AML Return – Completion Guide: Private Trust Companies & Restricted Trust Companies

Document version: 1.0

Revision History:

Effective Date	Version Number	Revision Description
7 September 2026	1.0	Initial release of document.

Contents

1 INTRODUCTION

The Monetary Authority Act (2020 Revision) (the "**MAA**") prescribes the principal functions of the Cayman Islands Monetary Authority (the "Authority"), including regulating and supervising financial services business carried on in or from within the Islands in accordance with the MAA and the regulatory laws, and monitoring compliance with the Anti-Money Laundering Regulations (2025 Revision) (the "**AMLRs**") pursuant to Sections 6(1)(b)(i), and (ii) of the MAA, respectively. In addition, Section 6(2) of the MAA requires the Authority in performing its principal functions to, among other things, act in the best economic interest of the Islands and promote and maintain a sound financial system and grants it such ancillary powers as may be required to fulfil its functions. Ensuring that regulated entities comply with the AMLRs when providing financial services is therefore an important jurisdictional matter to ensure that the Cayman Islands remains a financial centre of choice and that the financial system within the Islands is one that is strong and trusted.

In order to obtain the information necessary to discharge its principal functions, particularly that of monitoring compliance with the AMLRs, the Authority periodically undertakes sectoral ML/TF/PF risk assessments as part of its risk-based approach to AML/CFT supervision of regulated financial service providers ("FSPs"). In conducting sectoral ML/TF risk assessments and other related research, the Authority uses a software called Strix to distribute the AML Return to FSPs and further collect, analyse, model, and score ML/TF/PF and Sanctions risk data.

FSPs are required to provide this data by completing the AML Return Form and submit it through the Authority's web-based e-mail return software, to the Anti-Money Laundering Division ("AMLD"). The AML Return Form is issued in accordance with Regulation 53A of the AMLRs, pursuant to which the Authority may require a FSP to provide any information that the Authority reasonably requires in connection with the exercise of its functions. Requiring FSPs to provide the information by completing this AML Return is necessary to ensure that the Authority has the requisite information necessary to perform its functions as outlined in Section 6 of the MAA, which includes the monitoring of compliance with the AMLRs.

This Guide provides instructions and support to FSPs which carry out trust business for accessing, completion, and submission of the AML Return.

Please note that in accordance with Regulation 53B(1) of the AMLRs, failure to provide the requested information may amount to a criminal offence pursuant to Regulation 56 of the AMLRs and/or result in the imposition of an administrative fine of up to $1,000,000 for a corporate body or $100,000 for an individual, pursuant to Sections 42A, and 42B(4) of the MAA.

2 FORM INFORMATION

The AML Return – PTC and RTC Form is to be completed by each FSP holding a PTC Registration or a Restricted Trust Licence, who are commonly referred to as the "Entity" for purposes of this form.

The AML Return – PTC & RTC Form is made up of two (2) sections for collecting AML risk data: 1) the AML Inherent Risks; and 2) AML Controls.

3 ACCESSING AND SUBMITTING THE AML RETURN

3.1 ACCESS TO THE AML RETURN

Entities will receive an invitation to the web-based Return by email using the current email contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient's email address and cannot be shared or forwarded. Clicking on the link provided in the invitation email will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation email.

Logging into the Strix portal is then accomplished by clicking on the 'Return Home' button available immediately after activating, or via the link provided in the confirmation email. Account Login is only possible using a two-factor verification code which will be sent by email to the individual. If an Entity has multiple points of contact on file, they will all have joint access to the same Return.

The Authority is using the following entity contacts to distribute the AML Return: Anti-Money Laundering Compliance Officer ("AMLCO"), Money Laundering Reporting Officer ("MLRO"), Deputy Money Laundering Reporting Officer ("DMLRO"), and any other additional contacts, upon request from the Entity. If an entity is unsure of the current contact details the Authority has on record, they can contact the Authority at AMLReturns@cima.ky.

To access the AML Return:

1. When the AML Return is distributed from STRIX, the recipients will receive an invitation email from "Cayman Islands Monetary Authority" with the address AMLDoNotReply@cima.ky. The email will request the recipient to 'Confirm Account'. The recipient should click on the 'Confirm Account' button, which will redirect the recipient to the activation page using their default browser. A modern browser (e.g. MS Edge, Chrome, Safari) should be used for security purposes.

Cayman Islands Monetary Authority

In accordance with our duties under section 6(b)(ii) of the Monetary Authority Act, the Authority requires the entity to complete the following AML/CFT/CFP and Sanctions survey.

Survey Name: **Securities AML/CFT Survey**

Submission Deadline: **15 September 2022, 23:59 (UTC-05:00) Bogota, Lima, Quito, Rio Branco**

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

The following link provides steps to **activate your account**:

Confirm Account

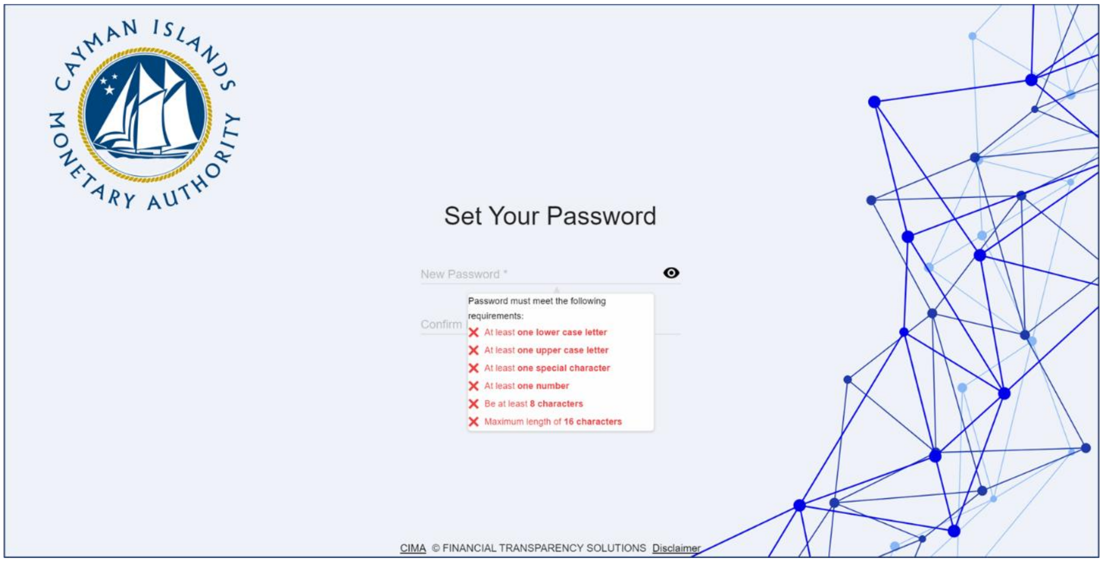
If the above button is not clickable, try clicking the URL or copying and pasting the URL below into the address bar of your web browser.

https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLl86VZVCRbBxrnmm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYSoP%2Bk8rPURRSVrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhATaTNSa3iE3aiA%3D

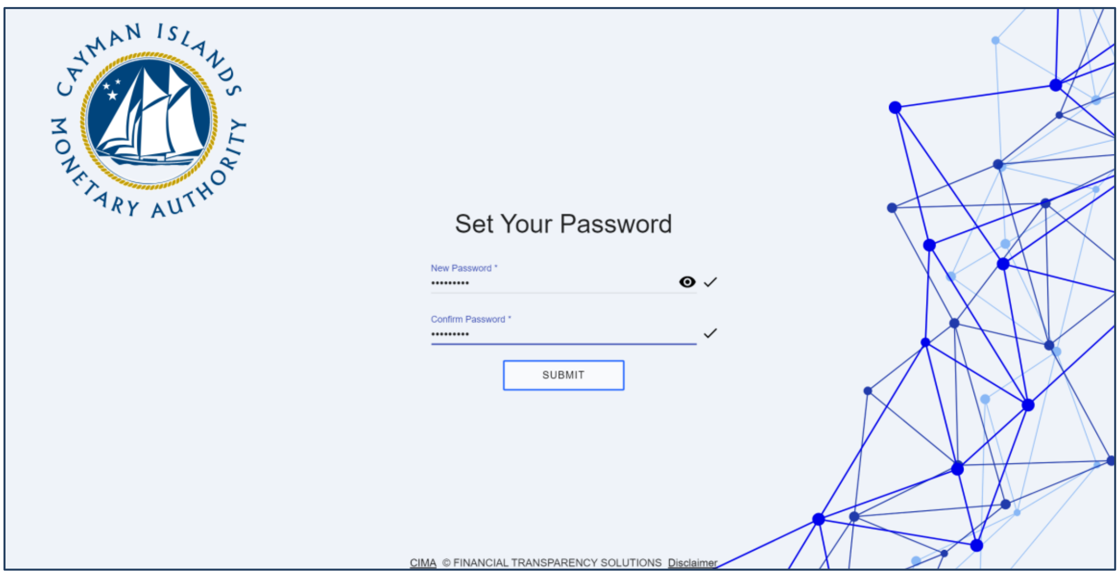
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

Please do not reply to this email, it is automatically generated.

