if you have any additional comments or notes to make, please include these on a separate sheet and enclose it with this form. If necessary Curtis Banks will contact you to discuss any points.

- I/we confirm that the firm has appointed a Data Protection Officer (DPO) if required.
- I/we confirm that the firm has the appropriate registration in place with the Information Commissioner's Office (ICO).
- I/we confirm that under GDPR the firm is able to comply with the new individual rights as set out under Articles 15-22 of the GDPR (2016/679).
- I/we confirm that the firm will only use the personal data and special category data for the purposes as agreed with the Curtis Banks Group.
- I/we confirm that the firm has set out to senior management and/or staff, training to raise awareness and increase understanding of GDPR where relevant.
- I/we confirm that the firm has reviewed and updated any relevant Governance documents including, but not limited to, Data Protection, Privacy Policies, and treatment of Special Category Data.
- I/we confirm that the firm has undertaken as part of the implementation of GDPR, and has a process in place to undertake in future, Data Protection Impact Assessments where relevant.
- I/we confirm that the firm will assess all personal data collected from the Curtis Banks Group and only hold data under the relevant lawful basis.
- I/we confirm that the firm has implemented a Data Retention Policy to ensure data is only processed in line with a lawful basis of processing, and deleted/securely disposed of data where none are applicable.
- I/we confirm that the firm has made preparations to detect and report breaches internally, to the relevant Curtis Banks Group company and/or ICO within the time frames set out under GDPR.
- I/we confirm that the firm has implemented a Subject Access Request process that complies with GDPR.
- I/we confirm that the firm conducts due diligence on third parties appropriately.
- I/we confirm that the firm will inform the Curtis Banks Group immediately if it intends to transfer personal data outside of the EU. This is only undertaken in strict compliance with the conditions for transfer set out in Chapter V of GDPR.
- I/we confirm the firm has appropriate corporate governance and compliance arrangements in place covering the services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm the firm has appropriate processes and procedures in place to ensure adherence to all relevant FCA legislation, including (but not limited to) that relating to staff training and competence, client money and assets and treating customers fairly in relation to the services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm that firm has in place appropriate business continuity arrangements in respect of services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm the firm has in place appropriate data protection/data security arrangements in respect of the services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm that the firm complies with the obligations under the Modern Slavery Act 2015.
- I/we confirm that the firm will notify Curtis Banks of any changes to the information contained within this form, including but not limited to regulatory status, breaches of regulation/legislation, custodians, investment strategy/approach, key contacts.
- I/we believe that the facts and matters contained in this form are true and the information provided is accurate to the best of my/our knowledge:

Declaration

Adviser firm name
Financial Services Register
firm reference number

1

Name

Position in Firm

Signature

Date

2

Name

Position in Firm

Signature

Date

6.3 Signature(s) of Appointed Representatives or Trading Styles

Data Protection

This section sets out how the Curtis Banks Group would expect you ('the firm' below) to comply with the General Data Protection Regulations (GDPR). Please review the following clauses and if you have any additional comments or notes to make, please include these on a separate sheet and enclose it with this form. If necessary Curtis Banks will contact you to discuss any points.

- I/we confirm that the firm has appointed a Data Protection Officer (DPO) if required.
- I/we confirm that the firm has the appropriate registration in place with the Information Commissioner's Office (ICO).
- I/we confirm that under GDPR the firm is able to comply with the new individual rights as set out under Articles 15-22 of the GDPR (2016/679).
- I/we confirm that the firm will only use the personal data and special category data for the purposes as agreed with the Curtis Banks Group.
- I/we confirm that the firm has set out to senior management and/or staff, training to raise awareness and increase understanding of GDPR where relevant.
- I/we confirm that the firm has reviewed and updated any relevant Governance documents including, but not limited to, Data Protection, Privacy Policies, and treatment of Special Category Data.
- I/we confirm that the firm has undertaken as part of the implementation of GDPR, and has a process in place to undertake in future, Data Protection Impact Assessments where relevant.
- I/we confirm that the firm will assess all personal data collected from the Curtis Banks Group and only hold data under the relevant lawful basis.
- I/we confirm that the firm has implemented a Data Retention Policy to ensure data is only processed in line with a lawful basis of processing, and deleted/securely disposed of data where none are applicable.
- I/we confirm that the firm has made preparations to detect and report breaches internally, to the relevant Curtis Banks Group company and/or ICO within the time frames set out under GDPR.
- I/we confirm that the firm has implemented a Subject Access Request process that complies with GDPR.
- I we confirm that the firm conducts due diligence on third parties appropriately.
- I/we confirm that the firm will inform the Curtis Banks Group immediately if it intends to transfer personal data outside of the EU. This is only undertaken in strict compliance with the conditions for transfer set out in Chapter V of GDPR.

