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# **AML Return – Completion Guide: Insurance**

Document version: 1.5

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**Revision History:**

<b>Effective Date</b>	<b>Version Number</b>	<b>Revision Description</b>
24 November 2022	1.0	Initial release of document
14 December 2022	1.1	Update to guidance for products and services questions.
31 July 2023	1.2	Updates to definitions, descriptions, explanations and questions.
31 July 2024	1.3	Updates to inherent risk and controls questions.
1 August 2025	1.4	Updates to section 1 and sections 4.3 through 4.6 along with updates to definitions, descriptions, and explanations and updates to controls questions.
1 June 2026	1.5	Updates to sections 1 to 4.6 and section 5 which includes updates to questions, descriptions and explanations.

## Contents

- 1 Introduction .....4
- 2 Form Information .....5
- 3 Accessing and Submitting the AML Return .....5
  - 3.1 Access to the AML Return.....5
  - 3.2 Completing the AML Return Form..... 10
- 4 Other Useful Information ..... 11
  - 4.1 User account lockouts..... 11
  - 4.2 Internet Browser..... 11
  - 4.3 Two-Factor Authentication..... 11
  - 4.4 Using Excel ..... 12
  - 4.5 Partial Or Incomplete Return Submissions..... 12
  - 4.6 Data and Security ..... 13
  - 4.7 Applicable Fees..... 13
- 5 *AML Return Guidance* ..... 13

## 1 INTRODUCTION

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

In order to obtain the information necessary to discharge its principal functions, particularly that of monitoring compliance with the AMLRs, the Authority periodically undertakes sectoral money laundering/terrorist financing/proliferation financing (ML/TF/PF) risk assessments as part of its risk-based approach to Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) supervision of regulated financial service providers (“**FSPs**”). In conducting sectoral ML/TF risk assessments and other related research, the Authority uses software called Strix to distribute the **AML Return** to FSPs and further collect, analyse, model, and assess ML/TF/PF and Sanctions risk data.

FSPs are required to provide this data by completing the AML Return Form and to submit it through the Authority’s web-based portal, Strix, to the Anti-Money Laundering Division (“**AML D**”), within sixty (60) days after distribution by the Authority.

The AML Return Form is issued in accordance with Regulation 53A of the AMLRs, pursuant to which the Authority may require a FSP to provide any information that the Authority reasonably requires in connection with the exercise of its functions. Requiring FSPs to provide the information by completing this AML Return is necessary to ensure that the Authority has the requisite information to perform its functions as outlined in Section 6 of the MAA, which includes the monitoring of compliance with the AMLRs.

Section 22(1)(a) of the Insurance Act, 2010 (“**IA**”) further sets out the duty of the Authority to maintain a general review of insurance business in the Islands, while Section 22(1)(b) thereof empowers the Authority to examine the affairs of a licensee in any manner as it deems fit, for the purposes of, among others, satisfying itself that regulations made under the Proceeds of Crime Act (2025 Revision), which includes the AMLRs, are being complied with. Additionally, in accordance with Section 22(2)(a) of the IA, the Authority is entitled at all reasonable times to have access to records of a licensee. The examination of the affairs of a licensee by way of the AML Return is therefore necessary for purposes of discharging the Authority’s functions.

This Guide provides instructions and support to FSPs licensed under the IA, for accessing, completing, and submitting the AML Return to AML D.

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

## 2 FORM INFORMATION

The AML Return – Insurance is to be completed by each FSP holding an Insurance licence - commonly referred to as the “Entity” for purposes of this form.

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

## 3 ACCESSING AND SUBMITTING THE AML RETURN

### 3.1 ACCESS TO THE AML RETURN


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

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

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

To access the AML Return:

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



### Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

[Confirm Account](#)

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

<https://amidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLlB6VZCRbBxmnm3fq3fSoAMoPYyQ6XKFqtb0MoYGkSpT5b5bDc%2B2cgpHPQ8df%2BUVVhbZktQht%2F4d2cbloYpsg%2Bjke0tE3GtlwMObYSoP%2Bk8rPURRSVrPSQt6JAshgsaBaC6uvcZY4KB266Hfgh4PhATaTNSa3IE3alA%3D>


For any questions concerning the survey or the current reporting cycle, please contact: [AMLSurvey@cima.ky](mailto: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.f-solutions.com](http://www.f-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.



### Set Your Password

New Password \*

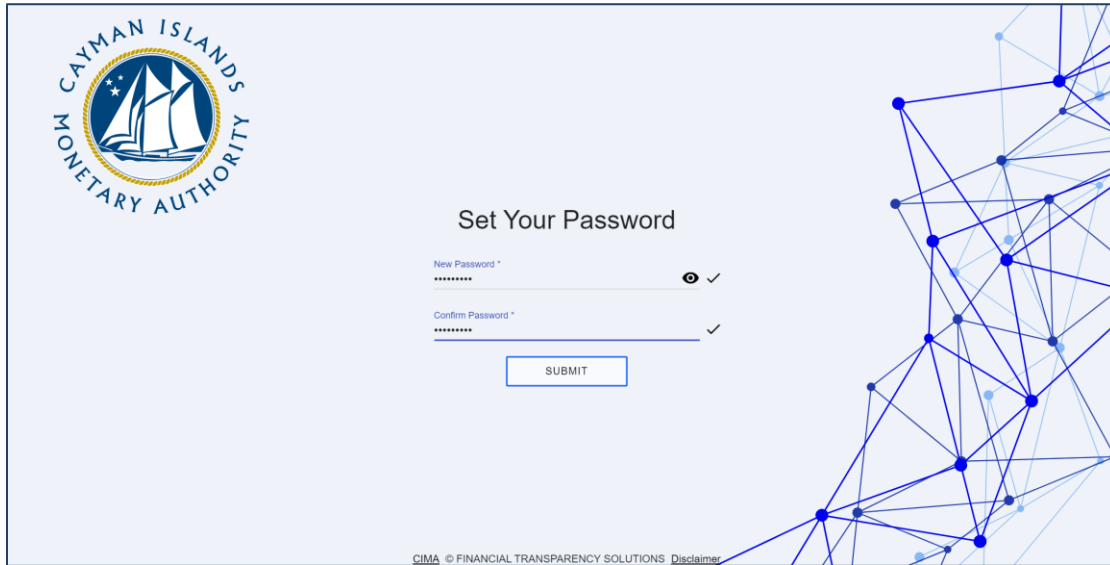
Confirm

Password must meet the following requirements:

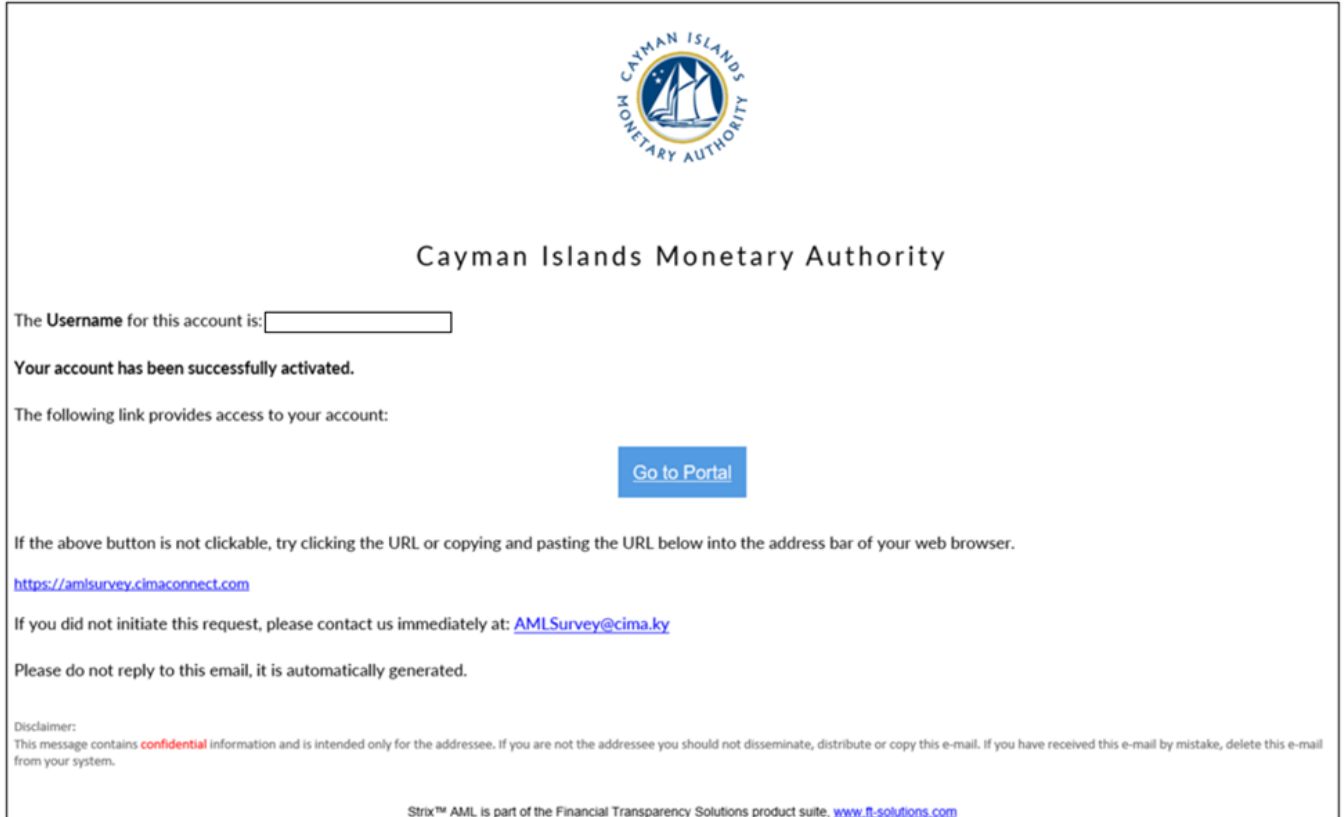
- ✗ At least one lower case letter
- ✗ At least one upper case letter
- ✗ At least one special character
- ✗ At least one number
- ✗ Be at least 8 characters
- ✗ Maximum length of 16 characters