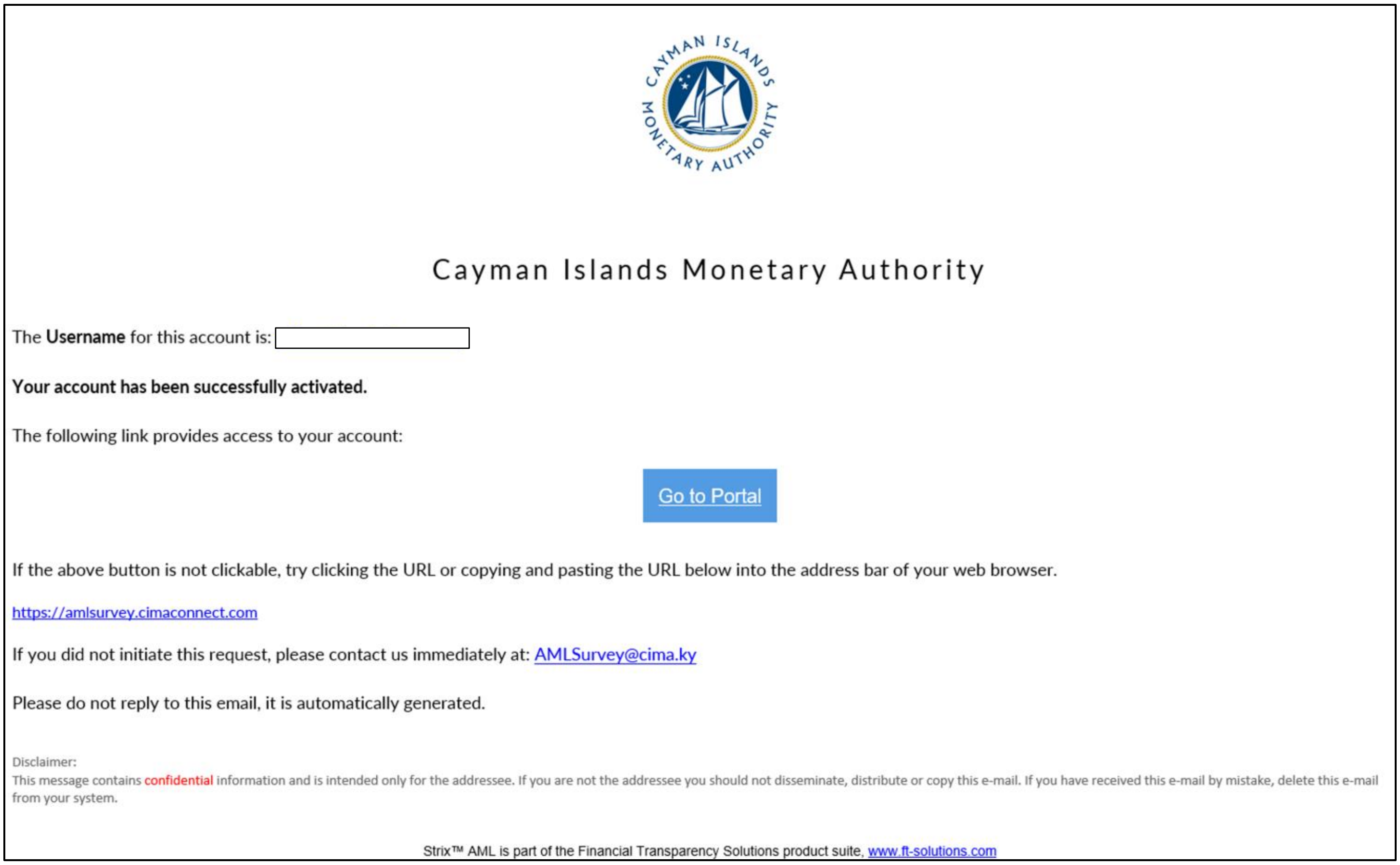
2. The recipient will then be asked to create a password which should include at least one uppercase letter, lowercase letter, number, and a special character. The password is required to be between 8 and 16 characters long.



3. The recipient will be asked to re-enter their password.



4. Once the recipient's password has been re-entered, and matches, they can submit and finish the activation process. An email "Notification of Successful Activation" will be sent providing a 'Go to Portal' link which can be used for all future access.



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

Go to Portal

If the above button is not clickable, try clicking the URL or copying and pasting the URL below into the address bar of your web browser.

https://amlsurvey.cimaconnect.com

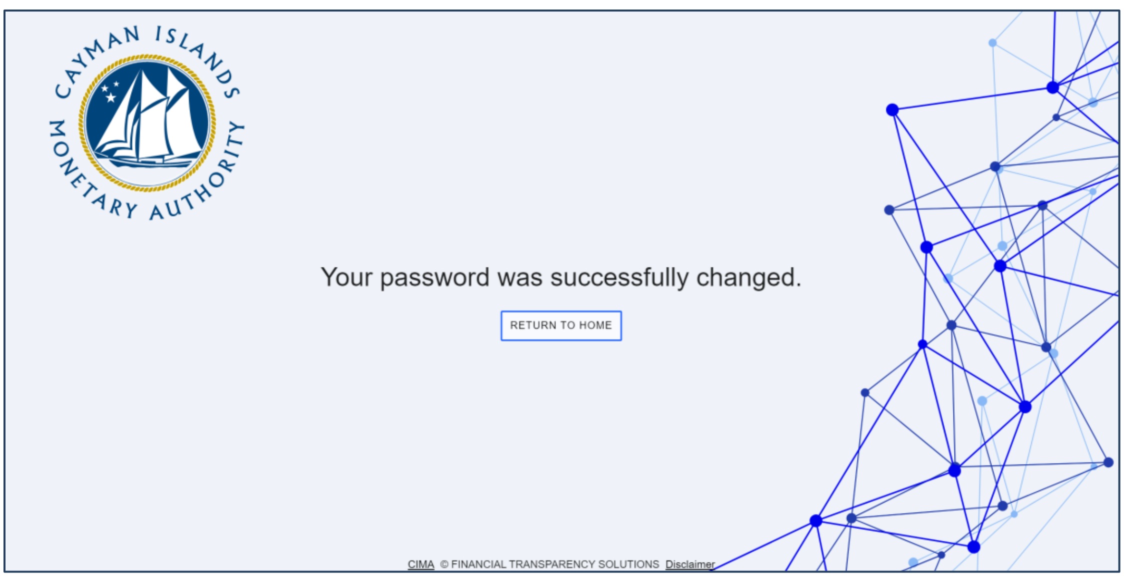
If you did not initiate this request, please contact us immediately at: AMLSurvey@cima.ky

Please do not reply to this email, it is automatically generated.

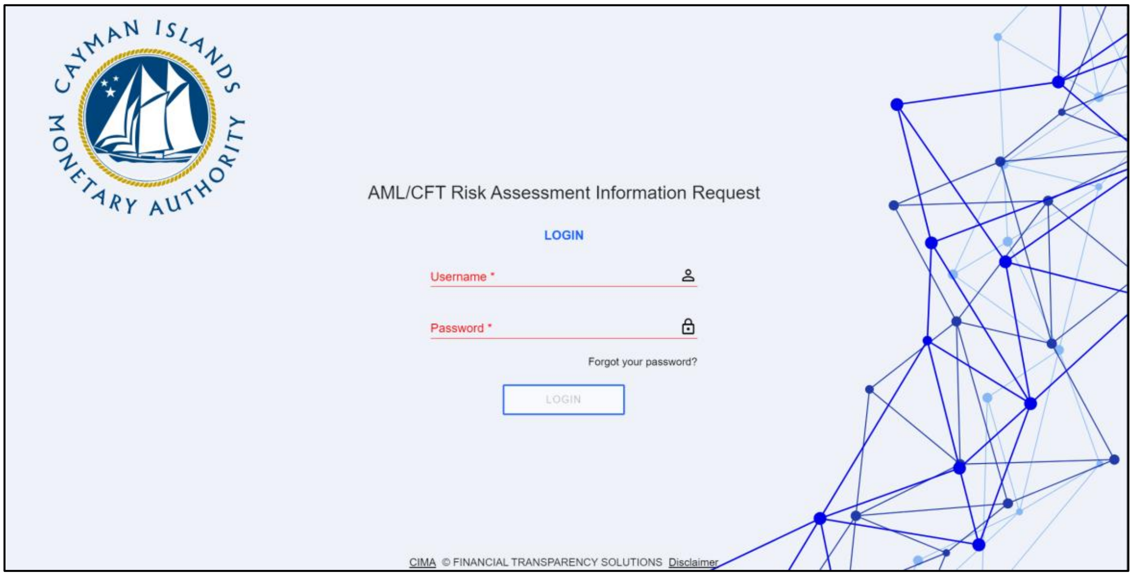
Disclaimer:
This message contains confidential information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

Strix™ AML is part of the Financial Transparency Solutions product suite, www.ft-solutions.com

5. The user should then click on the 'Return To Home' button.



6. The recipient should then enter their username, which is their email address where they received the AML Return invite, and the password they just created.



7. A six digit two-factor authentication code will be sent to the Return recipient's email address.

Cayman Islands Monetary Authority

A request has been received for a two-factor authentication (2FA) code. This code is valid for **10 minutes**.

Your **2FA code** for this account is:

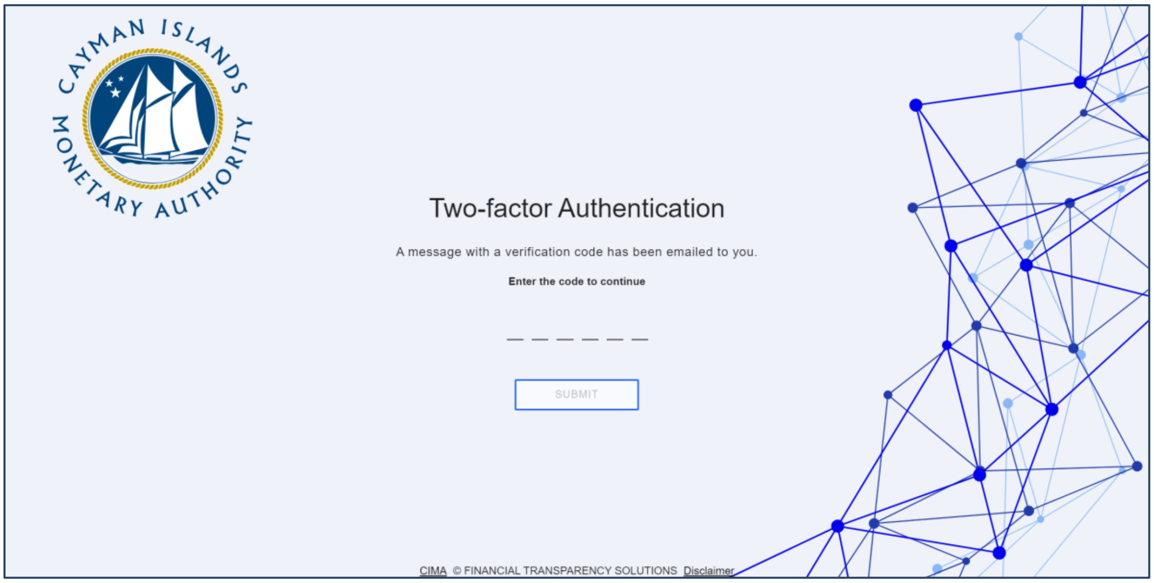
951247

If you did not initiate this request, please contact us immediately at: AMLSurvey@cima.ky

Please do not reply to this email, it is automatically generated.

