







# Foreword by the Chairman

#### **Renewed satisfaction**

From the start, 2017 proved to be a year of changes for Orias, including a change in its chairman and especially its secretary general. Daisy Facchinetti succeeded Grégoire Dupont, who had been present since the creation of the single register.

Beyond the presentation meetings held with members of the board of directors, we took advantage of the 10th anniversary of Orias to invite our partners to join us on 20 June.

With regard to the register, Orias saw a significant increase in the number of intermediaries to be registered, with 58,357 intermediaries as of 31 December 2017 across the different categories, reaching 98,350 registrations (5% compared with 2016).

In early 2017, insurance distribution professionals were busy preparing for the entry into force of the ad hoc directive. Its expected delay was welcomed by Orias.

In this context, the main goal for Orias was to maintain or even improve its service quality while further reducing its processing times.

The result, which we measure every year, is a source of satisfaction for the entire team.

#### A shift in focus towards the consumer

Orias is unique in that it brings together ten professional organisations, united within its bodies, working together to carry out its mission within the framework of the public service delegation.

In 2017, we wanted everyone to remember that Orias is intended primarily for consumers. A significant increase in its visibility with the general public was therefore necessary.

The foundations for a major communications campaign, to be observed over 2018, were established.

In this respect, Orias now has a new look thanks to its new logo.

Armed with this new identity, the single register began a consumer communication campaign entitled "We are not just a number" in spring 2018. Using the press and Web media, Orias addressed individuals to inform them of the advantages and the interest of having a single register with an updated, accessible range of information.

This desire to participate in providing a financial education to the public and therefore protect consumers is part of the DNA of Orias and its members.

#### **Noticeable originality**

It is also important to keep in mind that Orias is unique, particularly in a European context, in that it maintains a collection of registrations and ensures their relevance both for interested parties and for the supervisor involved downstream.

This is not the case in all EU countries. The independence of its structures allows Orias and its bodies, under the supervision of the Directorate General of the French Treasury, to play their roles completely.

In carrying out its mission, Orias will aim to promote the exemplary nature of this model to serve intermediation professionals in insurance, banking, and finance as laws and regulations change.

Bruno Pélissier Chairman of Orias









# Annual report 2017 Contents

1.	Re	sponsibilities, structure and activity of Orias	Pages
		Responsibilities: keeping and updating the Register of Insurance, Banking and Finance Intermediaries on behalf of the French government	-
		<ul><li>1.1.1 Legal framework</li><li>1.1.2 Keeping and updating the Single Register of Insurance, Banking and Finance Intermediaries</li></ul>	8
		<ul> <li>1.1.3 Registration categories and conditions</li> <li>1.1.4 LRelations with the Prudential Control and Resolution Authority (<i>ACPR - Autorité de Contrôle Prudentiel et de Resolution</i>) and the Financial Markets Authority (<i>AMF - Autorité des Marche Financiers</i>)</li> </ul>	9 S
	1.2	Structure: an association run by professional organisations from the sector under the supervision of the French Ministry of the Economy	12
		<ul> <li>1.2.1 Orias is a not-for-profit organisation in accordance with French law of 1901</li> <li>1.2.2 Orias is placed under the supervision of the French Ministry of the Economy</li> <li>1.2.3 Services offered by Orias</li> </ul>	13
	1.3	Activity in 2017:	15 18
	1.4	Use of the <u>www.orias.fr</u> website	21
2.	Sta	atistics as of 31/12/2017	
	2.1	Insurance, banking and finance intermediaries	
		2.1.1 General data	
	~ ~	2.1.2 Combined activities and categories	
	2.2	Insurance Intermediaries	
		2.2.1 General data	
		2.2.2 Data by category	
		2.2.2.2 Insurance or reinsurance broker category	
		2.2.2.3 General Insurance Agent category 2.2.2.4 Insurance Representative category	
		2.2.2.5 Insurance Intermediary Representative category	
		2.2.3 Cross-border practice by insurance intermediaries	41
	2.3	Banking transactions and payment services intermediaries	
		2.3.1 General data	
		2.3.2 Data by category	
		2.3.2.1 Overall changes	
		<ul> <li>2.3.2.2 Banking Transactions and Payment Services Broker category</li> <li>2.3.2.3 Banking Transactions and Payment Services Exclusive Representative category</li> <li>2.3.2.4 Banking Transactions and Payment Services Non-Exclusive Representative category</li> <li>2.3.2.5 IOBSP Representative category</li> </ul>	
	2.4	Independent financial advisors and tied agents of investment services providers	55
		2.4.1 Independent Financial Advisor category 2.4.2 PSITied Agent category	
	2.5	Crowdfunding advisors and crowdfunding intermediaries	63
		2.5.1 Crowdfunding Advisor category         2.5.2 Crowdfunding Intermediaries category	
3.	Or	ias's observations	
	-	Integrity checks applicable to intermediaries entered in the Single Register of Insurance, Banking, and Finance Intermediaries	
	3.2	Entry in the single register of crowdfunding intermediaries	
	3.3	Transposition of the Insurance Distribution Directive (2016/97) of 20 January 2016	
Ap		dices:	
		sition of Orias bodies: registration committee, board of directors and general meeting	73
		nentation of the 2017 budget	
		authorities in charge of keeping the register of insurance intermediaries in the 32 Party States European Economic Area (source: www.eiopa.europa.eu)	76
in	the 3	authorities in charge of keeping the register of banking transaction intermediaries 2 Party States to the European Economic Area	
(sc	urce	: http://ec.europa.eu/finance/finservices-retail/credit/mortgage/index_en.htm)	79



# List of abbreviations



- ACIFTE: Investment, Finance and Business Transfer Analysts and Advisors Analystes et conseillers en investissements, finance et transmission d'entreprise
- ACPR: Prudential control and resolution authority Autorité de contrôle prudentiel et de résolution
- AGA: General Insurance Agent Agent général d'assurance
- ALPSI: Investment Service Provider's Tied Agent Agent lié de prestataire de service d'investissements
- AMF: Financial Markets Authority Autorité des marchés financiers

- ANACOFI-CIF: National Association of Financial Advisors - Association nationale des conseils financiers - Conseillers en investissements financiers

- CIF: Financial investment advisors Conseillers en investissements financiers
- CIP: Crowdfunding advisor Conseiller en investissements participatifs
- CJN: National Criminal Database Casier judiciaire national
- CMF: Monetary and financial code Code monétaire et financier

- CNCIF: National Chamber of Independent Financial Advisors - Chambre nationale des conseillers en investissements financiers

- CNCGP: National Chamber of Wealth Advisors Chambre nationale des conseils en gestion de patrimoine
- COA: Insurance or Reinsurance Broker Courtier d'assurance ou de réassurance
- COBSP: Banking Transactions and Payment Services Broker Courtier en opérations de banque et en services de paiement
- CGPI: Independent Wealth Advisors Compagnie des conseils en gestion de patrimoine
- IAS: Insurance Intermediary Intermédiaire en assurance
- IEDOM: Overseas Departments Issuing Institution Institut d'émission des départements d'Outre-Mer
- IEOM: Overseas Issuing Institution Institut d'émission d'Outre-Mer
- IFP: Crowdfunding Intermediary Intermédiaire en financement participatif

- IOBSP: Banking Transactions and Payment Services Intermediary - Intermédiaire en opérations de banque et en services de paiement

- LE: Freedom of Establishment Libre établissement
- LPS: Freedom to Provide Services Libre prestation de services
- MA: Insurance Representative Mandataire d'assurance
- MAL: Tied Insurance Representative Mandataire d'assurance lié
- MIA: Insurance Intermediary Representative Mandataire d'intermédiaire d'assurance

- MIOBSP: Banking Transactions and Payment Services Intermediary Representative - Mandataire d'intermédiaire en opérations de banque et en services de paiement

- MOBSP: Banking Transactions and Payment Services Non-Exclusive Representative - Mandataire non exclusif en opérations de banque et en services de paiement

- MOBSPL: Banking Transactions and Payment Services Exclusive Representative - Mandataire exclusif en opérations de banque et en services de paiement

- NAF: Nomenclature of French Businesses (published by INSEE) - Nomenclature d'activités française (INSEE)

- PM: Legal Entity Personne morale
- PP: Natural Person Personne physique
- PSI: Investment services provider Prestataire de service d'investissements
- RCS: Trade and Companies Register Registre du commerce et des sociétés
- RNCP: National Directory of Professional Qualifications Répertoire national des certifications professionnelles
- SP: Payment Services Services de paiement



# Responsibilities, structure and activity of Orias

	Pag	ges
1.1	Responsibilities: keeping and updating the Register of Insurance, Banking and Finance Intermediaries on behalf of the French government	. 7
	1.1.1 Legal framework	
	1.1.2 Keeping and updating the Single Register of Insurance,	
	Banking and Finance Intermediaries	
	1.1.3 Registration categories and conditions	. 8
	1.1.4 Relations with the Prudential Control and Resolution Authority (ACPR - Autorité de	
	Contrôle Prudentiel et de Resolution) and the Financial Markets Authority (AMF - Auto	rité
	des Marches Financiers)	10
1.2	Structure: an association run by professional organisations from the sector under the	
	supervision of the French Ministry of the Economy	
	1.2.1 Orias is a not-for-profit organisation in accordance with French law of 1901	
	1.2.2 Orias is placed under the supervision of the French Ministry of the Economy	
	1.2.3 Services offered by Orias	
1.3	Activity in 2017:	15
	1.3.1 Requests	15
	1.3.2 Information requests by email and telephone	
	1.3.4 Integrity checks	20
1.4	Use of the www.orias.fr site	21



#### 1.1 Responsibilities: keeping and updating the Register of Insurance, Banking and Finance Intermediaries on behalf of the French government

#### 1.1.1 Legal framework

The French public authorities decided several years ago to establish a system for registering insurance brokers. Law no. 89-1014 of 31 December 1989 laid down the principle of a register of all insurance brokers. However, this registration principle was only implemented after Law no. 99-532 of 25 June 1999, which entrusted this task to professional insurance organisations.

Likewise, former articles L. 530-2-2 and R. 530-12 of the Insurance Code entrusted responsibility for holding the List of Insurance Brokers to a Committee composed of representatives of the Federation of Insurance Brokers (*FCA - Fédération des Courtiers en Assurance*), the French Association of Insuring Companies (*SFAC - Syndicat Français des Assureurs Conseils*), and the French Federation of Insurance Companies (*FFSA - Fédération Française des Sociétés d'Assurance*). The association created for this purpose, Association of the List of Insurance Brokers (*Association de la Liste des Courtiers en Assurance*), gave its name to this list. The "ALCA List" became the usual terminology. Registration on the ALCA list was not a legal obligation.

Subsequently, the Insurance Mediation Directive (IMD) 2002/92/EC of the European Parliament and of the Council of 9 December 2002 marked an additional milestone in the registration of insurance intermediaries. This directive was transposed into the Insurance Code by Law no. 2005-1564 of 15 December 2005, decree no. 2006-1091 of 30 August 2006, and a series of orders.

Article L. 512-1 and article R. 512-3 of the Insurance Code entrust an organisation, having status as a legal entity and bringing together professional insurance organisations, with keeping the register. This is the legal framework for the work carried out by Orias (formerly known as the Organisation for the Register of Insurance Intermediaries). The legal application of provisions relating to registration of insurance intermediaries was fixed on 31 January 2007.

The Banking and Financial Regulations law no. 2010-1249 of 22 October 2010 extended the scope of Orias's responsibilities to registration of insurance intermediaries, banking transactions and payment services intermediaries, financial investment advisors and tied agents of investment services providers. This law included the removal of the database of direct marketers of banking and financial services held jointly by the ACPR and the AMF starting on 1 January 2013. The launch date for the Single Register of Insurance, Banking and Finance Intermediaries was fixed at 15 January 2013 in an order by the Minister for the Economy on 20 December 2012.

Order no. 2014-559 dated 30 May 2014 on crowdfunding, amended by order no. 2016-520 of 28 April 2016 on cash certificates, led to a further extension of Orias's competence. Since 1 October 2014, Orias has assumed the task of registering crowdfunding advisors and crowdfunding intermediaries.

Order no. 2016-351 of 25 March 2016 on credit agreements for consumers relating to residential property, which transposes Directive 2014/17/EU of the European Parliament and of the Council of 4 February 2014, amends certain provisions applicable to IOBSP. These amendments came into force on 1 July 2016.

The legal framework of the Single Register is set out in Book V, Title IV, Chapter VI of the French Monetary and Financial Code. However, certain orders are not codified. They are available at <u>www.orias.fr</u>

#### Legal sources

Most provisions are codified in the Insurance Code, the Monetary and Financial Code and the AMF General Regulations:

The IAS regulations are set out in Book V of the French Insurance Code.

The IOBSP regulations are set out in Book V, Section I, Chapter IX of the Monetary and Financial Code. The CIF regulations are set out in Book V, Section IV, Chapter I of the Monetary and Financial Code and articles 325-1 to 325-31 of the AMF General Regulations.

The ALPSI regulations are set out in Book V, Section IV, Chapter V of the Monetary and Financial Code.

The CIP regulations are set out in Book V, Section IV, Chapter VII of the Monetary and Financial Code and articles 325-32 to 325-49 of the AMF General Regulations.

The IFP regulations are set out in Book V, Section IV, Chapter VIII of the Monetary and Financial Code.

#### 





#### 1.1.2 Keeping and updating the Single Register of Insurance, Banking and Finance Intermediaries

Article L. 512-1 of the Insurance Code and article L. 546-1 of the Monetary and Financial Code gave Orias responsibility for "setting up, keeping and updating the Register".

Orias therefore receives "applications for registration or registration renewal and decides on these applications". It "carries out deletions from the Register or withdraws registrations" under the conditions fixed by decree.

