

Frequently Asked Questions:

1. General Questions.

2. Specific Questions:

- **FC200**
- **FC220**
- **FC250**
- **FC270**



01

Questions	Answer/Clarification
General Are all values to be reported strictly for the specific reporting quarter only?	Please see the instructions in the cells and Manuals. Generally speaking for FC sheets, values should be reported for the relevant reporting date, unless otherwise specified (e.g., YTD in P&L)

02

Questions	Answer/Clarification
General If there is no data to report, should we input “0” or leave the fields blank?	Yes, enter “0”. Blank cells will be treated as missing data and cause validation issues.

03

Questions	Answer/Clarification
General Are FC100, FC110, FC120, FC130, and FC140 no longer required?	Yes, these forms have been replaced by a new set of forms: FC200, FC210, FC220, FC230, FC240, FC250, FC251, FC252, FC253, FC254, FC260, and FC270.

04

Questions	Answer/Clarification
<p>General</p> <p>How should we report a client who is a citizen of one country but resides in another? What is the proper way to determine and report residency?</p>	<p>Classify based on actual residence, not citizenship. Firms must make reasonable efforts to determine this. Use most recent verified address.</p>

05

Questions	Answer/Clarification
<p>General - relates to relevant tables/cells in other forms as well (e.g. FC210_6)</p> <p>For “Customer Residence” in forms, does it refer to tax residence?</p>	<p>FC210_6 = legal residence of client (where they live or are incorporated), not tax residence .</p>

06

Questions	Answer/Clarification
<p>General</p> <p>For reporting client residency in the “AIFC only” region, what legal entity types should be considered AIFC participants?</p>	<p>A legal entity is considered a participant of AIFC (Region 1) if it is registered with or recognised by AFSA as conducting activities within the AIFC framework, regardless of its country of incorporation. The official public register of AFSA is used as the source for this information.</p> <p>AIFC only = Centre Participant</p>

07

Questions

Answer/Clarification

General

Use classification as of quarter end date.

How should we report a client who was reclassified during the reporting period? Should the latest classification as of the quarter-end be used?

08

Questions	Answer/Clarification
<p>General - relates to relevant tables/cells in other forms as well (e.g. FC220_2.1)</p> <p>Where should cash holdings be reported? Under money market instruments (MMIs)?</p>	<p>Yes, cash should be reported under MMIs (Money Market Instruments). This treatment aligns with regulatory best practices and Basel III liquidity principles</p>

09

Questions	Answer/Clarification
<p>General - relates to relevant tables/cells in other forms as well (e.g. FC200_2.2)</p> <p>How should the origin of assets be determined, especially when the issuer is from one country, but the asset is issued or traded in another?</p> <p>For example, if the issuer is a Chinese company but issued its financial instruments/asset in UK on LSE. How should we classify origin of such asset?</p>	<p>Classify based on where the asset is primarily traded—in this case, UK (LSE), not issuer's home country.</p>

10

Questions	Answer/Clarification
<p>General - relates to relevant tables/cells in other forms as well (e.g. FC200_3)</p> <p>What is meant by “Destination of Accounts Booked”? Does it refer to the jurisdiction where transactions are executed or recorded?</p>	<p>It refers to the jurisdiction where the accounts are legally booked/recorded, not necessarily where the client resides or the transaction occurs</p>

11

Questions	Answer/Clarification
<p>General - relates to relevant tables/cells in other forms as well (e.g. FC220_2.4)</p> <p>For ETFs listed locally, what should be considered the asset's country of origin?</p> <p>Example: An ETF on QQQ (U.S.) listed on ITS (Kazakhstan). What should be considered the asset's origin in this case?</p>	<p>Origin = where the financial instrument is primarily issued, registered, or originally listed for public trading.</p> <p>Secondary listings (like trading on ITS or LSE) do not change the asset's origin, unless that listing is the primary registration.</p> <p>Where was the asset first and officially issued for public trading?</p> <p>If an instrument is registered and issued in the UK, even by a foreign company → UK = origin.</p> <p>If an instrument is issued in the USA, and just listed for trading in KZ (like QQQ ETF) → USA = origin.</p> <p><u>Guidance:</u> For listed instruments, always go with the primary listing or issue market.</p> <p>For derivatives, the origin is not the underlying asset, but the location of the listing or issuance of the derivative contract.</p> <p>Dual listings or secondary market trades do not change the asset's origin, unless the new market becomes the primary listing or registration venue.</p>

12

Questions	Answer/Clarification
<p>General - relates to relevant tables/cells in other forms as well (e.g. FC200_5)</p> <p>How should we determine whether a client qualifies as a High-Net-Worth Individual (HNWI)?</p>	<p>HNWI = individual with net investable assets exceeding USD 1 million, excluding primary residence</p>