Disclaimer:
This message contains confidential information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted.



9. Click 'Open' to access the AML Return request. If a Return recipient is a contact for two (2) or more FSPs, or where an Entity has two or more licences or registrations, related Returns will be listed here for the recipient to view and access.

3.2 COMPLETING THE AML RETURN FORM

1. Click the Current Questionnaire to access the AML Return Form and start populating the form with the required data.

    a. Completion guidance for the AML Return is available at section 5 of this Guide below.

    b. The recipient(s) can open, update, and close the AML Return as many times as needed prior to the Return's due date so long as the recipient selects 'Save'.

    c. Once the AML Return has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.

    d. Users should note that the Return does not have Excel import functionality. However, the Entity may utilise the XBRL functionality to assist in completing the Return. The Strix XBRL User Guide is published on the Authority's website and can be accessed at: https://www.cima.ky/cima-releases-strix-xbrl-overview-user-guide.

    e. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the Return name will be listed for verification, which is useful for instances where users are submitting for more than one entity.

    f. Once the AML Return is 'Submitted' an Excel and PDF copy of the completed Return will be available under 'Current Questionnaire'.

    g. Upon submission to the Authority a review of the AML Return will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Return through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.

2. If a user receives or has access to more than one Return, they will see the additional Return(s) in the 'Current Returns' section of the web page. At the top of the page, where it shows the Entity's name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

In the event the AML Return recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An email will be sent to the user identifying that they will not be able to log in. There are three (3) stages of lock out: 1) locked out for five (5) minutes; 2) locked out for ten (10) minutes; and, 3) if the user persists, locked out permanently.

To avoid being locked out, if the user fails to remember their password, they should update their password on the login page.

If the user is permanently locked out, they should contact AMLReturns@cima.ky to request having their account re-activated.

4.2 INTERNET BROWSER

Users should be aware that the AML Return will not open using the legacy Windows Explorer browser or with outdated Windows operating systems for security purposes. If the user's browser is defaulted to Explorer, the link should be copied and opened in Chrome, Edge, Safari, or another modern browser.

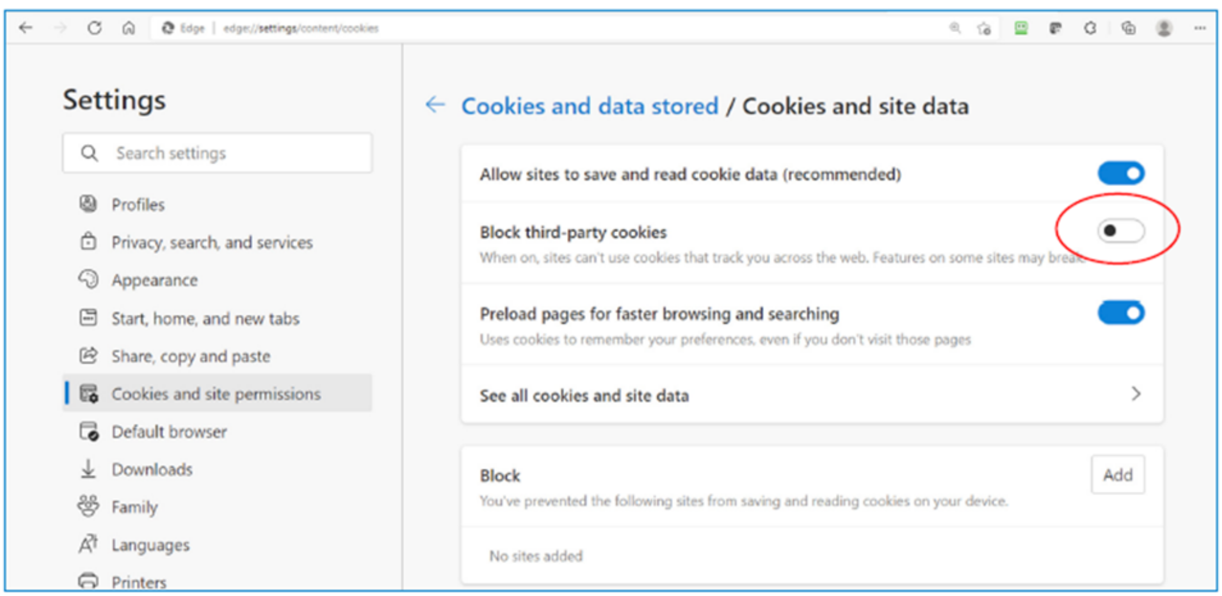
4.3 TWO-FACTOR AUTHENTICATION

Due to the security permissions around the two-factor authentication, the invite to the AML Return, or the access to the portal, cannot be shared with uninvited recipients. If entities wish to add additional users to assist with completing or reviewing the form, they can contact AMLReturns@cima.ky.

If an Entity's recipient is set up as a contact to the STRIX portal but they are not receiving their two-factor authentication code, they should attempt the following prior to contacting AMLReturns@cima.ky:

1) Check the date / time settings of the individual's computer and be sure they are set to 'Automatic'.
2) Try a different browser on the same computer (a secure modern browser is required – Chrome, Edge, Safari, Firefox).
3) Ensure that amldonotreply@cima.ky is not blocked by the individual / entity's network security.
4) Check that third party cookies are allowed:

Example of Microsoft Edge Cookie Setting:



4.4 USING EXCEL

The Strix portal allows you to copy two-column lists from an Excel document and paste the data directly into the Return. Given that there are several questions in the Return that require country breakdown details, the ability to bulk paste into Strix will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following:

a. *Open an Excel spreadsheet and using 2 columns – enter the question responses (number or value) in the first column and the country details (ISO code or name) in the second column.*
b. *Highlight and copy the information from the 2 columns in Excel, select the upload button next to the relevant question in Strix and then paste the data into the pop-up window.*
c. *Select 'Add' to upload the desired data into the Return form, or 'Clear' to remove the data.*

Note: Individual items may also be removed from the list by clicking on the delete button, next to the respective country, on the list.

4.5 PARTIAL OR INCOMPLETE RETURN SUBMISSIONS

Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. Prior to submitting an 'Incomplete' AML Return, the Entity is required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLReturns@cima.ky detailing the following:

a. *Licence or Registration Name*
b. *Licenced or Registration Number*
c. *Date of Licence or Registration*
d. *List of current directors*
e. *Number of Clients*
f. *Reason for requesting to make an Incomplete Submission.*

4.6 DATA AND SECURITY

The AML Return, the auto-generated communication from STRIX, and the data collected from FSPs in the AML Return are all maintained on-premises on the Authority's server systems. The Authority continues to use the same firewalls and data protection protocols that are deployed for the REEFs portal and other applications.

NOTE: The Authority encourages entities to save a copy of their submitted AML Return for their own record keeping purposes, since the Authority does not maintain copies of historical Returns for supervised entities. Additionally, as per the Authority's data management policy, submissions for terminated entities will not be accessible to their authorised contacts within the Strix portal.

4.7 APPLICABLE FEES

There are no fees associated with this Form.

5 AML RETURN GUIDANCE

Below are descriptions and explanations to the risk factors and controls factors which you are required to provide information on. The risk factors are used to assess Inherent ML/TF/PF and Sanctions Risks. Control factors are used to assess the AML/CFT/CPF, and Sanctions controls the entity has in place.

5.1 TERMS AND DEFINITIONS

AML Inherent Risk Factor Descriptions

Terms/Abbreviations	Definition/Meaning
AMLCO	Anti-Money Laundering Compliance Officer means the person designated in accordance with Regulation 3(1) of the Anti-Money Laundering Regulations (2025 Revision), as amended.
AMLRs	Anti-Money Laundering Regulations, (2025 Revision), as amended.
Beneficial Owner	Or ("BO") means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to — (a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person. (b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person. (c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement. *As guidance, in instances where a BO has multiple nationalities, where applicable, the entity is to disclose the nationality which could present the higher risks as referenced in Regulation 8A of the AMLRs.*
Beneficiary	In relation to a wire transfers or transfer of virtual assets, means the natural or legal person or the legal arrangement who is identified by the originator as the receiver of the requested transfer.

