

Annex 3 Financial Reports - DG SCIC - Financial Year 2018

Table 1 : Commitments

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Additional comments

Table 1: The level of commitments appears to be lower than available appropriations for Title 31. Authorised appropriations include EUR 15.51 M of assigned revenue which was cashed during 2017 but not used to finance activities during the year. The largest part of this amount is explained by the fact that as assigned revenue represents 2/3 of the overall financing of SCIC's interpreting activities, it is used as an 'anticipé' on revenue which is mostly consumed for long-term recruitment of freelance interpreters at the beginning of the year. Another part (approximately EUR 1.2 M of revenue) was collected at the end of 2018 from Agencies and other Institutions for the provision and installation of audio-visual and conference equipment, which shall be implemented in 2019.

Table 2: As mentioned for the previous table, payment appropriations authorised for Title 31 include the same amount of EUR 15.51 M of assigned revenue which was not committed in 2019.

Table 6: The data for Average Payment Times displayed in Table 6 do not include payments to freelance interpreters that are processed via DG Interpretation's local system, Grif. This does not distort average figures as these payments are subject to specific deadlines. It has to be noted that the figure of 15.80 days for Average Net Payment Time includes an average of 5.08 days for the processing time in the horizontal services. According to a detailed analysis of the report, for certain payments the latter figure was significantly higher than the average. Out of the 55 payments noted as late 15 would have been made in time if processing time of the horizontal services had not been higher than 5 days. Additionally, there were 3 payments made late due to lack of payment appropriations.

Table 8: The amount initially mentioned in the 'Total undue payments recovered' field of the expenses budget is not correct as it includes all credit notes which were requested to correct mistakes in invoices detected by SCIC ex-ante controls, before any payment had been authorised.

Tables 7 and 9: There is a discrepancy between the figures shown in Table 7, column 7 ('Outstanding balance'): EUR 478,316.00, and the one shown in Table 9, column titled 'Open Amount (Eur) at 31/12/2018': EUR 22,978,316.00. This difference of EUR 22,500,000.00 is due to a non budgetary recovery order issued to the European Parliament enabling SCIC's inter-institutional payment office to pay the freelance interpreters recruited by this institution. This is normal as the table 7 only refers to BGUE, budget regime 'I' and table 9 includes CGUE as well.

TABLE 1: OUTTURN ON COMMITMENT APPROPRIATIONS IN 2018 (in Mio €)					
			Commitment appropriations authorised	Commitments made	%
			1	2	3=2/1
Title 01 Economic and financial affairs					
01	01 02	Economic and monetary union	0,16	0,16	100,00 %
Total Title 01			0,16	0,16	100,00%
Title 02 Internal market, industry, entrepreneurship and SMEs					
02	02 03	Internal market for goods and services	0,1	0,1	100,00 %
Total Title 02			0,1	0,1	100,00%
Title 08 Research and innovation					
08	08 01	Administrative expenditure of the 'Research and innovation' policy area	0,25	0,25	100,00 %
Total Title 08			0,25	0,25	100,00%
Title 09 Communications networks, content and technology					
09	09 01	Administrative expenditure of the 'Communications networks, content and technology' policy area	0	0	100,00 %
	09 04	Horizon 2020	3,7	3,7	100,00 %
Total Title 09			3,7	3,7	100,00%
Title 13 Regional and urban policy					
13	13 03	European Regional Development Fund and other regional operations	0,25	0,25	100,00 %
	13 04	Cohesion Fund (CF)	0,11	0,11	100,00 %
Total Title 13			0,35	0,35	100,00%
Title 17 Health and food safety					
17	17 03	Public health	0,03	0,03	100,00 %
Total Title 17			0,03	0,03	100,00%
Title 20 Trade					
20	20 02	Trade policy	0,07	0,07	100,00 %
Total Title 20			0,07	0,07	100,00%
Title 25 Commission's policy coordination and legal advice					
25	25 01	Administrative expenditure of the 'Commission's policy coordination and legal advice' policy area	0,05	0,05	100,00 %
Total Title 25			0,05	0,05	100,00%
Title 26 Commission's administration					
26	26 01	Administrative expenditure of the 'Commission's administration' policy area	0,13	0,13	100,00 %
Total Title 26			0,13	0,13	100,00%
Title 29 Statistics					
29	29 02	The European statistical programme	0,36	0,35	98,63 %
Total Title 29			0,36	0,35	98,63%
Title 31 Language services					

