Directive on the All Firms Return

1 September 2026

Section 1 – OVERVIEW

Introduction

1.1	This Directive is issued by the Financial Services Regulatory Authority pursuant to Section 4 of the Financial Services Ordinance 2008 (the "FSO") and its effective date is 1 September 2026.
1.2	This Directive applies to any relevant business that is licensed by the FSRA to carry out one or more regulated activities. It applies to a relevant business that carries out regulated activities on any of St Helena, Ascension or Tristan da Cunha. Unless specified to the contrary, a reference in this Directive to "St Helena" is to be read as including all of St Helena, Ascension and Tristan da Cunha.
1.3	The Directive requires every relevant business to submit to the FSRA the All Firms Return which appears in Annex 1 to the Directive.

Section 2 – REPORTING REQUIREMENTS

2.1	A relevant business must submit an All Firms Return to the FSRA each year within 30 days of the following dates: (a) 31 March (b) 30 September
2.2	Some sections of the All Firms Return require a relevant business to report information relating to both its regulated and unregulated activities. Other sections require information with respect only to regulated activities.
2.3	In most sections of the All Firms Return, the reporting period is the six-month period ending on the date specified in 2.1(a) or (b), as relevant. Where another reporting period is to be used, the All Firms Return says so.

Section 3 – TRANSITIONAL REPORTING REQUIREMENTS

3.1	In relation to the reporting period ending 30 September 2026, a relevant business must submit an All Firms Return within 45 days of the period end date.

ANNEX 1

ALL FIRMS RETURN

Section A: Balance Sheet

	Fixed Assets	A	B
1.	Intangible assets		
2.	Tangible assets		
3.	Investments		
4.	TOTAL FIXED ASSETS		
	Current Assets		
5.	Stocks		
6.	Debtors (see Memo (1))		
7.	Investments held as current assets (see Memo (2))		
8.	Cash at bank and in hand		
9.	Other assets		
10.	TOTAL CURRENT ASSETS		
	Liabilities: amounts falling due within one year		
11.	Bank loans and overdrafts		
12.	Other liabilities falling due within one year		
13.	TOTAL AMOUNTS FALLING DUE WITHIN 1 YEAR		
14.	**Net current assets**		
15.	**Total assets less current liabilities**		
16.	**Other liabilities falling due after more than 1 year**		
17.	**Provisions for liabilities and charges**		
18.	**Net assets**		
19.	**Guarantees provided by firm**		
	Capital and Reserves		

20.	Ordinary share capital	[redacted]	
21.	Preference share capital		
22.	Share premium account		
23.	Profit and Loss account		
24.	Other reserves		
25.	TOTAL CAPITAL AND RESERVES		
26.	Memo (1): Includes total amount falling due within one year from directors, fellow group undertakings or undertakings in which the firm has a participating interest where included in debtors	[redacted]	
27.	Memo (2): Includes value of shares in group undertakings where such investments are held as current assets		

Notes for completion:

1. Please report values on a whole-firm basis, including both regulated and unregulated activities

Section B: Profit and Loss Account

B1	**Income from regulated activities**	
1.	Non-life insurance sales	
2.	Life insurance sales	
3.	Pension product sales	
4.	Other retail investment product sales	
5.	Other regulated activities	
6.	TOTAL	
B2	**Other Profit and Loss**	
7.	Income from non-regulated activities	
8.	Other revenue	
9.	**TOTAL REVENUE**	
10.	**TOTAL EXPENDITURE**	
11.	**Profit/Loss before taxation**	
12.	**Taxation**	
13.	**Profit/Loss for the period before dividends and appropriations**	
14.	**Dividends and other appropriations**	
15.	**Retained profit**	

Notes for completion:

1. Please report values on a whole-firm basis, including both regulated and unregulated activities.
2. Please report cumulative monthly values on a twelve-month cycle. For the reporting period ending 31 March, please report the cumulative monthly values for the preceding twelve months. For the reporting period ending 30 September, please report the cumulative monthly values for the preceding six months.

Section C: Client Money and Assets

1.	Does your firm receive or hold money in the course of or in connection with its distribution activity?		
2.	How does your firm hold money received in the course of or in connection with its **insurance** distribution activity? (select all that apply)	As client money under s.4 of the Financial Services Regulations 2017	As agent of an insurer
3.	If your firm holds client money under s.4 of the FSR 2017:		
3a.	Has your firm complied with the payment and segregation requirements in s.4(1), (2) and (3) of the FSR 2017?		
3b.	Has your firm obtained a trust acknowledgement letter in respect of each client money account?		
4.	During the reporting period, what was the highest:		
4a.	Account balance (for money held as client money, taken from the firm's records)		
4b.	Account balance for money held purely as agent of insurer (and not co-mingled with client money)		
5.	Does your firm hold any client assets (other than client money) or documents of title relating to those assets?		