Client / Customer	A person who is in a business relationship or carrying out a one-off transaction with a person who is conducting relevant financial business in the Islands **and their connected persons**. Generally, for an entity that has a Trust Licence, a client is a (1) Trust Structure, which is a 'Legal Arrangement', or (2) Settlor which is a 'Natural Person', or who has engaged with the entity to form a Trust Structure. However, it is possible for an entity to have other customer types (Individual or Legal Persons and Arrangements) depending on their business plan.
Connected Person	As defined in the Schedule of Regulation 2 of Private Trust Companies Regulations (2026 Revision)
Corporate Entity	A corporate body constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Return	**United States Dollars (US$).** All other currencies must be converted to US$ unless otherwise stated using the prevailing rate of exchange as at the last day of the reporting period.
Dealers in Precious Metals and Stones	Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer ("DMLRO") means the "nominated officer" as defined in Regulation 33(2) of the AMLRs.
Eligible Introducers	A person that "introduces" applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs

	i.e., a person who falls within one of the categories under Regulation 22(1)(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Entity	For the purposes of this form/ Return, an 'entity' is the holder of the Trust Licence that is responding to this Return.
F2F	The face-to-face engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Fintech Service	Services that use innovative technology to improve, change or enhance how a financial services business is conducted but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2025 Revision), except to the extent that it is modified by the Foundation Companies Act (2025 Revision) or those foundation companies established in other jurisdictions.
FRA	The Financial Reporting Authority ("FRA") is the Cayman Islands Financial Intelligence Unit responsible for deterring, preventing and detecting money laundering, terrorist financing and the financing of proliferation.
Gov / Pub Sector	Business conducted with companies who are Government or in the public sector. Companies in which a government has a controlling interest; and in respect of such company, includes all subsidiary entities of the company.
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US$15,000 or more (or equivalent in any currency) in exchange for goods.
HNWI	For the purpose of the AML Return, a high net worth individual ("HNWI") is: (i) an individual whose net worth is approx. US$1,000,000 or its equivalent in any other currency; or

	(ii) any person that has total assets of not less than approx. US$5,000,000 or its equivalent in any other currency. HNWIs also include those clients who are Ultra HNWIs.
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it is a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Individual	A client who is a Natural Person and not a Legal Person or Legal Arrangement.
Legal Arrangement	A trust, partnership, or other Entity created between parties which lacks separate legal personality.
Legal Person	A company or other entity created by operation of law with separate legal personality.
MLRO	Money Laundering Reporting Officer "MLRO" means the "nominated officer" as defined in Regulation 33(1) of the AMLRs.
ML/TF/PF	Money Laundering/ Terrorism Financing/ Proliferation Financing.
MSB	Money services business ("MSB") means the business of providing, in or from within the Islands, any of the following services: (a) money transmission; (b) cheque cashing; (c) currency exchange; (d) the issuance, sale or redemption of money orders or traveller's cheques.
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Director	A natural person or legal person who takes on the role of company director on the behalf of another.
Nominee Shareholder	A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-Compliant Accounts	Where a person carrying out relevant financial business is unable to obtain information as

	required under Part IV of the AMLRs to satisfy relevant customer due diligence. measures.
Non-F2F	Non–Face-to-Face ("Non-F2F") is where a customer can open an account and transact with a regulated FSP without being physically present for identification purposes, at the physical premises/office of the FSP.
NPO	A company or body of persons, whether incorporated or unincorporated, or a trust – (a) established or which identifies itself as established primarily for the promotion of charitable, philanthropic, religious, cultural, educational, social or fraternal purposes, or other activities or programmes for the public benefit or a section of the public within the Islands or elsewhere; and (b) which solicits contributions or raises funds from the public or a section of the public within the Islands or elsewhere.
OSP	Outsourced Service Provider ("OSP") is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future. Outsourcing does not include purchasing contracts.
PEP	"Politically Exposed Person" includes — (a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official. (b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and (c) a person who is or has been entrusted with a prominent function by an international

	organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.
Reporting Period	January 1 through December 31 of the applicable year.
Signatories	Signatories are those persons authorised to act on behalf of a client, for example, BOs, Directors, or other Third Parties.
Source of Funds	Source of funds is the origin of the assets that will be used to form and maintain the business relationship. A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together. Take this into account when answering questions relating to the 'Nature of Business (Source of Funding)'.
Special Economic Zone Business	Any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands.
Targeted Financial Sanctions (TFS)	Includes asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").
TCSP	Includes those entities conducting Trusts, Company Manager, and Corporate Service Provider business.
Transaction	For the purposes of this Return, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction. Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated to securities trades should be excluded from the definition.

Trust		A trust is a legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
Ultra HNWIs		Ultra-High Net Worth Individuals, also referred to as UHNWIs, are all HNWIs whose net worth is greater than or equal to US$30,000,000.
Value of Client Assets		The total value of assets held for or on behalf of customers. Client assets include monies belonging to customers held in savings, chequing/current accounts, fixed/time deposit accounts, and investment portfolios or custody services.
Virtual Assets Products and Services		Includes those services identified within the Virtual Asset (Service Providers) Act (2024 Revision), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.
Timeframe	Assets Under Management	Value of AUM **as at the end of the reporting period**.
Timeframe	Number of Clients	Number of clients **as at the end of the reporting period**.
Timeframe	Value of Transactions	Value of transactions conducted for clients ***during* the reporting period.**
Timeframe	Number of Transactions	Number of Transactions conducted **during the reporting period.**

AML Inherent Risk Questions:

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total number of clients / Connected Persons.	Enter the total number of clients / connected persons the entity has at the end of the reporting period. Total clients / connected persons consist of natural persons and legal persons and arrangements.

1.1.2	2	Total Number of Transactions for the reporting period.	Enter the total number of all transactions conducted for clients / connected persons during the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.3	3	Total Value of Client Assets Under Management, by geographic location of the assets, at the end of the reporting period - Monetary Value $$	Enter the total value of client assets for clients reported in Question 1, by geographic location of the assets, at the end of the reporting period. This is a monetary value $$ If an entity does not manage assets for its clients, a '0' value should be used.
1.1.4	4	Clients / Connected Persons that are Legal Persons, broken down by country of incorporation of the client.	Enter the total number of clients/ connected persons that are legal persons broken down by country of incorporation as at the end of the reporting period. If an entity does not have such clients, a '0' value should be used.
1.1.5	5	Value of Client Assets Under Management - Legal Persons - broken down by the geographic location of the assets, at the end of the reporting period - Monetary Value $$	Enter the value of assets under management for clients who are Legal Persons, at the end of the reporting period. If the entity does not have any clients that fit this category, record a '0'.
1.1.6	6	Clients / Connected Persons that are Legal Arrangements, broken down by country of establishment of the client.	Enter the total number of clients / connected persons that are legal arrangements, broken down by country of establishment of the client, at the end of the reporting period. Examples of legal arrangements include but are not limited to Partnerships and Trusts. If an entity does not manage assets for these clients, a '0' value should be used.
1.1.7	7	Value of Client Assets Under Management - Legal Arrangements - broken down by the geographic location of the client assets, at the end of the reporting period.	Enter the value of assets under management for clients who are Legal Arrangements, at the end of the reporting period.

			If the entity does not have any clients that fit this category record a '0'.
1.1.8	8	Does the entity have any clients / connected persons who are not Legal Persons?	Please answer 'Yes' or 'No'.
1.1.9	9	Total Number of PEPs.	Enter the total number of PEPS, at the end of the reporting period. Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, BOs, Directors, or hold any other form of control, including signatories.
1.1.10	10	Total Number of High Risk Clients.	Enter the total number of clients / connected persons that are high risk, at the end of the reporting period.
1.2.1	11	Total number of BOs of clients who are Legal Persons and Legal Arrangements.	Enter the total number of BOs of all clients who are legal persons or arrangements at the end of the reporting period. This category is specific to Legal Persons and Arrangements. Examples include, but are not limited to: the total number of BOs of Corporate entities and Settlors of Trusts. A BO should not be counted more than once regardless of the number of business relationships they have with the entity.
1.2.2	12	Number of BOs of clients who are Legal Persons.	Enter the number of BOs of Legal Person clients, broken down by the nationality of the BO.
1.2.3	13	Number of settlors of clients who are Legal Arrangements.	Enter the number of settlors of legal arrangement clients, broken down by the nationality of the settlor. This category is specific to clients who are Legal Arrangements and are Trusts.
1.2.4	14	Number of clients that have Nominees acting on behalf of a BO, or a Nominee within the ownership structure, broken down by nationality of the BO.	Enter the total number of clients that have Nominees acting on behalf of a beneficial owner, or within its ownership structure, broken down by nationality of the beneficial owner.

			This category is specific to clients who are Legal Persons and Arrangements. Examples include, but are not limited to, instances where a BO of a Corporate entity or the Settlor of a Trust has a Nominee appointed. If the entity does not have any clients that fit this category record a '0'.
1.2.5	15	Number of BOs of clients who are PEPs.	Enter the total number of BOs of clients who are PEPs as at the end of the reporting period. This category is specific to clients who are Legal Persons and Legal Arrangements. Examples include, but are not limited to, instances where a BO of a Corporate entity or the Settlor of a Trust is a PEP. If the entity does not have any clients that fit this category record a '0'.
1.2.6	16	Number of clients that have BOs who are HNWIs.	Enter the total number of clients which have BOs, who are also HNWIs. HNWIs is specific to those persons whose net worth is approx. US$1,000,000 or its equivalent in any other currency, or any person that has total assets of not less than approx. US$5,000,000 or its equivalent in any other currency. HNWIs also include those clients who are Ultra HNWIs.
1.2.7	17	Number of Clients that have BOs who are Ultra HNWIs.	Enter the total number of clients who have BOs who are also Ultra HNWIs. UHNWIs is specific to those persons whose net worth is equal to or greater than US$30,000,000 or its equivalent in any other currency.
1.2.8	18	Enter the total number of PEPs within all client trust structures.	Enter the total number of PEPs that are within all client trust structures, as at the end of the reporting period.
1.3.1	19	Does the Entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.3.2	20	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are Government or Public Sector,

			broken down by government jurisdiction. If the entity does not have any clients that fit this category record a '0'.
1.3.3	21	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Government or Public Sector during the reporting period, broken down by government jurisdiction.
1.3.4	22	Gov / Pub Sector - Value of Transactions .	Enter the value of transactions processed on behalf of clients that are Government or Public Sector, during the reporting period.
1.3.5	23	Gov / Pub Sector - Value of Client Assets.	Enter the value of client assets under management of the clients that are Government or Public sector, at the end of the reporting period. If there are no client assets under management, please record '0'.
1.3.6	24	Does the Entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.3.7	25	NPOs - Value of Transactions.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.
1.3.8	26	Does the Entity have any Foundation clients?	Please answer 'Yes' or 'No'.
1.3.9	27	Foundations - Number of Clients, broken down by country of formation.	Enter the number of clients that the entity has, as at the end of the reporting period, that are Foundations, broken down by government jurisdiction.
1.4.1	28	Does the entity have any clients that are Natural Persons?	Please answer 'Yes' or 'No'. This question does not apply to clients who are Legal Persons or Legal Arrangements.
1.4.2	29	Clients / Customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period. If an entity does not have such clients, a '0' value should be used.