Orias has an additional responsibility concerning insurance intermediaries, involving issuing and receiving crossborder practice notifications within the European Economic Area (EEA). As from 1 July 2016, Orias has the legal authority to manage notifications of cross-border practice in the European Economic Area concerning real estate credit intermediaries.

Finally, Orias is responsible for publishing the Register of Insurance, Banking and Finance Intermediaries on a website: <u>www.orias.fr</u>

Orias is therefore both an information and registration management organisation in respect of professionals as well as providing a service to consumers by publishing the list of duly registered intermediaries.

#### 1.1.3 Registration categories and conditions

The regulations cover three types of activities, carried out in one or more registration categories.

Four registration categories have been established in respect of the activity of insurance intermediaries:

- The category of Insurance and Reinsurance Brokers (COA), whether legal entities or natural persons registered on the Trade and Companies Register as insurance brokers, whether or not they base their analyses on a sufficient number of insurance policies available on the market, and not subject to a contractual obligation to work with one or more insurance companies;
- The category of General Insurance Agents (AGA), whether natural persons or legal entities mandated as general insurance agents, subject to a contractual obligation to work with one or more insurance companies;
- The category of Insurance Representatives (MA/MAL), whether natural persons or legal entities other than general insurance agents, mandated by an insurance company:
- either subject to a contractual obligation to work exclusively with one or more insurance companies;
- or not subject to a contractual obligation to work exclusively with one or more insurance companies but not basing their analyses on a sufficient number of insurance policies available on the market, according to article L. 550-1 of the Insurance Code;
- The category of Insurance Intermediary Representatives (MIA), natural persons or legal entities mandated by an intermediary registered in one of the three aforementioned categories.

LInsurance representatives and insurance intermediary representatives are not able to carry out claims management. This activity restriction also has exceptions<sup>2</sup>.

<sup>&</sup>lt;sup>27</sup> To persons carrying out insurance mandates in branches 4, 5, 6, 7, 11 and 12 mentioned in article R. 321-1 of this Code, as well as in branch 10 of the same article in respect of transporter's liability, to the exclusion of all other branches.



<sup>&</sup>lt;sup>1</sup> Article L. 550-1 of the Insurance Code stipulates that "tied insurance representatives" carrying out their activity in the name of and on behalf of a single insurance company and under its sole liability and can receive neither premiums nor sums intended for clients. It is stipulated that it is the responsibility of the contracting insurance company which registers tied representatives to oversee their registration and the activities they carry out <sup>2</sup> CThis limit is not applicable:

<sup>&</sup>lt;sup>1°</sup> To the credit institutions defined in article L. 511-1 of the Monetary and Financial Code;



Four registration categories have been established in respect of the activity of banking transaction and payment services intermediaries:

- The category of Banking Transaction and Payment Services Brokers (COBSP), acting under a mandate from the client and undertaking not to receive any mandate from a credit or payment institution, and not subject to a contractual obligation to work exclusively with a credit or payment institution, a financing company or an electronic money institution,
- The category of Banking Transactions and Payment Services Exclusive Representatives (MOBSPL/MBE), acting
  under a mandate from a credit institution, a financing company, a payment institution or an electronic money
  institution and subject to a contractual obligation to work exclusively with one of these institutions in a defined
  category of banking transactions or payment services,
- The category of Banking Transactions and Payment Services Non-Exclusive Representatives (MOBSP/MBNE), acting under one or more non-exclusive mandates from a credit institution, financing company, payment institution or electronic money institution,
- The category of Banking Transactions and Payment Services Intermediary Representatives (MIOBSP), acting under one or more mandates issued by one of the three aforementioned categories.

Operation in an IOBSP category is exclusive of another within the meaning of article R. 519-4 II of the CMF except for banking transactions of a different nature (consumer credit/debt consolidation/real-estate loans/reverse mortgages) or payment service.

Since 1 January 2017, Orias has collected intermediated banking transactions and/or payment services as part of the registration of these intermediaries.

Two categories have also been established in relation to the activity of "financial intermediaries", without this being a legal concept:

- The category of Independent Financial Advisors (CIF), "persons carrying out the following activities as their usual
  profession: investment advice, advice relating to the supply of investment services, and advice relating to carrying
  out transactions involving various assets". Independent financial advisors may also provide a service involving
  receiving and sending orders on behalf of third parties, subject to the conditions and limits fixed by the AMF General
  Regulations, and carry out other wealth management advisory activities.
- The category of Tied Agents of Investment Services Providers (ALPSI) providing investment services (receiving and sending orders on behalf of third parties, guaranteed or non-guaranteed investments, and investment advice). Tied agents can also promote services supplied by the investment services provider, supply advice on these services and market investment services to clients on behalf of the provider.

Lastly, as regards the crowdfunding activity, two categories are established:

- The category of Crowdfunding Advisors (CIP), "legal entities carrying out as their usual profession an investment
  advising activity mentioned in point 5 of article L. 321-1 relating to offers of capital securities and debt securities
  defined by decree. This activity is carried out by means of a website meeting the characteristics set out by the
  AMF's general regulations."
- The category of Crowdfunding Intermediaries (IFPs), "persons carrying out as their usual profession intermediation within the meaning of article L. 548-1: using a website to link holders of a specific project and persons funding this project for loan operations with or without interest".
- Platforms offering donation operations also fall into the IFP category since the entry into force of Article 11 of order no. 2016-1635 of 1 December 2016 reinforcing the French system of combating money laundering and the financing of terrorism.

Registration in each of these legal categories is subject to specific provisions detailed on the <u>www.orias.fr</u> website. Broadly speaking, all intermediaries must fulfil the following conditions:

- Condition of integrity,
- · Condition of graduated and specific professional capacity in respect of registration categories,
- Condition of specific civil liability insurance (insurance coverage or activity carried out under the entire liability of a principal),
- Condition of financial capacity (financial guarantee or activity carried out under the entire liability of a principal),
- Condition of membership in a professional association (only for financial investment advisors and crowdfunding advisors<sup>3</sup>).

<sup>&</sup>lt;sup>3</sup> In the absence of an approved CIP professional association, the AMF directly assumes these responsibilities.



#### Integrity checks

The provisions of article L. 512-4 of the Insurance Code and the provisions of articles L. 519-3-3, L. 541-2, L. 545-5, L. 547-7 and L. 548-4 of the Monetary and Financial Code require persons and entities registered with Orias to not have been finally sentenced for a series of crimes or misdemeanours set out in articles L. 322-2 of the Insurance Code and L. 500-1 of the Monetary and Financial Code.

In accordance with article R. 514-1 of the Insurance Code and article R. 546-5 of the Monetary and Financial Code, the integrity of the registered persons and entities is subject to systematic and reinforced checks via consultation of the national criminal database.

In addition, article L. 322-2 VI of the Insurance Code and article L. 500-1 VII of the Monetary and Financial Code specify that "The fact that a person or entity is not subject to the incapacity stipulated in this article is without prejudice to the competent authority's assessment of compliance with the conditions required for approval or authorisation to practice".

In practice, requests to access Bulletin 2 will be sent by "a secure means of telecommunication" to the national criminal database. Intermediaries who are nationals of an EU member state or other signatory state to the European Economic Area will also be subject to a criminal record check or equivalent in their state of origin. These requests are based on data identifying natural persons and directors of legal entities: gender, first name, last name, and date, town and country of birth.

If no record is held in the criminal database, the response "None" is returned. This means that the integrity condition has been met. On the other hand, if a sentence is recorded in the criminal database, the "paper" bulletin is sent to Orias for examination. The average "paper" bulletin return time is 5 days. Only the crimes and misdemeanours set out in article L. 322-2 of the Insurance Code and article L. 500-1 of the Monetary and Financial Code prohibit practising as an insurance, banking or finance intermediary. In the event the record contravenes the aforementioned articles L. 322-2 and/or L. 500-1, a prior information letter is sent to the persons concerned informing them that their registration risks are being deleted or rejected. The letter refers to the sentences in question and invites the persons concerned to send their comments in writing within a reasonable time period.

On expiry of this period, Orias registration committee, informed of any comments from interested parties, is able to take a decision to reject or delete the registration in respect of the intermediaries in question, notified by letter, sent with recorded delivery and acknowledgement of receipt. The decision for lack of integrity will also be notified, where relevant, to the insurance companies which have granted a mandate, credit and payment institutions which have granted a mandate or electronic money institutions which have granted a mandate, intermediaries which have granted a mandate, and the professional associations of CIFs in question, without mentioning the sentences concerned. In case of deletion for lack of integrity, the ACPR (in respect of IAS, IOBSP and IFP) or the AMF (in respect of CIF, ALPSI and CIP) is informed, without mentioning the sentences concerned. Information about removals and/or deletions is also sent to the Departmental Directorates for the Protection of Populations (DDPP) of the intermediaries concerned.

#### 1.1.4 Relations with the Prudential Control and Resolution Authority (ACPR - *Autorité de Contrôle Prudentiel* et de Resolution) and the Financial Markets Authority (AMF - *Autorité des Marches Financiers*)

It should be emphasised that neither the ACPR nor the AMF sits on the Orias board of directors, in accordance with its articles of association.

Exchanges of information concerning intermediaries listed in the Single Register between Orias and the ACPR and the AMF respectively are stipulated in articles L. 546-4 of the Monetary and Financial Code and L. 514-4 of the Insurance Code:

- "When the Financial Markets Authority or the Prudential Control Authority becomes aware of information likely to have consequences on the registration of the persons mentioned in article L. 546-1(I) likely to result in deletion from the register pursuant to that same article, or when the AMF or the ACPR invokes its power to enforce penalties pursuant to article L. 621-15 or article L. 612-41(I) respectively, it will inform the organisation responsible for keeping this register (art. L. 546-4 of the Monetary and Financial Code),





- "When the control authority is aware of a breach committed by an intermediary likely to result in deletion from the register mentioned in article L. 512-1(I), or when it invokes its power to enforce penalties applicable to article L. 612-41(I) of the Monetary and Financial Code, it will inform the organisation responsible for this register" (art. L. 514-4(I) of the Insurance Code).

Orias will communicate all information asked of it by the ACPR or AMF acting in the framework of their responsibilities. Orias will also have the ability to communicate any relevant information to the ACPR and AMF. On 16 December 2016, Orias signed an agreement with the ACPR concerning the periodic transmission of data relating to insurance, banking transactions and payment services intermediaries and to crowdfunding intermediaries, to be implemented in 2017.

Its exchanges are carried out according to a timetable established each year, taking into account a bimonthly frequency, based on the schedule of the registration committees.

Given that this information is not intended to be cross-referenced, the ACPR does not report these exchanges to the French national commission of data privacy (CNIL).

Furthermore, the persons subject to the control of the ACPR, pursuant to article L. 612-2 II-1° and 3° of the Monetary and Financial Code, must pay a contribution towards control costs, payable to the Banque de France, in accordance with article L. 612-20 of the Monetary and Financial Code. The amount of this contribution applicable to intermediaries registered in the category of Insurance or Reinsurance Broker, in one of the banking transactions and payment services intermediary categories, or in the crowdfunding intermediary category was fixed to 150 euros by an order by the Minister for the Economy on 26 April 2010. Persons simultaneously practising as an intermediary in banking transactions and payment services and an insurance or reinsurance broker or another activity subject to a contribution to the ACPR will only pay one contribution.

The contribution becomes due to the ACPR on registration with Orias on 1 April each year. Orias must send the list of insurance brokers by 15 May at the latest for contribution invoices to be sent out by the ACPR by 15 June at the latest. The intermediaries concerned must pay their contribution by 30 August of that year.

Independent financial advisors and crowdfunding advisors are similarly subject to control by the AMF pursuant to article L. 621-9 II 10° of the Monetary and Financial Code. They are therefore liable for the contribution stipulated in article L. 621-5-3-II-4° of the Monetary and Financial Code. The amount of this contribution is 450 euros, pursuant to article 2 of decree no. 2010-1724 of 30 December 2010. Orias must send a list of the persons concerned, correct as of 1 January of each financial year, to the AMF.



#### File communication requests from the authorities

\* The Overseas Departments Issuing Institution (IEDOM), created in 1959, is particularly responsible for ensuring territorial continuity in monetary matters by delegation of Banque de France in the five overseas departments and in the collectivities of Saint Pierre et Miquelon, Saint Barthélémy and Saint-Martin. The Overseas Issuing Institution (IEOM) performs the functions of a central bank in the overseas collectivities of the Pacific (New Caledonia, French Polynesia, Wallis and Futuna). By delegation from the ACPR, IEDOM-IEOM assumes control of insurance intermediaries and IOBSP in these territories.





### 1.2 Structure: an association run by professional organisations from the sector under the supervision of the French Ministry of the Economy

# 1.2.1 Orias is a not-for-profit organisation in accordance with French law of 1901

Orias is a not-for-profit organisation in accordance with French law 1901, the articles of association of which are ratified by ministerial order, called "Orias - Organisme pour le registre des Intermediaries en assurance" (Orias - Organisation for the register of insurance intermediaries).

The articles of association establish a registration committee responsible for entries, deletion of entries, and removal from the list. The registration committee is composed of 16 principal members and 16 substitute members. The quorum is set at half of its principal or substitute members. Decisions are taken by a two-thirds majority vote of the votes cast.

The composition of the registration committee is fixed by a ministerial order. The order of 24 February 2016 by the Minister for the Economy sets the composition of the registration committee.