Note : The figures are those related to the provisional accounts and not yet audited by the Court of Auditors

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TABLE 1: OUTTURN ON COMMITMENT APPROPRIATIONS IN 2018 (in Mio €)					
			Commitment appropriations authorised	Commitments made	%
			1	2	3=2/1
31	31 01	Administrative expenditure of the 'Language services' policy area	83,49	67,93	81,35 %
Total Title 31			83,49	67,93	81,35%
Title 32 Energy					
32	32 01	Administrative expenditure in the 'Energy' policy area	0,22	0,22	100,00 %
Total Title 32			0,22	0,22	100,00%
Total DG SCIC			88,91	73,33	82,48 %

* Commitment appropriations authorised include, in addition to the budget voted by the legislative authority, appropriations carried over from the previous exercise, budget amendments as well as miscellaneous commitment appropriations for the period (e.g. internal and external assigned revenue).

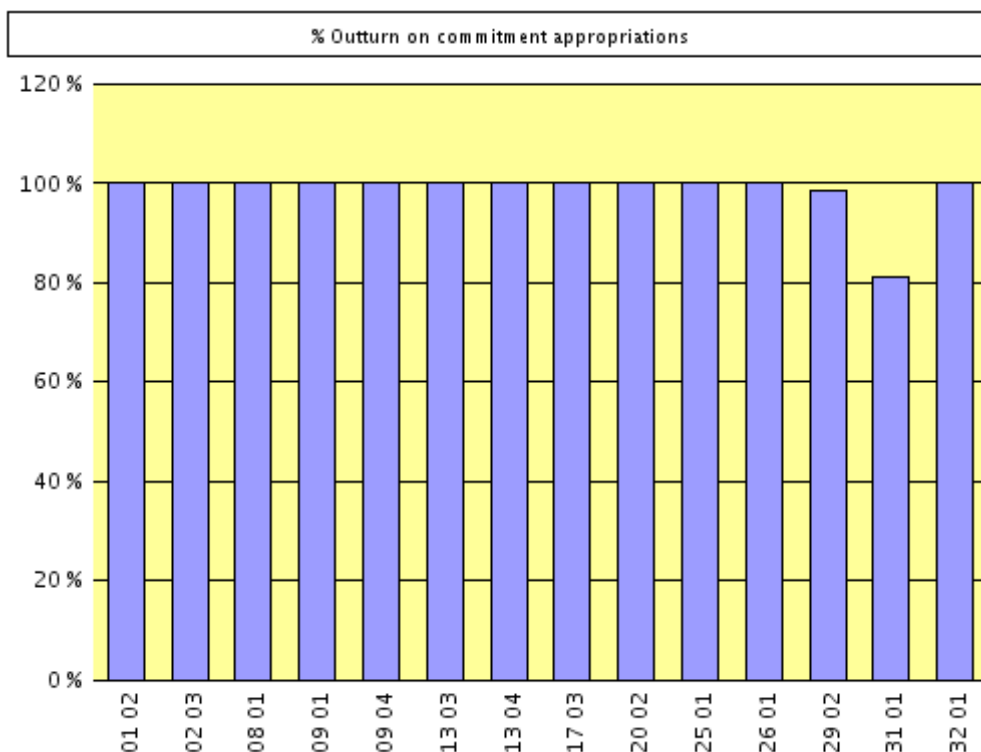


TABLE 2: OUTTURN ON PAYMENT APPROPRIATIONS IN 2018 (in Mio €)

