

GB-A Conduct questionnaire

Version 02/2025

General data

General notes on completing the GB-A Conduct questionnaire

Please note that the information in the survey refers to the cut-off date 31.12.2024. We kindly ask you to complete the form and submit it by 31.05.2025 at the latest.

For questions related to the content of the form, please contact fundsupervision@finma.ch. For technical questions about the application, please contact digital@finma.ch.

Institute

FINMA-ID

FINMA license

Name of contact person

Telephone number

Email

Suitability

- 1 Does the authorised party offer individual asset management and/or investment advisory services?
 Yes No
- 2 Does the authorised party refrain from client segmentation in accordance with Article 4 para. 7 FinSA as all clients are treated as private clients?
 Yes No
- 3 Are documented processes regarding the segmentation of clients in place?
 Yes No
- 4 Are organisational measures to avoid and disclose conflicts of interest in place?
 Yes No
- 5 Are documented processes to create client risk profiles and investment strategies in place?
 Yes No
- 6 Are documented processes to update client profiles and investment strategies in place?
 Yes No

- 7 Are processes in place for monitoring inconsistencies between the client risk profiles and investment strategies?
 Yes No
- 8 Are processes to classify products and determine the actual risk profiles of client portfolios in place?
 Yes No
- 9 Are instruments and processes to disclose standardised and individual risk to clients (including their documentation) in place?
 Yes No
- 10 Are clients informed about the market offer taken into account in accordance with Article 10 para. 1 FinSO?
 Yes No
- 11 Does the management reporting contain information about inconsistencies between the clients' risk profiles/investment strategies and the actual portfolio risk profiles?
 Yes No
- 12 Does the management reporting contain information on client complaints?
 Yes No
- 13 Is an internal directive to ensure best execution in place?
 Yes No
- 14 Are internal training sessions and continuing professional development courses for employees available, in order for them to acquire the required knowledge according to Article 6 FinSA in conjunction with Article 3 para. e FinSA?
 Yes No

Cross-border

- 15 Is the institute confronted with significant cross-border risks?
 Yes No
- 16 Is a formal risk assessment of the institute's cross-border risks carried out?
 Yes No
- 17 Is there a cross-border framework or cross-border directive in place?
 Yes No
- 18 Was the cross-border framework or cross-border directive updated in the last two years?
 Yes No
- 19 Organisational measures: Is there a clear and formalised internal allocation of tasks and responsibilities in relation to cross-border risks and activities?
 Yes No
- 20 Does the institute have provisions on cross-border controls (in the cross-border framework, the cross-border directive or in a separate cross-border control framework)?
 Yes No

- 21 Are cross-border risks covered by an internal management reporting or management information system (MIS)?
 Yes No

Market integrity

- 22 Does an annual risk assessment in accordance with the FINMA circular 2013/08 ("Market conduct rules", margin no. 46) take place?
 Yes No
- 23 Is the risk analysis in accordance with the FINMA Circular 2013/08 "Market conduct rules", margin no. 46 approved by the management?
 Yes No
- 24 Does the institute derive organisational measures and controls from the risk analysis in accordance with FINMA Circular 2013/08 "Market conduct rules", margin no. 46?
 Yes No
- 25 Are the market conduct rules and the organisational measures put in place by the institute set down in the system of directives?
 Yes No
- 26 Are internal controls to prevent and detect insider trading, front-running and market manipulation in place?
 Yes No
- 27 Are regular training sessions held for the employees affected by market conduct rules and the organisational measures put in place by the institute?
 Yes No
- 28 Does the institute's incentive system take into account the avoidance of incentives for non-market-compliant behaviour?
 Yes No
- 29 Structuring of internal analysis activities (please tick as appropriate / multiple answers possible)
 Internal secondary research
 Internal primary research
 Internal primary research with direct or indirect contact with issuers / major shareholders / investment banks

Product

- 30 Does the authorised party administer and/or manage collective investment schemes?
 Yes No
- 31 Does the authorised party specify the principles for the management and risk management of the managed collective investment schemes in its directives?
 Yes No
- 32 Are the procedures and systems for assessing and monitoring the key risks of the managed collective investment schemes, in particular market, liquidity and counterparty risks, specified in the internal directives?
 Yes No