- In respect of insurance brokers: two principal members and two substitute members appointed by the Chamber of Insurance Brokers (CSCA *Chambre Syndicale des Courtiers d'Assurance*);
- In respect of general insurance agents: two principal members and two substitute members appointed by the National Federation of Associations of General Insurance Agents (AGEA - Federation Nationale des Syndicats d'Agents Généraux d'Assurances);
- In respect of banking transactions and payment services intermediaries:
  - one principal member and one substitute member appointed by the French Association of Banking Transaction Intermediaries (AFIB *Association Française des Intermédiaries en Opérations de Banques*),
  - one principal member and one substitute member appointed by the Professional Association of Credit Intermediaries (APIC - Association Professionnelle des Intermédiaires en Crédits);
- In respect of independent financial advisors:
  - one principal member and one substitute member appointed by the National Association of Financial Advisors (ANACOFI CIF Association Nationale des Conseillers Financiers),
  - one principal member and one substitute member appointed by the National Chamber of Wealth Advisors (*Chambre Nationale des Conseils en Gestion de Patrimoine* CNCGP);
- In respect of insurance organisations:
  - three principal members and three substitute members appointed by the French Insurance Federation (FFA *Fédération Française de l'Assurance*),
  - one principal member and one substitute member appointed by the National Federation of French Mutual Insurance Organisations (FNMF *Fédération Nationale de la Mutualité Française*);
- In respect of credit institutions:
  - one principal member and one substitute member appointed by the French Banking Federation (FBF *Fédération Bancaire Française*),
  - three principal members and three substitute members appointed by the French Association of Credit Institutions and Investment Companies (AFECEI - *Association Française des Etablissements de Crédit et des Entreprises d'investissement*).

The members of the registration committee and all persons responsible for examination of dossiers are bound by professional secrecy (art. R. 512-3 VI). This professional secrecy is not enforceable upon the ACPR, the AMF, European Union organisations keeping national registers, or judicial authorities acting within the context of criminal proceedings.

The professional bodies with representatives on the registration committee are classified as members of the association.



The association is managed by the board of directors, the composition of which is fixed as follows by the articles of association:

- Two principal directors and two substitute directors appointed by the AFECEI,
- Two principal directors and two substitute directors appointed by the AGEA,
- Two principal directors and two substitute directors appointed by the CSCA,
- Two principal directors and two substitute directors appointed by the FFA 4,
- One principal director and one substitute director in respect of IOBSPs appointed by the IOBSP professional bodies with representatives on the registration committee,
- One principal director and one substitute director in respect of CIFs appointed by the CIF professional bodies with representatives on the registration committee.

In the event that IOBSP directors are not appointed jointly, the posts of principal director and substitute director are allocated alternatively each year to one of the two bodies represented on the registration committee. In the event that CIF directors are not appointed jointly, the posts of principal director and substitute director will be allocated alternatively each year to one of the two bodies represented on the registration committee.

The members of the board of directors elect a Chairman from among them for a term of two years.

The association draws up a balance sheet, profit and loss statement, and notes to the accounts. A statutory auditor certifies these accounts.

#### 1.2.2 Orias is placed under the supervision of the French Ministry of the Economy

The association is under the supervision of the Director General of the French Treasury. A representative of the Directorate General of the French Treasury, in the capacity of Government Commissioner, may therefore participate in the work of the general assembly and any other body created by the association's articles (to date, registration committee and board of directors). The representative receives all documents and notices of meetings and may request a second deliberation for all decisions taken by these bodies.

The association is financed by the annual registration fees set by ministerial order. Article L. 512-1 sets a maximum limit of 250 euros. At the recommendation of the board of directors, the order of 20 December 2012 set the amount of these fees at 30 euros per category. It is recalled that registration fees were initially set at 50 euros and were able to be reduced following efficiency gains in the management of applications.

Furthermore, entering/registration and removal/deletion decisions taken by Orias can be appealed before the relevant intermediary's local administrative court.

#### 1.2.3 Services offered by Orias

In order to manage applications, 12 employees on long-term contracts work within Orias, which increases its staff with temporary personnel over the first months of the year for the activity peak related to the renewal of registrations. In addition, a telephone support service to provide registration assistance manned by 3 to 5 tele-advisors is available to professionals. These staff are placed under the responsibility of a salaried Secretary General.

In view of the number of registration application dossiers to be processed, a distinction has been made between the examination of dossiers and their validation.

The examination of registration applications has been delegated to the Secretary General of Orias. The Secretary General and their teams are therefore responsible for preparing applications so that only complete applications are presented to the Committee. This notion of a complete application is defined in article R. 512-5 I and II of the Insurance Code and in article R. 546-3 I and II of the Monetary and Financial Code. The registration committee is responsible for validating registrations

<sup>&</sup>lt;sup>4</sup> The creation of the French Insurance Federation (FFA), resulting from the merger of the French Federation of Insurance Companies (FFSA) and Grouping of Mutual Insurance Companies (GEMA), effective since 1 July 2016, called for an amendment of Orias's articles of association, specifically concerning the representation of founding members on the board of directors. See the order of 27 February 2017 approving the articles of association of the body in charge of maintaining the single register of insurance, banking and finance intermediaries.



In order to ensure the best possible service quality to intermediaries and secure the Register's functioning in terms of the public authorities, Orias committed to a certification approach based on the ISO 9001 version 2008 standard. Orias, certified in September 2012 by SGS, had its certification renewed for three more years in September 2015 by AFAQ - AFNOR Certification.

#### Satisfaction survey

Started in 2012, Orias renewed its quality approach by asking an independent research institute, Opinion Way, to conduct a satisfaction survey with registered intermediaries (IAS, IOBSP and CIF).

From 29 September to 20 October 2017, 54,883 intermediaries were surveyed. The study was conducted with



4,656 respondents for a response rate of approximately 8.5% (less than previous years).

The new survey indicated an increased overall satisfaction level (from 7.5 in 2016 to 7.7 in 2017), and 64% of respondents rated the work of Orias between 8 and 10, regardless of the activity of the intermediaries.

This satisfaction is mainly due to an improvement in responses to renewal requests (from 8.1 to 8.3) as well as to registration applications, from 7.6 to 7.8. In addition, the evaluation of information requests by telephone also increased, reaching 7.4 in 2017.

Considering the quality goals that Orias has set for itself, the processing of applications and requests receives particular attention, especially with regard to processing time.



Their perception by intermediaries is therefore improving. In 2017, respondents estimated on average that a registration application is processed in 2.7 weeks (identical to 2016) and a change request in 1.9 weeks (with 56% estimating 1 week).

However, the validation of registration applications must also take into account the time necessary for the integrity check as well as its allocation to a registration committee.

Renewal applications and information

requests are estimated at 1.7 days and 1.5 days. Orias intends to maintain its efforts to improve these processing times.

In 2017, the respondents encountered fewer problems (4%). They mainly pertained to information requests, and 27% of them were related to a registration application. With regard to problems, one-third of respondents felt that processing times are too long.

As part of its continuous improvement approach, Orias is calling on intermediaries for ideas on how to improve. The requested changes focus mainly on simplifying the registration and renewal procedures as well as improving the availability of the Orias teams and telephone platform.



To manage intermediaries' requests, Orias originally decided to develop entirely electronic registration and data modification procedures via its website (online document submission, payment by bank card and email reminders). Computerised data exchange has also been set up with Orias "partners". These are:

- professional civil liability insurance companies, also acting as underwriters, which inform Orias of new cover, renewals and cancellations,
- principals (insurance companies on behalf of their general agents and/or representatives, credit institutions on behalf of their representatives and/or PSI tied agents and other principals on behalf of their intermediary representatives) able to take responsibility for all or some of their networks' formalities.

These "own account" procedures make it possible to speed up registrations and especially renewals.



#### 1.3 Activity in 2017 1.3.1 Requests

In total, for 2017, Orias received 59,695 requests (50,818 in 2016), or an average of 4,975 requests per month (4,235 in 2016).



In total, for 2017, Orias received 22,778 registration requests (22,549 in 2016), or an average of 1,898 requests per month (1,879 in 2016).





In total, for 2017, Orias received 27,686 change requests (19,563 in 2016), or an average of 2,307 requests per month (1,630 in 2016)



In total, for 2017, Orias received 7,233 removal requests (7,699 in 2016), or an average of 603 requests per month (642 in 2016). The peaks seen in March are explained by the non-renewal of categories at the end of the registration renewal period from 1 January to late February of each year. In addition, the peak in May 2016 is explained by the elimination of an MIOBSP network whose principal stopped its banking activities.



In total, for 2017, Orias received 1,998 deletion requests (2,043 in 2016), or an average of 167 requests per month (170 in 2016).







In total, for 2017, Orias received 2,037 European notification requests (1,689 in 2016), or an average of 170 per month (141 in 2016). Note that, since 1 July 2016, the European passport has been extended to intermediaries in banking transactions offering mortgage contracts.



In total, for 2017, Orias recorded 57,969 payments by bank card. The annual registration fees can be paid by bank, cheque, and/or bank transfer.







#### 1.3.2 Information requests by email and telephone

In total, for 2017, Orias received 37,309 incoming calls versus 35,820 for 2016, with 35,083 calls connected (awaiting handling) versus 33,885 for 2016 and 32,333 calls answered by tele-advisors versus 32,150 for 2016. Over the same period, Orias received 8,114 emails versus 8,294 for 2016, or an average of 676 emails per month.



Change in the type of requests received by telephone in 2015/2016/2017





#### Information requests received by telephone in 2017



Demandes d'informations reçues par téléphone en 2017 Objectif Qualité



The 90% target corresponds to the number of calls handled out of the number of calls connected.





#### Information requests received by email in 2016/2017

#### 1.3.3 Integrity checks

After submitting a registration application, all intermediaries registered with Orias in all categories are subject to national criminal database checks to obtain a Bulletin 2 in relation to them, pursuant to articles R. 514-1 of the Insurance Code and R. 546-5 of the Monetary and Financial Code.

The parties concerned are natural persons registered as sole traders, corporate officers of legal entity intermediaries as well as, where relevant, directors of intermediation businesses when carried out on a subsidiary and delegated basis.

For 2017, there were 160,430 national criminal database checks, of which 4/5 were initiated as part of a campaign to check intermediaries that had not been subject to a check in the last 4 months and 19,164 checks initiated in connection with a registration or change application.

As part of these checks, pursuant to articles R. 546-3 II and VIII of the Monetary and Financial Code and R. 512-5 II and VII of the Insurance Code, the registration committee took 41 decisions not to renew registrations and 29 decisions to remove registrations from their category due to failure to meet the integrity condition stipulated in articles L. 512-4 of the Insurance Code and L. 519-3-3 and L. 541-7 of the Monetary and Financial Code. By comparison, in 2016, 43 decisions not to renew registrations and 43 decisions to remove registrations from their category due to failure to meet the integrity condition stipulated in articles L. 512-4 of the Insurance Code and L. 519-3-3 and L. 541-7 of the Monetary and Financial Code. By comparison, in 2016, 43 decisions not to renew registrations and 43 decisions to remove registrations from their category due to failure to meet the integrity condition were taken.

Some of those subject to decisions not to renew their registration or to remove them from their category are now reinstated in the Single Register after undergoing "rehabilitation" procedures, which offer a chance to carry out formalities to remove records preventing the desired activity being carried out. In addition, for certain offences, records are automatically removed from Bulletin 2 after five years subject to no further offences being committed, although they remain on Bulletin 1. In these cases, Orias can no longer oppose registration on the grounds of failure to meet the integrity condition pursuant to article 133-16 of the Penal Code. In practice, the positive outcome of such a procedure entails the disappearance of the records in question from Bulletin 2 of the criminal record.



## Appeals to administrative courts concerning decisions taken by Orias

Non-registration and/or removal decisions are notified to the party concerned by recorded delivery letter within 15 days of the decision. The recipient is then able to file an amicable appeal against the decision. These appeals are considered by the registration committee in support of new and old transmitted items. Following the amicable appeal, the decision may be appealed before the administrative court with jurisdiction in the location where the professional activity is carried out, within two months. In 2017, the registration committee's decisions did not result in any new disputes before the administrative court. This same year, a new judgement was handed down in favour of Orias. In addition, two other previously initiated appeals remain pending. Since 2007, Orias has seen these decisions challenged 19 times before the administrative judge and has been successful in all cases.



## 1.4 Use of the <u>www.orias.fr</u> site



Page views





#### Number of visits and number of unique visitors

	2011	2012	2013	2014	2015	2016	2017	% change
Number of visits	495 446	593 637	906 299	847 599	834 690	570 287	1 226 438	32%
Unique visitors	265 896	349 414	457 393	451 712	478 683	447 808	738 174	39%
Page views	2 425 127	2 820 704	3 985 474	3 479 024	3 364 941	3 135 725	3 907 792	20%
Pages/visits	4,89	4,75	4,4	4,1	4,03	9,8	3,2	-208%

**Consumer page views in 2017** 



Page views in 2017	Number of page views 2016	2017	%
Intermediary research pages	722 568	836 284	73%
Intermediary details page	521 927	884 325	17%
Other pages in the consumer area	153 731	212 434	5%
Sub-total for "consumer" pages	1 398 226	1 933 043	45%
Total page views	3 135 725	3 907 792	100%



Statistics as of 31/12/2017

	Pages
2.1 Insurance, banking and finance intermediaries	25
2.1.1 General data	25
2.1.2 Combined activities and categories	
2.2 Insurance intermediaries	
2.2.1 General data	
2.2.2 Data by category	
2.2.2.1 Overall changes	
2.2.2.2 Insurance or Reinsurance Broker category	
2.2.2.3 General Insurance Agent category	
2.2.2.4 Insurance Representative category	
2.2.2.5 Insurance Intermediary Representative category	
2.2.3 Cross-border practice by Insurance Intermediaries	
2.3 Banking transactions and payment services intermediaries	
2.3.1 General data	
2.3.2 Data by category	46
2.3.2.1 Overall changes	46
2.3.2.2 Banking Transactions and Payment Services	
Broker category	
2.3.2.3 Banking Transactions and Payment Services	
Exclusive Representative category	49
2.3.2.4 Banking Transactions and Payment Services	
Non-Exclusive Representative category	51
2.3.2.5 IOBSP Representative category	
2.4 Independent financial advisors and tied agents of investment services providers	
2.4.1 Independent Financial Advisor category	
2.4.2 PSITied Agent category	
2.5 Crowdfunding advisors and crowdfunding intermediaries	
2.5.1 Crowdfunding Advisor category	
2.5.2 Crowdfunding Intermediaries category	

## 2.1 Insurance, banking and finance intermediaries 2.1.1 General data

	31/12/2015	31/12/2016	31/12/2017	Change 2017/2016
Number of intermediaries	53 380	55 618	58 357	5%
Registration categories				
Insurance or Reinsurance Broker	22 818	23 260	23 967	3%
General Insurance Agent	11 696	11 643	11 515	-1%
Insurance Representative	2 611	2 532	2 433	-4%
Insurance Intermediary Representative	17 606	19 216	21 130	10%
Banking Transactions and Payment Services Broker	5 223	5 759	6 314	10%
Banking Transactions and Payment Services Non-Exclusive Representative	9 910	10 737	11 414	6%
Banking Transactions and Payment Services Exclusive Representative	4 076	4 066	3 970	-2%
Banking Transactions and Payment Services Intermediary Representative	7 588	7 863	8 811	12%
Independent Financial Advisor	4 990	5 044	5 232	4%
Investment Service Provider's Tied Agent	3 257	3 382	3 385	0%
Crowdfunding advisor	30	44	52	18%
Crowdfunding Intermediary	61	60	127	112%
Total number of registrations	89 866	93 606	98 350	5%



Insurance Intermediary Representative 21%







Among these intermediaries, Orias had 8,372 applications for registration from legal entities having no precedence (no Orias number).