Chapter			Payment appropriations authorised *	Payments made	%
			1	2	3=2/1
Title 01 Economic and financial affairs					
01	01 02	Economic and monetary union	0,14	0,14	100,00 %
Total Title 01			0,14	0,14	100,00%
Title 02 Internal market, industry, entrepreneurship and SMEs					
02	02 03	Internal market for goods and services	0,1	0,1	100,00 %
Total Title 02			0,1	0,1	100,00%
Title 08 Research and innovation					
08	08 01	Administrative expenditure of the 'Research and innovation' policy area	0,33	0,26	77,48 %
Total Title 08			0,33	0,26	77,48%
Title 09 Communications networks, content and technology					
09	09 01	Administrative expenditure of the 'Communications networks, content and technology' policy area	0	0	0,00 %
	09 04	Horizon 2020	1,54	1,54	100,00 %
Total Title 09			1,54	1,54	99,96%
Title 11					
11	11 06	European Maritime and Fisheries Fund (EMFF)	0,48	0,48	100,00 %
Total Title 11			0,48	0,48	100,00%
Title 17 Health and food safety					
17	17 03	Public health	0,03	0,03	100,00 %
Total Title 17			0,03	0,03	100,00%
Title 20 Trade					
20	20 02	Trade policy	0,08	0,08	100,00 %
Total Title 20			0,08	0,08	100,00%
Title 23					
23	23 01	Administrative expenditure of the 'Humanitarian aid and civil protection' policy area	0	0	4,14 %
	23 03	The Union Civil Protection Mechanism	0,21	0,21	100,00 %
Total Title 23			0,22	0,21	98,30%
Title 25 Commission's policy coordination and legal advice					
25	25 01	Administrative expenditure of the 'Commission's policy coordination and legal advice' policy area	0,09	0,07	82,25 %
Total Title 25			0,09	0,07	82,25%
Title 26 Commission's administration					
26	26 01	Administrative expenditure of the 'Commission's administration' policy area	0,13	0,02	11,46 %
Total Title 26			0,13	0,02	11,46%
Title 29 Statistics					
29	29 02	The European statistical programme	0,04	0,04	100,00 %
Total Title 29			0,04	0,04	100,00%
Title 31 Language services					

Note : The figures are those related to the provisional accounts and not yet audited by the Court of Auditors

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TABLE 2: OUTTURN ON PAYMENT APPROPRIATIONS IN 2018 (in Mio €)

Chapter			Payment appropriations authorised *	Payments made	%
			1	2	3=2/1
31	31 01	Administrative expenditure of the 'Language services' policy area	84,59	62,69	74,10 %
Total Title 31			84,59	62,69	74,10%
Title 32 Energy					
32	32 01	Administrative expenditure in the 'Energy' policy area	0,22	0,22	100,00 %
Total Title 32			0,22	0,22	100,00%
Total DG SCIC			88	65,87	74,86 %

* Payment appropriations authorised include, in addition to the budget voted by the legislative authority, appropriations carried over from the previous exercise, budget amendments as well as miscellaneous payment appropriations for the period (e.g. internal and external assigned revenue).

