



AML Return – Completion Guide: Banking

Document version: 1.6

Revision History:

Effective Date	Version Number	Revision Description
26 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update to definitions
1 May 2023	1.2	Amendments to questions, along with updates to definitions, descriptions and explanations
1 May 2024	1.3	Updates to definitions, descriptions and explanations
2 May 2025	1.4	Updates to section 4 and definitions, questions, descriptions and explanations
1 May 2026	1.5	Updates section 1, section 4.4, definitions, questions, descriptions and explanations
16 July 2026	1.6	Updates to definitions

Contents

1	Introduction	4
2	Form Information	4
3	Accessing and Submitting the AML Return	4
3.1	Access to the AML Return.....	5
3.2	Completing the AML Return Form.....	9
4	Other Useful Information	11
4.1	User account lockouts.....	11
4.2	Internet Browser.....	11
4.3	Two-Factor Authentication.....	11
4.4	Data and Security	12
4.5	Applicable Fees	12
5	AML Return Guidance	12
5.1	Terms and Definitions.....	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) and Sanctions 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/PF risk assessments and other related research, the Authority uses a software called Strix to distribute the AML Return to FSPs and further collect, analyse, model, and score ML/TF/PF and Sanctions risk data.

FSPs are required to provide this data by completing the AML Return Form and submit it through the Authority’s web-based portal, Strix, to the Anti-Money Laundering Division (the “**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 banking licensees to provide the information by completing the AML Return – Banking Form 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. Additionally, in accordance with Section 17(3)(a) of the BTCA, the Authority is entitled at all reasonable times to have access to records of a licensee.

This Guide provides instructions and support to banking licensees for accessing, completing, and submitting the AML Return – Banking Form to the AMLD.

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 – Banking Form is to be completed by each FSP holding a banking licence - commonly referred to as the “Entity” for purposes of this form.

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

3 ACCESSING AND SUBMITTING THE AML RETURN

3.1 ACCESS TO THE AML RETURN

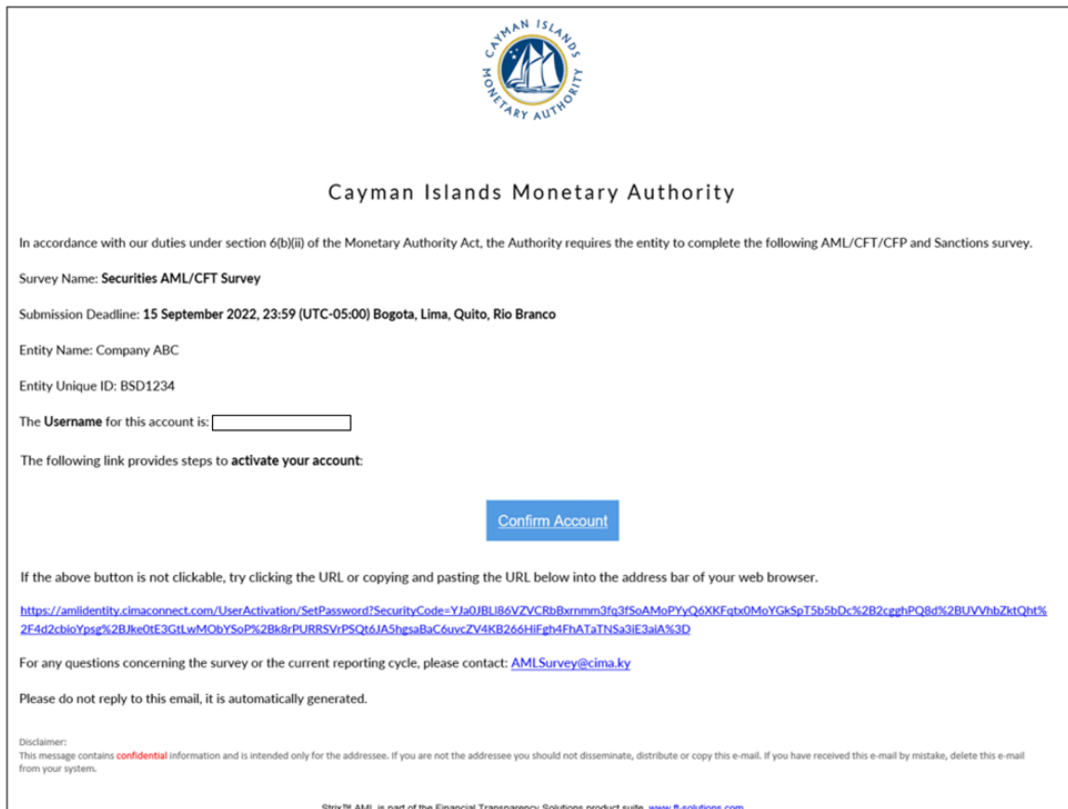
Entities will receive an invitation to the web-based Return by email using the current email contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient's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