#### **Number of categories**







#### Distribution of registered intermediaries by region

French Overseas Departments: 453 PP - 701 PM French Overseas Territories: 0 PP - 30 PM

Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	6,303	6,673	2,580	4,433	7,013	5%
Bourgogne-Franche-Comté	2,031	2,053	981	1,147	2,128	4%
Brittany	2,100	2,184	924	1,385	2,309	6%
Centre-Val-de-Loire	1,924	1,951	929	1,103	2,032	4%
Corsica	226	232	100	142	242	4%
Grand-Est	4,009	4,085	1,800	2,508	4,308	5%
Hauts-de-France	3,960	4,042	1,641	2,526	4,167	3%
lle-de-France	11,201	11,689	3,351	9,051	12,402	6%
Normandy	2,302	2,416	1,185	1,320	2,505	4%
Nouvelle-Aquitaine	5,345	5,552	2,502	3,260	5,762	4%
Occitanie	5,257	5,481	2,497	3,295	5,792	6%
Pays-de-la-Loire	2,743	2,883	1,236	1,815	3,051	6%
Provence-Alpes-Côte-d'Azur	4,948	5,211	1,968	3,494	5,462	5%
French Overseas Departments	1,031	1,137	453	701	1,154	1%
French Overseas Territories	1,001	29	0	30	30	3%
France overall	53,380	55,618	22,147	36,210	58,357	5%
		2015	2016	2017	%	Change 2016/2017
Legal entity intermediaries		31,805	33,788	36,210	62%	7.2%
Natural person intermediaries		21,575	21,830	22,147	38%	1.5%
Total intermediaries		53,380	55,618	58,357	100%	4.9%



#### A Agriculture, forestry, fishing 0% Non-exploitable 0% --B Mining industries 0% S Other service activities 4% C Manufacturing industries 1% -D Production and distribution of electricity, gas, steam and conditioned air 0% S Other service activities 0% E Production and distribution of water; sanitation, waste management and depollution 0% Q Human health and social work 0% -F Construction 2% P Education 0% O Public administration 0% -N Administrative and support service activities 1% G Automobile and motorcycle salesand M Specialist, scientific and technical repairs 19% activities 6% L Real-estate activities 5% H Transport and warehousing 0% I Accommodation and restaurants 0% - J Information and communication 1%

#### **TYPE OF ACTIVITY CARRIED OUT**

K Financial and insurance activities 61%

#### Type of activity carried out by intermediaries (NAF per section)

Type of activity carried out by intermediaries (NAF per section)	Number	%
A Agriculture, forestry, fishing	95	0%
B Mining industries	1	0%
C Manufacturing industries	400	1%
D Production and distribution of electricity, gas, steam and conditioned air	18	0%
E Production and distribution of water; sanitation, waste management and depollution	9	0%
F Construction	1,049	2%
G Automobile and motorcycle sales and repairs	10,922	19%
H Transport and warehousing	75	0%
Accommodation and restaurants	33	0%
J Information and communications	292	1%
K Financial and insurance activities	35,507	61%
L Real-estate activities	2,830	5%
M Specialist, scientific and technical activities	3,775	6%
N Administrative and support service activities	550	1%
0 Public administration	30	0%
P Education	120	0%
Ω Human health and social work	239	0%
R Arts, entertainment and recreational activities	68	0%
S Other service activities	2,313	4%
Non-exploitable	31	0%
Total	58,357	100%

<sup>1</sup> Including 25,979 intermediaries with NAF code 6622Z - Insurance agent and broker activities (45%)

<sup>2</sup> Including 3,249 intermediaries with NAF code 7022Z - Business consultants and other management advisors (6%)



# Focus on specific activities: vehicle dealerships, real-estate agents, funeral services

#### Automobile and motorcycle sales and repairs

6,686 intermediaries (compared with 6,261 in 2016, up 6.8%) declared NAF Code 45 - Automobile and motorcycle sales and repairs. These companies registered in the following categories:

	Number	%
CIF	1	0%
IAS	1,617	24%
IOBSP	679	10%
IAS + IOBSP	4,388	66%
CIF + IAS	1	0%
Total	6,686	100%

#### Real-estate activities

2,830 intermediaries (compared with 2,514 in 2016, up 13%) declared NAF Code 68 - Real-estate activities. These companies registered in the following categories:

	Number	%
CIF	39	1%
IAS	1,459	<b>52%</b>
IOBSP	553	20%
IAS + IOBSP	277	10%
CIF + IAS	54	2%
CIF + IOBSP	68	2%
CIF + IAS + IOBSP	380	13%
Total	2,830	100%

#### Funeral services

2,128 intermediaries (compared with 2,125 in 2016, 0.6%) declared NAF Code 9603Z - Funeral services. These companies almost exclusively registered as IASs, in the Insurance Intermediary Representative category.



#### 2.1.2 All activities and categories combined

As mentioned in point 2.1.1, 58,357 intermediaries are registered in 98,350 registration categories.



#### **COMBINED CATEGORIES**

	Number	%
IAS	27,390	47%
IOBSP	7,303	13%
ALPSI or CIF	856	1%
CIP or IFP	163	0%
IAS and IOBSP	14,884	26%
IAS and ALPSI or CIF	1,339	2%
IOBSP and ALPSI or CIF	246	0%
IAS and IOBSP and ALPSI or CIF	6,173	11%
Total	58,357	100%





## 2.2 Insurance intermediaries



French Overseas Departments: 404 PP - 461 PM

Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	5,452	5,717	2,316	3,650	5,966	4%
Bourgogne-Franche-Comté	1,793	1,831	930	957	1,887	3%
Brittany	1,776	1,843	838	1,085	1,923	4%
Centre-Val-de-Loire	1,651	1,666	872	868	1,740	4%
Corsica	202	206	96	121	217	5%
Grand-Est	3,560	3,624	1,719	2,095	3,814	5%
Hauts-de-France	3,350	3,426	1,502	2,028	3,530	3%
lle-de-France	9,438	9,812	3,036	7,398	10,434	6%
Normandy	2,009	2,128	1,127	1,060	2,187	3%
Nouvelle-Aquitaine	4,688	4,847	2,345	2,679	5,024	4%
Occitanie	4,605	4,753	2,298	2,757	5,055	6%
Pays-de-la-Loire	2,246	2,335	1,052	1,398	2,450	5%
Provence-Alpes-Côte-d'Azur	4,323	4,541	1,758	2,939	4,697	3%
French Overseas Departments*	806	857	404	461	865	1%
France overall	45,899	47,586	20,293	29,496	49,789	<b>4.6</b> %

PP : 96 PM : 121

\*Overseas departments (Guadeloupe, Guyana, Martinique, Mayotte, and Reunion) and certain overseas territories (Saint Barthélémy, Saint Martin, and Saint Pierre et Miquelon). (Source: Art. L. 500-1 of the French Insurance Code, amended by order no. 2008-698 of 11 July 2008).

	2015	2016	2017	%	Change 2016/2017
Legal entity insurance intermediaries	25,722	27,429	29,496	59%	8%
Natural person insurance intermediaries	20,177	20,157	20,293	41%	1%
IAS TOTAL	45,899	47,586	49,789	100%	5%



#### **TYPE OF ACTIVITY CARRIED OUT**

A Agriculture, forestry, fishing 0%



K Financial and insurance activities (1) 65%

Type of activity carried out by intermediaries (NAF per section)	Number	%
A Agriculture, forestry, fishing	93	0%
B Mining industries	1	0%
C Manufacturing industries	245	0%
D Production and distribution of electricity, gas, steam and conditioned air	14	0%
E Production and distribution of water; sanitation, waste management and depollution	6	0%
F Construction	475	1%
G Automobile and motorcycle sales and repairs	8,245	17%
H Transport and warehousing	67	0%
Accommodation and restaurants	32	0%
J Information and communications	192	0%
K Financial and insurance activities	32,408	65%
L Real-estate activities	2,170	4%
M Specialist, scientific and technical activities	2,735	5%
N Administrative and support service activities	380	1%
0 Public administration	28	0%
P Education	84	0%
Q Human health and social work	236	0%
R Arts, entertainment and recreational activities	66	0%
S Other service activities	2,290	5%
Non-exploitable	22	0%
Total	49.789	100.0%

<sup>1</sup> Including 25,844 intermediaries with NAF code 6622Z - Insurance agent and broker activities (52%)

<sup>2</sup> Including 3,405 intermediaries with NAF code 7022Z - Business consultants and other management advisors (6%)



#### 2.2.2 Data by category 2.2.2.1 Overall changes



Turnover rate	2015 Registrations Cancellations		2016 Registrations Cancellations		2017			
					Cancellations	%	Cancellations	%
Number of insurance brokers	1,950	-1,404	1,811	-1,369	1,979	8%	-1,272	5%
Number of general agents	810	-801	718	-771	670	6%	-798	7%
Number of insurance representatives	480	-551	472	-551	414	17%	-513	21%
Number of insurance intermediary representatives	3,111	-2,088	3,757	-2,147	4,088	19%	-2,174	10%
Total insurance intermediaries	5,446	-4,118	5,756	-4,069	6,193	12%	-3,990	8%

#### Changes in insurance intermediary categories since 2007







#### 2.2.2.2 Insurance or reinsurance broker category

Regions	2015	2016	РР	РМ	Total 2016	Change 2016/2017
Auvergne-Rhône-Alpes	2,839	2,923	1,079	1,913	2,992	2%
Bourgogne-Franche-Comté	849	851	530	340	870	2%
Brittany	858	875	443	462	905	3%
Centre-Val-de-Loire	770	752	419	347	766	2%
Corsica	66	65	28	42	70	8%
Grand-Est	1,538	1,553	748	868	1,616	4%
Hauts-de-France	1,472	1,491	654	873	1,527	2%
lle-de-France	5,327	5,461	825	4,862	5,687	4%
Normandy	898	928	536	410	946	2%
Nouvelle-Aquitaine	2,190	2,223	1,132	1,175	2,307	4%
Occitanie	2,188	2,219	974	1,325	2,299	4%
Pays-de-la-Loire	1,115	1,127	507	651	1,158	3%
Provence-Alpes-Côte-d'Azur	2,341	2,407	807	1,631	2,438	1%
French Overseas Departments*	367	385	51	335	386	0%
France overall	22,818	23,260	8,733	15,234	23,967	3%

\*Overseas departments (Guadeloupe, Guyana, Martinique, Mayotte, and Reunion) and certain overseas territories (Saint Barthélémy, Saint Martin, and Saint Pierre et Miquelon). (Source: Art. L. 500-1 of the French Insurance Code, amended by order no. 2008-698 of 11 July 2008).

	2015	2016	2017	%	Change 2016/2017
Legal entity insurance brokers	13,867	14,465	15,234	64%	5%
Individual insurance brokers	8,951	8,795	8,733	36%	-1%
Total	22,818	23,260	23,967	100%	3%




Insurance broker - Combined categories

General insurance agent and insurance broker 30%

	Number	%
"Only" insurance broker	9,688	40%
Insurance broker and general insurance agent (non-MIA)	7,113	30%
Insurance broker and insurance representative (or MIA)	955	4%
Insurance broker and independent financial advisor	3,676	15%
Broker in banking transactions and insurance broker	1,871	8%
Other cases of combined categories	664	3%
Total	23,967	100%



	2015	2015		2016		,
	Employees	%	Employees		Employees	%
Coverage by a financial guarantee	16,723	73%	16,613	71%	16,521	69%
Declaration of non-collection of funds	6,095	27%	6,647	29%	7,446	31%
Total	22,818	100%	23,260	100%	23,967	100%



#### 2.2.2.3 General Insurance Agent category

#### Distribution of general insurance agents by region



Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	1,963	1,339	1,199	106	1,305	-3%
Bourgogne-Franche-Comté	724	618	580	32	612	-1%
Brittany	736	572	538	38	576	1%
Centre-Val-de-Loire	696	598	548	48	596	0%
Corsica	87	67	64	2	66	-1%
Grand-Est	1,527	977	944	39	983	1%
Hauts-de-France	1,457	943	865	55	920	-2%
lle-de-France	3,165	1,366	1,277	77	1,354	-1%
Normandy	866	708	654	35	689	-3%
Nouvelle-Aquitaine	1,853	1,416	1,322	78	1,400	-1%
Occitanie	1,717	1,249	1,179	69	1,248	0%
Pays-de-la-Loire	895	663	610	51	661	0%
Provence-Alpes-Côte-d'Azur	1,546	1,039	953	58	1,011	-3%
French Overseas Departments*	374	88	54	40	94	7%
France overall	17,606	11,643	10,787	728	11,515	-1%

\*Overseas departments (Guadeloupe, Guyana, Martinique, Mayotte, and Reunion) and certain overseas territories (Saint Barthélémy, Saint Martin, and Saint Pierre et Miquelon). (Source: Art. L. 500-1 of the French Insurance Code, amended by order no. 2008-698 of 11 July 2008).