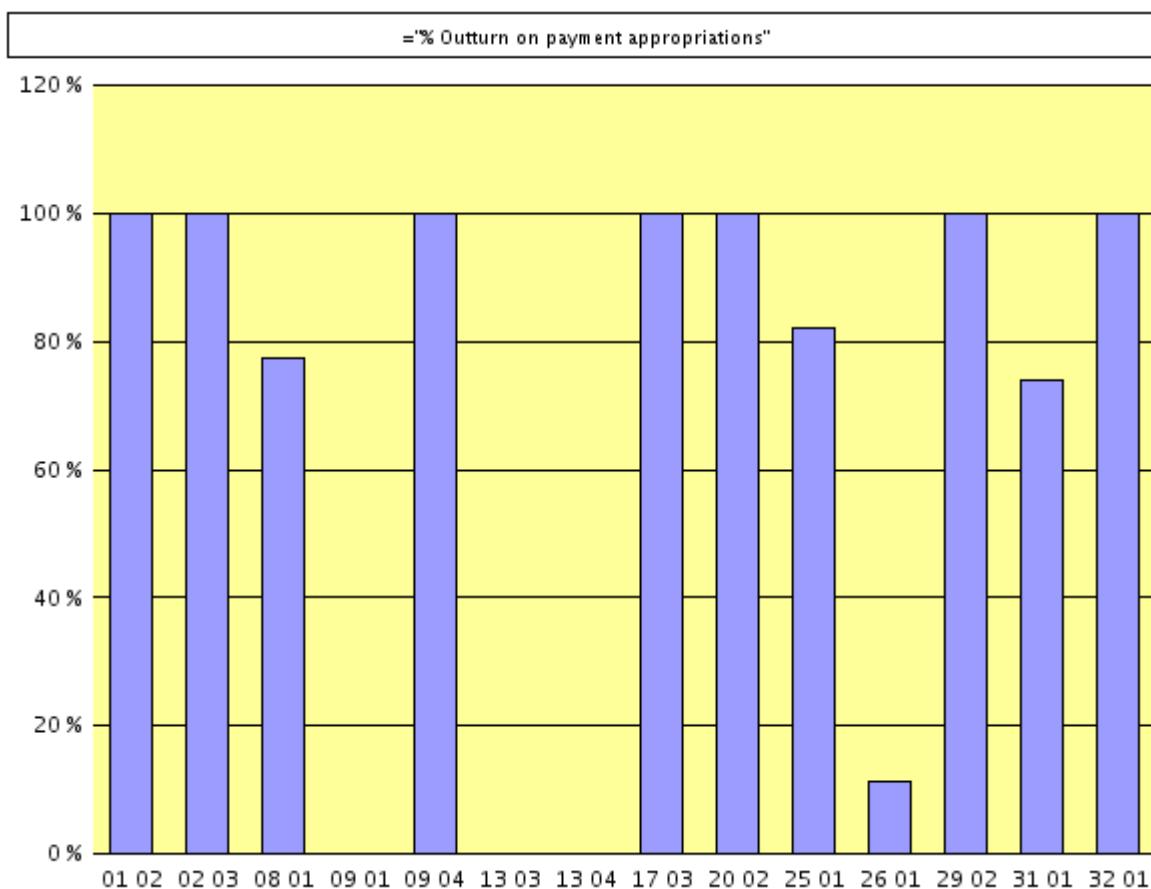


TABLE 3 : BREAKDOWN OF COMMITMENTS TO BE SETTLED AT 31/12/2018 (in Mio €)									
Chapter			2018 Commitments to be settled				Commitments to be settled from	Total of commitments to be settled at end	Total of commitments to be settled at end
			Commitments 2018	Payments 2018	RAL 2018	% to be settled	financial years previous to 2018	of financial year 2018	of financial year 2017
			1	2	3=1-2	4=1-2/1	5	6=3+5	7
Title 01 : Economic and financial affairs									
01	01 02	Economic and monetary union	0,16	0,00	0,16	100,00 %	0,00	0,16	0,16
Total Title 01			0,16	0,00	0,16	100,00%	0	0,16	0,16
Title 02 : Internal market, industry, entrepreneurship and SMEs									
02	02 03	Internal market for goods and services	0,1	0,10	0	0,00 %	0,00	0,00	0,00
Total Title 02			0,1	0,10	0	0,00%	0	0	0
Title 08 : Research and innovation									
08	08 01	Administrative expenditure of the 'Research and innovation' policy area	0,25	0,20	0,04	17,72 %	0,00	0,04	0,09
Total Title 08			0,25	0,20	0,04	17,72%	0	0,04	0,09
Title 09 : Communications networks, content and technology									
09	09 01	Administrative expenditure of the 'Communications networks, content and technology' policy area	0	0,00	0	100,00 %	0,00	0,00	0,00
	09 04	Horizon 2020	3,7	1,51	2,19	59,15 %	0,00	2,19	0,04
Total Title 09			3,7	1,51	2,19	59,16%	0	2,19	0,04
Title 11 :									
11	11 06	European Maritime and Fisheries Fund (EMFF)	0	0,00	0	0,00 %	0,00	0,00	0,63
Total Title 11			0	0,00	0	0,00%	0	0	0,63
Title 13 : Regional and urban policy									
13	13 03	European Regional Development Fund and other regional operations	0,25	0,00	0,25	100,00 %	0,00	0,25	0,00

Note : The figures are those related to the provisional accounts and not yet audited by the Court of Auditors

TABLE 3 : BREAKDOWN OF COMMITMENTS TO BE SETTLED AT 31/12/2018 (in Mio €)