Notes for completion:

1. In 4, the reporting period is the six-month period ending 31 March or 30 September, as relevant.

Section D: Insurance

D1 Professional Indemnity Insurance

insurance advising/ arranging/ dealing	retail investment (including pensions) advising/ arranging/ dealing	insurer	annualized premium	policy cover dates	indemnity limit (any one claim)	indemnity limit (aggregate)	policy excess	policy exclusions

D2 Other Insurance

type of cover	insurer	annualized premium	policy cover dates	indemnity limit (any one claim)	indemnity limit (aggregate)	policy excess	policy exclusions

D3 Insurance Further Details

1.	In relation to PII, annual income as stated on the most recent proposal form		
2.	Does your firm hold readily realizable funds that exceed the combined excess on all insurance policies held by the firm?		
3.	Excess/deficit of readily realizable funds		

Notes for completion:

1. Please do not report insurance cover which is held solely in relation to your firm's unregulated activities.

Section E: Customers and Financial Crime

1.	How many customers does your firm have?	At the end of the current reporting period			At the end of the previous reporting period	
2.	Please provide the distribution of your customers according to customer type	Individuals	Companies	Charities	Trusts	Other
3.	Please provide the number of the firm's customer relationships located in the following geographic areas	St Helena				
		United Kingdom				
		European Union				
		Other Europe				
		Middle East and Africa				
		Russia				
		North America				
		Caribbean, Central America and South America				
		Asia				
		Oceania				
4.	Does the FSRA's AML and CFT Directive apply to your firm?					

If you answer "Yes" to Question 4, please complete 5 to 13 below

5.	Please provide the distribution of your customers according to their customer risk rating.	Higher Risk	Low or Normal Risk	No Risk Rating
6.	Does your firm accept customers who are not physically present for identification purposes? If you answer "Yes" please specify the number of customers that have been accepted on this basis			

7.	Number of customers in each category with incomplete Customer Due Diligence		
8.	Number of customers in each category whose accounts have been suspended or terminated during the reporting period		
9.	Number of prospective customers who have been rejected by the firm		
10.	Number of Suspicious Activity Reports submitted	To the MLRO	External
11.	Does your firm rely on an intermediary to carry out CDD measures? If you answer “Yes”, please specify the name and address of the intermediary		
11A.	Does your firm have a written reliance agreement in place with the intermediary?		
	Has your firm obtained from the intermediary the information collected by it when carrying out the CDD measure?		
	Has your firm obtained and reviewed the AML/CFT policies of the intermediary?		
12.	Has your firm appointed an MLRO?		
13.	Have all staff and directors within the scope of the firm’s AML, CFT and sanctions compliance training policy received training during the reporting period?		

All firms should complete 14 to 16.

14.	Does your firm use an automated system to conduct screening against financial sanctions lists?	For customer sanctions	For payments sanctions

15.	Number of true matches detected in the reporting period	For customer sanctions	For payments sanctions
16.	Does your firm conduct repeated or ongoing customer sanctions screening?		

Notes for completion:

1. Please provide values for the six-month period ending 31 March or 30 September, as relevant.
2. Please provide values in respect only of your firm's regulated activities.

Section F: Customer Complaints

1.	Does your firm have a written customer complaints policy?		
2.	Does your firm maintain a customer complaints register?		
3.	Total number of complaints *received* during the reporting period.	Significant complaints	Other complaints
4.	Total number of complaints closed within 14 days.	Significant complaints	Other complaints
5.	Total number of complaints closed >14 days but within 30 days	Significant complaints	Other complaints
4.	Total number of complaints *remaining open* at the end of the reporting period.	Significant complaints	Other complaints
5.	Total number of complaints upheld		
6.	Total amount of redress or compensation paid		
7.	Banking	Current accounts	
		Overdrafts	
		Savings	
		Other banking (please specify)	
8.	Lending	Residential property mortgage first charge	
		Residential property mortgage second charge	
		Unsecured personal lending other than overdrafts	
9.	Insurance	Property	

		Motor and Marine		
		Travel		
		Health		
		Income protection		
		Funeral		
10.	Pensions and Investments Specify under A the number of complaints relating to advice Specify under B the number of complaints relating to arranging, dealing or safeguarding and administration		A	B
		Workplace personal pensions		
		Non-workplace personal pensions		
		Trust-based pensions (e.g., occupational and DB)		
		Annuities		
		Funds		
		Other retail investment products		
		Discretionary management services		
		Non-discretionary management services		

Notes for completion:

(c) Please provide values for the six-month period ending 31 March or 30 September, as relevant.
(d) Please provide values only in respect of your firm's regulated activities.
(e) "Significant complaint" is defined in section 7.3 of the FSRA's Directive on Licensing and Core Compliance.

Section G: Advisers, Arrangers and Custodians

1.	Does your firm carry on any of these regulated activities?	Giving, offering, or agreeing to give investment advice	Arranging for the safekeeping and administration of assets belonging to another	Safekeeping and administration of assets belonging to another
2.	What is the total value of assets as at the end of the reporting period, in each of these categories?	Assets in respect of which you provide investment advice (e.g. in discretionary and non-discretionary advisory accounts)	Assets belonging to another whose safekeeping and administration you have arranged (e.g. assets you have introduced to, or processed on behalf of, a pension scheme)	Assets belonging to another which you safekeep and administer (e.g. assets which you hold as a pension scheme depositary or trustee)

Notes for completion:

1. Please provide values for the six-month period ending 31 March or 30 September, as relevant