



Completion Guide: VASP AML/CFT/CPF Application Form

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Contents

1

Introduction

4

2

Form Information

4

3

Accessing and Submitting the AML Form.....

4

3.1

Access to the AML Form.....

4

3.2

Completing the AML Form

9

4

Other Useful Information

10

4.1

User account lockouts.....

10

4.2

Internet Browser.....

11

4.3

Two-Factor Authentication.....

11

4.4

Using Excel

11

4.5

Data and Security

12

4.6

Applicable Fees.....

12

5

AML Form Guidance

13

1 INTRODUCTION

The Cayman Islands Monetary Authority (the "Authority") undertakes ML/TF/PF and Sanctions risk assessments as part of its risk-based approach to AML/CFT/CPF supervision of regulated financial service providers ("FSPs"). In conducting entity level and sectoral ML/TF/PF risk assessments and other related research, the Authority uses a software called Strix to distribute the AML Form to FSPs and further collect, analyse, model, and score ML/TF/PF and Sanctions risk data.

This VASP AML/CFT/CPF Application Form (the "AML Form") is specific to those Virtual Assets Service Provider ("VASP") entities that are applying to the Authority for a VASP registration, a VASP licence or a VASP waiver, as relevant under the Virtual Asset (Service Providers) Act (2024 Revision) ("VASP Act"). **Those entities that have not yet commenced business should, where requested, report their projected figures for their first year of business.**

FSPs are required to complete the AML Form and submit it through the Authority's web-based software, to the Anti-Money Laundering Division (the "AML D"). The AML Form is issued in accordance with sections 6(1) and 8(1) of the VASP Act.

This Guide gives support to the applicants seeking registration, licensing or a waiver under the VASP Act for accessing, completion and submission of the AML Form.

2 FORM INFORMATION

The AML Form is to be completed by entities applying for a licence, registration or waiver, as relevant under the VASP Act - commonly referred to as the "Entity" for purposes of this form.

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

3 ACCESSING AND SUBMITTING THE AML FORM

3.1 ACCESS TO THE AML FORM

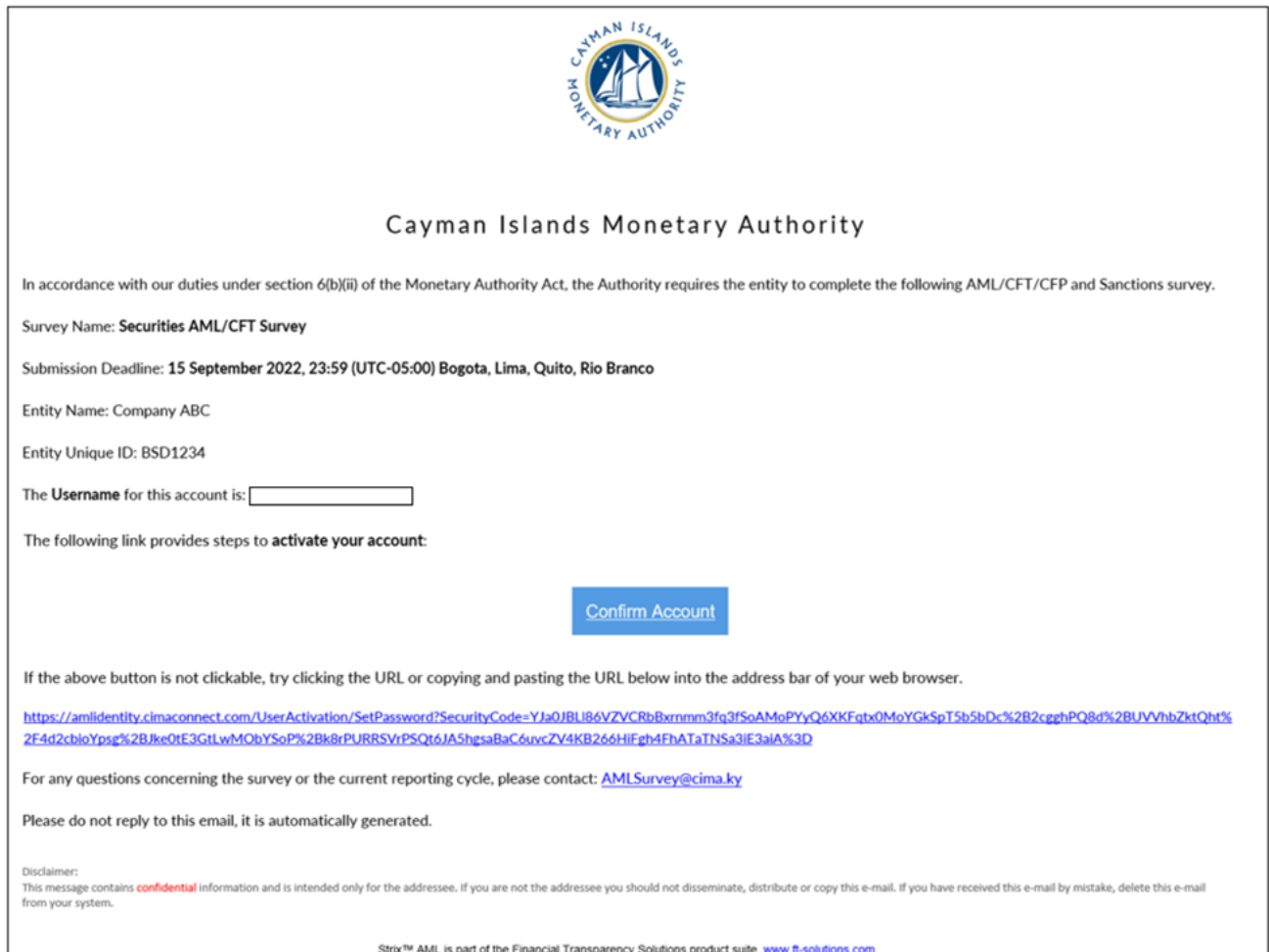
Entities will receive an invitation to the web-based Form by email using the current email contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient's email 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 Form.

The Authority is using the following entity contacts to distribute the AML Form: Registered Office, Anti Money Laundering Compliance Officer ("AMLCO"), Money Laundering Reporting Officer ("MLRO"), Deputy Money Laundering Reporting Officer ("DMLRO") and any other additional contacts, that have been provided by the Entity. If an Entity is unsure of the current contact details the Authority has on record, they can contact the Authority at AMLSurveys@cima.ky.

To access the AML Form:

1. When the AML Form 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/CPF 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=YJa0JLI86VZVCRbBxmnm3fq3fSoAMoPYyQ6XKFq0MoYGkSpTSb5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbloYpsg%2BJke0tE3GLwMObySoP%2Bk8rPURRSYrPSQt6JA5hgsaBaC6uvcZV4KB266Hfgh4FhAtaTNSa3IE3aiA%3D>

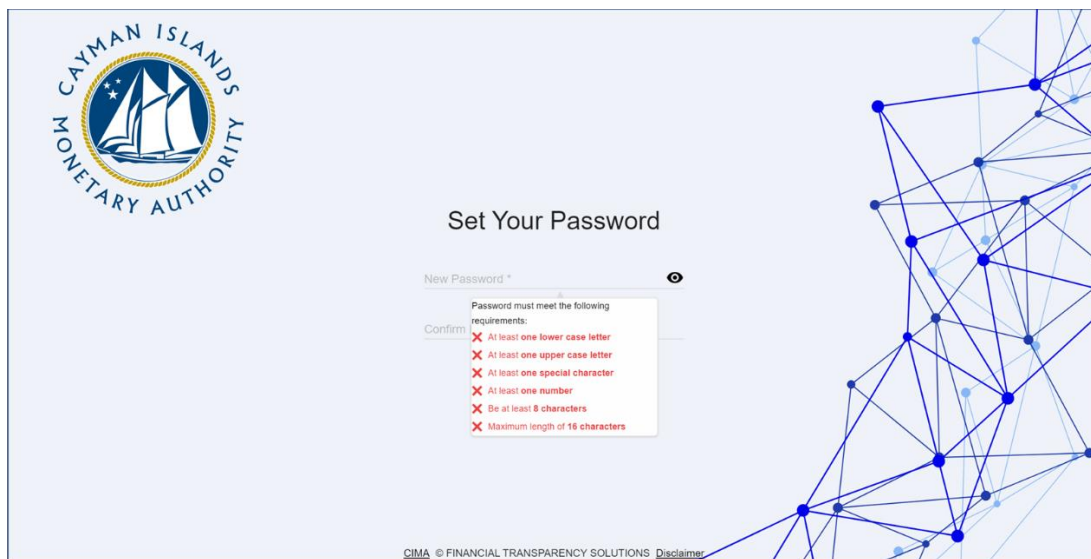
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

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

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

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.

