

<b>Comments Template on DP-14-IMD Discussion Paper on Conflicts of Interest in direct and intermediated sales of insurance-based investment products (PRIIPs)</b>		<b>Deadline 22 July 2014 18:00 CET</b>
Name of Company:	ACTUAM – Actuarial and Risk Services S.à.r.l, Luxembourg	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.  <i>Please indicate if your comments on this DP should be treated as confidential, by deleting the word <b>Public</b> in the column to the right.</i>	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ <u>Do not change the numbering</u> in the column “reference”; if you change numbering, your comment cannot be processed by our IT tool</li> <li>⇒ Leave the last column <u>empty</u>.</li> <li>⇒ 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>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.</li> </ul> <p><b>Please send the completed template, <u>in Word Format</u>, to <a href="mailto:DP-14-IMD@eiopa.europa.eu">DP-14-IMD@eiopa.europa.eu</a>. Our IT tool does not allow processing of any other formats.</b></p>		
Reference	Comment	
General Comment	The more difficult part will not be to manage conflicts of interest but to identify them.	Public
Q1.	Regarding ACTUAM, undertakings have to define cartography of the conflicts and then quantitative ones and qualitative ones, their relation with Solvency II Pillar II and define their implementation. What about the interest conflicts for big bank insurance? Is it possible to separate the physically insurance from banking as the one who is selling the banking products is not insurance professionals and which is the case for the moment.	Public

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Q2.		
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