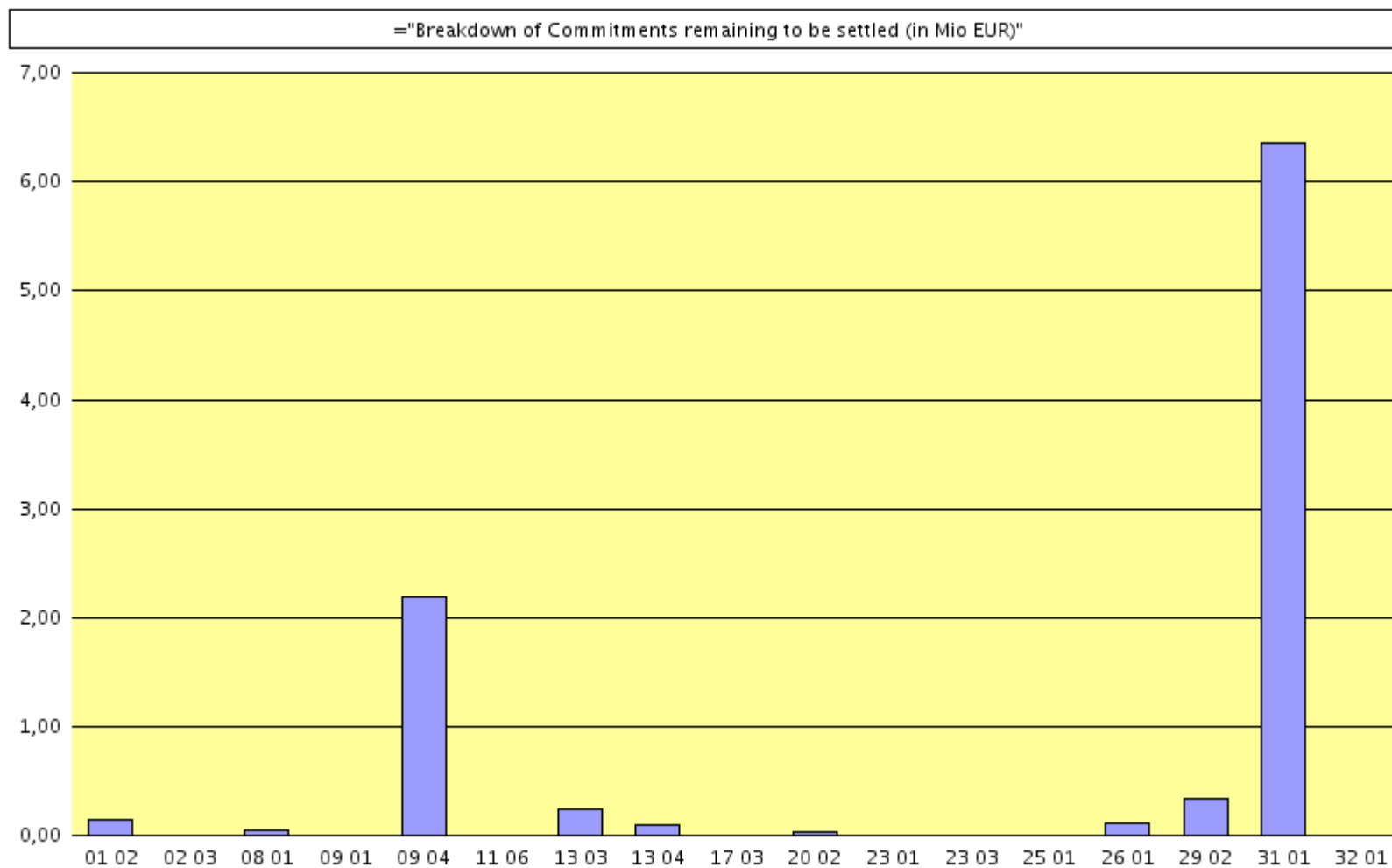
			2018 Commitments to be settled				Commitments to be settled from	Total of commitments to be settled at end	Total of commitments to be settled at end
Chapter			Commitments 2018	Payments 2018	RAL 2018	% to be settled	financial years previous to 2018	of financial year 2018	of financial year 2017
			1	2	3=1-2	4=1-2/1	5	6=3+5	7
13	13 04	Cohesion Fund (CF)	0,11	0,00	0,11	100,00 %	0,00	0,11	0,00
Total Title 13			0,35	0,00	0,35	100,00%	0	0,35	0
Title 17 : Health and food safety									
17	17 03	Public health	0,03	0,03	0	0,00 %	0,00	0,00	0,00
Total Title 17			0,03	0,03	0	0,00%	0	0	0
Title 20 : Trade									
20	20 02	Trade policy	0,07	0,03	0,04	61,25 %	0,00	0,04	0,06
Total Title 20			0,07	0,03	0,04	61,25%	0	0,04	0,06
Title 23 :									
23	23 01	Administrative expenditure of the 'Humanitarian aid and civil protection' policy area	0	0,00	0	0,00 %	0,00	0,00	0,00
	23 03	The Union Civil Protection Mechanism	0	0,00	0	0,00 %	0,00	0,00	0,33
Total Title 23			0	0,00	0	0,00%	0	0	0,33
Title 25 : Commission's policy coordination and legal advice									
25	25 01	Administrative expenditure of the 'Commission's policy coordination and legal advice' policy area	0,05	0,05	0	0,31 %	0,00	0,00	0,04
Total Title 25			0,05	0,05	0	0,31%	0	0	0,04
Title 26 : Commission's administration									
26	26 01	Administrative expenditure of the 'Commission's administration' policy area	0,13	0,02	0,12	88,54 %	0,00	0,12	0,00
Total Title 26			0,13	0,02	0,12	88,54%	0	0,12	0