			Note: This category does not include clients/ customers that are Legal Persons and Legal Arrangements.
1.4.3	30	Clients / Customers that are Natural Persons, broken down by residency of the client.	Enter the number of clients that are natural persons, broken down by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a '0' value should be used. *Note: This category does not include clients/ customers that are Legal Persons and Legal Arrangements.*
1.4.4	31	Total Transactions for the reporting period for all Natural Person clients.	Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period. This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a '0' value should be used. *Note: This category does not include clients / customers that are Legal Persons and Legal Arrangements.*
1.4.5	32	Value of Assets Held Under Management for all Natural Person clients.	Please provide the value at the end of the reporting period.
1.4.6	33	Natural Person Clients - Does the entity have any clients that are PEPs?	Please answer 'Yes' or 'No'. This question does not apply to clients who are Legal Persons or Legal Arrangements.
1.4.7	34	Number of Natural Person clients who are PEPs.	Enter the total number of Natural Person clients that are PEPs, as at the end of the reporting period. This question does not apply to clients who are Legal Persons or Legal Arrangements.
1.4.8	35	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.

1.4.9	36	Value of Assets Held Under Management for Natural Person clients who are PEPs.	Enter the total value of assets under management for Natural Persons clients who are PEPs, during the reporting period.
1.4.10	37	Does the entity have any Natural Person clients that are HNWIs?	Please answer 'Yes' or 'No'. This question <u>does not</u> apply to clients who are Legal Persons or Legal Arrangements.
1.4.11	38	Number of Natural Person clients who are HNWIs.	Enter the number of Natural Person clients the entity has that are HNWIs.
1.4.12	39	Natural Person Clients - HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are HNWIs, during the reporting period.
1.4.13	40	Does the entity have any Natural Person clients who are Ultra HNWIs?	Please answer 'Yes' or 'No'. For this category, Ultra HNWIs are those natural persons with net worth equal to or greater than US$30,000,000. This question <u>does not</u> apply to clients who are Legal Persons or Legal Arrangements.
1.4.14	41	Number of Natural Person clients who are Ultra HNWIs.	Enter the number of Natural Person clients the entity has that are Ultra-HNWIs at the end of the reporting period.
1.4.15	42	Natural Person Clients - Ultra HNWIs- Number of Transactions.	Enter the number of transactions conducted by Natural Persons who are Ultra HNWIs, during the reporting period.
1.4.16	43	Does the entity have any Natural Person clients that are PEPs and HNWIs?	Please answer 'Yes' or 'No'.
1.4.17	44	Number of Natural Person Clients who are PEPs and HNWIs.	Enter the number of Natural Person clients the entity has that are both PEPs and HNWIs / Ultra HNWIs, at the end of the reporting period.
1.4.18	45	Natural Person Clients - PEPs and HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are both PEPs and HNWIs, during the reporting period.

1.5.1	46	Number of clients that have settlors who are Natural Persons broken down by nationality of the Natural Person.	Enter the total number of Settlors who are natural Persons.
1.5.2	47	Number of clients that have settlors who are Legal Persons broken down by country of incorporation of the Legal Person.	Enter the number of clients that have settlors that are Legal Persons.
1.5.3	48	Number of clients that have Nominee Settlors appointed, broken down by nationality or country of incorporation of the individual the nominee acts on behalf.	Enter the number of clients that have a Nominee Settlor appointed, broken down by nationality or country incorporation of the individual the nominee is appointed on behalf.
1.5.4	49	Number of clients that have settlors that are Trusts, broken down by country of establishment of the Trust.	Enter the number of clients that have settlors that is a Trust at the end of the reporting period.
1.5.5	50	Number of clients that have settlors that are Beneficiaries.	Enter the number of clients that have settlors that are also Beneficiaries.
1.5.6	51	Number of clients that have settlors that are PEPs.	Enter the number of clients that have settlors that are PEPs.
1.5.7	52	Number of clients that have settlors that are HNWIs.	Enter the number of clients that have Settlors that are HNWIs.
1.5.8	53	Number of clients with settlors where funds were received from a party other than the Settlor, broken down by nationality or country of incorporation of the settlor.	Enter the number of Trust clients where funds were received from a party other than the Settlor, broken down by nationality or country incorporation of the settlor.
1.6.1	54	Number of clients with Beneficiaries that are Natural Persons, broken down by nationality of the Beneficiary.	Enter the number of clients with Beneficiaries that are Natural Persons, broken down by nationality of the Beneficiary.
1.6.2	55	Number of clients with Beneficiaries that are Legal Persons, broken down by country of incorporation of the Beneficiary.	Enter the number of clients with Beneficiaries that are Legal Persons, broken down by country of incorporation of the Beneficiary.
1.6.3	56	Number of clients with Beneficiaries that are Legal Arrangements, broken down by country of formation of the Beneficiary.	Enter the number of clients with Beneficiaries that are Legal Arrangements, broken down by country of formation of the Beneficiary.

1.6.4	57	Number of clients with Beneficiaries that are PEPs.	Enter the number of clients with Beneficiaries that are PEPs.
1.6.5	58	Number of clients with Beneficiaries that are HNWIs.	Enter the number of clients with Beneficiaries that are HNWIs.
1.6.6	59	Number of clients with Beneficiaries that are Ultra HNWIs.	Enter the number of clients with Beneficiaries that are Ultra HNWIs.
1.6.7	60	Number of clients where funds are paid to a third-party on behalf of the Beneficiary, broken down by nationality or country of incorporation of the beneficiary.	Enter the number of clients where funds are paid to a third-party on behalf of the Beneficiary, or for another purpose, broken down by nationality or country of incorporation of the beneficiary. This category is specific to clients who are Trusts who made payments to a Beneficiary where the payment was remitted to a third party whether for the Beneficiary’s benefit or another purpose.
1.7.1	61	**Nature of Business / Source of Funding:** Does the Entity have clients whose source of funding falls within the list of sectors below? • Banking Institutions • Other Financial regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech • Civil Service/ Gov Employment **excluding MSBs, Virtual Asset Products and Services Providers, and TCSPs.*	Please answer ‘Yes’ or ‘No’.
1.7.2	62	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the Banking sector.
1.7.3	63	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is from the financial sector (excluding Banking, MSBs, VASPs, and TCSPs).

1.7.4	64	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from Financial Leasing operations.
1.7.5	65	Money Lending - Number of Clients.	Enter the number of clients the entity has whose source of funding is from Money Lending operations.
1.7.6	66	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Accountancy (including any of: Audit, Assurance, Bookkeeping, and Insolvency).
1.7.7	67	Fintech - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the Fintech industry.
1.7.8	68	Civil Service/ Government Employment- Number of Clients	Enter the number of clients the entity has whose source of funding is from the Civil Service/ Government industry.
1.7.9	69	**Nature of Business / Source of Funding:** ▪ Does the entity have clients whose source of funding falls within the list of sectors below: Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Service Business (MSBs) ▪ Virtual Assets Products and Services ▪ High Value Dealers ▪ Trust Service Providers, Company Managers or Corporate Service Providers (TCSPs) ▪ Import/Export Industry ▪ Shipping and Transport of Goods.	Please answer ‘Yes’ or ‘No’.
1.7.10	70	Legal Practitioners – Number of Clients	Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner.

1.7.11	71	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from Dealers in Precious Metals and Stones operations.
1.7.12	72	Money Services Business - Number of Clients.	Enter the number of clients whose source of funding is derived from Money Services Business operations.
1.7.13	73	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the virtual asset sector (products, services, or investments).
1.7.14	74	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funding is derived from High Value Dealer operations.
1.7.15	75	TCSPs - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from TCSP operations.
1.7.16	76	Import / Export - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from Import / Export business operations.
1.7.17	77	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Shipping and Transport of Goods industry.
1.7.18	78	**Nature of Business / Source of Funding:** Does the entity have clients whose source of funding falls within the list of sectors below: ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry	Please answer ‘Yes’ or ‘No’.

