

| Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II | | Deadline 31 July 2012 18:00 CET |
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| Name of Company: | SANOFI | |
| Disclosure of comments: | Please indicate if your comments should be treated as confidential: | Public |
| <p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word Format, to CP-12-003@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to Consultation Paper 12-003.</p> | | |
| Reference | Comment | |
| General Comment | <p>We would like to thank EIOPA for its thorough consultation exercise. However, rather than going into the details of how the QIS should be operated, we would like to make a number of general comments :</p> <ul style="list-style-type: none"> - First of all, we cannot help noticing that a lot of the proposed technical specifications are heavily inspired from the Solvency 2 framework for insurance companies, even though the European Commission had said the rules for IORPs would not be just cut and paste from Solvency 2. We obviously regret this back-tracking. - Second, the level of detail in the consultation is well beyond the capabilities of most international companies who sponsor pension funds. This would probably have made sense in the financial sector where the relevant expertise is to be found. Again, this appears to show a desire to borrow from financial services regulations and apply them to pensions. Accordingly, we believe the technical specifications are designed in | |

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| | such a way that interested parties will not be able to comment properly. | |
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