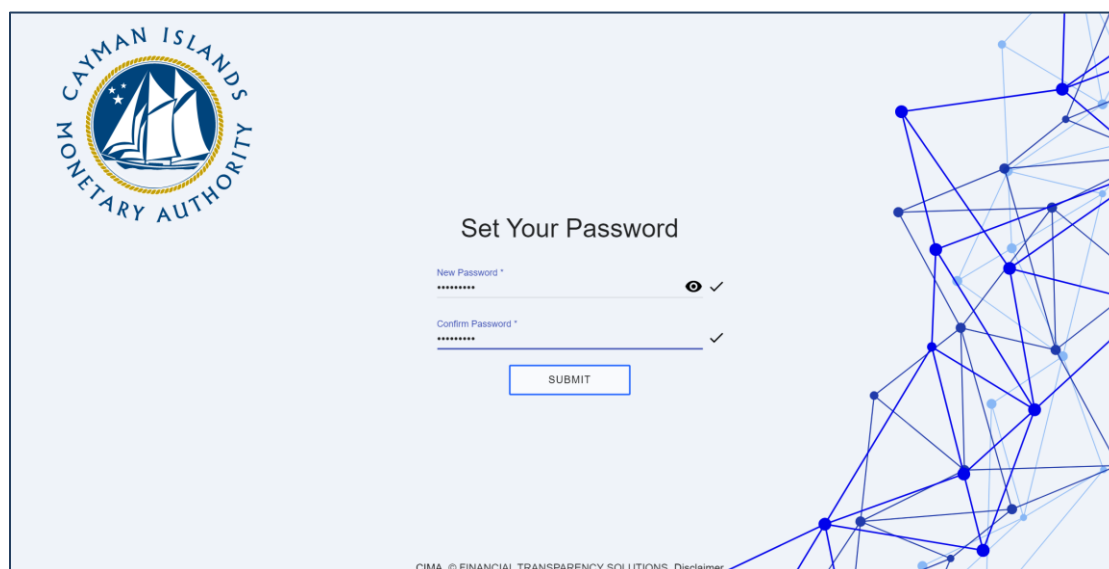


The screenshot shows the 'Set Your Password' form for the Cayman Islands Monetary Authority. The form has two input fields: 'New Password *' and 'Confirm'. The 'Confirm' field is highlighted with a red border, and a tooltip is displayed next to it. The tooltip contains the following requirements:

- At least one lower case letter
- At least one upper case letter
- At least one special character
- At least one number
- Be at least 8 characters
- Maximum length of 16 characters

The form also includes a 'SUBMIT' button and a footer with the text 'CIMA © FINANCIAL TRANSPARENCY SOLUTIONS Disclaimer'.

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



The screenshot shows the 'Set Your Password' form for the Cayman Islands Monetary Authority. The form has two input fields: 'New Password *' and 'Confirm Password *'. Both fields are filled with asterisks and have a checkmark icon next to them, indicating successful validation. The 'SUBMIT' button is visible below the fields. The form also includes a footer with the text 'CIMA © FINANCIAL TRANSPARENCY SOLUTIONS Disclaimer'.

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.

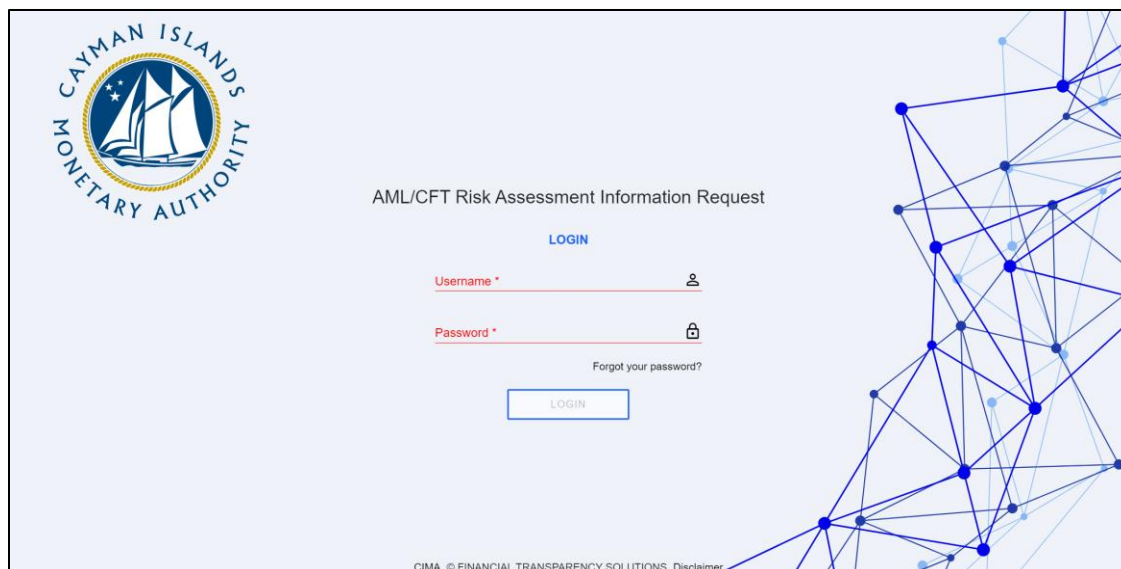


Your password was successfully changed.

[RETURN TO HOME](#)

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



AML/CFT Risk Assessment Information Request

LOGIN

Username *

Password *

Forgot your password?

LOGIN

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



CAYMAN ISLANDS
MONETARY AUTHORITY

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:

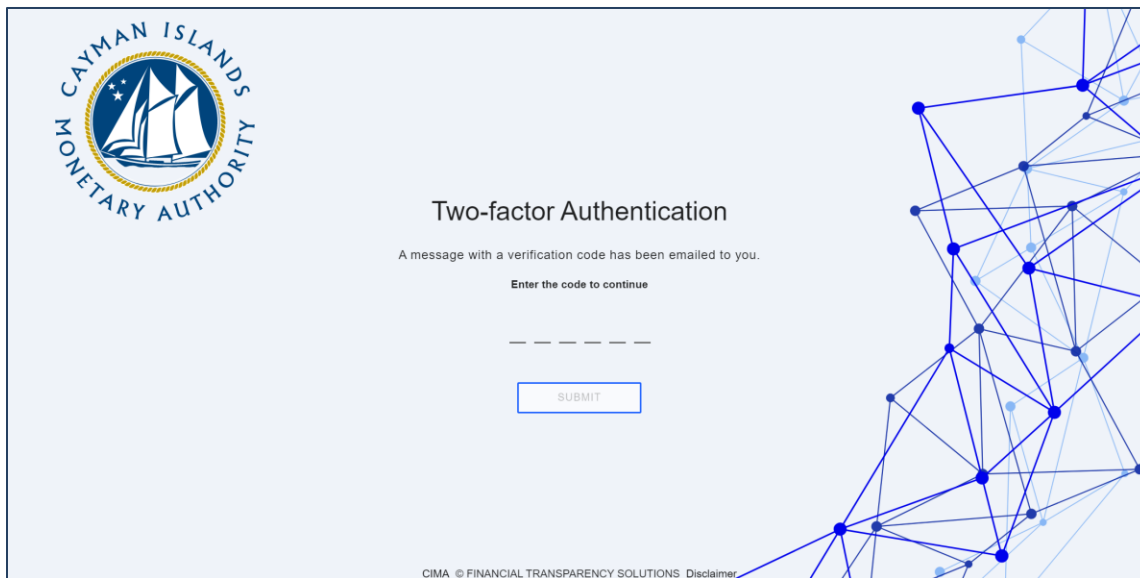
951247

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.



Two-factor Authentication

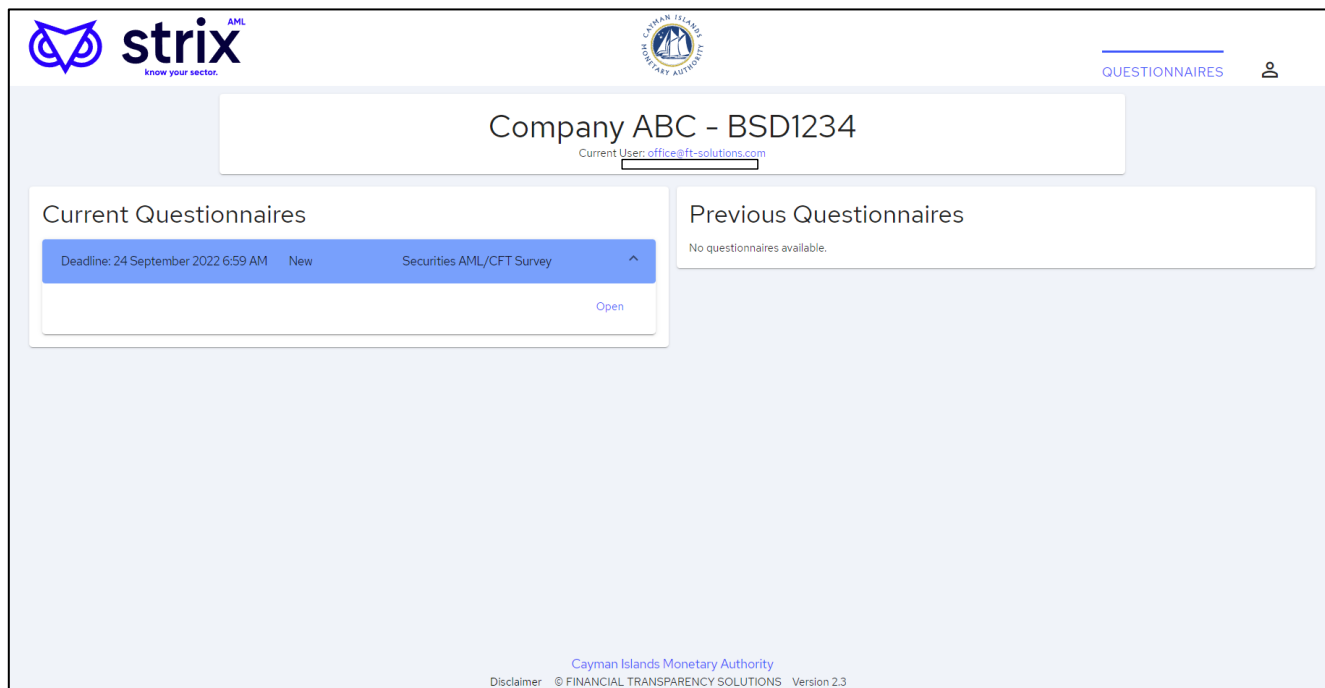
A message with a verification code has been emailed to you.