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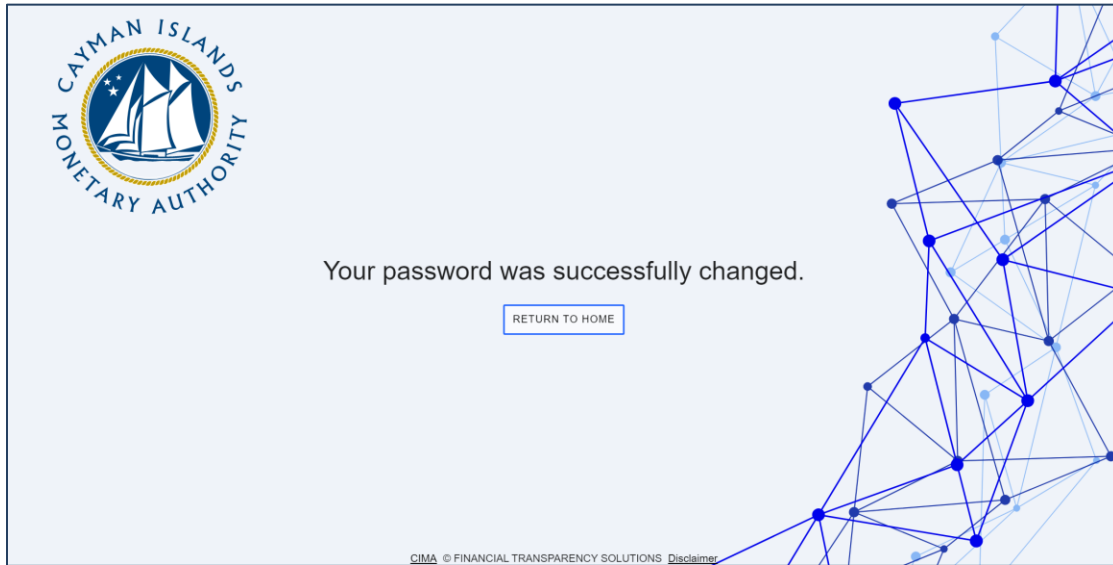
- 3. The recipient will be asked to re-enter their password.



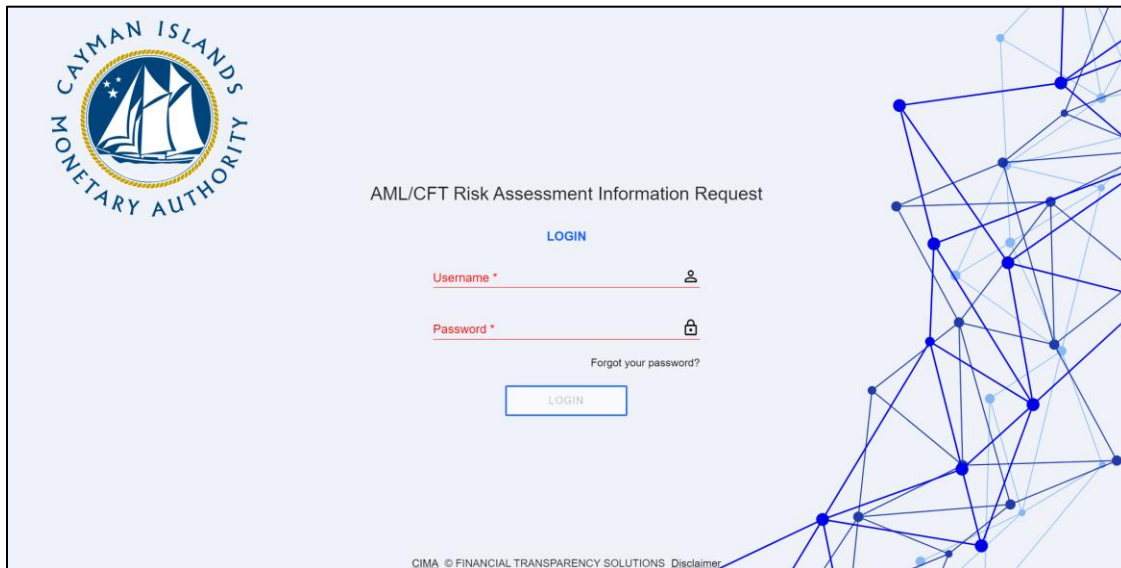
- 4. Once the recipient’s password has been re-entered, and matches, they can submit and finish the activation process. An email “Notification of Successful Activation” will be sent providing a ‘Go to Portal’ link which can be used for all future access.



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



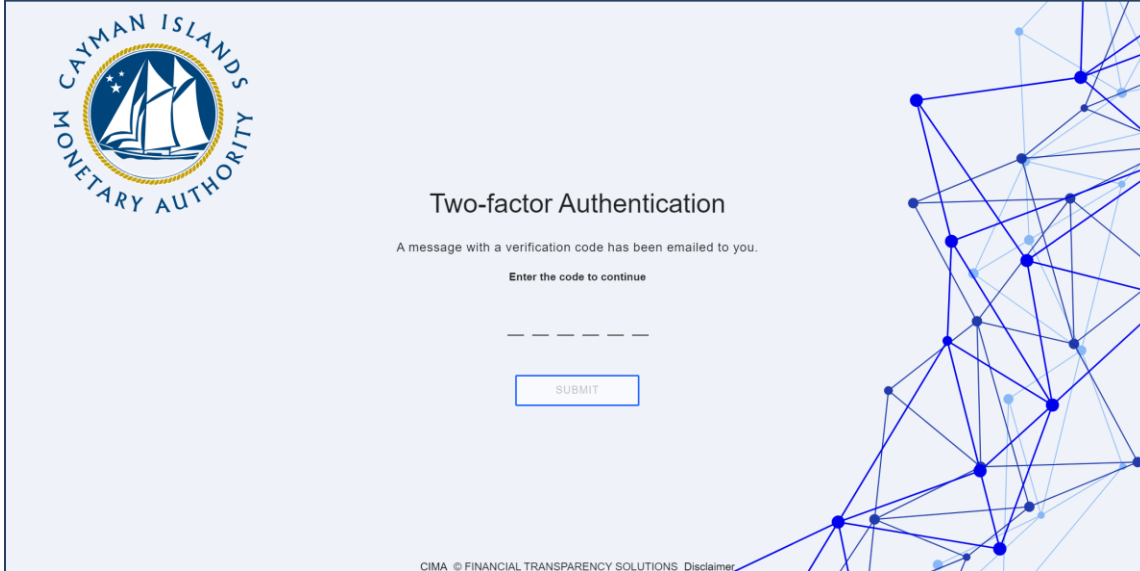
- The recipient should then enter their username, which is their email address where they received the AML Return invite, and the password they just created.



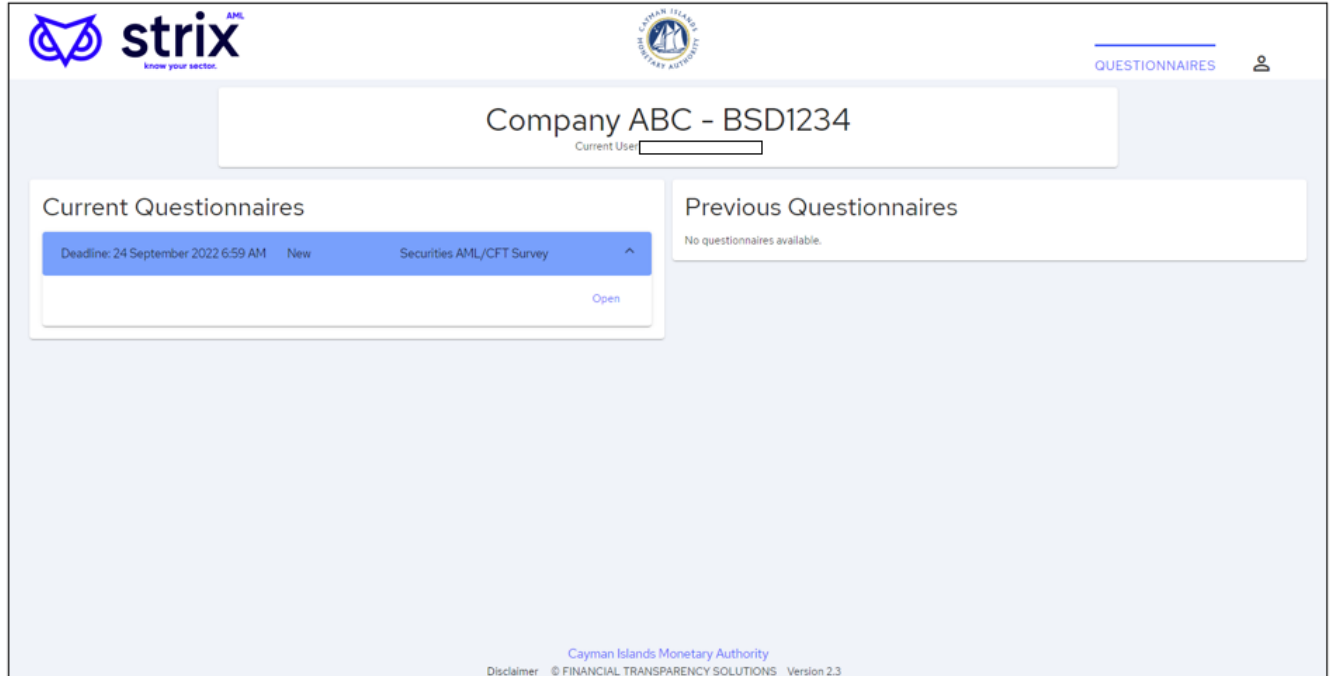
- A six digit two-factor authentication code will be sent to the return recipient's email



