Consultation Document:

Including data on branches in the Global LEI System

**Annex: Questionnaire**

Please type your answers into the attached questionnaire and send it to leiroc@bis.org by COB 16 November 2015. Where possible, please specify the reasons for the preferences expressed or the details of any trade-offs you see.

The responses to the questionnaire will be shared within the ROC membership and with the GLEIF. Neither participants’ identity nor any specifically identified reference to their opinion will be made public without their express consent. However, the responses themselves may be quoted on an anonymised basis. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure.

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| **Identification of the respondent and confidentiality** |
| **Respondent:** **Name and email of a contact person:**[ ]  **Please check this box if you object to any of the responses below being quoted on an anonymised basis, and specify here any sections or questions to which this objection applies** |
| *Please specify here as needed which response(s) should not be quoted:* |
| **1 Uses of international branch information** |
| 1.1 What regulatory or private sector uses could benefit from allowing international branches to obtain LEIs? |
| *Please insert your response here:* |
| 1.2 Are there complications that you envision from allowing international branches into the GLEIS, notably in view of possible breaches or risk of confusion with regard to the principle of exclusivity? If so, how would you propose to address them? |
| *Please insert your response here:* |
| **2 Conditions for issuing LEIs to branches** |
| 2.1 Are the conditions described in this consultation sufficiently restrictive or too restrictive? Please explain your answer and offer alternative suggestions. Be specific about what you would suggest adding or removing. |
| *Please insert your response here:*  |
| 2.2 Should an international branch’s head office be required to authorise that an international branch can obtain an LEI, prior to issuance of an LEI to the branch? Alternatively, should the GLEIS envisage a system where the contact person(s) of the headquarter entity, as recorded by the relevant LOU, would simply be notified that a request by one of its international branches was made? Please explain the reasons for your preference. |
| *Please insert your response here:* |
| 2.3 In addition to host country business registries, could the registration in a business registry held in the home country also be accepted in the GLEIS as an acceptable means to provide certainty on the existence of an international branch as a separate entity in the host country, especially where the establishment of a branch involves both home and host authorities, for instance in the banking sector? |
| *Please insert your response here:* |
| 2.4 What other factors should the ROC take into consideration? |
| *Please insert your response here:* |
| **3 Other** |
| 3.1 Do you have any comment on the definition of international branches on page 1 of this consultation document? |
| *Please insert your response here:* |
| 3.1 Do you think it should also be possible to assign an LEI to the “home activity excluding foreign branches,” for instance to avoid that the “headquarter-LEI” be used for two competing purposes: (i) identifying the entire legal person (home country activity plus foreign branches) and (ii) identifying only the home country activity? Please describe the uses or the risks you would see to such an LEI.Currently LEI covers the entiretyHead office in home countryInternational branch in host country AInternational branch in host country B |
| *Please insert your response here:* |
| 3.2 **a)** Because the existence of a branch is so closely linked to its head office, can it be considered that the LEI of the branch LEI would necessarily expire when the head office LEI does, or are there cases where the branch would be considered in the host jurisdiction to survive, for instance, to a dissolution of the head office entity? **b)** Similarly, in case a branch has been acquired by another legal entity, should it keep its LEI and the associated entity information be updated with the LEI of the new head office? **c)** If a branch is incorporated into a distinct legal person, should the LEI become inactive, be marked as a “CORPORATE\_ACTION” and a successor entity LEI mentioned, or should the entity keep its LEI with a mere update of the legal form?  |
| *Please insert your response here:* |
| 3.3 Is there anything important at this stage related to branches that has been omitted from this consultation or any other comment or suggestion you would like to make? |
| *Please insert your response here:* |

**Thank you for participating in this consultation.**