Enter the code to continue

SUBMIT

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



strix AML
know your sector.

QUESTIONNAIRES

Company ABC - BSD1234
Current User: office@ft-solutions.com

Current Questionnaires

Deadline	Status	Survey Name	Action
24 September 2022 6:59 AM	New	Securities AML/CFT Survey	Open

Previous Questionnaires

No questionnaires available.

Cayman Islands Monetary Authority
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3.2 COMPLETING THE AML FORM

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

- a. Completion guidance for the AML Form is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Form as many times as needed prior to the form due date so long as the recipient selects 'Save'.
 - c. Once the AML Form has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority. Users should note that the form does not have Excel import functionality.
 - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the form name will be listed for verification, which is useful for instances where users are submitting for more than one entity.
 - e. Once the AML Form is 'Submitted' an Excel and PDF copy of the completed form will be available under 'Current Questionnaire'.
 - f. Upon submission to the Authority a review of the AML Form will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Form 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 form, they will not see the additional form(s) in the 'Current Surveys' section of the web page. At the top of the page, where it shows the Entity 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 Form 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 won't 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 AMLSurveys@cima.ky to request having their account re-activated.

4.2 INTERNET BROWSER

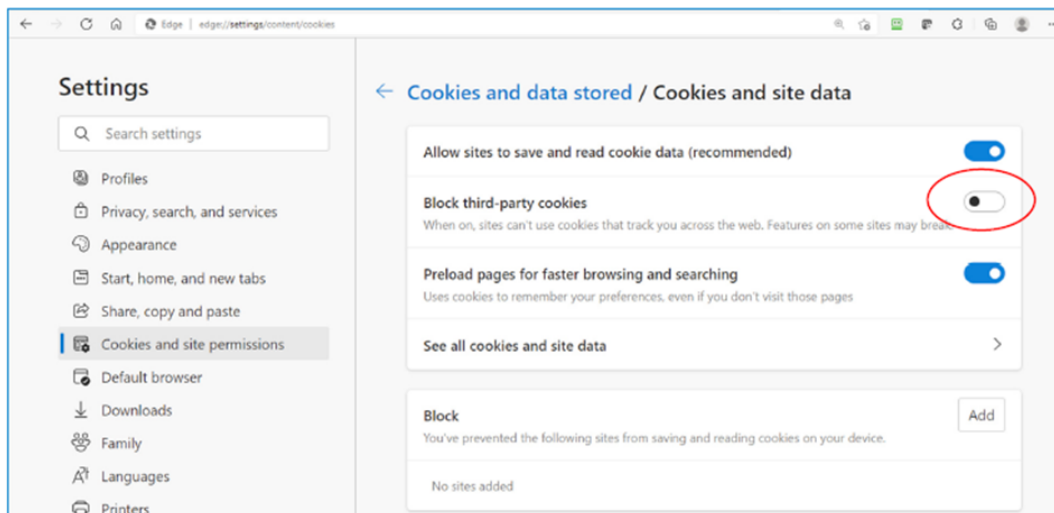
Users should be aware that the AML Form will not open using the legacy Windows Explorer browser or with outdated Windows operating systems for security purposes. If the user's browser is defaulted to Explorer the link should be copied and opened in Chrome, Edge, Safari, or other modern browser.

4.3 TWO-FACTOR AUTHENTICATION

Due to the security permissions around the two-factor authentication, the invite to the AML Survey, 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 AMLSurveys@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 AMLSurveys@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 as follows:

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 survey. Given that there are several questions in the survey 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 survey 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 DATA AND SECURITY

The AML Survey, the auto-generated communication from Strix, and the data collected from FSPs in the AML Survey 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 Survey 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.

4.6 APPLICABLE FEES

There are no additional fees associated with completing this Form.

5 AML FORM GUIDANCE

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

AML Inherent Risk Factor Descriptions

Term/Abbreviation	Definition/Meaning
AMLRs	Anti-Money Laundering Regulations (2025 Revision), as amended.
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.
Applicant	A person who is has applied to be registered or licensed to provide virtual asset service as a business from within the Islands under section 6 or section 8 of the Virtual Asset (Service Providers) Act (2024 Revision) or, in instances noted as relevant by the Authority, this also refers to a person who has applied for a waiver under the VASP Act
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 recognised 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; or (c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement.
Beneficiary	In relation to a transfer of virtual assets, means the natural or legal person or the legal arrangement that will own the virtual asset on completion of a transfer;

Broker-Dealer	A person who carries on one or more of the activities, specified in paragraph 1(a) of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended: buying, selling, subscribing for or underwriting securities as an agent.
Client / Customer	A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands.
Corporate Entity	Means a body corporate 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 Form	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.
Direct - F2F	The engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
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 AMLRs 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 AML Form, an 'entity' is the applicant for a VASP registration, licence, or waiver under the VASP Act that is responding to this form.
F2F	Face-to-face means the engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Fiat currency	Currency that is issued exclusively by the relevant body in a country or by a government that is designated as legal tender in its country of issuance through, among other things, government decree or law.
Fintech service	Means a service that uses innovative technology to improve, change or enhance financial services 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 Form, 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's 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 Arrangement.
Issuance of virtual assets or virtual asset issuance	Means the sale of newly created virtual assets to the public in or from within the Islands in exchange for fiat currency, other virtual assets or other consideration but does not include the sale of virtual service token
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.
Market Maker	A person who engages in activities specified in paragraph 1(b) of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended, in compliance with the rules of any market in securities operating under the oversight of or rules made by a recognised securities exchange or a recognised overseas regulatory authority: buying, selling, subscribing for or underwriting securities as principal where the person entering into that transaction — (i) holds themselves out as willing, as principal, to buy, sell or subscribe for securities of the kind to which the transaction relates at prices determined by that person generally and continuously rather than in respect of each particular transaction; (ii) holds themselves out as engaging in the business of underwriting securities of the kind to which the transaction relates; or (iii) regularly solicits members of the public with the purpose of inducing them, as principals or agents, to buy, sell, subscribe for or underwrite securities and such transaction is entered into as a result of such person having solicited members of the public in that manner.
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. As defined under the Money Services Act
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 or legal person who takes on the role of company director on 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 required by 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 financial service provider ("FSP") without being physically present for identification purposes, at the physical premises/office of the FSP.
Originator	In relation to a transfer of virtual asset, means a person, whether natural or legal, who places an order with the virtual asset provider for a virtual asset transfer.
Owner or Operator	In relation to a virtual asset trading platform, means a person or group of persons that exerts effective control over the activities of a virtual asset trading platform however, in the absence of a single entity or group that exerts effective control over the platform, the operator shall be considered to be the owner of the entity under which the platform operates
Originator	In relation to a virtual asset trading platform, means – (a) the single entity or group which exerts management control over the platform;

	(b) where a single entity or group which exerts management control is not identifiable, either – (i) the entity through which the platform operates; or (ii) the entity through which the platform contracts with users of the platform; or (c) where an entity or group under paragraph (a) or (b) is not identifiable, the entity or group that provides the services offered by the platform to the users of the platform.
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 to December 31 of the applicable year. Or For those entities that have not yet commenced business, projections for the first year of operations.

Securities Advisor	A person who carries on one or more of the activities, specified in paragraph 4 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended: Advising a person on securities if the advice is – (a) given to the person in that person’s capacity as an investor or potential investor or in that person’s capacity as agent for an investor or a potential investor; and (b) advice on the merits of that person’s doing any of the following (whether as principal or agent) – (i) buying, selling, subscribing for or underwriting a particular security; or (ii) exercising any right conferred by a security to buy, sell, subscribe for, or underwrite a security.
Securities Arranger	A person who carries on one or more of the activities, specified in paragraph 2 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended: Making arrangements with a view to – (a) another person (whether as a principal or an agent) buying, selling, subscribing for or underwriting securities; or (b) a person who participates in the arrangements buying, selling, subscribing for or underwriting securities.
Securities Manager	A person who carries on one or more of the activities, specified in paragraph 3 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended: Managing securities belonging to another person in circumstances involving the exercise of discretion.
SIBA	Securities Investment Business Act (2020 Revision), as amended.
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 and Value of Assets Under Management.
Special Economic Zone Business	Means 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 (TSF)	Means both 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 Trust, Company Manager, and Corporate Service Provider business.
Transaction	For the purposes of this AML Form, a transaction, whether fiat or virtual currency, 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 with securities trades should be excluded from the report.
Transfer of virtual asset	Means any transaction carried out on behalf of an originator with a view to making the virtual asset available to a beneficiary
Trust	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 HNWI	For the purpose of the AML Form, Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWI whose net worth is greater than or equal to US\$30,000,000.
Value of Assets Under Management	The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio.