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

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

To access the AML Return:

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




Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

[Confirm Account](#)

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLl86VZVCbBxrmnm3fg3fSoAmoPyQ6XKFqxb0MoYGkSpT5b5bDc%2B2cphPQ8d%2BUVvhbZxtQht%2F4d2cbioYpsg%2Bjke0E3GtlwMOBYSoP%2Bk8rPURRSVrPSQt6JAShpsaBaC6uycZV4KB266HfghdFhAtATNSa3IE3aIA%3D>

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

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

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

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

- 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.

**CAYMAN ISLANDS
MONETARY AUTHORITY**

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

CIMA © FINANCIAL TRANSPARENCY SOLUTIONS [Disclaimer](#)

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

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

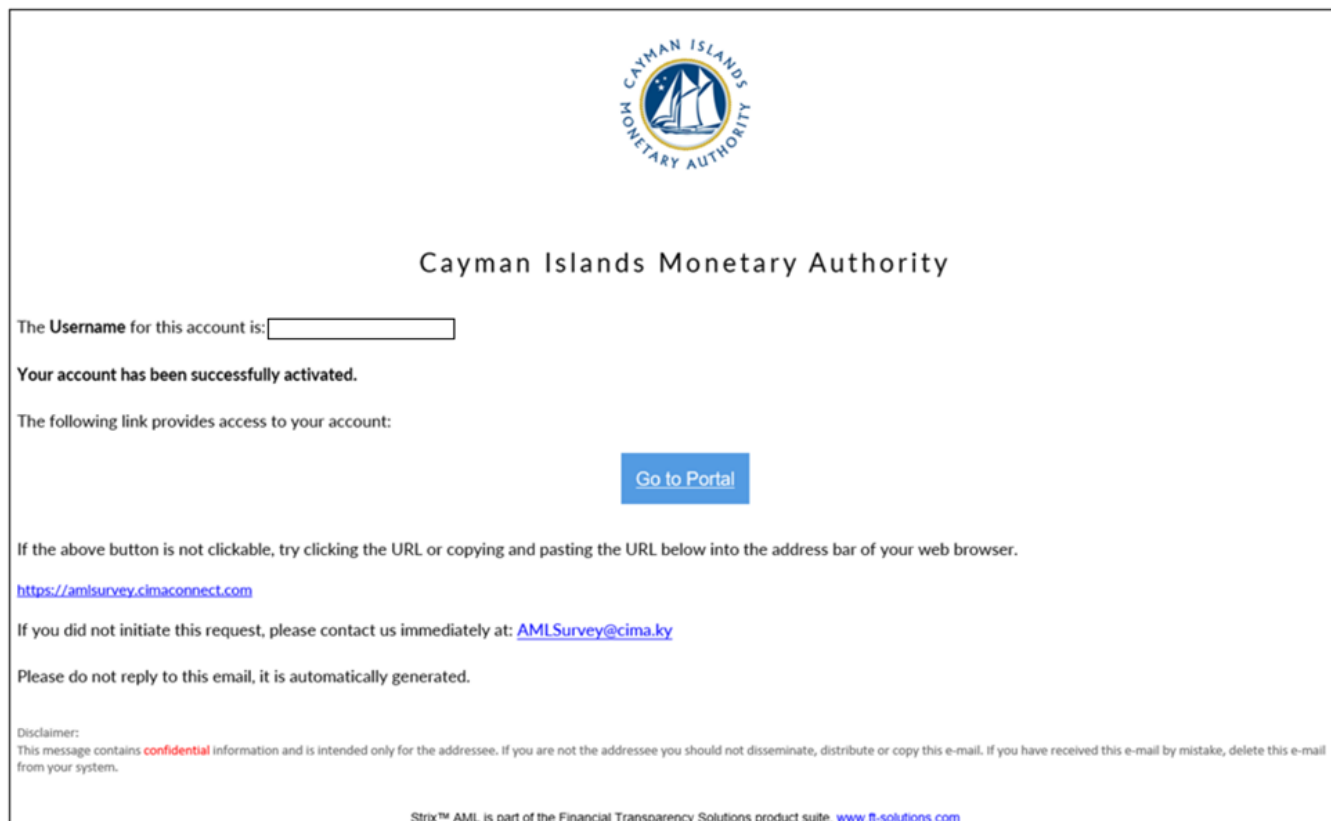
New Password *

Confirm Password *

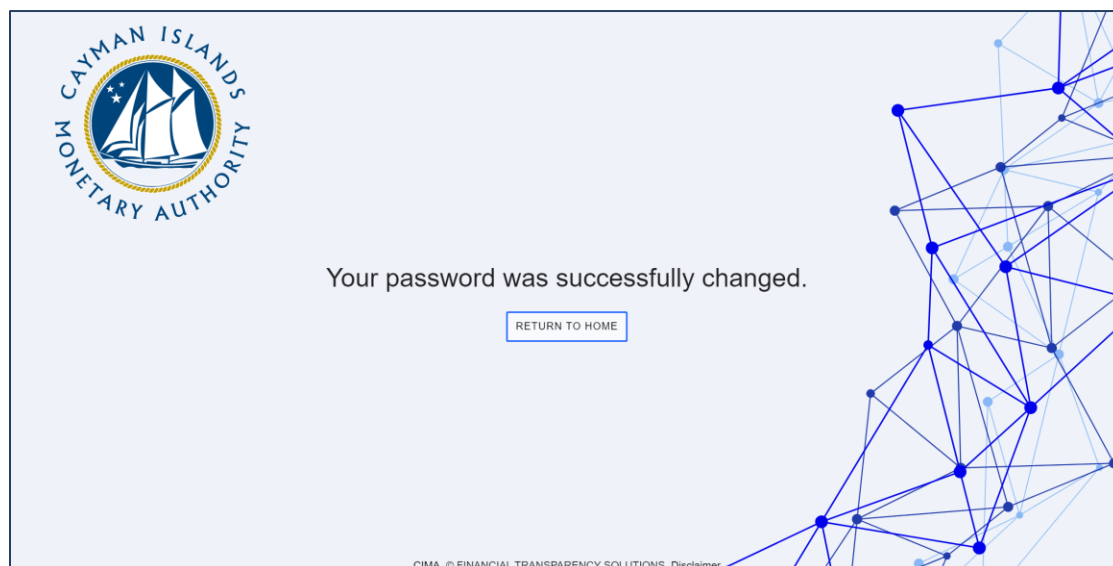
SUBMIT

CIMA © FINANCIAL TRANSPARENCY SOLUTIONS [Disclaimer](#)

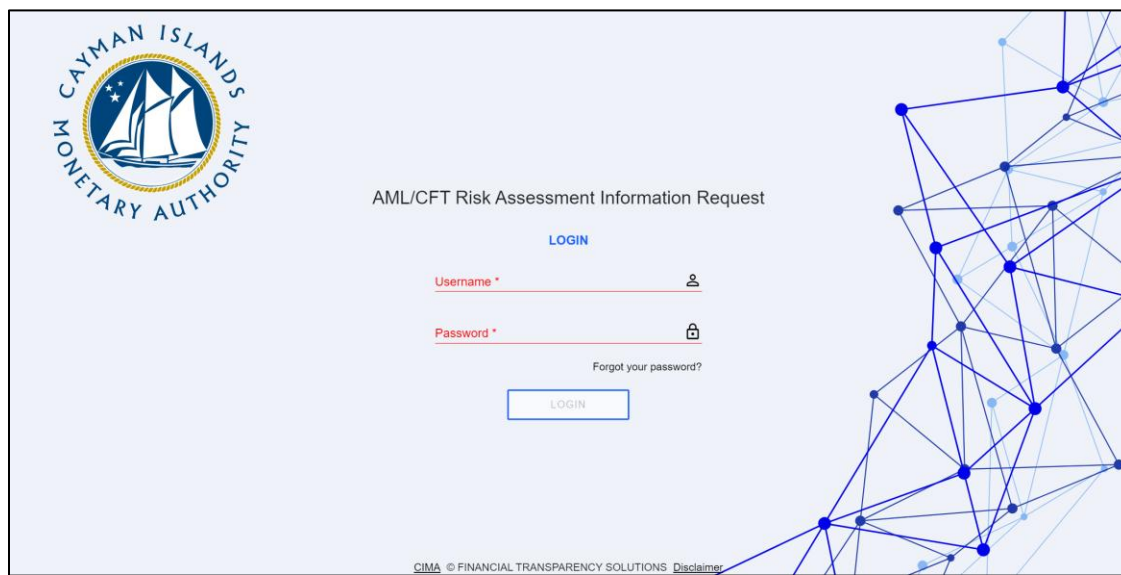
- Once the recipient's password has been re-entered, and matches, they can submit and finish the activation process. An email "Notification of Successful Activation" will be sent providing a 'Go to Portal' link which can be used for all future access.