	2015	2016	2017	%	Change 2016/2017
Legal entity general agents	685	712	728	6%	2%
Natural person general agents	11,047	10,931	10,787	94%	-1%
Total	11,696	11,643	11,515	100%	-1%





	Number	%
General agent without broker category or MIA	3,787	33%
General agent and insurance broker and other non-MIA categories	7,113	<b>62</b> %
General agent and MIA	299	3%
General agent and insurance broker and MIA	316	3%
Total	11,515	100%



	Number	%
General agent without banking or financial activity	5,467	47%
General agent and banking transactions intermediary	3,492	30%
General agent and banking transactions intermediary and ALPSI or CIF	2,547	22%
General agent and PSI tied agent or CIF	9	0%
Total	11,515	100%



## 2.2.2.4 Insurance Representative category Distribution of Insurance Representatives by region



Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	334	314	229	54	283	-10%
Bourgogne-Franche-Comté	117	106	63	18	81	-24%
Brittany	93	100	84	19	103	3%
Centre-Val-de-Loire	131	123	107	19	126	2%
Corsica	7	8	6	4	10	25%
Grand-Est	232	210	160	26	186	-11%
Hauts-de-France	161	161	121	30	151	-6%
lle-de-France	344	352	143	207	350	-1%
Normandy	102	106	99	9	108	2%
Nouvelle-Aquitaine	406	395	318	47	365	-8%
Occitanie	360	341	301	33	334	-2%
Pays-de-la-Loire	136	132	121	16	137	4%
Provence-Alpes-Côte-d'Azur	153	157	125	50	175	11%
French Overseas Departments*	35	27	17	7	24	-11%
France overall	2,611	2,532	1,894	539	2,433	-4%

\*Overseas departments (Guadeloupe, Guyana, Martinique, Mayotte, and Reunion) and certain overseas territories (Saint Barthélémy, Saint Martin, and Saint Pierre et Miquelon). (Source: Art. L. 500-1 of the French Insurance Code, amended by order no. 2008-698 of 11 July 2008).

	2015	2016	2017	%	Change 2016/2017
Legal entity insurance representatives	479	476	521	84%	9%
Natural person insurance representatives	129	118	102	16%	-14%
Total	608	594	623	100%	5%
Legal entity tied insurance representatives	28	26	18	1%	-31%
Natural person tied insurance representatives	1,975	1,912	1,792	99%	-6%
Total	2 003	1 938	1 810	100%	-7%

Nota: Tied Insurance Representatives (MALs) are "non-agent general insurance representatives, exercising their activity in the name of and on behalf of an insurance company and under its full responsibility, and receiving neither the premiums nor the sums for clients. They may be entered in the register of intermediaries by the company that mandates them. This company is responsible for verifying that they meet the conditions related to access to intermediary activity and to carrying out that activity". [...]. (see article L. 550-1 of the Insurance Code).







## 2.2.2.5 Insurance Intermediary Representative category

French Overseas Departments: 299 PP - 114 PM

Regions	2015	2016	PP	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	1,963	2,242	690	1,794	2,484	11%
Bourgogne-Franche-Comté	724	787	233	629	862	10%
Brittany	736	788	201	631	832	6%
Centre-Val-de-Loire	696	752	305	532	837	11%
Corsica	87	93	20	78	98	5%
Grand-Est	1,527	1,617	519	1,266	1,785	10%
Hauts-de-France	1,457	1,520	433	1,193	1,626	7%
lle-de-France	3,165	3,476	1,333	2,605	3,938	13%
Normandy	866	944	345	653	998	6%
Nouvelle-Aquitaine	1,853	1,979	609	1,527	2,136	8%
Occitanie	1,717	1,865	662	1,483	2,145	15%
Pays-de-la-Loire	895	1,007	319	777	1,096	9%
Provence-Alpes-Côte-d'Azur	1,546	1,741	512	1,368	1,880	8%
French Overseas Departments*	374	405	299	114	413	2%
France overall	17,606	19,216	6,480	14,650	21,130	10%

\*Overseas departments (Guadeloupe, Guyana, Martinique, Mayotte, and Reunion) and certain overseas territories (Saint Barthélémy, Saint Martin, and Saint Pierre et Miquelon). (Source: Art. L. 500-1 of the French Insurance Code, amended by order no. 2008-698 of 11 July 2008).

	2015	2016	2017	%	Change 2016/2017
Legal entity intermediary representatives	11,783	13,169	14,650	69%	11%
Natural person intermediary representatives	5,823	6,047	6,480	31%	7%
Total	17,606	19,216	21,130	100%	10%





#### Insurance Intermediary Representative: Coverage by a financial guarantee

	2015		2016		2017	
	Employees	%	Employees	%	Employees	%
Coverage by a financial guarantee	2,815	16%	2,934	15%	3,260	15%
Declaration of non-collection of funds	14,791	84%	16,282	85%	17,870	85%
Total	17,606	100%	19,216	100%	21,130	100%







# 2.2.3 Cross-border practice by insurance intermediaries

Notifications of EEA intermediaries in business in France

Country	2015	2016	2017	Change 2016/2017
United Kingdom	2,023	2,003	2,030	1%
Czech Republic	2,150	1,921	1,925	0%
Austria	1,045	523	645	23%
Germany	640	502	544	8%
Belgium	516	433	464	7%
Italy	322	289	311	8%
Luxembourg	268	240	242	1%
Netherlands	111	116	123	6%
Spain	85	82	92	12%
Ireland	85	67	71	6%
Sweden	65	47	52	11%
Liechtenstein	31	32	33	3%
Greece	20	19	26	9%
Bulgaria	19	23	25	9%
Poland	19	22	24	9%
Portugal	13	16	19	19%
Hungary	12	11	16	45%
Denmark	11	13	14	8%
Malta	9	10	12	20%
Cyprus	13	11	11	0%
Lithuania	10	9	10	11%
Latvia	6	8	8	0%
Estonia	3	6	6	0%
Romania	5	6	6	0%
Gibraltar	8	5	6	20%
Slovenia	5	3	5	67%
Slovakia	4	5	5	0%
Finland	10	5	5	0%
Norway	8	3	3	0%
Croatia	0	0	1	-
Total	7,516	6,430	6,734	5%

Nota: The notifications of Czech intermediaries operating in France must be analysed with care. In fact, the body holding the Register of Intermediaries in the Czech Republic sent a notification of operation in France for all of its registered intermediaries.



# Intermediaries registered in the Orias Register having given notice to operate with Freedom of Establishment (FOE) in the EEA



	2015	2016	2017	Change 2016/2017
Intermediaries having given notice to operate with FOE	73	72	78	8%

	2015	2016	2017	Change 2016/2017
Germany	6	7	7	
Austria	2	4	4	
Belgium	18	19	19	0%
Bulgaria	1	0	1	
Denmark		1	1	
Spain	22	21	22	5%
Finland			1	
Greece	1	1	3	
Hungary	2	2	2	
Ireland	1	1	2	
Italy	19	20	20	0%
Luxembourg	7	6	6	
Norway	1	1	2	
Netherlands	4	4	3	
Poland	2	4	5	
Portugal	10	9	15	67%
Czech Republic	1	1	1	
Romania			2	
United Kingdom	17	20	21	5%
Slovakia	0	2	2	
Slovenia	1	1	1	
Sweden	1	1	2	
Total	116	124	142	15%





# Intermediaries entered in the Orias Register having given notice to operate with Freedom of Services (FOS) in the EEA.

		2015	2016	2017	Change 2016/2017
Intermediaries having given notice to op	erate in FOS	860	952	1077	13%
	0045		0040	0047	01 0046/0047
Country	2015		2016	2017	Change 2016/2017
Germany	605		659	748	14%
Austria	571		634	710	12%
Belgium	495		555	626	
Bulgaria	476		522	586	12%
Cyprus	451		495	558	13%
Croatia	426		476	540	13%
Denmark	439		497	521	5%
Spain	384		431	491	14%
Estonia	357		394	449	14%
Finland	331		365	404	11%
Gibraltar	321		353	380	8%
Greece	304		335	370	10%
Hungary	304		335	369	10%
Ireland	302		333	359	8%
Iceland	292		322	357	11%
Italy	292		320	355	11%
Latvia	284		312	341	9%
Liechtenstein	283		311	340	9%
Lithuania	271		301	335	11%
Luxembourg	281		309	334	8%
Malta	272		300	332	11%
Norway	267		295	329	12%
Netherlands	266		298	325	9%
Poland	261		289	324	12%
Portugal	266		296	323	9%
Czech Republic	267		295	322	9%
Romania	262		291	319	10%
United Kingdom	246		275	306	11%
Slovakia	227		259	293	13%
Slovenia	105		148	184	24%
Sweden	97		138	175	27%
Total	10,005		11,143	12,405	11%

Orias Annual Report 2017 43



# 2.3 Banking transactions and payment services intermediaries

2.3.1 General data

Distribution of banking transactions and payment services intermediaries by region



French Overseas Departments: 159 PP - 303 PM French Overseas Territories: 0 PP - 23 PM

Regions	2015	2016	PP		РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	3,022	3,321	1,3	17	2,236	3,583	8%
Bourgogne-Franche-Comté	983	1,027	4	30	614	1,094	7%
Brittany	1,063	1,134	4	38	742	1,230	8%
Centre-Val-de-Loire	843	878	3	72	576	948	8%
Corsica	131	142	1	58	90	148	4%
Grand-Est	1,925	2,037	8	)9	1,328	2,137	5%
Hauts-de-France	2,005	2,058	7	56	1,360	2,116	3%
lle-de-France	4,438	4,790	1,5	94	3,629	5,223	9%
Normandy	1,175	1,232	5	66	736	1,302	6%
Nouvelle-Aquitaine	2,577	2,738	1,2	17	1,717	2,934	7%
Occitanie	2,706	2,888	1,3	77	1,716	3,093	7%
Pays-de-la-Loire	1,463	1,587	6	54	1,050	1,704	7%
Provence-Alpes-Côte-d'Azur	2,304	2,444	9:	32	1,680	2,612	7%
French Overseas Departments	242	420	- 1	59	303	462	10%
French Overseas Territories	342	21		0	23	23	10%
France overall	24,977	26,717	10,8	)9	17,800	28,609	7%
			2015	2016	2017	%	Change 2016/2017
Legal entity banking transaction intermediaries			15,148	16,347	17,800	62%	9%
Natural person banking transacti	on intermediarie	s	9,829	10,370	10,809	38%	4%
Total			24,977	26,717	28,609	100%	7%





#### **Banking transactions by category**

#### **TYPE OF ACTIVITY CARRIED OUT**





Type of activity carried out by banking transaction intermediaries (NAF per section)	Number	%
A Agriculture, forestry, fishing	44	0%
B Mining industries	1	0%
C Manufacturing industries	214	1%
D Production and distribution of electricity, gas, steam and conditioned air	6	0%
E Production and distribution of water; sanitation, waste management and depollution	4	0%
F Construction	786	3%
G Automobile and motorcycle sales and repairs	8,085	28%
H Transport and warehousing	14	0%
I Accommodation and restaurants	4	0%
J Information and communications	79	0%
K Financial and insurance activities	15,901	<b>56%</b>
L Real-estate activities	1,278	4%
M Specialist, scientific and technical activities	1,851	6%
N Administrative and support service activities	243	1%
0 Public administration	3	0%
P Education	44	0%
Ω Human health and social work	5	0%
R Arts, entertainment and recreational activities	6	0%
S Other service activities	31	0%
Non-exploitable	10	0%
Total	28,609	100%

(1) including 4,909 intermediaries with NAF code 45 - Automobile and motorcycle sales and repairs (18%)
 (2) including 8,687 intermediaries with NAF code 6622Z - Insurance agents and brokers activity (33%)

#### 2.3.2 Data by category 2.3.2.1 Overall changes

0 -

2013



2014

Turnover rate	2015 Registrations Cancellations R		2016 Registrations Cancellations		2017 Registrations % Cancellations			%
COBSP	930	-281	879	-343	952	17%	-397	-7%
MOBSP	1,647	-779	1,479	-652	1,473	14%	-796	-7%
MOBSPL	271	-229	216	-226	182	4%	-278	-7%
MIOBSP	1,629	-860	1,810	-1,535	1,906	24%	-958	-12%
IOBS All categories	3,937	-1,853	3,765	-2,025	3,984	14%	-2,092	-7%

2015

2016

COBSP - MOBSPL

2017





#### 2.3.2.2 Banking Transactions and Payment Services Broker category Distribution of banking transactions and payment

French Overseas Departments: 12 PP - 90 PM French Overseas Territories: 0 PP - 4 PM

Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	720	799	80	800	880	10%
Bourgogne-Franche-Comté	142	151	16	514	170	13%
Brittany	177	200	14	200	214	7%
Centre-Val-de-Loire	126	136	24	131	155	14%
Corsica	12	13	0	16	16	23%
Grand-Est	305	334	62	316	378	13%
Hauts-de-France	362	387	29	388	417	8%
lle-de-France	1,121	1,246	64	1,299	1,363	9%
Normandy	166	189	14	192	206	9%
Nouvelle-Aquitaine	504	576	77	556	633	10%
Occitanie	567	606	88	601	689	14%
Pays-de-la-Loire	323	348	37	322	359	3%
Provence-Alpes-Côte-d'Azur	618	675	60	668	728	8%
French Overseas Departments	80	96	12	90	102	6%
French Overseas Territories	00	3	0	4	4	33%
France overall	5,223	5,759	577	5,737	28,609	10%