Virtual Asset		A digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies.
Virtual Asset Custodian		A VASP who provides virtual asset custody services in or from within the Islands.
Virtual Asset Custody Service		The business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets.
Virtual Assets Service Providers (VASPs)		An entity that is registered pursuant to section 6(3) of the VASP Act or licensed as a virtual asset custodian or trading platform pursuant to section 8(2)(a) of the VASP Act.
Timeframe	Value of Transactions	Value of transactions processed during the reporting period. Or For those entities that have not yet commenced business, projections for the first year of operations.
Timeframe	Number of Transactions	Number of transactions conducted for the client during the reporting period. Or For those entities that have not yet commenced business, projections for the first year of operations.

AML Inherent Risk Questions:			
Ref No.	Question No.	Question	Description/Explanation
1.1.1	1	The Entity understands that when filling out the VASP AML/CFT/CPF Application Form (the "AML Form") it is to provide most recent figures for a 12-month period <i>if</i> the entity is currently engaged VASP business activity. If the Entity is currently NOT ACTIVE, it is to provide projected figures for all questions throughout this AML Form.	The Entity acknowledges that by selecting ("Yes") they understand that they are to provide a complete AML Form using annual figures <i>or</i> for those entities that have not commenced business, they are to provide projected figures for all responses throughout this form.
1.1.2	2	Does the Entity currently conduct business/ transactions with clients?	Answer 'Yes' or 'No'
1.1.3	3	Is the Entity applying for a VASP Licence, VASP Registration, or a VASP Waiver under the VASP Act?	Please select the option that is applicable to the Entity: • VASP Licence • VASP Registration • VASP Waiver
1.1.4	4	Total Clients / Customers at the end of the reporting period <i>or</i> if the entity has not commenced business, provide the total estimated clients in the first year in accordance with the entity's Business Plan.	Enter the total number of Clients/Customers at the end of the reporting period <i>or</i> if the entity has not commenced business, provide the total estimated clients in the first year in accordance with the entity's Business Plan Where applicable, the number of clients /customers should only include those of the Cayman Islands legal entity. Total clients consist of natural persons and legal persons and arrangements.
1.1.5	5	Total Clients / Customers throughout the reporting period.	For entities conducting business, provide how many different clients the entity conducted business with during the reporting period. This category is specific to all clients that the entity dealt with throughout the reporting period. Therefore, the combined total should include both current and

			past relationships/clients falling within the January to December timeframe.
1.1.6	6	Total Transactions for the reporting period <u>or</u> if the entity has not commenced business, provide the estimated total in the first year in accordance with the entity's Business Plan.	Enter the total number of all transactions conducted for clients during the reporting period <u>or</u> if the entity has not commenced business, provide the estimated total in the first year in accordance with the entity's Business Plan. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.7	7	Total Value of Transactions processed in the reporting period <u>or</u> if the entity has not commenced business, provide the estimated total value of transactions in the first year in accordance with the entity's Business Plan.	Enter the total value of transactions processed for clients during the reporting period <u>or</u> if the entity has not commenced business, provide the estimated total value of transactions in the first year in accordance with the entity's Business Plan. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.8	8	Total number of High Risk Clients / Customers at the end of the reporting period.	Enter the total number of High Risk clients/customers at the end of the reporting period.
1.1.9	9	Total number of PEP Clients / Customers at the end of the reporting period.	Enter the total number of PEP clients/customers at the end of the reporting period.
1.1.10	10	Total number of non-compliant Accounts at the end of the reporting period.	Enter the total number of Non-Compliant Accounts at the end of the reporting period.
1.2.1	11	Total number of BOs by country of nationality of the BO.	Enter the total number of BOs by country of nationality of the BO.
1.2.2	12	Does the entity have any clients that are Legal Persons or Legal Arrangements?	Answer 'Yes' or 'No'
1.2.3	13	Number of settlors of clients who are Legal Arrangements.	Enter the number of settlors of clients who are Legal Arrangements.
1.2.4	14	Number of Partners of clients who are Legal Arrangements.	Enter the number of Partners of clients who are Legal Arrangements.
1.2.5	15	Does the entity have any clients that have BOs who are HNWI's?	Answer 'Yes' or 'No' This category is specific to clients who are Legal Persons and Legal Arrangements. Examples include but not limited to instances where a BO of a LLC, Partners of a Partnership or Settlor of a Trust is a HNWI.

1.2.6	16	Number of Clients that have BOs who are HNWIs.	Enter the number of Clients that have BOs who are HNWIs.
1.2.7	17	Does the entity have any clients that have BOs who are Ultra HNWIs?	Answer 'Yes' or 'No'
1.2.8	18	Number of Clients that have BOs who are Ultra HNWIs.	Enter the number of Clients that have BOs who are Ultra HNWIs.
1.2.9	19	Does the entity have any clients that have BOs who are PEPs?	Answer 'Yes' or 'No'
1.2.10	20	Number of BOs of clients who are PEPs, broken down by nationality of the PEP.	Enter the number of BOs of clients who are also PEPs, broken down by nationality of the PEP.
1.2.11	21	Does the entity have any clients which have Nominees acting on behalf of a BO?	Answer 'Yes' or 'No'
1.2.12	22	Number of clients which have Nominees acting on behalf of a BO, broken down by nationality of the client.	Enter the number of clients which have Nominees acting on behalf of a BO, broken down by nationality of the client.
1.3.1	23	Clients/customers that are Legal Persons and Arrangements, broken down by country of incorporation or establishment of the client.	Enter the number of clients/customers that are Legal Persons and Arrangements, broken down by country of incorporation or establishment of the client.
1.3.2	24	Number of Transactions - Legal Persons and Arrangements.	Enter the number of Transactions processed for/ conducted by Legal Persons and Arrangements, during the reporting period.
1.3.3	25	Value of Transactions processed, for the reporting period, for all Legal Persons and Arrangements.	Enter the value of transactions processed, for the reporting period, for all Legal Persons and Arrangements.
1.3.4	26	Does the entity have any clients who have directors?	Answer 'Yes' or 'No'
1.3.5	27	Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director.	Enter the number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director.

1.3.6	28	Number of directors and/or senior management of clients who are PEPs.	Enter the number of directors and/or senior management of clients who are also PEPs.
1.3.7	29	Number of directors and/or senior management of clients who are High Net Worth Individuals.	Enter the number of directors and/or senior management of clients who are also High Net Worth Individuals.
1.3.8	30	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals.	Enter the number of directors and/or senior management of clients who are Ultra High Net Worth Individuals.
1.3.9	31	Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management.
1.4.1	32	Does the entity have any clients who are Legal Persons and or Legal Arrangements? If so, respond accordingly to the following questions, as applicable.	Please answer 'Yes' or 'No'.
1.4.2	33	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.3	34	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients the entity has, during the reporting period, that are a government or Public Sector, broken down by government jurisdiction.
1.4.4	35	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed by clients that are Government or Public Sector, during the reporting period.
1.4.5	36	Gov / Pub Sector - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Government or Public Sector, during the reporting period.
1.4.6	37	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.7	38	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, during reporting period, broken down

			by country of incorporation, registration, or establishment of the client.
1.4.8	39	NPO - Number of Transactions.	Enter the number of transactions processed for clients that are NPOs, during the reporting period
1.4.9	40	NPOs - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.
1.4.10	41	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.11	42	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has, as at the last date of reporting period, that are Foundations - broken down by country of establishment of the client.
1.4.12	43	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.
1.4.13	44	Foundations - Value of Transactions for the reporting period.	Enter the Value of Transactions processed for clients that are Foundations, during the reporting period.
1.4.14	45	Does the entity have any clients that are Trusts?	Please answer 'Yes' or 'No'.
1.4.15	46	Trusts - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has, during the reporting period, that are Trusts.
1.4.16	47	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are a Trusts, during the reporting period.
1.4.17	48	Trusts - Value of Transactions for the reporting period.	Enter the Value of Transactions processed for clients that are Trusts, during the reporting period.
1.4.18	49	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.19	50	Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Segregated Portfolio Companies, during the reporting period.
1.4.20	51	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients that are Segregated

			Portfolio Companies, during the reporting period.
1.4.21	52	Segregated Portfolio Companies - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Segregated Portfolio Companies, during the reporting period.
1.4.22	53	Does the entity have any Special Economic Zone clients?	Please answer 'Yes' or 'No'.
1.4.23	54	Special Economic Zone - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Special Economic Zone companies, during the reporting period.
1.4.24	55	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are Special Economic Zone companies, during the reporting period.
1.4.25	56	Special Economic Zone - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Special Economic Zone companies, during the reporting period.
1.4.26	57	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.
1.4.27	58	Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.28	59	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.29	60	Funds / Collective Investment Vehicles - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, by clients that hold Funds / Collective Investment Vehicles
1.5.1	61	Does the entity have any clients that are Natural Persons? If so, respond accordingly to the following questions, where applicable.	Please answer 'Yes' or 'No'.
1.5.2	62	Clients/customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients/customers that are Natural Persons, broken down by nationality of the client.