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Chapter			2018 Commitments to be settled				Commitments to be settled from	Total of commitments to be settled at end	Total of commitments to be settled at end
			Commitments 2018	Payments 2018	RAL 2018	% to be settled	financial years previous to 2018	of financial year 2018	of financial year 2017
			1	2	3=1-2	4=1-2/1	5	6=3+5	7
Title 29 : Statistics									
29	29 02	The European statistical programme	0,35	0,00	0,35	98,84 %	0,00	0,35	0,04
Total Title 29			0,35	0,00	0,35	98,84%	0	0,35	0,04
Title 31 : Language services									
31	31 01	Administrative expenditure of the 'Language services' policy area	67,93	61,58	6,35	9,35 %	0,00	6,35	4,48
Total Title 31			67,93	61,58	6,35	9,35%	0	6,35	4,48
Title 32 : Energy									
32	32 01	Administrative expenditure in the 'Energy' policy area	0,22	0,22	0	0,00 %	0,00	0,00	0,00
Total Title 32			0,22	0,22	0	0,00%	0	0	0
	Total DG SCIC		73,33	63,74	9,6	13,09 %	0	9,6	5,85

Note : The figures are those related to the provisional accounts and not yet audited by the Court of Auditors



Note : The figures are those related to the provisional accounts and not yet audited by the Court of Auditors

TABLE 4 : BALANCE SHEET SCIC

BALANCE SHEET	2018	2017
A.I. NON CURRENT ASSETS	1.088.287,98	1.793.570,46
A.I.1. Intangible Assets	0,00	0,00
A.I.2. Property, Plant and Equipment	1.088.287,98	1.793.570,46
A.II. CURRENT ASSETS	23.325.872,72	24.980.835,53
A.II.2. Current Pre-Financing	312.318,27	372.507,65
A.II.3. Curr Exch Receiv & Non-Ex Recoverables	23.013.554,45	24.608.327,88
A.II.6. Cash and Cash Equivalents	0,00	0,00
ASSETS	24.414.160,7	26.774.405,99
P.II. CURRENT LIABILITIES	-24.824.243,38	-27.969.268,82
P.II.2. Current Provisions	0,00	0,00
P.II.4. Current Payables	-2.279.143,64	-4.022.341,64
P.II.5. Current Accrued Charges & Defrd Income	-22.545.099,74	-23.946.927,18
LIABILITIES	-24.824.243,38	-27.969.268,82
NET ASSETS (ASSETS less LIABILITIES)	-410.082,68	-1.194.862,83
P.III.2. Accumulated Surplus/Deficit	-169.972.504,90	-134.577.407,56
Non-allocated central (surplus)/deficit*	170.382.587,58	135.772.270,39
TOTAL	0,00	0,00

It should be noted that the balance sheet and statement of financial performance presented in Annex 3 to this Annual Activity Report, represent only the assets, liabilities, expenses and revenues that are under the control of this Directorate General. Significant amounts such as own resource revenues and cash held in Commission bank accounts are not included in this Directorate General's accounts since they are managed centrally by DG Budget, on whose balance sheet and statement of financial performance they appear. Furthermore, since the accumulated result of the Commission is not split amongst the various Directorates General, it can be seen that the balance sheet presented here is not in equilibrium.

Additionally, the figures included in tables 4 and 5 are provisional since they are, at this date, still subject to audit by the Court of Auditors. It is thus possible that amounts included in these tables may have to be adjusted following this audit.

TABLE 5 : STATEMENT OF FINANCIAL PERFORMANCE SCIC

STATEMENT OF FINANCIAL PERFORMANCE	2018	2017
II.1 REVENUES	-92.366.851,19	-97.234.760,94
II.1.1. NON-EXCHANGE REVENUES	-12.801.192,35	-12.501.737,84
II.1.1.6. OTHER NON-EXCHANGE REVENUES	-12.801.192,35	-12.501.737,84
II.1.2. EXCHANGE REVENUES	-79.565.658,84	-84.733.023,1
II.1.2.2. OTHER EXCHANGE REVENUE	-79.565.658,84	-84.733.023,10
II.2. EXPENSES	65.565.079,64	61.839.663,6
II.2. EXPENSES	65.565.079,64	61.839.663,6
II.2.10. OTHER EXPENSES	62.780.655,17	57.081.708,31
II.2.2. EXP IMPLM BY COMMISS&EX.AGENC	2.784.102,36	5.120.003,80
II.2.6. STAFF AND PENSION COSTS	0,00	-362.250,00
II.2.8. FINANCE COSTS	322,11	201,49
STATEMENT OF FINANCIAL PERFORMANCE	-26.801.771,55	-35.395.097,34

The data displayed in SCIC's financial statements does not reflect yet the closure and correction bookings that are in the process of being posted by DG Budget.