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



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



## 3.2 COMPLETING THE AML RETURN FORM

1. Click the Current Questionnaire to access the AML Return Form and start populating the form with the required data.
  - a. Completion guidance for the AML Return is available at Section 5 of this Guide below.
  - b. The recipient(s) can open, update, and close the AML Return as many times as needed prior to the return due date so long as the recipient selects 'Save'.
  - c. Once the AML Return has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
  - d. Users should note that the return does not have Excel import functionality. However, the Entity may utilise the XBRL functionality to assist in completing the Return. The Strix XBRL Overview User Guide is published on the Authority's website and can be accessed at: <https://www.cima.ky/cima-releases-strix-xbrl-overview-user-guide>
  - e. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the return name will be listed for verification, which is useful for instances where users are submitting for more than one entity.
  - f. Once the AML Return is 'Submitted' an Excel and PDF copy of the completed return will be available under 'Current Questionnaire'.

- g. Upon submission to the Authority a review of the AML Return will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Return through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
2. If a user receives or has access to more than one return, they will not see the additional return(s) in the 'Current Returns section of the web page. At the top of the page, where it shows the Entity name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.

## 4 OTHER USEFUL INFORMATION

### 4.1 USER ACCOUNT LOCKOUTS

In the event the AML Return recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An email will be sent to the user identifying that they 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 [AMLReturns@cima.ky](mailto:AMLReturns@cima.ky) to request having their account re-activated.

### 4.2 INTERNET BROWSER

Users should be aware that the AML Return will not open using the legacy Windows Explorer browser or with dated 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.

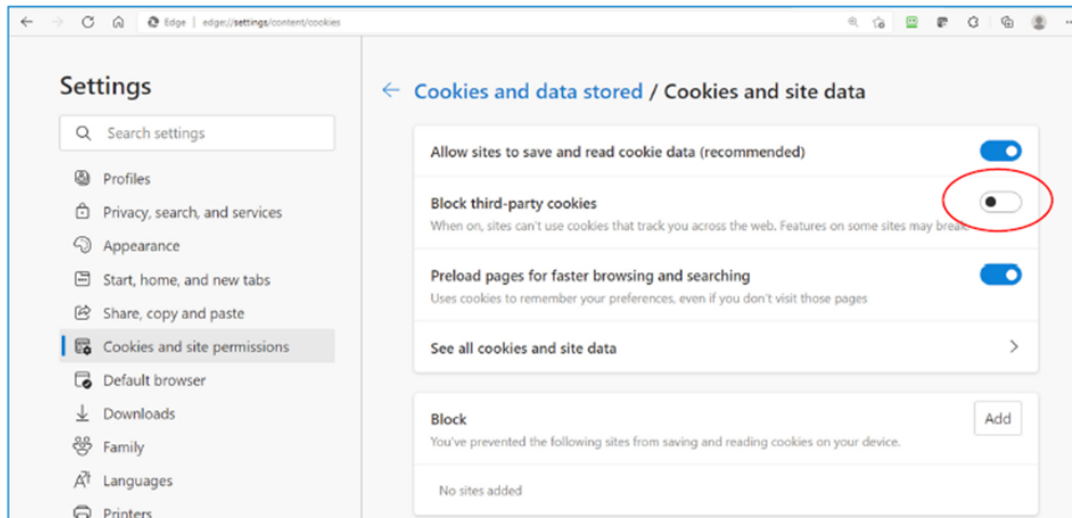
### 4.3 TWO-FACTOR AUTHENTICATION

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

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

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

### Example of Microsoft Edge Cookie Setting:



## 4.4 USING EXCEL

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

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

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

## 4.5 PARTIAL OR INCOMPLETE RETURN SUBMISSIONS

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

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

## 4.6 DATA AND SECURITY

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

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

## 4.7 APPLICABLE FEES

There are no fees associated with this Form.

# 5 AML RETURN GUIDANCE

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

### Terms and Definitions:

Term/Abbreviation	Definition/Meaning
AMLCO	Anti-Money Laundering Compliance Officer means the person designated in accordance with Regulation 3(1) of the Anti-Money Laundering Regulations (2025 Revision), as amended.
AMLRs	Anti-Money Laundering Regulations (2025 Revision), as amended.
Beneficial Owner	<p>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–</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person;</p> <p>(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</p>

	<p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement.</p> <p><i>As guidance, in instances where a BO has multiple nationalities, where applicable, the entity is to disclose the nationality which could present higher risks as referenced in Regulation 8A of the AMLRs.</i></p>
Beneficiary	In relation to a wire transfers or transfer of virtual assets, means the natural or legal person or the legal arrangement who is identified by the originator as the receiver of the requested transfer.
Client / Customer	<p>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.</p> <p><i>Generally, clients/customers are made up of natural persons, legal persons, and/or legal arrangements.</i></p>
Corporate Entity	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 Return	<p><b>United States Dollars (US\$).</b></p> <p>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.</p>
Dealers in Precious Metals and Stones	Legal and Natural Persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer (“DMLRO”) means the “nominated officer” as defined in Regulation 33(2) of the AMLRs.
Eligible Introducers	<p>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.</p> <p>The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under Regulation 22(1)(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an</p>

	applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Entity	For the purposes of this form/return, an 'entity' is the holder of an Insurance licence that is responding to this return.
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.
Fintech Services	Services that use innovative technology to improve, change or enhance how a financial services business is conducted but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2025 Revision), except to the extent that it is modified by the Foundation Companies Act (2025 Revision) or those foundation companies established in other jurisdictions.
FRA	Financial Reporting Authority ("FRA") is the Cayman Islands Financial Intelligence Unit responsible for deterring, preventing and detecting Money Laundering, Terrorist Financing and Proliferation Financing.
Gov / Pub Sector	Business conducted with companies who are Government or in the Public Sector. Companies in which a government has a controlling interest; and in respect of such company, includes all subsidiary entities of the company.
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods.
HNWI	For the purpose of the AML Return, a high net worth individual (HNWI) is:  (i) an individual whose net worth is approx. US\$1,000,000 or its equivalent in any other currency; or (ii) any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.  HNWIs also include those clients who are Ultra HNWIs.
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it'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 Legal Arrangement.
Legal Arrangement	A Trust, Partnership or other entity created between parties which lacks separate legal personality.
Legal Person	A company or other entity created by operation of law with separate legal personality.
MLRO	Money Laundering Reporting Officer “MLRO” means the “nominated officer” as defined in Regulation 33(1) of the AMLRs.
ML/TF/PF	Money Laundering/ Terrorism Financing/ Proliferation Financing.
MSB	Money Services Business (“MSB”) means the business of providing, in or from within the Islands, any of the following services: (a) money transmission; (b) cheque cashing; (c) currency exchange; (d) the issuance, sale or redemption of money orders or traveller’s cheques.
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Director	A natural or legal person who takes on the role of company director on the behalf of another.
Nominee Shareholder	A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-Compliant Accounts	Where a person carrying out relevant financial business is unable to obtain information 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.
NPO	A company or body of persons, whether incorporated or unincorporated, or a trust –  (a) established or which identifies itself as established primarily for the promotion of charitable, philanthropic, religious, cultural, educational, social or fraternal purposes, or other activities or programmes for the public

	<p>benefit or a section of the public within the Islands or elsewhere; and</p> <p>(b) which solicits contributions or raises funds from the public or a section of the public within the Islands or elsewhere.</p>
OSP	<p>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.</p> <p>Outsourcing does not include purchasing contracts.</p>
PEP	<p>“Politically Exposed Person” includes –</p> <p>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.</p> <p>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;</p> <p>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.</p>
Reporting Period	January 1 through December 31 of the applicable year.
Signatories	Signatories are those persons authorised to act on behalf of a client, for example, BOs, Directors, or other Third Parties.
Source of Funds	<p>The origin of the assets that will be used to form and maintain the business relationship.</p> <p>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.</p> <p>Take this into account when answering questions relating to the ‘Nature of Business – Source of Funding.</p>

Special Economic Zone Business	Any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Cayman Islands.	
Targeted Financial Sanctions (TFS)	Includes asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").	
TCSP	Includes those entities conducting Trust, Company Manager, and Corporate Service Provider business.	
Transaction	<p>For the purposes of this AML Return, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client.</p> <p>Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction.</p>	
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 Return, Ultra-High Net Worth Individuals ("UHWIs"), also referred to as UHNWI, are all HNWI whose net worth is greater than or equal to US\$30,000,000.	
Virtual Assets Products and Services	Includes those services identified within the Virtual Asset (Service Providers) Act (2024 Revision), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.	
Timeframe	Number of Clients	Number of clients <b>as at the end of the reporting period.</b>
Timeframe	Value of Business	Value of business (premiums/ fees/ commissions) collected from clients <b>during the reporting period.</b>
Timeframe	Number of Transactions	Number of transactions conducted for the client <b>during the reporting period.</b>