- 33 Does the authorised party regularly review whether the risk management principles of the managed collective investment schemes are appropriate and effective?
 Yes No
- 34 Does the reporting to the board of directors and the management include information on compliance with the risk management principles of the managed collective investment schemes?
 Yes No
- 35 Is the authorised party's risk control functionally and hierarchically separated from its operational activities?
 Yes No
- 36 Are the guidelines on the use of derivatives part of the risk management directives of the collective investment schemes?
 Yes No
- 37 Does the authorised party use derivatives for non-hedging purposes?
 Yes No
- 38 Is the risk control for each individual position as well as the the overall risk of the managed collective investment scheme carried out in accordance with Article 14 FinIO-FINMA?
 Yes No
- 39 Are the liquidity and other significant risks of each open-ended collective investment scheme under management regularly assessed and documented under various scenarios pursuant to Article 10 FinIO-FINMA if the net fund assets exceed CHF 25 million?
 Yes No
- 40 Are processes in place to identify, measure and control liquidity risks of the managed collective investment schemes?
 Yes No
- 41 Does the authorised party manage funds of funds (investment in target funds exceeding 49% of the fund assets)?
 Yes No
- 42 Is the selection process for new target funds documented and formalised?
 Yes No
- 43 Have there been any cross trades between two or more collective investment schemes and/or client portfolios managed by you in the last year?
 Yes No
- 44 Are there specific internal rules on cross trades?
 Yes No
- 45 Are cross-trades identified by your PMS systems?
 Yes No

Financial situation

- 46 Is compliance with the legal requirements on minimum capital monitored?
 Yes No

- 47 Is compliance with the legal requirements on capital adequacy monitored?
 Yes No
- 48 How often does such monitoring take place?
 monthly quarterly semi-annual annually other
- 49 Is the result of this monitoring reported to management?
 Yes No
- 50 How often does the reporting take place?
 monthly quarterly semi-annual annually other
- 51 Is the result of this monitoring reported to the board of directors?
 Yes No
- 52 How often does the reporting take place?
 monthly quarterly semi-annual annually other

Operational risks

- 53 Are operational risks (including cyber risks, critical data, BCM etc.) arising from the business activity in question identified, approved and monitored by the board of directors?
 Yes No
- 54 Are processes with significant operational risks partially or fully delegated?
 Yes No
- 55 Are the risks arising from delegation included in operational risk management?
 Yes No
- 56 Is an inventory of the significant operational processes compiled by the management?
 Yes No
- 57 Are the processes and controls in the area of significant operational risks regularly monitored and tested?
 Yes No

Organisation

- 58 Does the board of directors consist of at least one third independent members?
 Yes No
- 59 Does the majority of the board of directors not conduct any operational business?
 Yes No
- 60 Does the chair of the board of directors conduct any operational business?
 Yes No
- 61 Are processes in place to ensure risk identification and risk measurement across all business divisions?
 Yes No

- 62 Is the risk control for each individual position as well as the the overall risk of the assets of occupational pension schemes and the risks of any other management mandates carried out in accordance with Article 14 FinIO-FINMA?
 Yes No
- 63 Are processes in place to ensure the monitoring of delegated activities?
 Yes No
- 64 Is periodic risk and compliance reporting compiled for the management and the board of directors?
 Yes No
- 65 Is the risk management delegated?
 Yes No
- 66 To whom is the risk management delegated?
 Delegation within the group Delegation to a third party
- 67 Is the risk management delegated abroad?
 Yes No
- 68 Is the compliance function delegated?
 Yes No
- 69 To whom is the compliance function delegated?
 Delegation within the group Delegation to a third party
- 70 Is the compliance function delegated abroad?
 Yes No
- 71 Is the institute part of a group structure where the parent company and/or subsidiaries are domiciled abroad?
 Yes No
- 72 Is the group controlled by a foreign entity and/or are there significant dependencies on foreign entities (e.g. from a financial or organisational perspective or related to human resources)?
 Yes No
- 73 Are other group companies which are domiciled abroad authorised or supervised by a foreign regulatory body?
 Yes No
- 74 Is the group (entirely or partly) subject to regulatory consolidation and/or group supervision by a foreign regulatory body?
 Yes No

75 Comments