The accounting situation presented in the Balance Sheet and Statement of Financial Performance does not include the accruals and deferrals calculated centrally by the services of the Accounting Officer.

It has to be noted that the amount presented as 'Current Accrued Charges and Deferred Income' corresponds to the balances of the suspense accounts of the European Parliament and the Court of Justice. These accounts are used to make payments to freelance interpreters on behalf of these Institutions. The balance at year-end (EUR -22,545,099.74) reflects the amount that is still available for making necessary payments. When all payments related to a budget year are performed, the remaining balance is returned to the corresponding institution. Also related to these accounts, EUR 22,500,000.00 is part of 'Curr Exch Receiv & Non-Ex Recoverables' and it is the result of a recovery order issued but not cashed at year-end on the Parliament's suspense account.

It should be noted that the balance sheet and statement of financial performance presented in Annex 3 to this Annual Activity Report, represent only the assets, liabilities, expenses and revenues that are under the control of this Directorate General. Significant amounts such as own resource revenues and cash held in Commission bank accounts are not included in this Directorate General's accounts since they are managed centrally by DG Budget, on whose balance sheet and statement of financial performance they appear. Furthermore, since the accumulated result of the Commission is not split amongst the various Directorates General, it can be seen that the balance sheet presented here is not in equilibrium.

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TABLE 5bis : OFF BALANCE SHEET SCIC

OFF BALANCE	2018	2017
OB.3. Other Significant Disclosures	-952,28	-952,28
OB.3.5. Operating lease commitments	-952,28	-952,28
OB.4. Balancing Accounts	952,28	952,28
OB.4. Balancing Accounts	952,28	952,28
OFF BALANCE	0,00	0,00

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Additionally, the figures included in tables 4 and 5 are provisional since they are, at this date, still subject to audit by the Court of Auditors. It is thus possible that amounts included in these tables may have to be adjusted following this audit.

TABLE 6: AVERAGE PAYMENT TIMES FOR 2018 - DG SCIC

Legal Times							
Maximum Payment Time (Days)	Total Number of Payments	Nbr of Payments within Time Limit	Percentage	Average Payment Times (Days)	Nbr of Late Payments	Percentage	Average Payment Times (Days)
30	1451	1398	96,35 %	14,34	53	3,65 %	47,43
60	19	17	89,47 %	32	2	10,53 %	62

Total Number of Payments	1470	1415	96,26 %		55	3,74 %	
Average Net Payment Time	15,8			14,55			47,96
Average Gross Payment Time	17,22			15,74			55,42

Suspensions							
Average Report Approval Suspension Days	Average Payment Suspension Days	Number of Suspended Payments	% of Total Number	Total Number of Payments	Amount of Suspended Payments	% of Total Amount	Total Paid Amount
0	20	106	7,21 %	1470	1.015.177,93	5,15 %	19.727.475,90

Late Interest paid in 2018			
DG	GL Account	Description	Amount (Eur)
SCIC	65010100	Interest on late payment of charges New FR	322,11
			322,11

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TABLE 7 : SITUATION ON REVENUE AND INCOME IN 2018

Chapter		Revenue and income recognized			Revenue and income cashed from			Outstanding balance
		Current year RO	Carried over RO	Total	Current Year RO	Carried over RO	Total	
		1	2	3=1+2	4	5	6=4+5	
40	MISCELLANEOUS TAXES AND DEDUCTIONS	12.801.192,35	0	12.801.192,35	12.801.192,35	0	12.801.192,35	0
57	OTHER CONTRIBUTIONS AND REFUNDS IN CONNECTION WITH THE ADMINISTRATIVE OPERATION OF THE INSTITUTION	80.593.660,03	282.464,2	80.876.124,23	80.115.344,03	282.464,2	80.397.808,23	478.316
Total DG SCIC		93.394.852,38	282.464,2	93.677.316,58	92.916.536,38	282.464,2	93.199.000,58	478.316