### AML Inherent Risk Questions:

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1.	Total Clients/Customers at the end of the reporting period.	<p>Enter the total number of clients. This will include all customers on the entity's client list at <i>the end of</i> the reporting period.</p> <p>This number should include all clients the entity provides financial products and services.</p> <p>Total clients consist of Natural Persons, Legal Persons and Legal Arrangements.</p>
1.1.2	2.	Total Transactions during the reporting period.	Enter the total number of all transactions conducted for clients <i>during</i> the reporting period.
1.1.3	3.	Total Value of Business.	<p>Enter the total Value of Premiums/ Fees/ Commissions collected during the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected including long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
1.1.4	4.	Does the entity have any clients that are Legal Persons or Arrangements?	Please answer 'Yes' or 'No'.
1.1.5	5.	Clients/customers that are Legal Persons, broken down by country of incorporation of the client.	<p>Enter the total number of clients that are Legal Persons, broken down by country of incorporation, as at the end of the reporting period.</p> <p>Examples of legal persons include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.6	6.	Clients/customers that are Legal Arrangements, broken down by country of establishment of the client.	<p>Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as at the end of the reporting period.</p> <p>Examples of legal arrangements include but are not limited to Trusts and Partnerships.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>

1.1.7	7.	Number of Transactions - Legal Persons	Enter the total number of transactions processed for or on behalf of customers who are Legal Persons, during the reporting period.
1.1.8	8.	Number of Transactions – Legal Arrangements.	Enter the total number of transactions processed for or on behalf of clients who are Legal Arrangements, during the reporting period.
1.1.9	9.	Value of Business - Legal Persons.	Enter the total Value of Premiums / Commissions / Fees for clients who are Legal Persons, as at the end of the reporting period.
1.1.10	10.	Value of Business - Legal Arrangements.	Enter the total Value of Premiums / Commissions / Fees for clients who are Legal Arrangements, as at the end of the reporting period.
1.1.11	11.	Total number of PEPs.	Enter the total number of PEPs, broken down by the nationality of the PEP, as at <i>the end of</i> the reporting period.  Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, BOs, Directors, Investors, Promoters, or hold any other form of control, including signatories.
1.1.12	12.	Total number of High Risk Clients/Customers.	Enter the total number of clients / customers that are high risk, at <i>the end of</i> the reporting period.
1.1.13	13.	Total number of Non-Compliant Accounts at the end of the reporting period.	Enter the number of customer accounts that remain non-compliant with required identification and verification procedures, that is, sufficient CDD documents has not been collected, as at the end of the reporting period.
1.1.14	14.	Total value of client/ policyholder assets, by geographic location of the assets, at the end of the reporting period.	Enter the total value of client/ policyholder assets, by the geographic location where the assets of the client / policyholder assets are custodied, at the end of the reporting period.
1.2.1	15.	Total number of BOs of clients who are Legal Persons and Arrangements.	Enter the total number of BOs of all clients who are Legal Persons and Arrangements, broken down by nationality of the BO, as at <i>the end of</i> the reporting period.

			<p>This category is specific to Legal Persons and Legal Arrangements. Examples include but are not limited to: The total number of BOs of Corporate entities, Settlers of Trusts and General Partners of Limited Partnerships.</p> <p>A BO should not be counted more than once regardless of the number of business relationships they have with the entity.</p>
1.2.2	16.	Number of clients which have BOs that are directors of the client.	Enter the total number of clients which have BOs that are also directors of the client.
1.2.3	17.	Number of clients which have BOs that are Controllers of the client.	Enter the total number of clients whose BOs are also Controllers of the client.
1.2.4	18.	Number of clients which have BOs that are also senior managing officials of the client.	<p>Enter the total number of clients whose BOs are also senior managing officials of the client.</p> <p>Senior managers are individuals at the highest level of organizational management, who have the day-to-day responsibilities of managing a company or corporation. They hold specific executive powers conferred onto them by the board of directors and/or the shareholders.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.5	19.	Number of Clients that have BOs who are HNWI's.	<p>Enter the total number of clients who have BOs that are also HNWI's.</p> <p>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 Company or Settlor of a Trust is a HNWI.</p> <p>HNWI's is specific to those persons whose net worth is at least US\$1,000,000 or more, or those that have assets valued at least US\$5,000,000 or more.</p> <p><i>HNWI's also include those clients who are Ultra HNWI's.</i></p>
1.2.6	20.	Number of Clients that have BOs who are Ultra HNWI's.	<p>Enter the total number of clients who have BOs that are also Ultra HNWI's.</p> <p>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 Company or Settlor of a Trust is a UHNWI.</p> <p>UHNWI's is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p> <p>The count of these individuals should also be included in the HNWI category.</p>

1.2.7	21.	Number of BOs of clients who are Legal Persons or Arrangements who are also PEPs.	Enter the total number of clients who are Legal Persons and Arrangements that have BOs who are PEPs, as at the end of the reporting period.
1.2.8	22.	Number of clients that have Nominees acting on behalf of a BO, or a Nominee within the ownership structure, broken down by nationality of the BO.	Enter the total number of clients that have nominees acting on behalf of beneficial owners, or within its ownership structure, broken down by nationality of the beneficial owner.  This category is specific to clients who are Legal Persons and Arrangements.
1.2.9	23.	Number of directors and/or senior management of clients who are PEPs.	Enter the total number of clients who have directors and/or senior management who are also PEPs, broken down by nationality of the director / senior management, as at the end of the reporting period.
1.2.10	24.	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 the clients who are also HNWI's, as at the end of the reporting period.  HNWI's is specific to those persons whose net worth is at least US\$1,000,000 or more, or those that have assets valued at least US\$5,000,000 or more.  Entities should report all directors/ senior managers who fall in excess of the above range (including those directors / senior managers who qualify as UHNWI.  Approximate values are acceptable.
1.2.11	25.	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 the clients who are Ultra HNWI's, as at the end of the reporting period.  UHNWI's is specific to those persons whose net worth is equal to or greater than US\$30,000,000.  The count of these individuals should also be included in the HNWI category.
1.2.12	26.	Number of directors and/or senior management of clients who are PEPs & HNWI's/ Ultra HNWI's.	Enter the number of directors and/or senior management of the clients who are both PEPs <u>and</u> HNWI's/ Ultra HNWI's, as at the end of the reporting period.
1.3.1	27.	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.

1.3.2	28.	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are a Government or Public Sector, broken down by government jurisdiction.
1.3.3	29.	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions conducted by clients that are Government or Public Sector during the reporting period.
1.3.4	30.	Gov / Pub Sector - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected during the reporting period, for clients that are Government or Public Sector.
1.3.5	31.	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.3.6	32.	NPO - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, that are NPOs, broken down by country of incorporation.
1.3.7	33.	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period, broken down by country of incorporation.
1.3.8	34.	NPOs - Value of Business for the reporting period.	Enter the Value of premiums / commissions / fees collected during the reporting period, of clients that are NPOs.  <i>For long term investment contracts, use the total asset under management at the end of the reporting period.</i>
1.3.9	35.	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.  Answer 'Yes' if the entity has clients that have a Foundation within its structure.  <i>Note that one client can fall under multiple categories within this 'Structure' section.</i>
1.3.10	36.	Foundations - Number of Clients, broken down by the country of establishment of the client.	Enter the number of clients the entity has for this category.
1.3.11	37.	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients for this category during the reporting period.
1.3.12	38.	Foundations - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected from clients

			<p>that are a Foundation, during the reporting period.</p> <p><i>For long term investment contracts, use the total asset under management at the end of the reporting period.</i></p>
1.3.13	39.	Does the entity have any clients that are Trusts?	<p>Please answer 'Yes' or 'No'.</p> <p>Answer 'Yes' if the entity has clients that have a Trust within its structure.</p> <p><i>Note that one client can fall under multiple categories within this 'Structure' section.</i></p>
1.3.14	40.	Trusts - Number of Clients, broken down by country of formation of the client.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.3.15	41.	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients for this category during the reporting period.
1.3.16	42.	Trusts - Value of Business for the reporting period.	<p>Enter the Value of Premiums / Commissions / Fees collected during the reporting period, for clients that are Trusts.</p> <p><i>For long term investment contracts, use the total asset under management at the end of the reporting period.</i></p>
1.3.17	43.	Does the entity have any clients that are Segregated Portfolio Companies?	<p>Please answer 'Yes' or 'No'.</p> <p>Answer 'Yes' if the entity has any clients that have a Segregated Portfolio Company within their structure.</p> <p><i>Note that one client can fall under multiple categories within this 'Structure' section.</i></p>
1.3.18	44.	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.3.19	45.	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients, for this category, during the reporting period.
1.3.20	46.	Segregated Portfolio Companies - Value of business collected for the reporting period.	<p>Enter the Value of Premiums / Commissions / Fees collected during the reporting period.</p> <p><i>For long term investment contracts, use the total asset under management at the end of the reporting period.</i></p>