1.7.19	79	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers)?
1.7.20	80	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from the Gambling Industry (including online gambling).
1.7.21	81	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Adult Entertainment Industry.
1.7.22	82	Defence Industry - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Defence industry.
1.7.23	83	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from operating in the Oil and Gas industry.
1.7.24	84	Mining Industry - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Mining Industry.
1.7.25	85	Construction / Development - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from operating in the Construction / Development industry.
1.7.26	86	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived in the Retail & Restaurant Business.
1.7.27	87	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients whose source of funding is derived from Cannabis Production & Distribution operations.
1.7.28	88	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has whose source of funding is Unknown to the entity. Unknown businesses and professions are where the entity does not know, was not

			provided with, and was unable to verify, the nature of business or profession (source of funds) of the client.
1.7.29	89	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has whose source of funding is known businesses however not mentioned above.
1.8.1	90	**Source of Funds – Value of Client Assets:** Does the entity have client assets under management which the source of funds was derived from the following categories: ▪ Banking Institutions ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech ▪ Civil Service/ Gov Employment **excluding MSBs, Virtual Asset Products and Services, and TCSPs.*	Please answer 'Yes' or 'No'.
1.8.2	91	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from the Banking Institutions (excluding MSBs).
1.8.3	92	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds is derived from 'Other Financial Regulated Business' and not the following: banking, MSBs, VASPs, and TCSPs.
1.8.4	93	Financial Leasing - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Financial Leasing operations. Legal persons that are operating in Financial Leasing or natural persons employed in the Financial Leasing business.
1.8.5	94	Money Lending- Value of Client Assets.	Enter the value of client assets under management of clients

			whose source of funds are derived from Money Lending operations.
1.8.6	95	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived through Accountant operations (Audit / Assurance / Bookkeeping / Insolvency).
1.8.7	96	Fintech - Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds are derived through the Fintech industry. Legal persons that are operating in the Fintech industry or natural persons employed in the Fintech industry.
1.8.8	97	Civil Service / Gov Employment - Value of Client Assets	Enter the value of client assets under management of the clients whose source of funds are derived through Civil Service / Gov Employment.
1.8.9	98	**Source of Funds – Value of Client Assets:** ▪ Does the entity have client assets under management which the source of funds was derived from the following categories: Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ MSBs ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ TCSPs ▪ Import/Export industry ▪ Shipping and Transport of Goods	Please answer ‘Yes’ or ‘No’.
1.8.10	99	Legal Practitioners – Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funding is derived from Legal Practitioner operations. Legal persons or arrangements operating as Legal Practitioners or natural persons employed by Legal Practitioners.

1.8.11	100	Dealers in Precious Metals and Stones – Value of Client Assets	Enter the value of client assets under management of clients whose source of funding is derived from Dealers in Precious Metals and Stones operations.
1.8.12	101	Money Services Business - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from Money Services Business operations.
1.8.13	102	Virtual Asset Products and Services - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from the virtual asset sector (products, services, and investments).
1.8.14	103	High Value Dealers - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from High Value Dealer operations.
1.8.15	104	TCSPs - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from TCSP operations.
1.8.16	105	Import / Export Industry – Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding are derived from Import / Export operations. Both from legal persons that are in the Import / Export Industry or natural persons employed by the Import / Export Industry as clients.
1.8.17	106	Shipping and Transport of Goods - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding are derived from Shipping and Transport of Goods operations.
1.8.18	107	**Source of Funds – Value of Client Assets:** Does the entity have client assets under management, which the	Please answer ‘Yes’ or ‘No’.

		source of funds was derived from the following categories: ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry	
1.8.19	108	Real Estate Agents / Brokers - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from the Real Estate industry (Agents, Brokers, and Sellers).
1.8.20	109	Gambling Business (including online gambling) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from Gambling.
1.8.21	110	Adult Entertainment - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from operating in the Adult Entertainment industry.
1.8.22	111	Defence Industry - Value of Client Assets.	Enter the value of assets under management of clients whose source of funding is derived from operating in the Defence Industry.
1.8.23	112	Oil and Gas Industry - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from operating in the Oil and Gas industry.
1.8.24	113	Mining Industry - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from operating in the Mining Industry.
1.8.25	114	Construction / Development - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from operating in the Construction / Development industry.
1.8.26	115	Retail & Restaurant Business - Value of Client Assets.	Enter the value of client assets under management of clients

			whose source of funding is derived from Retail & Restaurant Business operations.
1.8.27	116	Cannabis Production & Distribution - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from operating in the Cannabis Production & Distribution business.
1.8.28	117	Industry / profession not known or not recorded - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from unknown or unrecorded Industries / Professions.
1.8.29	118	Other - Not listed above - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funding is derived from industries/ Professions not listed above.
1.9.1	119	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'. Please save your work.
1.9.2	120	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback that may be relevant, which you could not provide on the tabs above. Enter 'N/A' if no comments.
2.1.1	121	Number of clients with Discretionary Trusts.	Enter the number of clients with Discretionary Trusts, at the end of the reporting period.
2.1.2	122	Number of clients with Non-Discretionary Trusts.	Enter the number of clients with Non-Discretionary Trusts, at the end of the reporting period.
2.1.3	123	Number of clients with Star Trusts.	Enter the number of clients with Star Trusts, at the end of the reporting period.
2.1.4	124	Number of clients with Unit Trusts.	Enter the number of clients with Unit Trusts, at the end of the reporting period.
2.1.5	125	Number of clients with Employee Benefit Trusts.	Enter the number of clients with Employee Benefit Trusts, at the end of the reporting period.

2.1.6	126	Number of clients with Fixed Interest Trusts.	Enter the number of clients with Fixed Interest Trusts, at the end of the reporting period.
2.1.7	127	Number of clients with Charitable Trusts.	Enter the number of clients with Charitable Trusts, at the end of the reporting period.
2.1.8	128	Number of clients with Nominee Trusts.	Enter the number of clients with Nominee Trusts, at the end of the reporting period.
2.1.9	129	Number of clients with foreign law trusts, broken down by the country of trust formation.	Enter the number of clients with Foreign Law trusts, broken down by the country of trust formation, at the end of the reporting period.
2.1.10	130	Value of assets of clients who are foreign law trusts, broken down by the country of trust formation.	Enter the value of assets of foreign law trusts, broken down by the country of trust formation, at the end of the reporting period.
2.1.11	131	Number of clients with Trust Products not listed above.	Enter the number of clients with other Trust Products not listed above, at the end of the reporting period.
2.1.12	132	Please indicate the Other Trust Products.	Please detail the types of 'Other' Trust Products. Note all that apply.
2.2.1	133	Number of clients - Trustee.	Enter the number of clients the entity provides Trustee Services to, at the end of the reporting period.
2.2.2	134	Number of clients - Executor Services	Enter the number of clients the entity provides Executor Services to, at the end of the reporting period.
2.2.3	135	Number of clients – Administrator Services.	Enter the number of clients the entity provides Administrator Services to, at the end of the reporting period.
2.2.4	136	Number of clients - Protector Services.	Enter the number of clients the entity provides Protector Services to, at the end of the reporting period.
2.2.5	137	Number of clients- Enforcer Services.	Enter the number of clients the entity provides Enforcer Services

			to, at the end of the reporting period.
2.2.6	138	Number of clients - Nominee Services.	Enter the number of clients the entity provides Nominee Services to, at the end of the reporting period.
2.2.7	139	Number of clients - Registered Office Services.	Enter the number of clients the entity provides Registered Office Services to, at the end of the reporting period.
2.3.1	140	Number of clients with assets that are marine vessels within their client structure, by the nationality of the BO.	Enter the number of clients with assets that are marine vessels within their client structure, broken down by nationality of the BO.
2.3.2	141	Number of clients with assets that are marine vessels within the client structure, by jurisdiction of registration of the marine vessels.	Enter the number of clients with assets that are marine vessels within their client structure, broken down by jurisdiction of registration of the marine vessels.
2.3.3	142	Number of clients with assets that are aircraft within their client structure, by the nationality of the BO.	Enter the number of clients with assets that are aircraft within their client structure, broken down by nationality of the BO.
2.3.4	143	Number of clients with assets that are aircraft within the client structure, by jurisdiction of registration of the aircraft.	Enter the number of clients with assets that are aircraft within their client structure, broken down by jurisdiction of registration of the aircraft.
2.3.5	144	Number of clients with assets that are Real Estate assets within their client structure, by the nationality of the BO.	Enter the number of clients with real estate assets within their client structure, broken down by nationality of the BO.
2.3.6	145	Country location of the assets that are Real Estate.	Enter the number of clients with real estate assets within their client structure, broken down by country location of the real estate.
2.3.7	146	Number of clients with assets that are held as cash	Enter the number of clients with assets that are held as cash, within their client structure, broken down by nationality of the BO.
2.3.8	147	Value of Client assets that are held as cash	Enter the value of clients assets that are held as cash within their

			client structure, broken down by country location of the assets.
2.3.9	148	Number of clients with assets that are held as Securities	Enter the number of clients with assets that are held as Securities, broken down by the nationality of the BO.
2.3.10	149	Value of client assets that are held as Securities	Enter the value of clients with assets that are held as Securities, broken down by country location of the assets.
2.3.11	150	Number of clients with assets that are held as Art and Antiques	Enter the number of clients with assets that are held as Art and Antiques, broken down by the nationality of the BO.
2.3.12	151	Value of clients with assets that are held as Art and Antiques	Enter the value of clients with assets that are held as Art and Antiques, broken down by country location of the assets.
2.3.13	152	Number of clients with assets that are held as Intellectual Property	Enter the number of clients with assets that are held as Intellectual Property, broken down by the nationality of the BO.
2.3.14	153	Value of clients with assets that are held as Intellectual Property	Enter the value of clients with assets that are held as Intellectual Property, broken down by country location of the assets.
2.3.15	154	Number of clients with assets that are held as Precious Metals	Enter the number of clients with assets that are held as Precious Metals, broken down by the nationality of the BO.
2.3.16	155	Value of Client assets that are precious metals	Enter the value of clients with assets that are held as precious metals, broken down by country location of the assets.
2.3.17	156	Does the entity have clients / connected persons with other assets not listed above?	Please answer 'Yes' or 'No'.
2.3.18	157	Value of 'other assets', that are not listed above, within their client structure	Enter the value of 'other assets', that are not listed above, within their client structure, broken down by country location of the assets.