Note : The figures are those related to the provisional accounts and not yet audited by the Court of Auditors

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TABLE 8 : RECOVERY OF PAYMENTS
(Number of Recovery Contexts and corresponding Transaction Amount)

Year of Origin (commitment)	Total undue payments recovered		Total transactions in recovery context (incl. non-qualified)		% Qualified/Total RC	
	Nbr	RO Amount	Nbr	RO Amount	Nbr	RO Amount
2017			2	13.502,49		
No Link			160	78.837.539,54		
Sub-Total			162	78.851.042,03		

EXPENSES BUDGET	Error		Irregularity		OLAF Notified		Total undue payments recovered		Total transactions in recovery context (incl. non-qualified)		% Qualified/Total RC	
	Nbr	Amount	Nbr	Amount	Nbr	Amount	Nbr	Amount	Nbr	Amount	Nbr	Amount
INCOME LINES IN INVOICES												
NON ELIGIBLE IN COST CLAIMS												
CREDIT NOTES			41	213.796,83			41	213.796,83	96	808.215,38	42,71%	26,45%
Sub-Total			41	213.796,83			41	213.796,83	96	808.215,38	42,71%	26,45%
GRAND TOTAL			41	213.796,83			41	213.796,83	258	79.659.257,41	15,89%	0,27%

Note : The figures are those related to the provisional accounts and not yet audited by the Court of Auditors. The provisional closure will be based on the recovery context situation at 31/01/2017.

TABLE 9: AGEING BALANCE OF RECOVERY ORDERS AT 31/12/2018 FOR SCIC

	Number at 1/01/2018	Number at 31/12/2018	Evolution	Open Amount (Eur) at 1/01/2018	Open Amount (Eur) at 31/12/2018	Evolution
2017	8		-100,00 %	24.582.464,20		-100,00 %
2018		10			22.978.316,00	
	8	10	25,00 %	24.582.464,20	22.978.316,00	-6,53 %

TABLE 10 : RECOVERY ORDER WAIVERS IN 2018 >= EUR 60.000

	Waiver Central Key	Linked RO Central Key	RO Accepted Amount (Eur)	LE Account Group	Commission Decision	Comments
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Total DG SCIC	
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Number of RO waivers	
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There are no waivers below 60 000 €

None of your Recovery Order Waivers (if any) reaches EUR 60.000

TABLE 11 : CENSUS OF NEGOTIATED PROCEDURES - DG SCIC - 2018**Internal Procedures > € 60,000**

Negotiated Procedure Legal base	Number of Procedures	Amount (€)
Annex 1 - 11.1 (b) - Artistic/technical reasons or exclusive rights (technical monopoly, captive market)	3	760.550,36
Art. 134.1(b) (Without prior publication) Technical or artistic reasons, or reasons connected with the protection of exclusive rights	2	182.911,51
Art. 134.1(b) (Without prior publication) Work of art, technical reasons or protection of exclusive rights	2	139.116,93
Total	7	1.082.578,80

TABLE 12 : SUMMARY OF PROCEDURES OF DG SCIC EXCLUDING BUILDING CONTRACTS

Internal Procedures > € 60,000

Procedure Legal base	Number of Procedures	Amount (€)
Exceptional Negotiated Procedure without publication of a contract notice (Art. 134 RAP)	4	322.028,44
Negotiated procedure middle value contract (Annex 1 - 14.2)	1	67.949,60
Negotiated Procedure with at least five candidates below Directive thresholds (Art. 136a RAP)	4	373.758,50
Negotiated procedure without prior publication (Annex 1 - 11.1)	3	760.550,36
Open Procedure (Art. 127.2 RAP)	1	600.000,00
Total	13	2.124.286,90

DG Interpretation has a relatively high percentage of negotiated procedures compared to other Directorates General. The underlying reason is that SCIC manages the organisation of conferences on budget lines co-delegated by other DGs and in this area faces situations of limited availability of suitable contractors.

TABLE 13 : BUILDING CONTRACTS

Legal base	Contract Number	Contractor Name	Description	Amount (€)

TABLE 14 : CONTRACTS DECLARED SECRET

LC Responsible Organi	LC Contract/Grant Type	LC Date	Legal base	Contract Number	Contractor Name	Description	Amount (€)

TABLE 15 : FPA duration exceeds 4 years - SCIC

None of your FPA (if any) exceeds 4 years