1.3.21	47.	Does the entity have any clients that are from Special Economic Zone?	<p>Please answer 'Yes' or 'No'.</p> <p>Answer 'Yes' if the entity has any clients that are a member of a Special Economic Zone.</p> <p><i>Note that one client can fall under multiple categories within this 'Structure' section.</i></p>
1.3.22	48.	Special Economic Zone - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.3.23	49.	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients, for this category, during the reporting period.
1.3.24	50.	Special Economic Zone - Value of Business for the reporting period.	<p>Enter the Value of Premiums / Commissions / Fees collected during the reporting period.</p> <p><i>For long term investment contracts, use the total asset under management at the end of the reporting period.</i></p>
1.4.1	51.	Does the entity have any clients that are Natural Persons?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.</p>
1.4.2	52.	Clients / customers that are Natural Persons, broken down by Nationality of the client.	<p>Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i></p>
1.4.3	53.	Clients/customers that are Natural Persons, broken down by Residency of the client.	<p>Enter the number of clients that are natural persons, broken down by their residency.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients/ customers that are Legal Persons and Arrangements.</i></p>

1.4.4	54.	Natural Persons - Total Transactions for the reporting period.	<p>Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients / customers that are Legal Persons and Arrangements.</i></p>
1.4.5	55.	Value of Business - Natural Persons.	<p>Enter the total value of Premiums / Commissions / Fees earned for clients that are Natural Persons during the reporting period.</p> <p>For long term investment contracts, use the total asset under management at the end of the reporting period.</p>
1.4.6	56.	Natural Person Clients - Does the entity have any clients that are PEPs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.</p>
1.4.7	57.	Number of Natural Person clients who are PEPs, broken down by the nationality of the client.	<p>Enter the total number of Natural Person clients that are PEPs, broken down by the nationality of the client, as at the end of the reporting period.</p> <p>This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.</p>
1.4.8	58.	Natural Persons - PEPs - Number of Transactions.	<p>Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.</p>
1.4.9	59.	Does the entity have any Natural Person clients that are HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p>HNWIIs is specific to those persons whose net worth is at least US\$1,000,000 or more, or those that have assets valued at least US\$5,000,000 or more.</p> <p>Entities should report all natural person clients who fall in excess of the above range including those who qualify as UHNWI.</p> <p>Approximate values are acceptable.</p> <p>This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.</p>
1.4.10	60.	Number of Natural Person clients who are HNWIIs.	<p>Enter the number of Natural Person clients the entity has that are HNWIIs.</p>

1.4.11	61.	Natural Person Clients - HNWI's - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are HNWI's, during the reporting period.
1.4.12	62.	Does the entity have any Natural Person clients that are Ultra HNWI's?	Please answer 'Yes' or 'No'.  For this category, Ultra HNWI's are those natural persons with net worth equal to or greater than US\$30,000,000.  This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.
1.4.13	63.	Number of Natural Person clients who are Ultra HNWI's.	Enter the number of Natural Person clients the entity has that are Ultra-HNWI's at the end of the reporting period.
1.4.14	64.	Natural Person Clients - Ultra HNWI's- Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are Ultra HNWI's, during the reporting period.
1.4.15	65.	Does the entity have any Natural Person clients that are PEPs and HNWI's /Ultra HNWI's?	Please answer 'Yes' or 'No'.  Include all PEPs, both HNWI and Ultra HNWI's.
1.4.16	66.	Number of Natural Person clients who are PEPs and HNWI's / Ultra HNWI's.	Enter the number of Natural Person clients the entity has that are both PEPs and HNWI's / Ultra HNWI's, at the end of the reporting period.  Include all PEPs, both HNWI and Ultra HNWI's.
1.4.17	67.	Natural Person Clients - PEPs and HNWI's / UHNWI's - Number of Transactions.	Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWI's/Ultra HNWI's, during the reporting period.  Include all PEPs, both HNWI and Ultra HNWI's.
1.5.1	68.	Total Number of Beneficiaries, Natural and Legal Persons.	Enter the Total Number of Beneficiaries, for clients that are Natural and Legal Persons.
1.5.2	69.	Number of Beneficiaries Clients that are Natural Persons.	Enter the Number of Beneficiaries for Clients that are Natural Persons.
1.5.3	70.	Number of Beneficiaries Clients that are Corporations.	Enter the Number of Beneficiaries for Clients that are Corporations.
1.5.4	71.	Number of Beneficiaries Clients that are Corporate Group Structures.	Enter the Number of Beneficiaries for Clients that are Corporate Group Structures.

1.5.5	72.	Number of Beneficiaries Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary.	Enter the Number of Beneficiaries for Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary.
1.5.6	73.	Number of Beneficiaries Clients that are NPOs.	Enter the Number of Beneficiaries for Clients that are NPOs.
1.5.7	74.	Number of Beneficiaries Clients that are Trusts.	Enter the Number of Beneficiaries for Clients that are Trusts.
1.5.8	75.	Number of Beneficiaries Clients that are Foundations.	Enter the Number of Beneficiaries for Clients that are Foundations.
1.659	76.	Number of Beneficiaries Clients that are PEPs, broken down by nationality of the Beneficiary.	Enter the Number of Beneficiaries for Clients that are PEPs, broken down by nationality of the Beneficiary.
1.6.1	77.	<p><b>Nature of Business / Source of Funding:</b> Does the entity have clients whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> <li>• Banking Institutions</li> <li>• Other Financial Regulated Business*</li> <li>• Financial Leasing</li> <li>• Money Lending</li> <li>• Accountants</li> <li>• Fintech</li> <li>• Civil Service / Government Employment</li> </ul> <p><i>*excluding MSBs, VASPs, and TCSPs.</i></p>	Please answer 'Yes' or 'No'.
1.6.2	78.	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Banking sector.
1.6.3	79.	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from the Financial Sector (excluding Banking, VASPs, MSBs and TCSPs).
1.6.4	80.	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from Financial Leasing operations.
1.65	81.	Money Lending - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from Money Lending operations.

1.6.6	82.	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived through being an Accountant (including but not limited to the areas of: Audit, Assurance, Bookkeeping, and Insolvency).
1.6.7	83.	Fintech - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Fintech Industry.
1.6.8	84.	Civil Service / Government Employees – Number of Clients	Enter the number of clients the Entity has whose source of funding is from Civil Service or Government employment.
1.6.9	85.	<p><b>Nature of Business / Source of Funding:</b> Does the entity have clients whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> <li>▪ Legal Practitioners</li> <li>▪ Dealers in Precious Metals and Stones</li> <li>▪ Money Services Business (MSBs)</li> <li>▪ Virtual Asset Products and Services</li> <li>▪ High Value Dealers</li> <li>▪ TCSPs</li> <li>▪ Import/Export Industry</li> <li>▪ Shipping and Transport of Goods</li> </ul>	Please answer 'Yes' or 'No'.
1.6.10	86.	Legal Practitioners – Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner.
1.6.11	87.	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.6.12	88.	Money Services Business - Number of Clients.	Enter the number of clients whose source of funds is derived from Money Services Business operations.
1.6.13	89.	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Virtual Asset Products and Services (products, services, or investments).
1.6.14	90.	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funds is derived from High Value Dealer operations.

1.6.15	91.	TCSPs - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from TCSP operations.
1.6.16	92.	Import / Export - Number of Clients.	Enter the number of clients the entity has, which are Legal Persons or Legal Arrangements operating in the Import / Export business, and Natural Persons employed in the Import / Export industry.
1.6.17	93.	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from the Shipping and Transport of Goods industry.
1.6.18	94.	<p><b>Nature of Business / Source of Funding:</b></p> <p>Does the entity have clients whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Gambling Business</li> <li>▪ Adult Entertainment Industry</li> <li>▪ Defence Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> </ul>	Please answer 'Yes' or 'No'.
1.6.19	95.	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Real Estate Industry (Agents / Brokers / Sellers).
1.6.20	96.	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Gambling Industry (including online gambling)
1.6.21	97.	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Adult Entertainment Industry..
1.6.22	98.	Defence Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Defence Industry.
1.6.23	99.	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived

			from operating in the Oil and Gas Industry.
1.6.24	100.	Mining Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Mining Industry.
1.6.25	101.	Construction / Development - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from operating in the Construction / Development Industry.
1.6.26	102.	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived in the Retail/ Restaurant Business.
1.6.27	103.	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.
1.6.28	104.	Unknown Businesses and Professions - Number of Clients, broken down by the country of incorporation of the client.	Enter the number of clients the entity has, whose source of funds is Unknown to the entity.  Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.
1.6.29	105.	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has whose source of funds is from known businesses, however not mentioned above.
1.7.1	106.	<p><b>Source of Funds – Value of Client Assets Under Management.</b></p> <p>Does the entity have client assets under management which the source of funds was derived from the following categories:</p> <ul style="list-style-type: none"> <li>▪ Banking Institutions</li> <li>▪ Other Financial regulated Business*</li> <li>▪ Financial Leasing</li> <li>▪ Money Lending</li> <li>▪ Accountants</li> <li>▪ Fintech</li> <li>▪ Civil Service / Gov Employment</li> </ul> <p><i>*excluding MSBs, VASPs, and TCSPs.</i></p>	Please answer 'Yes' or 'No' as applicable.
1.7.2	107.	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets whose source of funding is derived from the Banking sector.