13

Questions	Answer/Clarification
<p>General - relates to relevant tables/cells in other forms as well (e.g. FC250_6)</p> <p>Regarding beneficial ownership, how should we handle situations where multiple individuals (e.g., shareholders of a joint-stock company) are beneficiaries, but specific ownership shares are unknown?</p>	<p>UBO's residential address and share % must be obtained during client onboarding (via the KYC process) and reported accordingly in regulatory forms. This ensures compliance with AML obligations and supports accurate UBO reporting. Please see Practical guidance to AIFC AML/CFT Framework.</p> <p>As per section 5.30.3 of the Practical Guidance to the AIFC Anti-Money Laundering and Counter-Terrorist Financing Framework,</p> <p>For a customer that is a legal person, a Relevant Person should identify any natural person who ultimately has a controlling ownership interest (i.e. more than 25%) in the legal person and any natural person exercising control of the legal person or its management and take reasonable measures to verify their identities. If there is no such natural person, the Relevant Person should identify the relevant natural persons who hold the position of senior managing official in the legal person and take reasonable measures to verify their identities</p>

14

Questions

How should we report “Net Asset Movement” for custodial services started during the period—especially if some assets were both accepted and withdrawn?

Answer/Clarification

Report net change during the period: e.g., if accepted 100, withdrew 50 → report 50

15

Questions	Answer/Clarification
<p>General</p> <p>Can we submit a request to modify (e.g., remove, add, or restructure) the Forms due to unsuitability?</p>	<p>Yes, you may submit such a request. We will review it and continue to monitor overall trends in form suitability. If future data supports your suggestion, it may be considered in a future version of the form.</p>

FC200



01

Questions	Answer/Clarification
<p>FC200</p> <p>The form mentions both “Advising” and “Arranging on Investments”, but the tables only reference advisory services. Should we include arranging activities provided to advisory clients?</p>	<p>Yes. FC200 is applicable only for firms conducting and/or advising and arranging for advisory clients. All such activities, including arranging related to advisory clients, should be reported under relevant AuA sections. If you provide arranging only services (with no advising), Firm is required to provide the clarification via explanatory note.</p>

FC220



01

Questions	Answer/Clarification
<p>FC220</p> <p>What is the difference between Aggregate NAV, NAV, and AUM? How should each be reported, and why are NAV and AUM separated in the form?</p>	<p>Please refer to the instructions in the Excel form.</p> <p>AUM = value of assets managed, incl. liabilities.</p> <p>NAV = value of net assets (AUM minus liabilities). <u>Calculated per unit.</u> Reflects the actual value attributable to investors.</p> <p>Aggregated NAV = total value of a fund's assets minus its liabilities, representing the overall worth of the entire fund or portfolio, <u>without dividing it by the number of units.</u></p>

FC220_1	Fund Name	Date of register	Investment Strategy	Fund Type*	Exempt/Non-Exempt	Legal Form	AUM (kUSD)	Aggregate NAV (kUSD)	NAV	Number of Unitholders	Top Holdings [Tickers, name (weights)]
Fund 1											
Fund 2											
Fund 3											
Fund 4											
Fund 5											
Fund 6											
Fund 7											
Fund 8											
Fund 9											
Fund 10											
Fund 11											
Fund 12											
Fund 13											

The per-share or per-unit value of a fund's assets minus its liabilities. It represents the price at which investors can buy or sell one unit of the fund.

02

Questions	Answer/Clarification
<p>FC220_1</p> <p>How many “top positions” are expected to be reported? Is there a threshold or number to guide selection (e.g., Top 5, Top 10)?</p>	<p>No fixed number, use materiality.</p>

03

Questions	Answer/Clarification
<p>FC220_2.1</p> <p>How should futures positions be valued in AUM reporting? Should notional value be included or just the cash margin?</p> <p>Example:</p> <p>Cash: \$1M; Futures Position: \$10M notional (e.g., oil contracts with a total notional value of \$10M).</p> <p>According to the table, AUM appears to be calculated as Cash + Futures Notional, resulting in \$11M.</p> <p>However, in reality, AUM should reflect only the cash portion, i.e., \$1M.</p> <p>How should futures positions be reported in this table?</p>	<p>You should report: \$1M cash — as is.+ Mark-to-Market (MTM) value of the futures</p> <p>Do NOT report the full \$10M notional as part of AUM.</p> <p>If you can't calculate MTM or margin?</p> <p>Use best available estimate and clearly disclose in the Explanatory Note:</p> <p><i>"Futures exposure is reported based on initial margin posted, as notional value does not reflect actual assets under management."</i></p> <p>Conclusion: Use the MTM value of open futures contracts, not the notional value, because MTM better reflects real economic exposure and aligns with fair-value accounting principles.</p>