1.5.3	63	Clients/customers that are Natural Persons, broken down by Residency of the client.	Enter the number of clients/customers that are Natural Persons, broken down by Residency of the client.
1.5.4	64	Total Transactions for the reporting period for all Natural Persons.	Enter the total number of Transactions for the reporting period for all Natural Persons.
1.5.5	65	Value of Transactions processed, in the reporting period, for all Natural Persons.	Enter the total value of transactions processed, in the reporting period, for all Natural Persons.
1.5.6	66	Natural Persons - Does the entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.
1.5.7	67	Number of Natural Persons who are PEPs, broken down by nationality of the client.	Enter the number of clients the entity has that are Natural Persons and also PEPs, during the reporting period.
1.5.8	68	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons and also PEPs, during the reporting period.
1.5.9	69	Natural Persons - PEPs - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Natural Persons and also PEPs, during the reporting period.
1.5.10	70	Does the entity have any Natural Person clients that are HNWI's?	Please answer 'Yes' or 'No'. Individuals 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.
1.5.11	71	Number of Natural Persons who are HNWI's, broken down by nationality of the client.	Enter the number of clients the entity has that are Natural Persons and also HNWI's, during the reporting period.
1.5.12	72	Natural Persons - HNWI's - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons and also HNWI's, during the reporting period.
1.5.13	73	Natural Persons - HNWI's - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Natural Persons and also HNWI's, during the reporting period.
1.5.14	74	Does the entity have any Natural Person clients that are <i>both</i> PEPs and HNWI's?	Please answer 'Yes' or 'No'. Individuals who are PEPs <i>and</i> 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.
1.5.15	75	Number of Natural Persons who are PEPs & HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and HNWIs, during the reporting period.
1.5.16	76	Natural Persons - PEPs & HNWIs - Number of Transactions.	Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWIs, during the reporting period.
1.5.17	77	Natural Persons - PEPs & HNWIs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWIs, during the reporting period.
1.5.18	78	Does the entity have any Natural Person clients that are Ultra HNWIs?	Please answer 'Yes' or 'No'. Individuals whose net worth is at least US\$30,000,000.
1.5.19	79	Number of Natural Persons who are Ultra HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has that are Natural Persons and also Ultra HNWIs, during the reporting period.
1.5.20	80	Natural Persons – Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons and also Ultra HNWIs, during the reporting period.
1.5.21	81	Natural Persons – Ultra HNWIs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are Natural Persons and also Ultra HNWIs, during the reporting period.
1.5.22	82	Does the entity have any Natural Person clients that are <i>both</i> PEPs and Ultra HNWIs?	Please answer 'Yes' or 'No'. Individuals who are PEPs <i>and</i> whose net worth is at least US\$30,000,000.
1.5.23	83	Number of Natural Persons who are PEPs & Ultra HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and Ultra HNWIs, during the reporting period.
1.5.24	84	Natural Persons - PEPs & UHNWIs - Number of Transactions.	Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and Ultra HNWIs, during the reporting period.
1.5.25	85	Natural Persons - PEPs & UHNWIs - Value of	Enter the value of transactions conducted by clients who are a combination of

		Transactions for the reporting period.	Natural Persons, PEPs, and Ultra HNWIs, during the reporting period.
1.6.1	86	Nature of Business / Source of Funding: Enter the total Value of Assets Under Management from clients whose source of funding fall within the list of sectors below: • Banking Institutions (excluding MSBs) • Other Financial Regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech *excluding MSBs, VASPs, and TCSPs.	Enter the total number of clients that fall within the list of the sectors.
1.6.2	87	Does the entity have any clients whose source of funding is derived from the Banking sector (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.6.3	88	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed by Banking Institutions (excluding MSBs).
1.6.4	89	Does the entity have any clients whose source of funding is derived from the financial services sector, other than Banking, VASPs, MSBs and TCSPs?	Please answer 'Yes' or 'No'.
1.6.5	90	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has that are legal persons operating as Other Financial Regulated Business, and natural persons that are employed by Other Financial Regulated Businesses.
1.6.6	91	Does the entity have any clients whose source of funding is from Financial Leasing operations?	Please answer 'Yes' or 'No'.
1.6.7	92	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Financial Leasing companies, and natural

			persons that are employed by Financial Leasing companies.
1.6.8	93	Does the entity have any clients whose source of funding is derived from Money Lending operations?	Please answer 'Yes' or 'No'.
1.6.9	94	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Money Lending institutions, and natural persons that are employed by Money Lending institutions.
1.6.10	95	Does the entity have any clients whose source of funding is derived from being Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency)?	Please answer 'Yes' or 'No'.
1.6.11	96	Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), and natural persons that are employed by Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency).
1.6.12	97	Does the entity have any clients whose source of funding is derived from the Fintech Industry?	Please answer 'Yes' or 'No'.
1.6.13	98	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Fintech industry, and natural persons that are employed in the Fintech industry.
1.6.14	99	Nature of Business / Source of Funding: Enter the total number of clients whose source of funding fall within the list of sectors below: ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Service Business (MSBs) ▪ Virtual Asset Service Providers (VASPs) ▪ High Value Dealers ▪ TCSPs	Provide the total number of clients that fall within the list of the sectors.

		▪ Import/Export Industry ▪ Shipping and Transport of Goods	
1.6.15	100	Does the entity have any clients whose source of funds is derived from being a Legal Practitioner?	Please answer 'Yes' or 'No'.
1.6.16	101	Legal Practitioner - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.6.17	102	Does the entity have any clients whose source of funds is derived from Dealers in Precious Metals and Stones operations?	Please answer 'Yes' or 'No'.
1.6.18	103	Dealers in Precious Metals and Stones - Number of Clients.	Enter the number of clients the entity has, that are Legal Persons operating as Dealers in Precious Metals and Stones, and Natural Persons that are employed by Dealers in Precious Metals and Stones.
1.6.19	104	Does the entity have any clients whose source of funds is derived from Money Services Business operations?	Please answer 'Yes' or 'No'.
1.6.20	105	Money Services Business - Number of Clients.	Enter the number of clients the entity has that are legal persons operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses.
1.6.21	106	Does the entity have any clients whose source of funds is derived from Virtual Asset Products and Services?	Please answer 'Yes' or 'No'.
1.6.22	107	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has, that are legal persons offering virtual asset products and services, and natural persons that are employed by institutions which offer virtual asset products and services.
1.6.23	108	Does the entity have any clients whose source of funds is derived through High Value Dealer operations?	Please answer 'Yes' or 'No'.

1.6.24	109	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.6.25	110	Does the entity have any clients whose source of funds is derived from TCSP operations?	Please answer 'Yes' or 'No'.
1.6.26	111	Trusts, Company Managers, or Corporate Service Providers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Trusts, Company Managers, or Corporate Service Providers, and natural persons that are employed by Trusts, Company Managers, or Corporate Service Providers.
1.6.27	112	Does the entity have any clients whose source of funds is derived from the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.28	113	Import / Export - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Import/ Export business, and natural persons that are employed the Import/ Export industry.
1.6.29	114	Does the entity have any clients whose source of funding is derived from the Shipping and Transport of Goods Industry?	Please answer 'Yes' or 'No'.
1.6.30	115	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Shipping and Transport of Goods business, and natural persons that are employed in the Shipping and Transport of Goods industry.
1.6.31	116	Nature of Business / Source of Funding: Enter the total number of clients whose source of funding fall within the list of sectors below: ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry	Provide the total number of clients that fall within the list of the sectors.

		▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry	
1.6.32	117	Does the entity have any clients whose source of funds is derived from the Real Estate industry (Agents / Brokers / Sellers)?	Please answer 'Yes' or 'No'.
1.6.33	118	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents.
1.6.34	119	Does the entity have any clients whose source of funds is derived from the Gambling Industry (including online gambling)?	Please answer 'Yes' or 'No'.
1.6.35	120	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.6.36	121	Does the entity have any clients whose source of funds is derived from the Adult Entertainment Industry?	Please answer 'Yes' or 'No'.
1.6.37	122	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry.
1.6.38	123	Does the entity have any clients whose source of funds is derived from the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.39	124	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.6.40	125	Does the entity have any clients whose source of funds is	Please answer 'Yes' or 'No'.

		derived from operating in the Oil and Gas Industry?	
1.6.41	126	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.6.42	127	Does the entity have any clients whose source of funds is derived from the Mining Industry?	Please answer 'Yes' or 'No'.
1.6.43	128	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.6.44	129	Does the entity have any clients whose source of funds is derived from operating in the Construction / Development Industry?	Please answer 'Yes' or 'No'.
1.6.45	130	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry.
1.6.46	131	Does the entity have any clients whose source of funds is derived from operating in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.47	132	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.6.48	133	Does the entity have any clients whose source of funds is derived from Cannabis Production & Distribution operations?	Please answer 'Yes' or 'No'.
1.6.49	134	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Cannabis Production & Distribution industry, and natural persons that are employed in the Cannabis Production & Distribution industry.
1.6.50	135	Does the entity have any clients whose source of funds is	Please answer 'Yes' or 'No'.

		derived from Unknown Businesses or Professions?	
1.6.51	136	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions. Unknown businesses and professions are where the entity does not know, and was not provided with, and verified, the line of business or profession of the client.
1.6.52	137	Does the entity have any clients where their business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.53	138	Other - Not mentioned above - Number of Clients, broken down by nationality or country of incorporation of the client.	Enter the number of clients the entity has, that are legal persons operating in known businesses/industries, not mentioned above, and natural persons that are employed in known businesses/industries, not mentioned above.
1.7.1	139	Source of Funds – Value of Transactions. Enter the total value of transaction for clients whose source of funds fall within the list of sectors below: ▪ Banking Institutions (excluding MSBs) ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech *excluding MSBs, VASPs, and TCSPs.	Enter the total value of transactions processed by clients that are legal persons operating as, and natural persons employed in, the listed sectors.
1.7.2	140	Banking Institutions (excluding MSBs) - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs).
1.7.3	141	Other Financial Regulated Business - Value of	Enter the value of transactions conducted by clients that are legal persons operating as Other Financial Regulated Business not

		Transactions for the reporting period.	mentioned in this section, and natural persons that are employed in any Other Financial Regulated Business.
1.7.4	142	Financial Leasing - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct Financial Leasing business or (2) Natural Persons employed or earn income through Financial Leasing business.
1.7.5	143	Money Lending- Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct Money Lending business or (2) Natural Persons employed or earn income through Money Lending Business.
1.7.6	144	Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency) - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that are Accountants (Audit / Assurance / Bookkeeping / Insolvency) or (2) Natural Persons employed or earn income as an Accountant.
1.7.7	145	Fintech - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Fintech industry, or (2) Natural Persons employed or earn income in the Fintech industry.
1.7.8	146	Source of Funds – Value of Transactions Enter the total value of transactions for clients whose source of funds fall within the list of sectors below: ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ MSBs ▪ VASPs ▪ High Value Dealers ▪ TCSPs ▪ Import/Export Industry ▪ Shipping and Transport of Goods	Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.
1.7.9	147	Legal Practitioner - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that are a Legal Practice or (2) Natural Persons employed or earn income as a Legal Practitioner.