			Both from legal persons that are Banking Institutions exc. MSBs or natural persons that are employed by Banking Institutions exc. MSBs as clients.
1.7.3	108.	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets whose source of funding is derived from the Financial Sector (excluding Banking, VASPs, MSBs and TCSPs).
1.7.4	109.	Financial Leasing - Value of Client Assets.	Enter the value of client assets whose source of funding is derived from Financial Leasing operations.  Both from legal persons that are Financial Leasing or natural person employed by Financial Leasing as clients.
1.7.5	110.	Money Lending- Value of Client Assets.	Enter the value of client assets whose source of funding is derived from Money Lending operations.  Both from legal persons that are Money Lending or natural person employed by Money Lending as clients.
1.7.6	111.	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets whose source of funding is derived through being an Accountant (including but not limited to the areas of: Audit, Assurance, Bookkeeping, and Insolvency).  Both from legal persons that are Accountants (Audit / Assurance / Bookkeeping / Insolvency) or natural person employed as Accountants that are clients.
1.7.7	112.	Fintech - Value of Client Assets.	Enter the value of client assets whose source of funding is derived from the Fintech Industry.  Both from legal persons that are in the Fintech industry or natural persons employed in the Fintech industry.
1.7.8	113.	Civil Service/ Government Employment - Value of Client Assets.	Enter the value of client assets whose source of funding is derived from being employed in the Civil Service or Government sector.
1.7.9	114.	<b>Source of Funds – Value of Client Assets Under Management.</b> Enter the total value of client assets for clients whose source of funds falls within the list of sectors below: : ▪ Legal Practitioners	Please answer 'Yes' or 'No' as applicable.

		<ul style="list-style-type: none"> <li>▪ Dealers in Precious Metals and Stones</li> <li>▪ MSBs</li> <li>▪ Virtual Asset Products and Services</li> <li>▪ High Value Dealers</li> <li>▪ Trusts, Company Managers or Corporate Service Providers</li> <li>▪ Import/Export Industry</li> <li>▪ Shipping and Transport of Goods</li> </ul>	
1.7.10	115.	Legal Practitioners – Value of Client Assets.	<p>Enter the value of client assets whose source of funding is derived from being a Legal Practitioner.</p> <p>Both from legal persons that are Legal Practitioners or natural persons employed as Legal Practitioners as clients.</p>
1.7.11	116.	Dealers in Precious Metals and Stones- Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from Dealers in Precious Metals and Stones operations.</p> <p>Both from legal persons that are Dealers in Precious Metals and Stones or natural person employed as Dealers in Precious Metals and Stones as clients.</p>
1.7.12	117.	Money Services Business - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from Money Services Business operations.</p> <p>Both from legal persons that are Money Services Businesses or natural persons that are employed by Money Services Businesses as clients.</p>
1.7.13	118.	Virtual Asset Products and Services - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from Virtual Asset Products and Services (products, services, or investments).</p> <p>Both from legal persons that are VASP Products and Services or natural person employed by VASP Products and Services providers as clients.</p>
1.7.14	119.	High Value Dealers - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from High Value Dealer operations.</p> <p>Both from legal persons that are High Value Dealers or natural person employed by High Value Dealers as clients.</p>
1.7.15	120.	Trusts, Company Managers and Corporate Service Providers - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from TCSP operations.</p> <p>Both from legal persons that are Trusts, Company Managers, or Corporate Service Providers or natural</p>

			person employed by Trusts, Company Managers, or Corporate Service Providers as clients.
1.7.16	121.	Import / Export Industry – Value of Client Assets.	<p>Enter the value of client assets Legal Persons or Legal Arrangements operating in the Import / Export business, and Natural Persons employed in the Import / Export industry.</p> <p>Both from legal persons that are in the Import / Export Industry or natural persons employed by the Import / Export Industry as clients.</p>
1.7.17	122.	Shipping and Transport of Goods - Value of Client Assets.	<p>Enter the value of client assets whose source of funding is derived from the Shipping and Transport of Goods industry.</p> <p>Both from legal persons that are in the Shipping and Transport of Goods industry or natural persons employed by the Shipping and Transport of Goods industry as clients.</p>
1.7.18	123.	<p><b>Source of Funds – Value of Client Assets Under Management</b></p> <p>Enter the total value of client assets for clients whose source of funds falls within the list of sectors below:</p> <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Gambling Business</li> <li>▪ Adult Entertainment Industry</li> <li>▪ Defence Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> </ul>	Please answer 'Yes' or 'No' as applicable.
1.7.19	124.	Real Estate Agents / Brokers - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from the Real Estate Industry (Agents / Brokers / Sellers).</p> <p>Both from legal persons that are Real Estate Agents / Brokers or natural persons employed as Real Estate Agents / Brokers as clients.</p>
1.7.20	125.	Gambling Business (including online gambling) - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from the Gambling Industry (including online gambling).</p> <p>Both from legal persons that are in the Gambling business or natural person employed by the Gambling business as clients.</p>

1.7.21	126.	Adult Entertainment - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from the Adult Entertainment Industry.</p> <p>Both from legal persons that are in the Adult Entertainment Industry or natural person employed by the Adult Entertainment Industry as clients.</p>
1.7.22	127.	Defence Industry - Value of Client Assets.	<p>Enter the value of assets whose source of funds is derived from the Defence Industry.</p> <p>Both from legal persons that are in the Defence Industry or natural person employed by the Defence Industry as clients.</p>
1.7.23	128.	Oil and Gas Industry - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from operating in the Oil and Gas Industry.</p> <p>Both from legal persons that are in the Oil and Gas Industry or natural person employed by the Oil and Gas Industry as clients.</p>
1.7.24	129.	Mining Industry - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from the Mining Industry.</p> <p>Both from legal persons that are in the Mining Industry or natural persons employed by the Mining Industry as clients.</p>
1.7.25	130.	Construction / Development - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from operating in the Construction / Development Industry.</p> <p>Both from legal persons that are in the Construction / Development industry or natural persons employed in the Construction / Development industry as clients.</p>
1.7.26	131.	Retail & Restaurant Business - Value of Client Assets.	<p>Enter the value of client assets whose source of funding is derived in the Retail / Restaurant Business.</p> <p>Both from legal persons that are in the Retail &amp; Restaurant Business or natural persons employed in the Retail &amp; Restaurant Business as clients.</p>
1.7.27	132.	Cannabis Production & Distribution - Value of Client Assets.	<p>Enter the value of client assets whose source of funds is derived from Cannabis Production &amp; Distribution operations.</p> <p>Both from legal persons that are in the Cannabis Production &amp; Distribution industry or natural persons employed in the Cannabis Production &amp; Distribution industry as clients.</p>

1.7.28	133.	Industry / profession not known or not recorded - Value of Client Assets.	Enter the value of client assets whose source of funds is Unknown to the entity.  Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.
1.7.29	134.	Other - Not listed above - Value of Client Assets.	Enter the value of client assets whose source of funds is from known businesses, however not mentioned above.
1.8.1	135.	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.8.2	136.	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback that may be relevant, which you could not provide on the tabs above.  Enter 'N/A' if no comments.
2.1.1	137.	Does the entity provide any products / services related to Professional Indemnity insurance?	Please answer 'Yes' or 'No'.
2.1.2	138.	Professional Indemnity – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Professional Indemnity, broken down by the country of the insured.
2.1.3	139.	Professional Indemnity - Value of Business.	Enter the Value of Premiums / Commissions / Fees collected from clients provided products related to Professional Indemnity.  <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.4	140.	Does the entity provide any products / services related to Life & Annuity?	Please answer 'Yes' or 'No'.
2.1.5	141.	Life & Annuity - Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Life & Annuity, broken down by the country of the insured. This excludes Term Life policies.
2.1.6	142.	Life & Annuity - Value of Business.	Enter the Value of Premiums / Commissions / Fees collected for products related to Life & Annuity, which the entity

			provides to clients, as at the end of the reporting period.
2.1.7	143.	Life & Annuity - Value of Policyholder Assets.	Enter the Value of Policyholder Assets for products related to Life & Annuity, the entity provides to clients, as at the end of the reporting period.  If the entity is not an insurance company or this question is not applicable enter '0'
2.1.8	144.	Life & Annuity – Reinsurance – Is all activity transacted for this line of business reinsurance coverage?	Enter 'Yes' or 'No'  Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.  If less than 100% reinsurance include the percentage in the Comments/Feedback section.
2.1.9	145.	Does your entity provide any products / services related to Collateralized Insurance?	Please answer 'Yes' or 'No'.  Includes those Class C insurer licences who are collateralised by funding sources which include the issuance of bonds or other instruments, contracts for differences and such other funding mechanisms which fall under investment products.
2.1.10	146.	Collateralized Insurance – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Collateralized Insurance, broken down by the country of the insured.
2.1.11	147.	Collateralized Insurance - Value of business.	Enter the Value of Premiums / Commissions / Fees from products related to Collateralized Insurance, which the entity provides to clients, as at the end of the reporting period.  <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.12	148.	Does your entity provide any products / services related to Long Term Disability, AD&D, Critical Illness +5 years?	Please answer 'Yes' or 'No'.
2.1.13	149.	Long Term Disability, AD&D, Critical Illness +5 years – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Long Term Disability, AD&D, Critical Illness +5 years,

			broken down by the country of the insured.
2.1.14	150.	Long Term Disability, AD&D, Critical Illness +5 years – Value of business.	<p>Enter the Value of Premiums / Commissions / Fees from products related to Long Term Disability, AD&amp;D, Critical Illness +5 years, which the entity provides to clients, as at the end of the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.15	151.	Long Term Disability, AD&D, Critical Illness +5 years – Is all activity transacted for this line of business reinsurance?	<p>Enter 'Yes' or 'No'</p> <p>Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.</p> <p>If less than 100% reinsurance include the percentage in the Feedback section.</p>
2.1.16	152.	Does your entity provide any products / services related to Other Long-Term Health +5 years?	Please answer 'Yes' or 'No'.
2.1.17	153.	Other Long-Term Health +5 years – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Other Long-Term Health +5 years, broken down by the country of the insured.
2.1.18	154.	Other Long-Term Health +5 years - Value of Business.	<p>Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Health +5 years, which the entity provides to clients, as at the end of the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.19	155.	Other Long-Term Health +5 years - Is all activity transacted for this line of business reinsurance?	<p>Enter 'Yes' or 'No'</p> <p>Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.</p>