2.3.19	158	List type(s) of 'Other Assets'	List the 'Other Assets' of clients during the reporting period, which are not listed above.
2.4.1	159	Does the entity facilitate transactions in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.4.2	160	Physical Cash Transactions - Number of Clients.	Enter the number of the clients that made transactions in the form of Physical Cash during the reporting period.
2.4.3	161	Physical Cash - Number of Transactions.	Enter the number of cash transactions processed on behalf of clients during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the client.
2.4.4	162	Physical Cash - Value of Transactions.	Enter the number of cash transactions processed on behalf of clients during the reporting period. Transactions include those between the entity and the client and those conducted on behalf of the client.
2.4.5	163	Does the entity facilitate transactions in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.4.6	164	Virtual Currency Transactions-Number of Clients.	Enter the number of clients that conducted transactions in the form of Virtual Currency during the reporting period.
2.4.7	165	Virtual Currency - Number of Transactions.	Enter the number of Virtual Currency transactions clients conducted, during the reporting period.
2.4.8	166	Virtual Currency - Value of Transactions.	Enter the value of virtual currency transactions processed by or on behalf of clients.
2.4.9	167	Does the entity facilitate client transactions via Third Parties?	Please answer 'Yes' or 'No'.
2.4.10	168	Third Party Transactions - Number of Clients.	Enter the number of clients that conducted transactions via Third

			Parties during the reporting period. Transactions via third party means that the payment was paid to a third party not associated with the business relationship or transaction.
2.4.11	169	Third Party - Number of Transactions.	Enter the number of Third-Party transactions processed by clients during the reporting period.
2.4.12	170	Third Party - Value of Transactions.	Enter the value of transactions processed by clients during the reporting period, transacted via Third Parties.
2.4.13	171	Does the Entity facilitate transactions via Credit/Debit Card?	Please answer 'Yes' or 'No'.
2.4.14	172	Credit/Debit Card Transactions - Number of Clients	Enter the number of clients that made transactions via Credit Card during the reporting period.
2.4.15	173	Credit/Debit Card Transactions - Number of Transactions.	Enter the number of transactions processed via credit card payments during the reporting period.
2.4.16	174	Credit/Debit Card Payments - Value of Transactions.	Enter the value of Credit Card transactions processed for clients during the reporting period.
2.4.17	175	Does the entity facilitate client transactions in the form of Wire Transfers?	Please answer 'Yes' or 'No'. This section <u>does not include</u> Internal Bank Transfers.
2.4.18	176	Wire Transfers - Number of Clients.	Enter the number of clients that made transactions in the form of Wire Transfers during the reporting period. This section <u>does not include</u> Internal Bank Transfers.
2.4.19	177	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions that were conducted by clients, during the reporting period. This section <u>does not include</u> Internal Bank Transfers.

2.4.20	178	Wire Transfers - Value of Funds Transferred (excluding Internal Bank Transfers).	Enter the value of Wire Transfer transactions conducted by clients during the reporting period. This section <u>does not include</u> Internal Bank Transfers.
2.4.21	179	Does the entity facilitate transactions in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.4.22	180	Transfer of Securities - Number of Clients.	Enter the number of clients that conducted transactions in the form of Transfer of Securities during the reporting period.
2.4.23	181	Transfer of Securities - Number of Transactions.	Enter the number transactions made by clients, during the reporting period, in the form of Transfer of Securities.
2.4.24	182	Transfer of Securities - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, by way of Transfer of Securities.
2.4.25	183	Does the Entity facilitate transactions in the form of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.4.26	184	Internal Bank Transfers - Number of Clients.	Enter the number of clients that conducted transactions in the form of Internal Bank Transfers, during the reporting period.
2.4.27	185	Internal Bank Transfers - Number of Transactions.	For the purposes of this Return, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction.
2.4.28	186	Internal Bank Transfers - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, by way of Internal Bank Transfers.

2.4.29	187	Does the Entity facilitate transactions to / from clients in other forms of payments not listed above?	Please answer 'Yes' or 'No'.
2.4.30	188	Other Forms of Payment - Number of Clients.	List the Other Forms of Payment processed by clients during the reporting period, which are not listed above.
2.4.31	189	Other Forms of Payment - Number of Transactions.	Enter the number of clients that conducted transactions in the form of Other Forms of Payment during the reporting period.
2.4.32	190	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, by way of Other Forms of Payment.
2.4.33	191	Please indicate the types of other Forms of Payments.	List the Other Forms of Payment processed by clients during the reporting period, which are not listed above. Note all that apply.
2.5.1	192	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated.
2.5.2	193	Total number of transactions received, broken down by origin of the funds.	Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds.
2.5.3	194	Total value of funds transferred out, broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients during the reporting period, broken down by the country of payment destination.
2.5.4	195	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of outgoing transactions during the reporting period, broken down by destination country of the transaction.
2.6.1	196	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'. Please save your work.

2.6.2	197	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Enter 'N/A' if no comment.
3.1.1	198	Number of Clients onboarded via F2F.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via F2F methods, and not only those onboarded during the reporting period. F2F channels include F2F; Referrals within Group – F2F; Eligible Introducers - F2F; Other Introducers - F2F
3.1.2	199	Number of Clients onboarded via Non-F2F.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and not only those onboarded during the reporting period. Examples of Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have F2F contact with the clients.
3.1.3	200	Number of clients onboarded via Online Platforms or portal.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and not only those onboarded during the reporting period.
3.1.4	201	Number of Clients onboarded through Referrals within Group - F2F.	Enter the number of clients which were onboarded using referrals within Group - F2F during the reporting period, broken down by nationality of the BO. An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients.
3.1.5	202	Number of Clients onboarded through Referrals within Group - Non F2F.	Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels, during the reporting period, broken down by the nationality of the BO.

			Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.
3.1.6	203	Number of total active Clients onboarded through Eligible Introducers - All EI Relationships.	Total clients in the entity's entire portfolio that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients' identity. An Eligible Introducer is a person who falls within one of the categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
3.1.7	204	Number of Clients onboarded through Eligible Introducers during the reporting period.	Enter the number of clients which were onboarded through Eligible Introducers during the reporting period, broken down by country of nationality of the BO.
3.1.8	205	Number of Clients onboarded via Online Platforms or portal.	Enter the number of clients which were onboarded during the reporting period, via Online Platforms, broken down by the nationality of the BO.
3.2.1	206	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	207	To whom has the AML Compliance Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period.
3.2.3	208	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer at the end of the reporting period.

3.2.4	209	How many AML Compliance Officers has the entity had in the past 3 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".
3.2.5	210	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	211	To whom has the Money Laundering Reporting Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.
3.2.7	212	What was the country of residency of the Money Laundering Reporting Officer at the end of the reporting period?	Enter the country of residency of the Money Laundering Reporting Officer at the end of the reporting period.
3.2.8	213	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	214	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	215	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.

3.2.11	216	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.12	217	To whom has the Targeted Financial Sanction screening function been outsourced?	Select one of the following options which best describes the outsourced relationship for the screening of Targeted Financial Sanctions (TFS): • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.
3.2.13	218	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.14	219	Has the entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.15	220	To whom has the transaction monitoring function been outsourced?	Select one of the following options which best describes the outsourced Transaction Monitoring relationship: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.
3.2.16	221	What was the outsourcing country of the Transaction Monitoring function at the end of the reporting period?	Enter the country the entity outsourced the transaction monitoring function to at the end of the reporting period.
3.2.17	222	How many Transaction monitoring platforms / services did the entity have in the past 3 years?	If no turnover of the transaction monitoring platforms / services in the three-year period, answer "1".

3.2.18	223	Has the entity outsourced any Trust Services functions during the reporting period?	Please answer 'Yes' or 'No'.
3.2.19	224	To whom has Trust Services Functions been outsourced?	Select one of the following options which best describes the outsourced Transaction Monitoring relationship: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.
3.2.20	225	What was the country of the outsourced trust services function at the end of the reporting period?	Enter the country of which the entity outsourced Trust services functions to, at the end of the reporting period.
3.2.21	226	Enter the number of Trust Services functions that were outsourced in the past 3 years.	Enter the number of engagements where the entity outsourced Trust services, during the past 3 years.
3.3.1	227	Where is the entity's physical place of business?	Select the country where the entity operates.
3.3.2	228	Does the entity form part of a group structure?	Please answer 'Yes' or 'No'.
3.3.3	229	In which country is the Entity's ultimate Parent company incorporated?	Enter the country in which the entity's ultimate Parent company was incorporated.
3.3.4	230	Number of Subsidiaries, by location, broken down by country of operation.	Enter the number of Subsidiaries by location, broken down by country of operation. If the entity does not have subsidiaries enter '0'.
3.3.5	231	How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period?	Enter the number of beneficial Owners the entity has, broken down by nationality of the beneficial owner, at the end of the reporting period.
3.3.6	232	How many directors does the entity have appointed, by country of	Enter the number of directors appointed to the entity at the end of the reporting period, broken

		nationality of the Director, at the end of the reporting period?	down by the nationality of the directors.
3.4.1	233	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'. Please save your work.
3.4.2	234	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Enter 'N/A' if no comment.

AML Controls Questions:

No.	Question No.	Question	Description/Explanation
1.1.1	235	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF and Sanctions risks and issues?	Please answer 'Yes' or 'No'.
1.1.2	236	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	237	What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?	Enter the frequency in number of months.
1.1.4	238	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	239	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	240	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	241	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	242	Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?	Please answer 'Yes' or 'No'.
1.1.9	243	Does the Board / Governing Body ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.1.10	244	Has the entity, or its Directors, Shareholders, Beneficial Owners, or Senior Officers been denied an	Please answer 'Yes' or 'No'.

		application by any Regulatory Body?	
1.1.11	245	Provide the country of jurisdiction.	Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body. Name all that apply.
1.1.12	246	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	247	Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	248	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.2.2	249	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	250	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	251	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	252	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	253	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	254	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	255	Does the AMLCO report to the Board on AML/CFT/CPF and Sanctions related issues and on the adequacy of the AML/CFT/CPF and Sanctions framework?	Please answer 'Yes' or 'No'.
1.2.9	256	Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF and Sanctions compliance breaches?	Please answer 'Yes' or 'No'.