1.7.10	148	Dealers in Precious Metals and Stones - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that are Dealers in Precious Metals and Stones, or (2) Natural Persons employed or earn income by Dealers in Precious Metals and Stones.
1.7.11	149	Money Services Business - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that are Money Services Businesses, or (2) Natural Persons who are employed by or earn income through Money Services Businesses.
1.7.12	150	VASPs - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who (1) are Legal Persons that are VASPs, or (2) Natural Persons who are employed by or earn income through VASP products and/or services.
1.7.13	151	High Value Dealers - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that are High Valued Dealers, or (2) Natural Persons who are employed by or earn income as a High Value Dealer. <i>High Value Dealers - Dealers in any saleable item with a price equal to or greater than US\$15,000.</i>
1.7.14	152	Trusts, Company Managers, or Corporate Service Providers - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that are Trusts, Company Managers, or Corporate Service Providers, or (2) Natural Persons employed or earn income by Trusts, Company Managers, or Corporate Service Providers.
1.7.15	153	Import/Export Industry - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Mining Industry, or (2) Natural Persons employed or earn income in the Mining Industry.
1.7.16	154	Shipping and Transport of Goods - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Import / Export Industry, or (2) Natural Persons employed or earn income in the Import / Export Industry.
1.7.17	155	Source of Funds – Value of Transactions. Enter the total value of transactions for clients whose	Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.

		source of funds fall 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	
1.7.18	156	Real Estate Agents / Brokers - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that are Real Estate Agents / Broker or (2) Natural Persons employed or earn income as a Real Estate Agents / Broker.
1.7.19	157	Gambling business (including online gambling) - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct Gambling Business, or (2) Natural Persons employed or earn income through Gambling Business.
1.7.20	158	Adult Entertainment - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Adult Entertainment Industry, or (2) Natural Persons employed or earn income through the Adult Entertainment Industry.
1.7.21	159	Defence Industry - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Defence Industry, or (2) Natural Persons employed or earn income in the Defence Industry.
1.7.22	160	Oil and Gas Industry - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Oil and Gas Industry, or (2) Natural Persons employed or earn income in the Oil and Gas Industry.
1.7.23	161	Mining - Value of Transactions for the reporting period.	Enter the value of transactions conducted with Clients who are (1) Legal Persons that conduct business in the Mining Industry, or (2) Natural Persons employed or earn income in the Mining Industry.
1.7.24	162	Construction / Development - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Construction / Development industry, or (2) Natural

			Persons employed or earn income in the Construction / Development industry.
1.7.25	163	Retail & Restaurant Business - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Retail & Restaurant industry, or (2) Natural Persons employed or earn income in the Retail & Restaurant industry.
1.7.26	164	Cannabis Production & Distribution - Value of Transactions for the reporting period.	Enter the value of transactions with Clients who are (1) Legal Persons that conduct business in the Cannabis Production & Distribution industry, or (2) Natural Persons employed or earn income in the Cannabis Production & Distribution industry.
1.7.27	165	Industry / profession not known or not recorded - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in unknown or unrecorded Industries/ Professions, and natural persons that are employed in unknown or unrecorded Industries/ Professions.
1.7.28	166	Other - Not listed above - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in known Businesses/ Industries/ Professions not listed above, and natural persons that are employed in known Businesses/ Industries/ Professions not listed above.
1.8.1	167	Does the entity have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
1.8.2	168	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback that may be relevant, which the entity could not provide on the tabs above.
2.1.1	169	Does the entity conduct <u>or</u> intend to conduct virtual asset Custody Services?	Please answer 'Yes' or 'No'.
2.1.2	170	Custodian Services - Number of Clients.	Enter the number of clients that have been offered custodian services by the entity, during the reporting period.
2.1.3	171	Custodian Services - Number of Transactions	Enter the number of transactions that the entity processed for clients that it offered custodian services to, during the reporting period.

2.1.4	172	Custodian - Value of Fiat Assets Under Management.	Enter the value of Fiat Assets Under Management for clients that the entity offered custodian services to, during the reporting period.
2.1.5	173	Custodian - Value of Securities Under Management.	Enter the value of Securities Under Management for clients that the entity offered custodian services to, during the reporting period.
2.1.6	174	Custodian - Value of Virtual Assets Under Management.	Enter the value of Virtual Assets Under Management for clients that the entity offered custodian services to, during the reporting period.
2.1.7	175	Is the entity an Issuer of <u>or</u> intending to issue Private VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.8	176	Issuer Private VA Coins and Tokens - Number of Clients.	Enter the number of clients that were issued Private VA Coins and Tokens by the entity, during the reporting period.
2.1.9	177	Issuer of Private VA Coins and Tokens - Number of Transactions.	Enter the number of transactions the entity conducted, relating to issuance of Private VA Coins and Tokens, during the reporting period.
2.1.10	178	Issuers of Private VA Coins and Tokens - Gross Value of AUM.	Enter the gross value of Assets Under Management of Private VA Coins and Tokens issued during the reporting period.
2.1.11	179	Is the entity an Issuer of <u>or</u> intending to issue Public VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.12	180	Issuer of Public VA Coins and Tokens - Number of Clients.	Enter the number of clients that were issued with Public VA Coins and Tokens by the entity, during the reporting period.
2.1.13	181	Issuer of Public VA Coins and Tokens - Number of Transactions.	Enter the number of transactions the entity conducted, relating to issuance of Public VA Coins and Tokens, during the reporting period.
2.1.14	182	Issuers of Public VA Coins and Tokens - Gross Value of AUM.	Enter the gross value of Assets Under Management, of Public VA Coins and Tokens issued by the entity, during the reporting period.
2.1.15	183	Is the entity a Dealer of <u>or</u> intending to deal in VA Coins and Tokens?	Please answer 'Yes' or 'No'.

2.1.16	184	Dealer of VA - Number of Clients.	Enter the number of clients the entity provided the Dealer of VA Coins and Tokens services to, during the reporting period.
2.1.17	185	Dealer of VA - Number of Transactions.	Enter the number of transactions the entity processed as a Dealer of VA Coins and Tokens, during the reporting period.
2.1.18	186	Dealer of VA - Value of Transactions.	Enter the value of transactions relating to the services rendered by the entity as a Dealer of VA Coins and Tokens, during the reporting period.
2.1.19	187	Is the entity an Operator of <u>or</u> intending to operate a Virtual Asset Platform / Exchange?	Please answer 'Yes' or 'No'.
2.1.20	188	Does <u>or</u> will the entity allow/use privacy coins/anonymity-enhancing cryptocurrencies on the platform/exchange?	Please answer 'Yes' or 'No'.
2.1.21	189	VA Platform / Exchange - Number of Clients.	Enter the number of clients the entity provided with the services of an operator of a Virtual Asset Platform / Exchange, during the reporting period.
2.1.22	190	VA Platform / Exchange - Number of Transactions.	Enter the number of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period.
2.1.23	191	VA Platform / Exchange - Total Value of Transactions.	Enter the total value of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period.
2.1.24	192	Does <u>or</u> will the entity service Clients as an Agency Broker for Virtual Assets?	Please answer 'Yes' or 'No'.
2.1.25	193	Agency Broker for VA - Number of Clients.	Enter the number of clients the entity provided the services of an Agency Broker for VA, during the reporting period.
2.1.26	194	Agency Brokers for VA - Number of Transactions.	Enter the number of transactions that the entity processed as an Agency Broker for VA, during the reporting period.
2.1.27	195	Agency Broker for VA - Value of Transactions.	Enter the total value of transactions that the entity processed relating to the service