04

Questions	Answer/Clarification
<p>FC220_3.3</p> <p>Let's assume there is the two assets in the portfolio of the Fund. One is booked in U.S. and another in U.K. How I should indicate Total Number of Unitholders by Destination of Accounts Booked ?</p>	<p>For number of unitholders (FC220_3.3) provide a breakdown of booking centres where the client's units are booked.</p> <p>For FC220_3.1, FC220_3, provide a breakdown of booking centres where the client assets are booked in value of AUM and NAV.</p>

05

Questions	Answer/Clarification
<p>FC220_7.1</p> <p>Is liquidity classification subjective? Should we apply professional judgment in assessing asset liquidity?</p>	<p>Yes, apply professional judgment with reasonable justifications.</p>

FC250



01

Questions	Answer/Clarification
<p>FC250_1</p> <p>Does the “Total error trades” count include trades rejected by the system due to pricing errors or issues like technical outages?</p>	<p>Include only firm-side errors (e.g., misbooking, system fault). Not client-side entry errors.</p>

02

Questions	Answer/Clarification
How is a “Dormant” client or account defined? By lack of activity (trading or movement) or by internal status (e.g., blocked or closed)?	This refers to the count of account that were inactive for trading or investments for 12 months

FC250	Instructional Guidelines
Number of Client Accounts	This refers to the count of account that were active for trading or investments for 12 months
Number of Dormant Accounts	This refers to the count of account that were inactive for trading or investments for 12 months
Number of Test Accounts	These accounts are created for testing purposes, often used internally by the firm for running simulations, training, or demonstrating services, without involving actual trading.
Number of Unique Clients	This refers to the count of distinct clients who hold one or more accounts with the firm. It eliminates duplicates in case a single client has multiple accounts.

03

Questions

If a commission is refunded, should it reduce income in the reporting period or be disregarded for reporting purposes?

Answer/Clarification

A commission refund should be recorded as a **reduction in income in the reporting period when the refund was made**, in accordance with the accrual principle.

For example, if the commission was accrued in Q1 but partially refunded in Q2, the refund should be reflected as a reduction of income in **Q2**.

There is no need to recalculate income for Q1 — simply report the refund as a decrease in the current income for Q2.

04

Questions	Answer/Clarification
<p>FC250_1</p> <p>When calculating “total number of products offered,” should every individual instrument be counted, or are instruments grouped by type (e.g., all stocks as one product)?</p>	<p>Count by instrument type, e.g., stocks = 1, bonds = 1, not each ticker.</p>

05

Questions

Answer/Clarification

FC250_3

Is this referring to the ultimate custodian (such as Euroclear, Clearstream, etc.), or to the broker's level of custody (the first level of custody, such as the Central Securities Depository, prime broker, etc.)? We have a direct agreement with the Central Securities Depository, but the CSD may in turn hold assets at a higher level (e.g., Euroclear, etc.). If the requirement is to identify the ultimate custodian, we are concerned that it may not be possible to determine it for each individual asset.

You should indicate the custodian (first-level) with whom the firm has a direct contractual and operational relationship. Ideally, the custody chain, including the ultimate custodian (if known), should be disclosed in the comments or explanatory section.

06

Questions	Answer/Clarification
<p>FC250</p> <p>For OTC transactions, what determines whether a transaction is attributed to AIFC — the settlement location, the counterparty, or something else?</p>	<p>An OTC transaction with an Authorised Firm registered in AIFC → is considered to be within AIFC.</p> <p>An OTC transaction with a foreign bank → is considered to be outside AIFC, even if the settlement is processed through a local entity in Kazakhstan.</p>

FC270



15

Questions	Answer/Clarification
<p>FC270_2</p> <p>Row 47 – it seems that this row is irrelevant as client classes are mutually exclusive. (meaning there can be no overlapping clients as the client classified as, for example, retail cannot be professional at the same time)</p>	<p>This row shows how many clients are involved in multiple activities. These clients are already included in the T1 count but are shown here to highlight the overlaps across activities. Please refer to Manual.</p>

FC270_2	Banking	Insurance	Managing Investments	Managing CIS	Advising on Investments	Dealing in Investments	Providing Money Services
1 - Retail Clients							
2 - Deemed Professional Clients							
3 - Assessed Professional Clients							
4 - Market Counterparties							
T1 - Total Number of Clients by engagement in a regulated activity				-	-	-	-
T2 - Total Number of Unique Clients							
T3 - Total Number of Overlapping Clients							

This row shows how many clients are involved in multiple activities. These clients are already included in the T1 count but are shown here to highlight the overlaps across activities.

