

ICARA TEMPLATE FOR MIFID INVESTMENT FIRMS

[FIRM NAME]

REFERENCE DATE: [DATE]

BOARD APPROVAL DATE: [DATE]

DEADLINE FOR SUBMISSION OF MIF007 FORM TO FCA: [DATE]

[DATE]

[The following is a preview only. To purchase the full document, please visit:

<https://fsreg.com/icara-template-for-mifid-investment-firms/>

This is the ICARA document prepared by [FIRM NAME] (the “Firm”) in relation to the year ending [DATE]. Its purpose is to record the Firm’s review of the adequacy of its ICARA process under MIFIDPRU 7.8.2.¹

This ICARA document was prepared by the Firm’s compliance officer and approved by the Firm’s Board on [DATE].

	Question/Answer
1.	Please provide a clear description of the Firm’s business model and strategy and how it aligns with the Firm’s risk appetite.²
	[COMPLIANCE OFFICER TO COMPLETE]
2.	Please provide an explanation of the activities carried on by the Firm, with a focus on the most material activities.³
	[COMPLIANCE OFFICER TO COMPLETE]
3.	Where the Firm has concluded that the ICARA process is fit for purpose, please provide a clear explanation of why the Firm reached this conclusion.⁴
	[COMPLIANCE OFFICER TO COMPLETE]
4.	Where the Firm has concluded that the ICARA process requires further improvement, please provide a clear explanation of: a) the improvements needed; b) the steps needed to make those improvements and the timescale for taking them; and c) who within the Firm is responsible for taking the steps in (b).⁵
	[COMPLIANCE OFFICER TO COMPLETE]
5.	Please provide a clear explanation of any other changes to the Firm’s ICARA process that have occurred following the review and the reasons for those changes.⁶

¹ Under MIFIDPRU 7.8.2, a firm must review the adequacy of its ICARA process: (1) at least once every 12 months; and (2) irrespective of any review carried out under (1), following any material change in the firm’s business model or operating model.

² MIFIDPRU 7.8.7(3)(a).

³ MIFIDPRU 7.8.7(3)(b).

⁴ MIFIDPRU 7.8.7(3)(c).

⁵ MIFIDPRU 7.8.7(3)(d).

⁶ MIFIDPRU 7.8.7(3)(e).