1.2.10	257	Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures?	Please answer 'Yes' or 'No'.
1.2.11	258	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	259	Does the MLRO report to the Board on AML/CFT/CPF and Sanctions related issues and on the adequacy of the AML/CFT/CPF and Sanctions framework?	Please answer 'Yes' or 'No'.
1.3.1	260	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	261	Have the Directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	262	Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	263	Has the MLRO received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	264	Has the DMLRO received specialized compliance/AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.6	265	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	266	Are changes to policy and procedures communicated to all Staff/Directors and Senior Management?	Please answer 'Yes' or 'No'.

1.3.8	267	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	268	What is the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company during the reporting period?	Enter the percentage of employees/ agents/ directors that have NOT been exposed to AML/CFT/CPF training by the entity during the reporting period.
1.3.10	269	Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually?	Please answer 'Yes' or 'No'.
1.4.1	270	Does the entity have an Internal Audit Department, Unit, or function (including outsourced) with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	271	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?	Please answer 'Yes' or 'No'.
1.4.3	272	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	273	Does the Internal AML audit include reviews of the AML/CFT/CPF and Sanctions related policies, procedures and processes?	Please answer 'Yes' or 'No'.
1.4.5	274	Has the AML audit function performed an AML/CFT/CPF and Sanctions audit and issued a report for conclusions and recommendations?	Please answer 'Yes' or 'No'.
1.4.6	275	What is the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?	Enter the frequency, in months, of how often an internal AML audit for the AML/CFT/CPF and Sanctions programme is conducted.
1.4.7	276	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	277	What is the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, in months, of the Board review of the AML audit program.

1.4.9	278	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select ‘Yes’, ‘No’, or ‘Not Applicable’.
1.4.10	279	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	280	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer ‘Yes’ or ‘No’.
1.4.12	281	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer ‘Yes’ or ‘No’.
1.5.1	282	Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors?	Please answer ‘Yes’ or ‘No’.
1.5.2	283	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer ‘Yes’ or ‘No’.
1.5.3	284	Does the entity consider the ML/TF/PF risks of the clients, (including BOs), in their risk assessment?	Please answer ‘Yes’ or ‘No’.
1.5.4	285	Does the entity consider the ML/TF/PF and Sanctions risks relating to geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer ‘Yes’ or ‘No’.
1.5.5	286	Does the entity consider the ML/TF/PF and Sanctions risks associated with products and services (existing and new) in their risk assessment?	Please answer ‘Yes’ or ‘No’.
1.5.6	287	Does the entity consider the ML/TF/PF and Sanctions risks associated with delivery channels (existing and new) in their risk assessment?	Please answer ‘Yes’ or ‘No’.
1.5.7	288	Does the entity ensure ML/TF/PF and Sanctions business risk assessments are done / updated	Please answer ‘Yes’ or ‘No’.

		prior to the launch of any new products/services/delivery channels/technologies?	
1.5.8	289	Does the entity consider the ML/TF/PF and Sanctions risks associated with technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	290	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	291	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	292	Where applicable, does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.
1.5.12	293	Does the entity take their nature, size and complexity into consideration and consider the need for other risk factors, other than those listed above, when developing their business risk assessment?	Please answer 'Yes' or 'No'.
1.5.13	294	How often, in months, does the entity review High-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.14	295	How often, in months, does the entity review Medium-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.15	296	How often, in months, does the entity review Low-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.6.1	297	Does the entity rely on Group AML/CFT/CPF policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	298	If yes to use of group policies and procedures, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?	Please answer 'Yes' or 'No'.

1.6.3	299	Has the Board, or Governing Body, ensured that necessary amendments are made to the entity's policies and procedures for alignment with the requirements in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.4	300	Does the entity have Board, or Governing Body, approved policies and procedures for Customer Due Diligence measures i.e. customer identification and verification?	Please answer 'Yes' or 'No'.
1.6.5	301	Does the entity have Board, or Governing Body, approved policies and procedures for identification of high-risk customers inc. PEPs?	Please answer 'Yes' or 'No'.
1.6.6	302	Does the entity have Board, or Governing Body, approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.6.7	303	Does the entity have Board, or Governing Body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	304	Does the entity have Board or Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	305	Does the entity have Board or Governing Body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?	Please answer 'Yes' or 'No'.
1.6.10	306	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	307	Does the entity have procedures for declining, de-risking, terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons?	Please answer 'Yes' or 'No'.

1.6.12	308	Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period.	Enter the total number client accounts that were declined, terminated, or restricted due to AML/CFT/CPF and Sanctions concerns.
1.7.1	309	Does the entity have a Sanctions screening process including policies and procedures?	Please answer 'Yes' or 'No'.
1.7.2	310	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	311	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	312	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	313	Is sanctions monitoring done in real time or after the event?	Select what applies: 'No process', 'After the event', or 'Real time'.
1.7.6	314	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	315	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	316	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	317	Have assets of any customers been identified as persons or entities designated by the OFSI or OFAC?	Please answer 'Yes' or 'No'.
1.7.10	318	Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.7.11	319	Does the entity have systems and procedures in place to determine whether the entity or any of its	Please answer 'Yes' or 'No'.

		affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?	
1.7.12	320	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions?	Please answer ‘Yes’ or ‘No’.
1.7.13	321	Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries surrounding sanctioned jurisdictions are scrutinized to ensure the unlisted countries are not being used as conduits to evade targeted financial sanctions and proliferation alerts / risks?	Please answer ‘Yes’ or ‘No’.
1.8.1	322	Does the entity have transaction monitoring policies and procedures developed commensurate to its operations?	Please answer ‘Yes’ or ‘No’.
1.8.2	323	Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager’s drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer ‘Yes’ or ‘No’.
1.8.3	324	Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer ‘Yes’ or ‘No’.
1.8.4	325	Is there a requirement for senior management approval before	Please answer ‘Yes’ or ‘No’.

		establishing high risk business relationships i.e. with PEPs?	
1.8.5	326	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	327	Where applicable, does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	328	Where high risk customers are identified, did the entity conduct EDD measures for every transaction carried out by such customers?	Please answer 'Yes' or 'No'.
1.8.8	329	Enter the total number of alerts resulting in internal Suspicious Activity Reports to the MLRO related to ML/TF/PF and Sanctions matters identified during transaction monitoring only.	Enter the total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR.
1.9.1	330	Does the entity have Internal Reporting policies and procedures i.e. Identification and Reporting of Suspicious Activities and Transactions to the MLRO?	Please answer 'Yes' or 'No'.
1.9.2	331	Does the entity's policies and procedures identify the MLRO and how to make a filing to them?	Please answer 'Yes' or 'No'.
1.9.3	332	Does the entity have policies and procedures for reporting to the Cayman Islands Financial Reporting Authority?	Please answer 'Yes' or 'No'.
1.9.4	333	How many internal Suspicious Activity Reports have been reported to the MLRO in total for the current reporting period?	Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period.
1.9.5	334	How many Suspicious Activity Reports have been reported, to the Financial Reporting Authority, by the MLRO for the current reporting period?	Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period.
1.9.6	335	How many hours on average does it take to file a suspicious activity report 'SAR' to the FRA?	Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.

			Time period is from when you identified the suspicious activity of a transaction until you filed with the FRA.
1.9.7	336	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.
1.9.8	337	Has the entity been penalized or received a warning for non-compliance, relating to reporting requirements or failure to comply with a direction, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	338	Does the entity have procedures to maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	339	Does the entity have procedures to maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.
1.9.11	340	If the MLRO decides not to file a SAR to the FRA are there procedures to ensure the MLRO's reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	341	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	342	How many years after *the end of* the business relationship are records retained?	Enter the number of years.
1.10.3	343	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	344	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	345	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	346	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.

1.11.1	347	Does the entity have outsourced arrangements for its functions and services?	Select which best applies: ‘Yes’, ‘No’
1.11.2	348	In total, how many services does the entity outsource to either third parties, or within its group or subsidiaries, during the reporting period?	Enter the total number of services the entity outsources to either third parties, or within its group or subsidiaries.
1.11.3	349	Is there a Board approved documented policy on outsourcing?	Select which best applies: ‘Yes’, ‘No’ or ‘Not Applicable’. This question is only applicable if the entity outsources any activities.
1.11.4	350	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Enter the total number of services the entity outsources from either third parties, or within the entity’s group or subsidiaries.
1.11.5	351	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: ‘Yes’, ‘No’ or ‘Not Applicable’. This question is only applicable if the entity outsources any activities.
1.11.6	352	Does the outsourcing agreement(s) clearly set out the obligations of both parties?	Select which best applies: ‘Yes’, ‘No’ or ‘Not Applicable’. This question is only applicable if the entity outsources any activities.
1.11.7	353	Does the outsourcing agreement(s) require Outsourced Service Provider to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: ‘Yes’, ‘No’ or ‘Not Applicable’. This question is only applicable if the entity outsources any activities.
1.11.8	354	Is there a contingency plan in the event the Outsourced Service Provider fails to perform the outsourced activity?	Select which best applies: ‘Yes’, ‘No’ or ‘Not Applicable’. This question is only applicable if the entity outsources any activities.
1.11.9	355	Does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced Service Provider?	Select which best applies: ‘Yes’, ‘No’ or ‘Not Applicable’. This question is only applicable if the entity outsources any activities.
1.11.10	356	If applicable, does the outsourced AMLCO/MLRO have access to the entity's Board?	Select which best applies: ‘Yes’, ‘No’ or ‘Not Applicable’.

			This question is only applicable if the entity outsources any activities.
1.11.11	357	Are there policies and procedures for outsource arrangements to ensure data protection restrictions would NOT delay access to data and documents?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.12	358	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.13	359	Does the entity conduct testing to ensure the Outsourced Service Provider complies with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.12.1	360	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'. Please save your work.
1.12.2	361	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback for this tab. Enter 'N/A' if no comments.