			If less than 100% reinsurance include the percentage in the Feedback section.
2.1.20	156.	Does the entity provide any products / services related to Coverage of Market Outcome?	Please answer 'Yes' or 'No'.
2.1.21	157.	Coverage of Market Outcome – Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Coverage of Market Outcome, broken down by the country of the insured.
2.1.22	158.	Coverage of Market Outcome - Value of business	Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Market Outcome, which the entity provides to clients, as at the end of the reporting period. <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.23	159.	Does your entity provide any products / services related to Coverage of Legal Outcome?	Please answer 'Yes' or 'No'.
2.1.24	160.	Coverage of Legal Outcome – Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Coverage of Legal Outcome, broken down by the country of the insured.
2.1.25	161.	Coverage of Legal Outcome - Value of Business	Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Legal Outcome, which the entity provides to clients, as at the end of the reporting period. <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.26	162.	Does your entity provide any products / services related to Pension Coverage?	Please answer 'Yes' or 'No'.
2.1.27	163.	Pension Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Pension

			Coverage, broken down by the country of the insured.
2.1.28	164.	Pension Coverage - Value of Business	<p>Enter the Value of Premiums / Commissions/ Fees from products related to Pension Coverage, which the entity provides to clients, as at the end of the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.29	165.	Pension Coverage - Is all activity transacted for this line of business reinsurance?	<p>Enter 'Yes' or 'No'</p> <p>Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.</p> <p>If less than 100% reinsurance include the percentage in the Feedback section.</p>
2.1.30	166.	Does your entity provide any products / services related to Hull Coverage?	Please answer 'Yes' or 'No'.
2.1.31	167.	Hull Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Hull Coverage, broken down by the country of the insured.
2.1.32	168.	Hull Coverage - Value of Business	<p>Enter the Value of Premiums / Commissions / Fees from products related to Hull Coverage, which the entity provides to clients, as at the end of the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.33	169.	Does your entity provide any products / services related to Aviation coverage?	Please answer 'Yes' or 'No'.
2.1.34	170.	Aviation Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Aviation Coverage, broken down by the country of the insured.

2.1.35	171.	Aviation Coverage - Value of Business.	<p>Enter the Value of Premiums / Commissions / Fees from products related to Aviation Coverage, which the entity provides to clients, as at the end of the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.36	172.	Does your entity provide any products / services related to Kidnap and Ransom coverage?	Please answer 'Yes' or 'No'.
2.1.37	173.	Kidnap and Ransom Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Kidnap and Ransom Coverage, broken down by the country of the insured.
2.1.38	174.	Kidnap and Ransom Coverage - Value of Business.	<p>Enter the Value of Premiums / Commissions / Fees from products related to Kidnap and Ransom Coverage, which the entity provides to clients, as at the end of the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.1.39	175.	Does your entity provide any Products with Loan Features?	<p>Please answer 'Yes' or 'No'.</p> <p>Loans include promissory notes.</p>
2.1.40	176.	Loan Features - Number of active loans at the end of the reporting period, broken down by country of the borrower.	Enter the number of active loans the entity processed for or on behalf of customers, related parties or third parties, broken down by the country of the insured.
2.1.41	177.	Loan Features - Value of active loans	Enter the value of loans issued by the entity, including for or on behalf of clients, for the reporting period.
2.1.42	178.	Does your entity provide any products / services relating to Early Surrenders?	Please answer 'Yes' or 'No'.
2.1.43	179.	Early Surrenders - Number of clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Loan Features, broken down by the country of the insured.

2.1.44	180.	Early Surrenders - Value of Surrenders for the reporting period.	Enter the Value of Premiums / Commissions / Fees from products related to Early Surrenders, which the entity provides to clients, as at the end of the reporting period.
2.1.45	181.	Does your entity provide any Other Long-Term Coverage insurance products / services not included in the above questions?	Please answer 'Yes' or 'No'.
2.1.46	182.	Other Long-Term Coverage - Number of clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Other Long-Term Coverages, broken down by the country of the insured.
2.1.47	183.	Other Long-Term Coverage - Value of Business	<p>Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Coverage, which the entity provides to clients, as at the end of the reporting period.</p> <ul style="list-style-type: none"> <li>• Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>• Insurance Manager - Management Fees</li> <li>• Insurance Agent - Fees and Commissions</li> <li>• Insurance Broker - Fees and Commissions</li> </ul>
2.2.1	184.	Does the entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.2.2	185.	Physical Cash - Number of Clients.	Enter the number of clients that made payments in the form of Physical Cash during the reporting period.
2.2.3	186.	Physical Cash - Number of Transactions.	Enter the number of Physical Cash transactions conducted by clients during the reporting period.
2.2.4	187.	Physical Cash - Value of Funds Transferred.	<p>Enter the value of the Physical Cash transactions conducted by clients during the reporting period.</p> <p>Payments include those between the entity and the client and those conducted on behalf of the entity.</p>
2.2.5	188.	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.

2.2.6	189.	Virtual Currencies - Number of Clients.	Enter the number of clients that had payments in the form of Virtual Currency during the reporting period.
2.2.7	190.	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions conducted by clients during the reporting period.
2.2.8	191.	Virtual Currencies - Value of Funds Transferred.	Enter the value of the Virtual Currency transactions conducted by clients during the reporting period.
2.2.9	192.	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.2.10	193.	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.
2.2.11	194.	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions conducted by clients during the reporting period.
2.2.12	195.	Third Parties - Value of Funds Transferred.	Enter the value of the Third-Party transactions conducted by clients during the reporting period.
2.2.13	196.	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.2.14	197.	Credit Card Payments - Number of Clients	Enter the number of clients that made payments via Credit Card during the reporting period.
2.2.15	198.	Credit Card Payments - Number of Transactions.	Enter the number of Credit Card transactions conducted by clients during the reporting period.
2.2.16	199.	Credit Card Payments - Value of Funds Transferred.	Enter the value of Credit Card transactions conducted by clients during the reporting period.
2.2.17	200.	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.2.18	201.	Wire Transfers - Number of Clients.	Enter the number of clients that made payments in the form of Wire Transfers during the reporting period.

2.2.19	202.	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions conducted by clients during the reporting period.
2.2.20	203.	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.2.21	204.	Does your entity facilitate payments of Clients in the form of Transfer of securities?	Please answer 'Yes' or 'No'.
2.2.22	205.	Transfer of securities - Number of Clients.	Enter the number of clients that facilitated payments via transfer of securities, during the reporting period.
2.2.23	206.	Transfer of securities- Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, relating to transfer of securities.
2.2.24	207.	Transfer of securities- Value of Transactions.	Enter the value of transactions relating to payments via Transfer of securities, conducted by clients during the reporting period.
	208.		
	209.		
	210.		
	211.		
2.2.25	212. 20 8	Does your entity facilitate payments of Clients in Other Forms of Payment not mentioned above?	Please answer 'Yes' or 'No'.
2.2.26	2209	Other Forms of Payment - Number of Clients.	Enter the number of clients who made payments using other forms of payment not listed above, during the reporting period.
2.2.27	210. 22 10	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.
2.2.28	211.	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were transferred by clients using other forms of payments, during the reporting period.
2.2.29	212.	Please indicate the types of other forms of payments.	List the other forms of payment conducted by clients during the reporting period, which are not listed above.

2.3.1	213.	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated.  These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.
2.3.2	214.	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, during the reporting period, broken down by country of origin of the funds.  These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.
2.3.3	215.	Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination.	Enter the total value of funds transferred out by clients, broken down by the country of payment destination.
2.3.4	216.	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of transactions relating to outward transfers by the clients, or on behalf of clients, broken down by country of destination of the transaction.
2.4.1	217.	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.4.2	218.	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	219.	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.  F2F channels include: Direct-F2F, Referrals within Group – F2F, Eligible Introducers – F2F, and Other Introducers-F2F.
3.1.2	220.	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	221.	Total number of clients via Online Platforms or portal.	Provide the total number of clients, in the <u>entity's entire portfolio</u> , that were onboarded via Online platform or portal, and not only those onboarded during the reporting period.
3.1.4	222.	Number of Clients through Referrals within Group - F2F.	Enter the number of clients that were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the UBOs nationality.  An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself has F2F interaction with the clients.
3.1.5	223.	Number of Clients through Referrals within Group - Non F2F.	Enter the number of clients that 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	224.	Number of Clients onboarded through Eligible Introducers.	Total clients in the entity's <u>entire portfolio</u> 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	225.	Number of Clients through Eligible Introducers.	Enter the number of clients that were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the BO.