			rendered as an Agency Broker for VA, during the reporting period.
2.1.28	196	Does <u>or</u> will the entity offer any services in relation to/ affiliated with investment funds in the Cayman Islands that deal with/ invest in virtual assets?	Please answer 'Yes' or 'No'.
2.1.29	197	Does <u>or</u> will the entity provide other investment activities not listed above?	Please answer 'Yes' or 'No'.
2.1.30	198	Other Investment Activities - Number of Clients.	Enter the number of clients to which the entity provided other investment activities not listed above, during the reporting period.
2.1.31	199	Other Investment Activities VA - Number of Transactions.	Enter the number of transactions that the entity processed, during the reporting period, relating to other VA investment activities, which are not listed above.
2.1.32	200	Other Investment Activities - VA - Value of Transactions.	Enter the total value of transactions relating to other VA investment activities, not listed above, which the entity provided during the reporting period.
2.1.33	201	Indicate the types of 'Other Investment Activities'. Name all that apply.	List all other VA investment activities not listed above, which the entity offers.
2.2.1	202	Does <u>or</u> will the entity conduct batch processing for client transactions?	Please answer 'Yes' or 'No'.
2.2.2	203	Batch Processing - Average Number of Clients processed within a week.	Enter the average number of clients processed by the entity each week, through Batch Processing of transactions.
2.2.3	204	Batch Processing - Average Value of Transactions processed within a week.	Enter the average value of transactions processed within a week, using the Batch Processing of transactions method.
2.2.4	205	Does <u>or</u> will the entity engage in Virtual Asset Lending?	Please answer 'Yes' or 'No'.
2.2.5	206	Virtual Asset Lending - Number of Clients.	Enter the number of clients the entity lent Virtual Asset to, during the reporting period.
2.2.6	207	Virtual Asset Lending - Number of Transactions.	Enter the number of transactions conducted, during the reporting period,

			involving the entity lending Virtual Asset to clients.
2.2.7	208	Virtual Asset Lending - Value of Transactions.	Enter the value of transactions conducted, during the reporting period, relating to the entity lending Virtual Asset to clients.
2.2.8	209	Does <u>or</u> will the entity operate VA ATMs?	Please answer 'Yes' or 'No'.
2.2.9	210	Number of VA ATMs, broken down by country of ATM location.	Enter the number of VA Automated Teller Machines (ATMs) the entity has, broken down by country where the ATMs are <i>or</i> will be located.
2.2.10	211	VA ATM Operator - Number of Transactions, broken down by the country of the ATM.	Enter the number of transactions conducted at the VA Automated Teller Machines (ATMs), during the reporting period, broken down by country of location of the ATM.
2.2.11	212	VA ATM Operator - Value of Transactions, broken down by country of VA ATM.	Enter the value of transactions conducted on the VA Automated Teller Machines (ATMs) during the reporting period, broken down by country of location of the ATM.
2.2.12	213	Does <u>or</u> will the entity provide Mixers, Tumbler, Blenders, Foggers, or similar products and services to clients?	Please answer 'Yes' or 'No'.
2.2.13	214	Mixer Products and Services - Number of Clients.	Enter the number of clients where mixer products and services are applied.
2.2.14	215	Mixer Products and Services - Number of Transactions.	Enter the number of transactions conducted, during the reporting period, relating to Mixer Products and Services.
2.2.15	216	Mixer Products and Services - Value of Transactions.	Enter the total value of the transactions conducted, during the reporting period, relating to Mixer Products and Services.
2.3.1	217	Does <u>or</u> will the entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	218	Physical Cash - Number of Clients.	Enter the number of clients that processed Physical Cash transactions, during the reporting period.
2.3.3	219	Physical Cash - Number of Transactions.	Enter the number of Physical Cash transactions conducted during the reporting period.

			Payments include those between the entity and the client and those conducted on behalf of the entity.
2.3.4	220	Physical Cash - Value of Funds Transferred.	Enter the total value of funds transferred in form of Physical Cash during the reporting period.
2.3.5	221	Does <u>or</u> will the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.6	222	Virtual Currency - Number of Clients.	Enter the number of clients that processed payments in the form of Virtual Currency during the reporting period.
2.3.7	223	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions the clients conducted, during the reporting period.
2.3.8	224	Virtual Currencies - Value of Transactions.	Enter the value of funds transferred by clients using Virtual Currencies during the reporting period.
2.3.9	225	Does <u>or</u> will the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.3.10	226	Third Parties - Number of Clients.	Enter the number of clients that conducted payments via Third Parties during the reporting period. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction.
2.3.11	227	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions conducted by clients during the reporting period.
2.3.12	228	Third Parties - Value of Transactions.	Enter the value of funds transferred by clients during the reporting period, using payments via Third Parties.
2.3.13	229	Does <u>or</u> will the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.3.14	230	Credit Card Payments - Number of Clients	Enter the number of clients who made payments via Credit Card during the reporting period.
2.3.15	231	Credit Card Payments - Number of Transactions.	Enter the number of transactions conducted by clients, during the reporting period, using Credit Cards.

2.3.16	232	Credit Card Payments – Value of Transactions.	Enter the value of transactions processed by clients, during the reporting period, using Credit Cards.
2.3.17	233	Does <u>or</u> will the entity facilitate payments of Clients via Debit Card?	Please answer 'Yes' or 'No'.
2.3.18	234	Debit Card Payments - Number of Clients	Enter the number of clients who made payments via Debit Card during the reporting period.
2.3.19	235	Debit Card Payments - Number of Transactions.	Enter the number of transactions conducted by clients, during the reporting period, using Debit Cards.
2.3.20	236	Debit Card Payments – Value of Transactions.	Enter the value of transactions processed by clients, during the reporting period, using Debit Cards.
2.3.21	237	Does <u>or</u> will the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.3.22	238	Wire Transfers - Number of Clients.	Enter the number of clients that made payments in the form of Wire Transfers during the reporting period.
2.3.23	239	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions conducted by clients, during the reporting period.
2.3.24	240	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.3.25	241	Does <u>or</u> will the entity facilitate payments with Clients in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.26	242	Transfer of Securities - Number of Clients.	Enter the number of clients that made payments in the form of Transfer of Securities, during the reporting period.
2.3.27	243	Transfer of Securities - Number of Transactions.	Enter the number of transactions made by clients, during the reporting period, in the form of Transfer of Securities.
2.3.28	244	Transfer of Securities - Value Transactions.	Enter the value of funds transferred by clients during the reporting period, by way of Transfer of Securities.
2.3.29	245	Does <u>or</u> will the entity facilitate payments of Clients in other forms not listed above?	Please answer 'Yes' or 'No'.

2.3.30	246	Other Forms of Payment - Number of Clients.	Enter the number of clients that made payments using other forms of payment not listed above, during the reporting period.
2.3.31	247	Other Forms of Payment - Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, using other forms of payment other than the ones listed above.
2.3.32	248	Other Forms of Payment - Value of Transactions.	Enter the value of funds that were transferred by clients during the reporting period, using other forms of payments not listed above.
2.3.33	249	Please indicate the types of Other Forms of Payment.	List the Other Forms of Payment processed by clients during the reporting period, which are not listed above.
2.4.1	250	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country where the funds originated.
2.4.2	251	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds.
2.4.3	252	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, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country of payment destination.
2.4.4	253	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 relating, broken down by destination country of the transaction.
2.5.1	254	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	255	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Please include 'N/A' if no comment.
3.1.1	256	Total number of Clients - Direct - F2F.	Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and <u>not only</u>

			those onboarded during the reporting period.
3.1.2	257	Total number of Clients - Direct - Non-F2F.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and <u>not only</u> those onboarded during the reporting period. Examples of Direct Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have Direct F2F contact with the clients.
3.1.3	258	Total number of clients via Online Platforms.	Provide the total number of clients, in the <u>entity's entire portfolio</u>, that were onboarded via Online platforms, and not only those onboarded during the reporting period.
3.1.4	259	Number of Clients through Referrals within Group - F2F during the reporting period, broken down by the BOs nationality.	Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the BOs nationality. 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	260	Number of Clients - Direct - Non-F2F, broken down by nationality of the BO.	Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the BOs. 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	261	Total number of Clients onboarded through Eligible Introducers.	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	262	Number of Clients onboarding through Eligible Introducers during the reporting period,	Enter the number of clients which were onboarded through Eligible Introducers,

		broken down by nationality of the BO.	during the reporting period, broken down by the nationality of the BO.
3.1.8	263	Number of Clients onboarded through other introducers, and not Eligible Introducers, (Non-F2F), broken down by nationality of the BO.	Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the BOs.
3.1.9	264	Clients onboarding via Online Platforms during the reporting period, broken down by nationality of the BO.	Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the BO.
3.1.11	265	Provide the percentage of client assets held in hot wallets.	Enter the % number
3.1.12	266	Provide the percentage of client assets held in cold wallets.	Enter the % number
3.2.1	267	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	268	To whom has the AML Compliance Officer role been outsourced?	Select one of the following options which 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	269	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	270	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	271	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.

3.2.6	272	To whom has the Money Laundering Reporting Officer role been outsourced?	Select one of the following options which 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	273	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	274	How many Money Laundering Reporting Officers has the entity had in the past 3 years?	If no turnover of the Money Laundering Reporting Officer role in the three-year period, answer "1".
3.2.9	275	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	276	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	Select one of the following options which 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	277	What was the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period?	Enter the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period.
3.2.12	278	How many Deputy Money Laundering Reporting Officers has the entity had in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officer role in the three-year period, answer "1".

3.2.13	279	Has the entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	280	To whom has the Targeted Financial Sanction screening function been outsourced?	Select one of the following options which best describes the outsource relationship for the screening of Targeted Financial Sanctions: • 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.
3.2.15	281	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, during the reporting period.
3.2.16	282	How many TFS screening platforms has the entity had in the past 3 years?	If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	283	Has the entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	284	To whom has the Transaction Monitoring function been outsourced?	Select one of the following options which best describes the outsource 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.
3.2.19	285	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.
3.2.20	286	How many Transaction Monitoring platforms has the entity had in the past 3 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".