	2015	2016	2017	%	Change 2016/2017
Legal entity banking transaction brokers	4,667	5,186	5,737	91%	11%
Natural person banking transaction brokers	556	573	577	9%	1%
Total	5,223	5,759	6,314	100%	10%





#### **Banking transactions - COBSP category - combined**

#### Banking transactions and payment services brokers - Combined Categories



	2015	2016	2017	%
"Only" banking transactions broker	1,181	1,240	1,322	21%
Banking transactions broker and IAS	2,222	2,592	2,995	47%
Banking transactions broker and IAS and CIF	1,499	1,580	1,657	26%
Other combined categories	321	347	340	5%
Total	5,223	5,759	6,314	100%





# 2.3.2.3 Banking Transactions and Payment Services Exclusive

French Overseas Departments: 0 PP - 15 PM

Regions	2015	2016	PP	PN		Total 201	7 Change 2016/2017
Auvergne-Rhône-Alpes	409	409	376	2	6	402	-2%
Bourgogne-Franche-Comté	188	188	166	1	2	178	-5%
Brittany	214	214	202	1	0	212	-1%
Centre-Val-de-Loire	145	142	131	1	1	142	0%
Corsica	22	22	19		4	23	5%
Grand-Est	335	332	310	1	8	328	-1%
Hauts-de-France	347	343	278	4	0	318	-7%
lle-de-France	678	663	547	10	3	650	-2%
Normandy	271	267	246	1	0	256	-4%
Nouvelle-Aquitaine	466	469	421	4	2	463	-1%
Occitanie	465	467	430	3	2	463	-1%
Pays-de-la-Loire	219	217	201		8	209	-4%
Provence-Alpes-Côte-d'Azur	311	317	283	2	8	311	-2%
French Overseas Departments	6	16	0	1	5	15	-6%
France overall	4,076	4,066	3,610	36	0	3,970	-2%
			20	15 2016	2017	%	Change 2016/2017
Legal entity banking transaction	exclusive repres	sentatives	3	42 357	360	9%	1%
Natural person banking transaction exclusive representatives			3,7	34 3,709	3,610	91%	-3%
Total			4,0	76 4,066	3,970	100%	-2%

It should be noted that 3,668 general insurance agents are included in the MOBSPL category, or 92% of those in this category.





#### **Banking transactions - MOBSPL category - combined**







# 2.3.2.4 Banking Transactions and Payment Services Exclusive

French Overseas Departments: 96 PP - 175 PM French Overseas Territories: 0 PP - 19 PM

Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	1,213	1,407	284	1,214	1,498	6%
Bourgogne-Franche-Comté	413	432	56	417	473	9%
Brittany	376	417	14	461	475	14%
Centre-Val-de-Loire	391	410	32	399	431	5%
Corsica	66	70	3	66	69	-1%
Grand-Est	821	873	39	857	896	3%
Hauts-de-France	837	844	30	837	867	3%
lle-de-France	1,715	1,854	232	1,760	1,992	7%
Normandy	444	458	27	456	483	5%
Nouvelle-Aquitaine	987	1,063	107	1,018	1,125	6%
Occitanie	1,025	1,125	215	968	1,183	5%
Pays-de-la-Loire	550	606	56	594	650	7%
Provence-Alpes-Côte-d'Azur	867	911	97	885	982	8%
French Overseas Departments	205	249	96	175	271	9%
French Overseas Territories	205	18	0	19	19	6%
France overall	9,910	10,737	1,288	10,126	11,414	6%

	2015	2016	2017	%	Change 2016/2017
Legal entity banking transaction representatives	9,089	9,676	10,126	89%	5%
Natural person banking transaction representatives	821	1,061	1,288	11%	21%
Total	9,910	10,737	11,414	100%	6%





#### Banking transactions - MOBSP category - combined

Banking transactions representative + other IAS + CIF 7% Banking transactions representative and other IAS 3% Banking transactions representative and MIA and CIF 3% Banking transactions representative 31%

	Number	%
"Only" banking transactions representative	3,601	32%
Banking transactions representative and MIA	6,120	54%
Banking transactions representative and MIA and CIF	319	3%
Banking transactions representative and other IAS	346	3%
Banking transactions representative + other IAS + CIF	849	7%
Other combined categories	179	2%
Total	11,414	100%



## 2.3.2.5 Banking Transactions and Payment Services Intermediary Representative category

#### Distribution of banking transactions and payment services intermediaries by region



Département d'Outre-Mer : 59 PP - 47 PM

Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	937	899	625	380	1,005	12%
Bourgogne-Franche-Comté	296	299	246	82	328	10%
Brittany	355	353	261	132	393	11%
Centre-Val-de-Loire	215	222	187	71	258	16%
Corsica	34	39	36	8	44	13%
Grand-Est	575	611	426	249	675	10%
Hauts-de-France	607	648	435	258	693	7%
lle-de-France	1,245	1,386	781	849	1,630	18%
Normandy	357	373	284	125	409	10%
Nouvelle-Aquitaine	841	820	636	275	911	11%
Occitanie	830	860	673	283	956	11%
Pays-de-la-Loire	477	506	368	212	580	15%
Provence-Alpes-Côte-d'Azur	739	758	506	317	823	9%
French Overseas Departments*	80	89	59	47	106	19%
France overall	7,588	7,863	5,523	3,288	8,811	12%

	2015	2016	2017	%	Change 2016/2017
Natural person banking transactions intermediary representatives	2,658	2,654	3,288	37%	24%
Legal entity banking transactions intermediary representatives	4,930	5,209	5,523	63%	6%
Total	7,588	7,863	8,811	100%	12%





#### **Banking transactions - MIOBSP category - combined**

#### Banking transactions and payment services intermediary representatives - Combined Categories



Orias Annual Report 2017 54 16

437

8,811

0%

5%

100%

Banking transactions intermediary representative and CIF

Other combined categories

Total

Banking transactions intermediary representative and other IAS and CIF



# 2.4 Independent financial advisors and tied agents of investment services providers

## 2.4.1 Independent Financial Advisor category Distribution of Independent Financial Advisors by region



French Overseas Departments: 26 PP - 66 PM French Overseas Territories: 0 PP - 13 PM

Regions	2015	2016	РР	PM	٦	Fotal 2017	Change 2016/2017
Auvergne-Rhône-Alpes	667	677	91	600		691	2%
Bourgogne-Franche-Comté	111	108	12	91	l	103	-5%
Brittany	164	168	21	163	}	184	10%
Centre-Val-de-Loire	88	87	15	71		86	-1%
Corsica	13	15	2	11		13	-13%
Grand-Est	213	212	21	193	}	214	1%
Hauts-de-France	200	194	23	181		204	5%
lle-de-France	1,851	1,874	168	1,777	1	1,945	4%
Normandy	97	99	9	97	7	106	7%
Nouvelle-Aquitaine	342	347	48	331		379	9%
Occitanie	422	425	64	377	7	441	4%
Pays-de-la-Loire	236	235	21	228	226 247		5%
Provence-Alpes-Côte-d'Azur	496	502	48	466	6	514	2%
French Overseas Departments	90	89	26	66	6	92	3%
French Overseas Territories	90	12		13	3	13	8%
France overall	4,990	5,044	569	4,663	}	5,232	4%
			2015	2016	2017	%	Change 2016/2017
Legal entity independent financia	al advisors		4,329	4,435	4,663	89%	5%
Natural person independent final			661	609	569	11%	-7%
Total			4,990	5,044	5,232	100%	4%

\* Note that employees of financial investment advisors do not appear on the register. However, financial investment advisors are referenced on the website of professional associations.



#### **TYPE OF ACTIVITY CARRIED OUT**



Type of activity carried out by CIFS	Number	%
A Agriculture, forestry, fishing	8	0%
E Production and distribution of water; sanitation, waste management and depollution	1	0%
FConstruction	3	0%
G Automobile and motorcycle sales and repairs	132	3%
J Information and communications	16	0%
K Financial and insurance activities	2,812	54%
_ Real-estate activities	289	6%
M Specialist, scientific and technical activities	1,924	37%
N Administrative and support service activities	28	1%
O Public administration	2	0%
P Education	8	0%
S Other service activities	2	0%
Non-exploitable	7	0%
Total	5,232	100%

#### Type of activity carried out by CIFs





	20	15	20	2017				
	Registrations	Cancellations	Registrations	Cancellations	Registrations	%	Cancellations	%
Independent financial advisors	544	-463	548	-494	607	12%	419	8%

#### Distribution of Independent Financial Advisors by professional association



<b>CIF</b> Association	2015	2016	2017	Change 2016/2017
ACIFTE	263	265	254	-4%
ANACOFI - CIF	2,308	2,300	2,343	2%
CNCGP	1,285	1,294	1,374	6%
CNCIF	823	835	803	-4%
LA COMPAGNIE DES CGPI	283	300	318	6%
CIF being eliminated	28	50	140	
Total	4,990	5,044	5,232	4%

Note: This table presents "CIF companies". Thus, by way of illustration, a company with two co-managers is considered a company.





#### **Combined activities - Independent Financial Advisors**

	2015	2016	2017	%	Change 2016/2017
CIF	773	794	816	16%	3%
CIF + IAS	1,212	1,309	1,318	25%	1%
CIF + IOBSP	80	85	97	2%	14%
CIF + IAS + IOBSP	2,925	2,856	3,001	57%	5%
Total	4,990	5,044	5,232	100%	4%



#### **Combined activities - ACIFTE**









Combined activities	T	otal	AC	IFTE	ANAC	OFI-CIF	CN	CGP	CN	CIF	C	GPI
	No.	%	No.	%	No.	%	No.	%	No.	%	No	%
CIF	756	15%	228	90%	298	13%	51	4%	153	19%	26	8%
CIF + IAS	1,288	25%	9	4%	712	30%	347	25%	129	16%	91	29%
CIF + IOBSP	91	2%	8	3%	47	2%	16	1%	16	2%	4	1%
CIF + IAS + IOBSP	2,957	58%	9	4%	1,286	55%	960	70%	505	63%	197	62%
Total	5,092	100%	254	100%	2,343	100%	1,374	100%	803	100%	318	100%





# 2.4.2 PSITied Agent category

French Overseas Departments: 28 PP - 1 PM French Overseas Territories: 0 PP - 1 PM

Regions	2015	2016	РР	РМ	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	383	442	459	22	481	9%
Bourgogne-Franche-Comté	149	153	144	6	150	-2%
Brittany	160	158	156	2	158	0%
Centre-Val-de-Loire	119	121	112	5	117	-3%
Corsica	18	18	17	1	18	0%
Grand-Est	244	237	221	8	229	-3%
Hauts-de-France	259	248	224	8	232	-6%
lle-de-France	541	558	489	60	549	-2%
Normandy	187	186	173	8	181	-3%
Nouvelle-Aquitaine	382	377	353	16	369	-2%
Occitanie	378	401	404	21	425	6%
Pays-de-la-Loire	166	178	179	5	184	3%
Provence-Alpes-Côte-d'Azur	256	269	240	22	262	-3%
French Overseas Departments	15	35	28	1	29	-17%
French Overseas Territories	15	1		1	1	0%
France overall	3,257	3,382	3,199	186	3,385	0%

	2015	2016	2017	%	Change 2016/2017
Legal entity PSI tied agents	145	167	186	5%	11%
Natural person PSI tied agents	3,112	3,215	3,199	95%	0%
Total	3,257	3,382	3,385	100%	0%



#### **TYPE OF ACTIVITY CARRIED OUT**

- TYPE OF ACTIVITY CARRIED OUT

   NAF 43 Special trade construction work 0%

   NAF 47 Retail, excluding automobiles and motorcycles 0%

   NAF 55 Accommodation 0%

   NAF 56 Restaurants 0%

   NAF 62 Programming, consulting and other computing activities 0%

   NAF 63 Information services 0%

   NAF 64 Financial service activities, excluding insurance and retirement funds 0%

   NAF 82 Office administrative and other business support activities 0%

   NAF 84 Public administration and defence; compulsory social security 0%

   NAF 85 Education 0%

   NAF 85 Human health activities 0%

- NAF 86 Human health activities 0%
- NAF 93 Sports, recreational and leisure activities 0% NAF 96 Other personal service activities 0%



	Number	%
NAF 43 Special trade construction work	2	0%
NAF 46 Wholesale, excluding automobiles and motorcycles3	281	8%
NAF 47 Retail, excluding automobiles and motorcycles	3	0%
NAF 55 Accommodation	1	0%
NAF 56 Food service	1	0%
NAF 63 Information services	1	0%
NAF 64 Financial service activities, excluding insurance and retirement funds	1	0%
NAF 65 Insurance	14	0%
NAF 66 Activities related to financial and insurance services	18	1%
NAF 68 Real-estate activities	2,737	81%
NAF 70 Head office activities; management board	253	7%
NAF 71 Architecture and engineering activities; technical inspection and analysis activities	58	2%
NAF 74 Other specialist, scientific and technical activities	1	0%
NAF 82 Office administrative and other business support activities	1	0%
NAF 85 Education	4	0%
NAF 86 Human health activities	2	0%
NAF 93 Sports, recreational and leisure activities	1	0%
NAF 96 Other personal service activities	5	0%
Non-exploitable	1	0%
Total	3,385	100%

It should be noted that 2,545 general insurance agents are included in the ALPSI category, or 75% of those registered in this category.



#### Change in ALPSI category

Turnover rate	20 Registrations	15 Cancellations	20 Registrations	16 Cancellations	Registrations	<mark>2</mark> %	017 Cancellations	%
PSI Tied Agents	335	-245	367	-242	321	9%	-318	-9%

# 2.5 Crowdfunding advisors and crowdfunding intermediaries



The decrease seen in summer 2016 is explained by the requirement to provide a professional liability insurance certificate to Orias during registration, pursuant to articles L. 547-5 and L. 548-5 of the Monetary and Financial Code.