3.1.8	226.	Number of Clients through Other Introducers - Non-F2F.	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	227.	Number of Clients via Online Platform or portal.	Enter the number of clients onboarded using online platform or portal during the reporting period, broken down by nationality of the BO.
3.2.1	228.	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	229.	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	230.	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 as at the end of the reporting period.
3.2.4	231.	How many AML Compliance Officers has the entity had within the past 3 years?	If no turnover of the Compliance Officer role in the three-year period, answer "1".
3.2.5	232.	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	233.	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	234.	What was the country of residency of the Money Laundering Reporting	Enter the country of residency of the Money Laundering Reporting Officer at the end of the reporting period.

		Officer at the end of the reporting period?	
3.2.8	235.	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover within the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	236.	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	237.	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>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.</p>
3.2.11	238.	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	239.	How many Deputy Money Laundering Reporting Officers have you had in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	240.	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	241.	To whom has the Targeted Financial Sanction screening function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the screening of targeted financial sanctions:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>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.</p>

3.2.15	242.	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.16	243.	How many TFS Screening platforms / software did the entity have 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	244.	Has the entity outsourced the function of transaction or client monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	245.	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship of the transaction monitoring function:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.</p>
3.2.19	246.	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	247.	How many Transaction monitoring platforms / software did the entity have in the past 3 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	248.	Physical presence - Place of Business.	Select the country of the entity's physical business operations.
3.3.2	249.	Does the entity form part of a group structure?	Please answer 'Yes' or 'No'.
3.3.3	250.	In which country is the entity's <i>ultimate</i> Parent Company incorporated?	<p>Select the country of incorporation of the entity's Parent Company.</p> <p><i>If no Parent, select "Cayman Islands"</i></p>
3.3.4	251.	In which country is the entity's Holding Company incorporated?	<p>Select the country of incorporation of the entity's Holding Company.</p> <p><i>If no separate Holding Company, select the country of incorporation of the Parent Company.</i></p>

3.3.5	252.	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.
3.3.6	253.	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.
3.3.7	254.	In which countries, by percentage of equity ownership, are shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Select the countries where all shareholders of the entity are located and their percentage of equity ownership.  For publicly listed entities please list beneficial ownership of 10% or more.
3.3.8	255.	How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period?	Enter the number of Beneficial Owners of the entity, holding 10% or more, broken down by country of nationality of the shareholder(s).
3.3.9	256.	How many directors does the entity have appointed, by country of nationality of the director, at the end of the reporting period?	Enter the number of directors of the entity, broken down by country of nationality of the directors.
3.4.1	257.	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	258.	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 'NA' if no comment.

<b>AML Controls Questions</b>			
<b>No.</b>	<b>Question No.</b>	<b>Question</b>	<b>Description/Explanation</b>
1.1.1	259	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF and Sanctions risks and issues?	Please answer 'Yes' or 'No'.
1.1.2	260	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	261	What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?	Enter the frequency in number of months.
1.1.4	262	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	263	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	264	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	265	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	266	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	267	Does the Board / Governing Body ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.1.10	268	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	269	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	270	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	271	Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	272	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.2.2	273	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	274	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	275	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	276	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	277	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	278	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	279	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	280	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	281	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	282	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	283	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	284	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.

1.3.2	285	Have the Directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	286	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	287	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	288	Has the DMLRO received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.6	289	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	290	Are changes to policy and procedures communicated to all Staff/Directors and Senior Management?	Please answer 'Yes' or 'No'.
1.3.8	291	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	292	What is the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company during the reporting period?	Enter the percentage of employees/ agents/ directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period.
1.3.10	293	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	294	Does the entity have an Internal Audit Department, Unit, or function (including outsourced) with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	295	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?	Please answer 'Yes' or 'No'.
1.4.3	296	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.

1.4.4	297	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	298	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	299	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	300	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	301	What is the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, <u>in months</u> , of the Board review of the AML audit program.
1.4.9	302	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	303	Where applicable, does the internal audit include testing of EI relationships?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.11	304	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	305	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	306	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	307	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	308	Does the entity consider the ML/TF/PF and Sanctions risks of clients (including BOs), in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.4	309	Does the entity consider the ML/TF/PF and Sanctions risks relating to geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.

1.5.5	310	Does the entity consider the ML/TF/PF and Sanctions risks associated with products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.6	311	Does the entity consider the ML/TF/PF and Sanctions risks associated with delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.7	312	Does the entity ensure ML/TF/PF and Sanctions business risk assessments are done / updated prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.5.8	313	Does the entity consider the ML/TF/PF and Sanctions risks associated with technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	314	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	315	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	316	Where applicable, does the entity consider outsourcing risk factors in its risk assessment?	Please select 'Yes', 'No', or 'Not Applicable'.
1.5.12	317	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	318	How often, in months, does the entity review High-Risk relationships/accounts?	Please select the most appropriate response: 'Not Applicable – no high risk clients', 'More than 18 months', '7 – 12 months', '1 – 6 months'.
1.5.14	319	How often, in months, does the entity review Medium-Risk relationships/accounts?	Please select the most appropriate response: 'Not Applicable – no 'Medium' risk clients', More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.15	320	How often, in months, does the entity review Low-Risk relationships/accounts?	Please select the most appropriate response: 'Not Applicable – no low risk clients', More than 18

			months, 7 – 12 months, 1 – 6 months.
1.6.1	321	Does the entity rely on Group AML/CFT policies and procedures?	Please select the most appropriate response: 'Not Applicable – No group structure', 'Yes', or 'No'.
1.6.2	322	If yes to use of group policies and procedures, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?	Please select the most appropriate response: 'Yes', 'No', or 'Not Applicable'
1.6.3	323	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	324	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	325	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	326	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	327	Does the entity have Board, or Governing Body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	328	Does the entity have Board or Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	329	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	330	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.

1.6.11	331	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	332	Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period.	Enter the total number of client accounts that were declined, terminated, or restricted due to AML/CFT/CPF and Sanctions concerns.
1.7.1	333	Does the entity have a Sanctions screening process including policies and procedures?	Please answer 'Yes' or 'No'.
1.7.2	334	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	335	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	336	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	337	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	338	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	339	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	340	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	341	Have assets of any customers been identified as persons or entities designated by the OFSI or OFAC?	Please answer 'Yes' or 'No'.
1.7.10	342	Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting from sanction screening?	Please answer 'Yes' or 'No'.

1.7.11	343	Does the entity have systems and procedures in place to determine 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?	Please answer 'Yes' or 'No'.
1.7.12	344	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	345	Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries surrounding sanctioned jurisdictions are scrutinized to ensure the unlisted countries are not being used as conduits to evade targeted financial sanctions and proliferation alerts / risks?	Please answer 'Yes' or 'No'.
1.8.1	346	Does the entity have transaction monitoring policies and procedures developed commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	347	Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.3	348	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	349	Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs?	Please answer 'Yes' or 'No'.

1.8.5	350	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	351	Where applicable, does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	352	Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.
1.8.8	353	Enter the total number of Alerts resulting in internal Suspicious Activity Reports to the MLRO related to ML/TF/PF and Sanctions matters identified during transaction monitoring only.	The total number of alerts produced through <u>transaction monitoring</u> systems and processes which resulted in the escalation of an internal SAR to the MLRO.
1.9.1	354	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	355	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	356	Does the entity have policies and procedures for reporting to the Cayman Islands Financial Reporting Authority?	Please answer 'Yes' or 'No'.
1.9.4	357	How many internal Suspicious Activity Reports have been reported to the MLRO in total for the current reporting period?	Enter the number of internal Suspicious Activity Reports reported to the MLRO in total during the reporting period.
1.9.5	358	How many Suspicious Activity Reports have been reported, to the Financial Reporting Authority, by the the MLRO for the current reporting period?	Enter the total number of Suspicious Activity Reports filed by the entity's MLRO, to the FRA, during the reporting period.
1.9.6	359	How many hours on average does it take to file a Suspicious Activity Report 'SAR' to the FRA?	Enter the number of hours (average) the entity, through the MLRO, takes to file a Suspicious Activity Report to the FRA.
1.9.7	360	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.

1.9.8	361	Has the entity been penalized or received a warning for non-compliance, relating to reporting requirements or failure to comply with a direction, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	362	Does the have procedures to maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	363	Does the entity have procedures to maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.
1.9.11	364	If the MLRO decides not to file a SAR to the FRA, are there procedures to ensure the MLRO's reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	365	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	366	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	367	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	368	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	369	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	370	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	371	Does the entity have outsourced arrangements for its functions and services?	Please answer 'Yes' or 'No'.
1.11.2	372	In total, how many services does the entity outsource to either third parties, or within its group or subsidiaries, during the reporting period?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.11.3	373	Is there a Board approved documented policy on outsourcing?	Please answer 'Yes' or 'No'.
1.11.4	374	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', or 'No'
1.11.5	375	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', or 'No'
1.11.6	376	Does the outsourcing agreement(s) clearly set out the obligations of both parties?	Select which best applies: 'Yes', or 'No'

1.11.7	377	Does the outsourcing agreement(s) require the Outsourced Service Provider to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', or 'No'
1.11.8	378	Is there a contingency plan in the event the Outsourced Service Provider fails to perform the outsourced activity?	Select which best applies: 'Yes', or 'No'
1.11.9	379	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', or 'No'
1.11.10	380	If applicable, does the outsourced AMLCO/MLRO have access to the entity's Board?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.11	381	Are there policies and procedures for outsource arrangements to ensure data protection restrictions would NOT delay access to data and documents?	Select which best applies: 'Yes', or 'No'
1.11.12	382	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.13	383	Does the entity conduct testing to ensure the Outsourced Service Provider complies with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.12.1	384	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	385	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback for this tab.  Enter 'N/A' if no comments.