3.3.1	287	Has the entity outsourced the function of Trading platform within the reporting period?	Please answer 'Yes' or 'No'.
3.3.2	288	To whom has the Trading platform function been outsourced?	Select one of the following options which best describes the outsource relationship for the Trading platform: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the Trading platform turnover includes one of each within the reporting period.
3.3.3	289	What was the outsourcing country of the Trading platform function at the end of the reporting period?	Enter the country the entity outsourced the Trading platform function to, at the end of the reporting period.
3.3.4	290	How many Trading platforms has the entity had in the past 3 years?	If no turnover of the Trading platform function in the three-year period, answer "1".
3.3.5	291	Has the entity outsourced the function of Liquidity platforms within the reporting period?	Please answer 'Yes' or 'No'.
3.3.6	292	To whom has the Liquidity platform function been outsourced?	Select one of the following options which best describes the outsource relationship for the Liquidity platform: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where of the Liquidity platform turnover that includes one of each within the reporting period.
3.3.7	293	What was the outsourcing country of the Liquidity platform function at the end of the reporting period?	Enter the country the entity outsourced the Liquidity platform function to, at the end of the reporting period.
3.3.8	294	How many Liquidity platforms has the entity had in the past 3 years?	If no turnover of the Liquidity platform function in the three-year period, answer "1".
3.3.9	295	Has the entity outsourced the function of Mixer, Blender, Fogger, or other similar services within the reporting period?	Please answer 'Yes' or 'No'.

3.3.10	296	To whom has Mixer, or similar services, been outsourced?	Select one of the following options which best describes one of the following options which best describes the outsource relationship for the Mixer, Blender, Fogger, or other similar services: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the Mixer services that includes one of each within the reporting period.
3.3.11	297	What was the outsourcing country of the Mixer Services function at the end of the reporting period?	Enter the country the entity outsourced the Mixer, Blender, Fogger, or other similar services to, at the end of the reporting period.
3.3.12	298	How many Mixer Service Providers has the entity transacted with in past 3 years?	If no turnover of the Mixer, Blender, Fogger, or other similar services in the three-year period, answer "1".
3.3.13	299	Did the entity engage in Margin Trading during the reporting period?	Please answer 'Yes' or 'No'.
3.3.14	300	Number of Margin Trading Transactions	Enter the number of Margin Trading transactions the entity conducted, during the reporting period.
3.3.15	301	Value of funds borrowed by the entity for Margin Trading, broken down by borrowing country.	Enter the Value of funds borrowed by the entity during the reporting period, for Margin Trading transactions, broken down by borrowing country
3.4.1	302	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.4.2	303	In which countries by percentage of equity ownership are all Shareholders of the entity located.	Insert countries where all Shareholders of the entity are located and their percentage of equity ownership. <i>For publicly listed entities please list beneficial ownership of 10% or more.</i>
3.4.3	304	Number of Branches by location, broken down by country of operation.	Enter the number of Branches the entity has, broken down by country of operation.
3.4.4	305	Number of Subsidiaries by location, broken down by country of operation.	Enter the number of Subsidiaries the entity has, broken down by country of operation.

3.4.5	306	In which country is the Parent or Holding Company incorporated?	Enter the country of incorporation for the Parent or Holding Company.
3.4.6	307	Percentage of Controlling Interests in the entity, broken down by country of location of the Controlling Interests.	Insert countries where persons or beneficial owners who control the entity are located, and their percentage of Controlling Interest in the entity. <i>For publicly listed entities please list beneficial ownership of 10% or more.</i>
3.4.7	308	Does the entity have any licence or registration in another jurisdiction(s)?	Please answer 'Yes' or 'No'.
3.4.8	309	Did the entity receive any penalty or other enforcement action in another jurisdiction(s)?	Please answer 'Yes' or 'No'.
3.4.9	310	List the jurisdiction(s) which enforcement action was taken.	Enter the name(s) of the jurisdiction(s) which enforcement action was taken, if any. If none, use '0' to indicate none.
3.4.10	311	Does the entity hold any Controlling Interest in other legal person(s) or legal arrangement(s) engaged in Virtual Asset products or services?	Please answer 'Yes' or 'No'.
3.4.11	312	List the jurisdiction(s) where the entity holds a Controlling Interest in other legal person(s) or legal arrangement(s) engaged in Virtual Asset products or services.	Enter the name(s) of the jurisdiction(s) which the entity holds a Controlling Interest in other legal person(s) or arrangement(s) engaged in Virtual Asset products or services. If none, use '0' to indicate none.
3.4.12	313	Does the entity hold any Controlling Interest in other legal person(s) or legal arrangement(s) operating in a Special Economic Zone and engaged in Virtual Asset products or services?	Please answer 'Yes' or 'No'.
3.4.13	314	List the jurisdiction(s) where the entity holds a Controlling Interest in other legal	Enter the name(s) of the jurisdiction(s) which the entity holds a Controlling Interest in another legal person or

		person(s) or legal arrangement(s) operating in a Special Economic Zone and engaged in Virtual Asset products or services.	arrangement operating in a Special Economic Zone and engaged in Virtual Asset products or services. If none, use '0' to indicate none.
3.5.1	315	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.5.2	316	Please use this area to provide any comments or feedback for this tab.	Use this area to provide any comments or feedback for this tab. Please enter 'N/A' if no comment.

AML Controls Questions:

No.	Question No.	Question	Description/Explanation
1.1.1	317	Does <u>or</u> will 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	318	Does <u>or</u> will the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	319	What is <u>or</u> will be 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	320	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	321	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	322	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	323	Is there a documented ML/TF/PF/Sanctions risk	Please answer 'Yes' or 'No'.

		assessment framework approved by the Governing Body?	
1.1.8	324	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	325	Does Senior Management 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	326	Has the entity, or its directors, shareholders, beneficial owners, or senior officers been denied an application by any regulatory body?	Please answer 'Yes' or 'No'.
1.1.11	327	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.
1.1.12	328	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management a PEP?	Please answer 'Yes' or 'No'.
1.1.13	329	Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	330	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.2.2	331	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	332	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	333	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	334	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	335	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	336	Does the AMLCO have sufficient compliance/AML skills and	Please answer 'Yes' or 'No'.

		experience to perform their function?	
1.2.8	337	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	338	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	339	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	340	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	341	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	342	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	343	Have the directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	344	Has the AML Compliance Officer received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	345	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	346	Has the DMLRO received specialized AML/CFT/CPF and Sanctions	Please answer 'Yes' or 'No'.

		training over the last year relevant to the current position?	
1.3.6	347	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	348	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.3.8	349	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	350	What 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	351	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	352	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	353	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?	Please answer 'Yes' or 'No'.
1.4.3	354	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	355	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	356	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	357	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	358	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	359	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	360	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	361	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	362	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	363	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	364	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	365	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	366	Does the entity consider the ML/TF/PF risks of the clients, including those risks relating to BOs, in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.4	367	Does the entity consider the ML/TF/PF 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	368	Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.6	369	Does the entity consider the ML/TF/PF delivery channels	Please answer 'Yes' or 'No'.

		(existing and new) in their risk assessment?	
1.5.7	370	Does the entity ensure ML/TF/PF business risk assessments are done prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.5.8	371	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	372	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	373	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	374	Does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.
1.5.12	375	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	376	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	377	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	378	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	379	Does the entity rely on Group AML/CFT policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	380	If yes, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's	Please answer 'Yes' or 'No'.

		legislation and regulatory framework?	
1.6.3	381	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	382	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	383	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	384	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	385	Does the entity have Board, or governing body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	386	Does the entity have Board or governing body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	387	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	388	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	389	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	390	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.	
1.7.1	391	Does the entity have a sanctions screening process including policies and procedures?	Please answer 'Yes' or 'No'.
1.7.2	392	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	393	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	394	When designated list are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	395	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	396	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	397	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	398	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	399	Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen?	Please answer 'Yes' or 'No'.
1.7.10	400	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	401	Does the entity have systems and procedures in place to determine	Please answer 'Yes' or 'No'.

		whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?	
1.7.12	402	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	403	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 those 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	404	Does the entity have transaction monitoring policies and procedures developed, commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	405	Does the entity have Governing Body approved 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	406	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	407	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	408	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	409	Does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	410	Where high risk customers are identified, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.
1.8.8	411	Enter the total number of Alerts resulting in Suspicious Activity Reports related to ML/TF/PF and Sanctions matters identified during transaction monitoring.	The total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR.
1.9.1	412	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	413	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	414	Does the entity have policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.9.4	415	How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO 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	416	How many Suspicious Activity Reports have been reported, to the FRA, 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	417	How many hours on average does it take to file a SAR to the FRA?	Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.
1.9.7	418	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business	Please answer 'Yes' or 'No'.

		activities, directors or senior management?	
1.9.8	419	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	420	Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	421	Does the entity maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.
1.9.11	422	If the MLRO decides not to file a SAR to the FRA, is the reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	423	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	424	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	425	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	426	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	427	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	428	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	429	If applicable, 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.
1.11.2	430	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.
1.11.3	431	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.
1.11.4	432	In total, how many services does the entity outsource to either third parties, within its group or subsidiaries?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.11.5	433	Does the outsourcing agreement 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.
1.11.6	434	If relevant, does the outsourcing agreement require OSP 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.
1.11.7	435	If relevant, is there a contingency plan in the event the Outsourcing 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.
1.11.8	436	If relevant, 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.
1.11.9	437	If relevant, 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.
1.11.10	438	If relevant, are there policies and procedures 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.
1.11.11	439	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.
1.11.12	440	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.
1.13.1	441	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.13.2	442	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 comment.