## 2.5.1 Crowdfunding Advisor category

Région	2015	2016	2017	Change 2016/2017
Auvergne Rhône-Alpes	1	3	4	
Brittany		1	1	
lle-de-France	18	29	35	21%
Normandy		1	1	
Nouvelle-Aquitaine	3	3	4	
Occitanie	3	2	2	
Pays de la Loire	3	2	2	
Provence-Alpes-Côte d'Azur	1	2	2	
French Overseas Department	1	1	1	
France overall	30	44	52	<b>18</b> %

Note: a CIP must be a commercial company established in France (art. L.547-3-I CMF and art. 1-4° a) of the order concerning the single register provided for in art. L.512-1 of the French Insurance Code and art. L.546-1 of the French Monetary and Financial Code).

Number

0/

#### Type of activity carried out by crowdfunding advisors

	Number	70
NAF 62 – Programming, consulting and other computing activities	2	3.8%
NAF 63 - Information services	5	9.6%
NAF 64 - Financial service activities, excluding insurance and retirement funds	5	9.6%
NAF 66 - Activities related to financial and insurance services	14	26.9%
NAF 70 - Head office activities; management board	24	46.2%
NAF 82 - Office administrative and other business support activities	2	3.8%
Total	52	100.0%

As of 31 December 2017, 14 platforms had accumulated registrations of crowdfunding advisors and crowdfunding intermediaries.

## 2.5.2 Crowdfunding Intermediary category

Regions	2015	2016	РР	PM	Total 2017	Change 2016/2017
Auvergne-Rhône-Alpes	5	5		9	9	80%
Bourgogne-Franche-Comté		0		1	1	
Brittany	1	3		4	4	33%
Centre-Val-de-Loire	1	1		2	2	100%
Corsica		0		1	1	
Grand-Est	4	3		5	5	67%
Hauts-de-France	1	1		4	4	300%
lle-de-France	33	34		69	69	103%
Normandy		0		1	1	
Nouvelle-Aquitaine	4	2	1	8	9	350%
Occitanie	5	4		6	6	50%
Pays-de-la-Loire	2	1		5	5	400%
Provence-Alpes-Côte-d'Azur	2	3		5	5	67%
French Overseas Departments	3	3		6	6	100%
France overall	61	60	1	126	127	112%
Note: With the exception of crowdfunding intermediaries offering only donation operations, a crowdfunding intermediary must be a commercial company						

established in France (Art. L. 548-21 of the Monetary and Financial Code) and Art. 1-4° a) of the order concerning the single register provided for in art. L. 512-1 of the Insurance Code and art. L. 546-1 of the Monetary and Financial Code.

Of the 127 platforms in this category, 50 indicated that they offer only donation operations. In this regard, recall that they are not required to justify any condition of professional competence.





#### Type of activity carried out by crowdfunding intermediaries

Type of activity carried out by crowdfunding intermediaries	Number	%
NAF 18 - Printing and reproduction of recordings	1	1%
NAF 41 - Construction of buildings	1	1%
NAF 46 - Wholesale, excluding automobiles and motorcycles	3	2%
NAF 47 - Retail, excluding automobiles and motorcycles	1	1%
NAF 58 - Publishing	1	1%
NAF 59 - Motion picture, video and television program production	1	1%
NAF 62 - Programming, consulting and other computing activities	18	14%
NAF 63 - Information services	10	8%
NAF 64 - Financial service activities, excluding insurance and retirement funds	21	17%
NAF 66 - Activities related to financial and insurance services	22	17%
NAF 70 - Head office activities; management board	25	20%
NAF 73 - Advertising and market research	2	2%
NAF 74 - Other specialist, scientific and technical activities	2	2%
NAF 82 - Office administrative and other business support activities	8	6%
NAF 84 - Public administration and defence; compulsory social security	1	1%
NAF 88 - Social action without housing	1	1%
NAF 93 - Sports, recreational and leisure activities	1	1%
NAF 94 - Activities of member-based organisations	8	6%
Total	127	100%





# Orias's observations

	P	ages
3.1	Integrity checks applicable to intermediaries entered in the Single Register of Insurance,	
	Banking, and Finance Intermediaries	67
3.2	Entry in the single register of crowdfunding intermediaries	68
3.3	Transposition of the Insurance Distribution Directive (2016/97) of 20 January 2016	69



# 3.1 Integrity checks applicable to intermediaries entered in the Single Register of Insurance, Banking, and Finance Intermediaries

As part of its mission to maintain and update the single register, Orias ensures compliance with the condition of integrity applicable to insurance, banking and finance intermediaries across all registration categories.

Orias ensures this check for the following:

- natural person intermediaries operating in their own name,
- persons who direct, manage or administer legal entity intermediaries,

- persons who are members of a supervisory body, have the power to sign on behalf of and for the persons who are directly responsible for the intermediation activity within these intermediaries when the activity permits it.

Pursuant to Article L. 512-4 of the Insurance Code and Articles R. 519-6, L. 541-7, L. 547-7 and R. 548-2 of the Monetary and Financial Code, the condition of integrity makes reference to the provisions of Article L. 322-2 (I) to (V) of the Insurance Code and the incapacities provided for in Article L. 500-1 of the Monetary and Financial Code, respectively.

In addition to sanctions by the respective supervisory authorities, the Prudential Control and Resolution Authority and the Financial Markets Authority, the check of this condition is carried out pursuant to Articles R. 514-1 of the Insurance Code and R. 546-5 of Monetary and Financial Code through "the communication of Bulletin 2 of the criminal record of the person in question to the national criminal database, automated by secure telecommunication means, or its equivalent for nationals of another Member State of the European Union or another State party to the Agreement on the European Economic Area as well as for persons from New Caledonia, French Polynesia and the Wallis and Futuna Islands".

This check is performed at the time of each entry on the single register as well as each change involving the persons concerned. Given that compliance with this condition must be continuous, Orias regularly queries the national criminal database.

Pursuant to Article 768 et seq. of the Criminal Procedure Code, the national criminal database receives, particularly from court clerks, a series of decisions and convictions and records them.

As the queries were carried out, it became clear that updating the queried bulletins required registration and deletion periods of approximately 4 to 6 months.

Also, after the communication of a Bulletin 2 returned without any indications or containing convictions not referred to in the above provisions, certain intermediaries are entered in the single register even if the condition of integrity is not met, such as when they have been convicted but no indication is in the Bulletin 2 due to the extended processing time.



In contrast, in recent months, Orias has seen instances of a Bulletin 2 containing convictions that were voided due to court decisions involving exclusion from entry in the bulletin of the interested parties in particular.

This is why Orias queries the national criminal database every four months on average. For 2017, Orias made more than 160,000 queries and intends to maintain its efforts.

In addition, Article L. 322-2 of the French Insurance Code has not been amended to take into account, in particular, changes to the Consumer Code, unlike Article L. 500-1 of the Monetary and Financial Code, and constant changes in the criminal law.

According to the current wording, certain convictions, such as those regarding consumption, are no longer in contradiction with the intermediation activity, considering the new codification.

This difficulty in assessing the integrity of intermediaries must also be encountered by the intermediaries themselves as regards their staff, for whom they must ensure compliance with this condition.

Orias hopes that work will be done, in coordination with the profession, on updating the provisions governing integrity in order to ensure strict compliance under the best conditions.

# 3.2 Entry in the single register of crowdfunding intermediaries

2017 saw the registration of crowdfunding platforms offering only donation operations, reaching 127 registrations as of 31 December 2017, including about 50 donation platforms, an increase of 112% from 2016.

As part of the registration application review process, platforms must communicate their website address, pursuant to article 1 of the single register order.

During the review periods, it was also found that certain platforms with viable websites are promoting online jackpots for the purpose of pooling money. This purpose does not fall under the requirements of Article L. 548-1 of the Monetary and Financial Code specific to the activity of crowdfunding intermediaries.

There is confusion between these two activities: one involves entry in the single register, and the other involves registration with the French Prudential Control and Resolution Authority as a payment services provider.



At some point in the future, the feasibility of a donation operation forces these platforms to adopt a confusing status upon their registration both for professionals of the sector and for end-consumers online.

However, Article L. 548-2 of the Monetary and Financial Code specifies that the status of crowdfunding intermediary applies to persons engaging in regular business activity. In practice, it seems that this last detail is not properly assessed.

Orias is committed to maintaining an understandable single register that corresponds to the reality of the professionals who are entered in it.

# 3.3Transposition of the Insurance Distribution Directive (2016/97) of 20 January 2016

The Insurance Distribution Directive (EU) 2016/97 of 20 January 2016 will come into effect on 1 October 2018, after the original date of 23 February 2018 was postponed.

In domestic law, texts, orders and decrees will be published by 1 July 2018 at the latest.

For the sake of uniformity, Orias had previously sought harmony between the different activities subject to entry in the single register. Orias is also pleased that insurance intermediary representatives are now eligible for the mandate issued by a Community intermediary, duly notified in France under freedom of establishment or freedom to provide services.

With this in mind, the single registry order will be amended in summer 2018. However, the information on the Orias public website is not expected to change.

The directive introduces an annual obligation for some of these intermediaries to update their knowledge starting in February 2019.

However, Orias will not be in charge of ensuring compliance with this new requirement. It should be remembered that the same is true for the continuing education obligations applicable to intermediaries in banking transactions and payment services as well as to financial investment advisors.

In addition, the European passport system for insurance intermediaries has been maintained, and its arrangements for implementation by the competent authorities of the Member States of the European Union are being reviewed to take account of these developments.

To that end, intermediaries wishing to engage in insurance intermediation within the European Union will be informed of the locally applicable rules of general interest.

Article 11 of the Directive states that "Member States will ensure appropriate publication by their competent authorities of the relevant national legal provisions protecting the general good, including information about whether and how the Member State has chosen to apply the stricter provisions provided for in Article 29(3), which are applicable to the carrying on of insurance and reinsurance distribution in their territories."



These rules are then published by the European Insurance and Occupational Pensions Authority (EIOPA)<sup>s</sup> and "regularly updated by the competent national authorities".

To date, the French Prudential Control and Resolution Authority has indicated, for insurance intermediation, that the entire system, whether legislative or regulatory, as well as the codified decrees, are considered as rules of general interest.

<sup>&</sup>lt;sup>5</sup> rhttps://eiopa.europa.eu/consumer-protection/general-good-provisions


	Pages
- Composition of Orias bodies: registration committee, board of directors	
and general meeting	73
- Implementation of the 2017 budget	75
- List of authorities in charge of keeping the register of insurance intermediaries	
in the 32 Party States to the European Economic Area (source: www.eiopa.europa.eu)	76
- List of authorities in charge of keeping the register of banking transaction intermediaries	
in the 32 Party States to the European Economic Area	
(source: http://ec.europa.eu/finance/finservices-retail/credit/mortgage/index_en.htm)	79



## **REGISTRATION COMMITTEE** (composition as of 20 June 2018)

- Insurance brokers
- Jean-Paul Ancel (CSCA<sup>1</sup>), principal member
- Christophe Hautbourg (CSCA), principal member
- General insurance agents
- Patrick Blanchard (AGEA<sup>2</sup>), principal member
- Philippe Lequeux-Sauvage (AGEA) principal member
- Banking transactions and payment services intermediaries
- Géraud Cambournac (AFIB<sup>3</sup>), principal member
- Philippe Taboret (APIC<sup>4</sup>), principal member
- Independent financial advisors
- Michel Fleuriet (ANACOFI-CIF<sup>®</sup>), principal member
- Edith Rossi (CNCGP<sup>6</sup>), principal member
- Insurance organisations
- Jérôme Goelen (FFA'), principal member
- Audrey Plouvier (FFA), principal member
- Sophie Crémière-Bouxin (FFA), principal member
- Caroline Plaute (FNMF), principal member
- Credit institutions and investment firms
- Stéphane Yvon (FBF<sup>®</sup>), principal member
- Marie-Anne Bousquet-Suhit (AFECEI<sup>®</sup>), principal member
- Arabelle Conte (AFECEI), principal member
- Gilles Homan (AFECEI), principal member

- Cyril Bayvet (CSCA), substitute member
- Position to be filled
- Gaëlle Durgeau (AGEA), substitute member
- Jérôme Speroni (AGEA), substitute member
- Jean-Luc Metz (AFIB), substitute member
- Virginie Gaillard (APIC), substitute member
- Déborah Pérou (ANACOFI-CIF), substitute member
- Position to be filled
- Françoise Costinesco (FFA), substitute member
- Eric Sailly (FFA), substitute member
- Maud Schnunt (FFA), substitute member
- Laetitia Cesari (FNMF), substitute member
- Gimy Vella-Rodriguez (FBF), substitute member
- Sylvie Dariosecq (AFECEI), substitute member
- Patrice Gobert (AFECEI), substitute member
- Karine Rumayor (AFECEI), substitute member

The composition of the registration committee was fixed by the ministerial order of 24 February 2016, as amended by the orders of 1 August 2016, 21 March 2017, and 27 June 2017.