4 - Arranging Credit F. | FC260 - Providing Money S. | FC270

01

Questions	Answer/Clarification
<p>FC270</p> <p>If a complaint is received and reviewed in one quarter but closed in the next, how should it be reported across periods?</p>	<p>If a complaint was received in Q1, reviewed in Q1, but closed in Q2, then:</p> <p>In Q1, it must be reported as “Pending” under FC270_3, because a complaint is only considered “Upheld” or “Rejected” once a final conclusion has been reached, which, in this case, occurred in Q2.</p> <p>The type of complaint (e.g. Suitability, Performance, or Service) should be reported in both Q1 and Q2, per FC270_4, to allow tracking and trend analysis.</p>

02

Questions	Answer/Clarification
FC270 Should complaints submitted to the regulator but not directly to the firm be included in our statistics?	Yes, if the firm became aware of it.

03

Questions	Answer/Clarification
<p>FC270</p> <p>How should we classify inquiries or claims from courts or officials that stem from a client complaint but were not submitted by the client?</p>	<p>If the firm is informed by a regulatory or judicial body about a matter that clearly stems from a client complaint, it should be reported. However, if it is a procedural or legal inquiry not linked to a specific client complaint, it should be classified separately as a regulatory matter.</p>

04

Questions

Answer/Clarification

FC270

If a complaint was reviewed and no new facts were found, but the client remains dissatisfied, should it be marked as “Rejected” or “Upheld”? Also, confirm whether “Upheld” means the complaint was accepted and action taken.

A complaint should be classified as “Rejected” if the firm does not satisfy the client’s claim after review, even if the client remains dissatisfied. “Upheld” applies where the firm satisfies the claim, regardless of whether the client was technically correct.

05

Questions	Answer/Clarification
<p>FC270</p> <p>Suitability - Please clarify what is exactly meant and which complaints should be categorized under this.</p> <p>Example 1: a client was unaware of the product conditions and now demands a refund of the commission.</p> <p>Example 2: a client claims they do not like taking risks but invested themselves in high-risk instruments that resulted in a loss.</p> <p>Example 3: a client trades US securities, expecting the purchase to be executed on a US exchange, but the trade is executed on a different exchange under the best execution system. The client submits a complaint because their expectations were not met.</p>	<p>Generally speaking,</p> <p>Suitability = wrong product. Performance = product failed to deliver. Service = process or delivery failure.</p> <p><i>Please see the manual for the definitions</i></p> <p>Suitability means the firm either: 1) Offered a product unsuitable (wrong) to the client's profile, or failed to properly assess the client's needs.</p> <p>Example 1 -> "Suitability", Product not appropriate for client's understanding/needs</p> <p>Example 2 -> "Suitability", even if the client initiated the trade, the complaint is about the risk not matching their risk appetite, which is a core element of suitability.</p> <p>Example 3 -> not "Suitability". Execution venue expectations and how trades are routed = quality of execution-related service. Not an issue with product itself, or its suitability.</p>

06

Questions	Answer/Clarification
<p>FC270</p> <p>Performance - Please clarify what is exactly meant and which complaints should be categorized under this. Also, should it be assessed from the client's perspective or the company's (as the clients may not fully understand the nature and specifics of the product)? For example: if a service operates as expected from the company's point of view and meets its expectations, but the client remains dissatisfied because they had different expectations.</p>	<p>“Performance” complaints are those where the client is dissatisfied with the actual return, outcome, or behaviour of a financial product or service, after it was correctly delivered.</p> <p>These complaints typically arise after purchase or execution, and do not relate to the product’s suitability or service process, but rather to the results or value delivered.</p> <p>Do not classify as Performance if: 1) The product was unsuitable (Suitability) 2) There was a service delivery failure (Service) and client misunderstands the nature of the product due to poor disclosure (possibly Suitability or Service, depends on context)</p>

07

Questions	Answer/Clarification
<p>FC270</p> <p>How should we report situations where a regulatory warning or action was issued, but the firm disagrees and is responding within the period? Is it “Open” or “Closed”?</p>	<p>If a supervision body has issued a decision or action, but your firm does not agree = "OPEN".</p> <p>Supervised body has concluded breach and the firm has accepted the outcome (fine, sanction, warning, remediation and etc.) or any appeal or response process is completed and the decision is final. = "CLOSED"</p>