Declaration

- I/we confirm the firm has appropriate corporate governance and compliance arrangements in place covering the services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm the firm has appropriate processes and procedures in place to ensure adherence to all relevant FCA legislation, including (but not limited to) that relating to staff training and competence, client money and assets and treating customers fairly in relation to the services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm that firm has in place appropriate business continuity arrangements in respect of services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm the firm has in place appropriate data protection/data security arrangements in respect of the services provided to Curtis Banks SIPP and SSAS clients.
- I/we confirm that the firm complies with the obligations under the Modern Slavery Act 2015.
- I/we confirm that the firm will notify Curtis Banks of any changes to the information contained within this form, including but not limited to regulatory status, breaches of regulation/legislation, custodians, investment strategy/ approach, key contacts.
- I/we believe that the facts and matters contained in this form are true and the information provided is accurate to the best of my/our knowledge:

Adviser firm name

Financial Services Register
firm reference number

Name

Position in Firm

Signature

Date

Name

Position in Firm

Signature

Date

7 Investment Firm Checklist

All investment Firms will be required to provide relevant literature and documentation in support of the investment services they provide. Please indicate below what information is currently available and will accompany this application.

7.1 Investment Services Literature

Please provide details of the literature documenting your investment services.

Service Brochure	Prospectus
Factsheet(s)	Key Features
Terms and Conditions	Fees and Charges Sheet
Investment Managers Information for Distributors	

7.2 Financial Adviser Forms and Client Declarations

Please provide details of the forms and declarations that are required for financial advisers and clients.

Adviser Terms of Business	Target Market Guidance
Risk Warnings	Professional Client Declaration
NMPI Declaration	Power of Attorney/Authority to Deal

7.3 Account Opening Forms & Client Agreements

Please provide copies of all relevant account opening forms and clients service agreements.

Application Form	Client Agreement/Terms & Conditions
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7.4 Investments Analysis

We will require details of the underlying assets invested in discretionary or model portfolio accounts.

Sample list of holdings including ISINs	Illustration of Portfolio Allocation
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7.5 Company Due Diligence

Please provide all relevant due diligence information relating to each investment firm.

Business Plan (for firms less than 3 years old)	Latest Pillar 3 (P3) Disclosure Document
Company structure Chart	Latest Financial Statement
Authorised signatory list	Future financial forecast
Most recent audited accounts	Current management accounts



Notes



Notes



Notes

Curtis Banks Limited,
3 Temple Quay,
Bristol, BS1 6DZ

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F 0117 929 2514

curtisbanks.co.uk

Curtis Banks,
153 Princes Street,
Ipswich, IP1 1QJ

T 0370 414 7000
F 0370 414 8000

Call charges will vary. We may record and monitor calls.

If you're contacting us by email, please remember not to send any personal, financial or banking information because email is not a secure method of communication.

Curtis Banks Group plc (registered number 07934492) and Curtis Banks Limited (registered number 06758825) are companies registered in England & Wales with their registered addresses at Dunn's House, St Paul's Road, Salisbury, SP2 7BF. Curtis Banks Limited is authorised and regulated by the Financial Conduct Authority (number 492502).

Curtis Banks Pensions is a trading name of Suffolk Life Pensions Limited. Suffolk Life Pensions Limited is a company registered in England & Wales (registered number 1180742) and is authorised and regulated by the Financial Conduct Authority (number 116298). Suffolk Life Annuities Limited is a company registered in England & Wales (registered number 1011674) and is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (number 110468). The registered address of both companies is 153 Princes Street, Ipswich, Suffolk IP1 1QJ.

IMQ 0524 May 2024