<sup>1</sup> Chamber of Insurance Brokers (Chambre Syndicale des Courtiers d'Assurance)

<sup>&</sup>lt;sup>9</sup> French Association of Credit Institutions and Investment Companies (Association Française des Etablissements de crédits et des Entreprises d'Investissement)



<sup>&</sup>lt;sup>2</sup>National Federation of Associations of General Insurance Agents (Fédération nationale des syndicats d'agents généraux d'assurance)

<sup>&</sup>lt;sup>3</sup> French Association of Banking Intermediaries (Association Française des Intermédiaires Bancaires)

<sup>&</sup>lt;sup>4</sup>Professional Association of Credit Intermediaries (Association Professionnelle des Intermédiaires en crédits)

<sup>&</sup>lt;sup>5</sup>National Association of Financial Advisors (Association Nationale des Conseils Financiers) <sup>6</sup>National Chamber of Wealth Advisors (Chambre Nationale des Conseils en Gestion de Patrimoine)

<sup>&</sup>lt;sup>7</sup> French Insurance Federation (*Fédération Française de l'Assurance*)

<sup>&</sup>lt;sup>8</sup> French Banking Federation (Fédération Bancaire Française)



# BOARD OF DIRECTORS (composition as of 20 June 2018)

- Pierre Bocquet (AFECEI), principal member
- Jérôme Speroni (AGEA), principal member
- Bruno Pélissier (AGEA), principal member
- David Charlet (ANACOFI-CIF), principal member
- Alain Morichon (CSCA), principal member
- Bertrand de Surmont (CSCA), principal member
- Philippe Poiget (FFA), principal member
- Martine Bacciochini (FFA), principal member
- Thierry Bernard (IOB/APIC), principal member

- Stéphane Yvon (AFECEI), substitute member
- Françoise Palle-Guillabert (AFECEI), principal member
  Marie-Anne Bousquet-Suhit (AFECEI), substitute member
  - Gaëlle Durgeau (AGEA), substitute member
  - Antoine Giannandréa (AGEA), substitute member
  - Benoist Lombard (CNCGP), substitute member
  - Cyril Bayvet (CSCA), substitute member
  - Alain Marquetty (CSCA), substitute member
  - Matthieu Bébéar (FFA), substitute member
  - Sophie Crémière-Bouxin (FFA), substitute member
  - Jean-Bernard Valade (IOB/AFIB), substitute member

# GENERAL MEETING (composition as of 20 June 2018)

- Jean-Bernard Valade (AFIB), principal member
- Bruno Pélissier (AGEA), principal member
- David Charlet (ANACOFI-CIF), principal member
- Philippe Taboret (APIC), principal member
- Benoist Lombard (CNCGP), principal member
- Alain Morichon (CSCA), principal member
- Jérôme Pedrizzetti (FBF), principal member
- Philippe Poiget (FFA), principal member
- Martine Bacciochini (FFA), principal member
- Philippe Braghini (FNMF), principal member

- Françoise Palle-Guillabert (AFECEI), principal member Marie-Anne Bousquet-Suhit (AFECEI), substitute member
  - Jean-Marie Person (AFIB), substitute member
  - Jérôme Speroni (AGEA), substitute member
  - Patrice Geraudie (ANACOFI-CIF), substitute member
  - Virginie Gaillard (APIC), substitute member
  - Edith Rossi (CNCGP), substitute member
  - Bertrand de Surmont (CSCA), substitute member
  - Stéphane Yvon (FBF), substitute member
  - Françoise Costinesco (FFA), substitute member
  - Sophie Crémière-Bouxin (FFA), substitute member
  - Pascale Fassinotti (FNMF), substitute member

Bruno Pélissier, principal director for the AGEA, is Chairman of Orias for a term from 1 January 2017 to 31 December 2018.

Daisy Facchinetti, Secretary General of Orias, assumes the duties of secretary of the registration committee.

As of 20 June 2018, Evelyne Ahipeaud, Deputy Head of the ASSUR2 Office and representative of the Directorate General of the French Treasury, attends all meetings of Orias governance bodies and is entitled to ask for a second deliberation on decisions taken.

> Orias Annual Report 2017 74

## IMPLEMENTATION OF THE 2017 BUDGET7

# Expenses (expressed in €k)

	Budget implementation 2013	Budget implementation 2014	Budget implementation i 2015	Budget implementation 2016	Budget implementation 2017	Change 2017/2016
Personnel expenses (1)	1,138	993	885	871	718	-153
Building expenses	179	156	179	183	181	-2
IT expenses	397	380	353	219	325	+106
Other business expenses	614	729	992	953	873	-80
"Contacts, studies" expenses	107	94	112	106	112	+6
Office expenses	46	38	36	38	40	+2
Other expenses	10	18	13	9	9	0
Non-recurring expenses	870	540	159	340	297	-43
Total expenses	3,361	2,948	2,729	2,719	2,555	-164

(1) 12 FTEs including 11 permanent employees

Expenses for 2017 total €2,555k, a decrease of €164k from 2016.

The decrease in personnel costs resulted from changes in staff at the end of 2016 and the change in the provision for paid leave.

The increase in IT expenses corresponds to IT upgrades made to adapt the management tool.

The decrease in other operating expenses is due to lower fees and charges related to shared services (IT, accounting, human resources, etc.) within the GPSA EIG, to which Orias belongs.

## Incom

The vast majority of the income of €3,270k came from the receipt of registration fees, with a small proportion coming from income from financial investments.

In accordance with the order of 22 December 2011, in application of article L. 512-1 of the Insurance Code, and the order of 20 December 2012, in application of article L. 546-1 of the Monetary and Financial Code, the annual registration or renewal fee was maintained at 30 euros per category for the 2017 financial year. The total amount of registration fees received was €3,214k, €134k more than in 2016.

Financial income totalled €56k compared with €62k in 2016.

# Result for the financial year

The 2017 financial year showed a surplus of €715k.

The Orias board of directors proposed keeping the amount of the annual registration and renewal fees at 30 euros per category for 2017. The General Directorate of the French Treasury endorsed this decision.







## List of authorities in charge of keeping the single register of insurance intermediaries in the European Economic Area\* (Source www.eiopa.europa.eu)

#### Germany:

Deutscher Industrie-und Hendelskammertag e.V. (DIHK) Breite Strasse 29 10178 Berlin DEUTSCHLAND www.dihk.de

Austria: (For all intermediaries except for credit institutions practising insurance intermediation) Federal Ministry of Science, Research and Economy (BMWFW) Stubenring 1 1010 Vienna AUSTRIA www.bmwfw.gv.at

(Only for credit institutions operating in insurance intermediation) Finanzmarktaufsichtsbehörde (FMA) AUSTRIA www.fma.gv.at

#### Belgium:

Financial Services and Market Authority (FSMA) Rue du congrès – Congresstraat, 12 – 14 1000 Brussels BELGIUM www.fsma.be

Bulgaria: Financial Supervision Commission 33, Shar Planina Street 1303 Sofia BULGARIA www.fsc.bg Cyprus: Insurance Companies Control Service (ICCS) P.O BOX 23364 1682 Nicosia CYPRUS www.mof.gov.cy

#### Croatia:

Hrvatska agencija za nadzor financijskih usluga (Croatian Financial Services Supervisory Agency) Miramarska cesta 24b 10000 Zagreb CROATIA www.hanfa.hr

### Denmark:

Finanstilnet (The Danish Financial Supervisory Authority) Aarhusgade 110 DK – 2100 Copenhagen DENMARK www.ftnet.dk

#### Spain:

Orias Annual Report 2017 76

Direccion General de Seguros y fondos de Pensiones (Ministerio de Economia y competitividad) Paseo de la Castellana, 44 28046 Madrid SPAIN www.dgsfp.mineco.es www.dgsfp.meh.es

Estonia: Financial Supervisory Authority Sakala Street 4 15030 Tallinn ESTONIA www.fi.ee

\* Updated: April 2016



Greece:

Bank of Greece Department of Private Insurance Supervision 21, E. Venizelos Avenue 102 50 Athens GREECE www.bankofgreece.gr

Finland: Finanssivalvonta Financial Supervisory Authrority P.O. BOX 103 00101 Helsinki FINLAND www.finanssivalvonta.fi

Gibraltar: Financial Services Commission Operations Division P.O. BOX 940 Suite 3A, Atlantic Suites Europort Avenue GIBRALTAR www.fsc.gi

Hungary: Magyar Nemzeti Bank (Hungarian National Bank) 1534 Budapest BKKP Pf. 777 HUNGARY www.mnb.hu

Ireland: Central Bank of Ireland P.O. BOX 559 Dame Street Dublin 2 IRELAND www.centralbank.ie

Iceland: Financial Supervision Authority (Fjarmalaeftirlitid) Katrinartun 2 105 Reykjavik ICELAND www.fme.is Italy:

Istituto per la Vigilanza sulle Assicurazioni (IVASS) Servizio di Vigilanza Intermediari Assicurativi Via del Quirinale, 21 00187 Rome ITALY www.ivass.it

Liechtenstein: Financial Market Authority (FMA) Landstrasse 109 P.O. BOX 279 LI - 9490 Vaduz PRINCIPALITY OF LIECHTENSTEIN www.fma-li.li

Lithuania: Bank of Lihuania Supervision Service Zirmuny g. 151 LT - 09128 Vilnius LITHUANIA www.lb.it

Luxembourg: Commissariat aux Assurances 7 boulevard Joseph II L - 1840 Luxembourg GRAND DUCHY OF LUXEMBOURG www.commassu.lu

Latvia: Financial and Capital Market Commission Kungu iela 1 Riga LV 1050 LATVIA www.fktk.lv

Malta: Malta Financial Services Authority Notabile Road Attard BKR 3000 MALTA www.mfsa.com.mt

Orias Annual Report 2017 77



### Norway:

Finanstilsynet (The Financial Supervisory Authority Of Norway) Revierstredet 3, Postboks 1187 Sentrum N - 0107 Oslo NORWAY www.finanstilsynet.no

### Netherlands:

Netherlands Authority for the financial Markets (Autoriteit Financiele Markten – AFM) Supervision Service Center (Toezicht Service Centrum) P.O. Box 11723 NETHERLANDS www.afm.nl

### Poland:

Poslish Financial Supervision Authority Pl. Powstancow Warszawy 1 00-950 Warszawa POLAND www.knf.gov.pl

### Portugal:

Instituto de Seguros de Portugal Departemento de Autorizaçoes e Registo Avenida da Republica nº 76 1600-205 Lisboa PORTUGAL www.isp.pt

### Czech Republic: Czech National Bank Na Prikope 28 115 03 Praha 1 CZECH REPUBLIC www.cnb.cz

Romania: Financial Supervisory Authority 15th Splaiul Independentei 5th District Bucharest 050092 ROMANIA www.asfromania.ro

### United Kingdom:

Passport Notification Unit Approved Persons, Passporting and Mutuals Department Financial Conduct Authority (FCA) 25 the North Colonnade Canary Wharf London E14 5 HS UNITED KINGDOM www.fca.org.uk

### Slovakia:

National Bank of Slovakia Imricha Karvasa, 1 813 25 Bratislava SLOVAKIA www.nbs.sk

### Slovenia:

Insurance Supervision Agency TRG Republike 3 1000 Ljubljana SLOVENIA www.a-zn.si

### Sweden:

Orias Annual Report 2017 78

Bolagsverket\* (Swedish Companies Registration Office) SE-851 81 Sundsvall SWEDEN www.bolagsverket.se

\* For information. Not a party to the Luxembourg Protocol



# List of authorities in charge of keeping the single register of banking transactions intermediaries in the European Economic Area

## (Source: http://ec.europa.eu/finance/finservices-retail/credit/mortgage/index\_en.htm)

### Belgium:

The Financial Services and Markets Authority (FSMA) Mortgage and credit providers and intermediaries Rue du Congrès-Congresstraat 12/14 1000 Brussels BELGIUM www.fsma.be

Bulgaria: Bulgarian National Bank 1 Knyaz Alexander 1 sq. 1000 Sofia BULGARIA www.bnb.bg/index.htm

Croatia: Croatian National Bank Trg Hrvatskih Velikana 3 10000 Zagreb CROATIA www.hnb.hr/en

Denmark: Finanstilsynet (Danish Financial Supervisory Authority) Aarhusgade 110 2100 Copenhagen DENMARK www.finanstilsynet.dk

Estonia: The Financial Supervision Authority (Finantsinspektsioon) Sakala 4 Tallinn 15030 ESTONIA www.fi.ee Finland: The Finnish Financial Supervisory Authority (Finanssivalvonta) Snellmaninkatu 6 P.O Box 103 00101 Helsinki FINLAND www.finanssivalvonta.fi

Hungary: The Central Bank of Hungary Szabadsag ter 9 1054 Budapest HUNGARY www.mnb.hu

Irelande: Central Bank of Ireland Protection: Passporting Notifications Consumer Protection: Policy & Authorisations PO Box 9138 College Green Dublin 2 IRELAND www.centralbank.ie/regulation/industrysectors/retailintermediaries/pages/ authorisationprocess.aspx

Italy: Organismo per la gestione degli elenchi degli Agenti in attivita finanziaria et dei Mediatori creditizi Piazza Borghese, n. 3 00186 Roma ITALY www.organismo-am.it

Orias Annual Report 2017 79



Latvia: Consumer Rights Protection Center Brivibas iela 55 Riga LV-1010 Latvija LATVIA www.ptac.gov.lv

Lithuania: The Bank of Lithuania Gedimino ave. 6 01103 Vilnius LITHUANIA www.lb.lt

Luxembourg Commission de Surveillance du Secteur Financier (CSSF) 283 route d'Arlon 2991 Luxembourg GRAND DUCHY OF LUXEMBOURG www.cssf.lu/

Malta: Malta Financial Services Authority Notabile Road Attard BKR 3000, M MALTA www.mfsa.com.mt

Netherlands: Netherlands Authority for the Financial Markets (AFM) PO Box 11723 1001 GS Amsterdam NETHERLANDS www.afm.nl/en Poland: Polish Financial Supervision Authority (KNF) Plac Powstancow Warszawy 1 P.O Box 419 00-950 Warszawa POLAND www.knf.gov.pl/en/index.html

Slovenia: Bank of Slovenia Banking Supervision Department Slovenska 35 SI – 1505 Ljubljana SLOVENIA www.bsi.si

Slovakia: National bank of Slovakia Imricha Karvasa 1 81325 Bratislava SLOVAKIA www.nbs.sk/sk/titulna-stranka

Sweden: Finansinspektionen Box 7821 103 97 Stockholm SWEDEN http://www.fi.se/Folder-EN/Startpage/