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



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



CAYMAN ISLANDS
MONETARY AUTHORITY

AML/CFT Risk Assessment Information Request

LOGIN

Username *

Password *

Forgot your password?

LOGIN

CIMA © FINANCIAL TRANSPARENCY SOLUTIONS Disclaimer

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



CAYMAN ISLANDS
MONETARY AUTHORITY

Cayman Islands Monetary Authority

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

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

951247

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

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

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

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

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Two-factor Authentication

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

Enter the code to continue

[SUBMIT](#)

CIMA © FINANCIAL TRANSPARENCY SOLUTIONS Disclaimer

- 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.

strix AML
know your sector.

**CAYMAN ISLANDS
MONETARY AUTHORITY**

QUESTIONNAIRES

Company ABC - BSD1234

Current User:

Current Questionnaires

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

Previous Questionnaires

No questionnaires available.

Cayman Islands Monetary Authority
Disclaimer © FINANCIAL TRANSPARENCY SOLUTIONS Version 2.3

3.2 COMPLETING THE AML RETURN FORM

- 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 in 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. Users should note that the Return does not have Excel import functionality.
 - d. Upon submission, you will receive a confirmation email from the 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.
 - e. Once the AML Return is 'Submitted', an Excel and PDF copy of the completed Return will be available under 'Current Questionnaire'.
 - f. 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 details to the Authority as indicated in the email.
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. Prior to submitting an 'Incomplete' AML Return, the Entity is required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLReturns@cima.ky detailing the following:
 - i. Licence or Registration Name
 - ii. Licence or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current Directors
 - v. Number of Clients
 - vi. Reason for requesting to make an Incomplete Submission.
2. If a User receives or has access to more than one Return, they will see the additional Return(s) in the 'Current Returns' section of the web page. At the top of the page, where it shows the Entity's name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.
 3. 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 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

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

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

4.2 INTERNET BROWSER

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

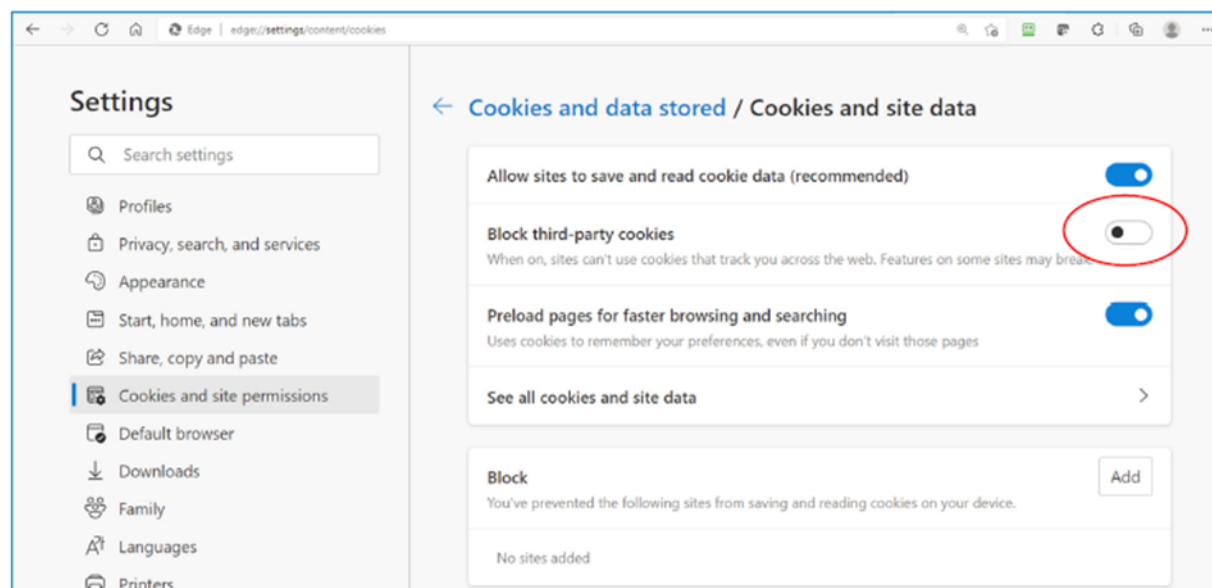
4.3 TWO-FACTOR AUTHENTICATION

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

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

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

Example of Microsoft Edge Cookie Setting:



4.4 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: Please consider saving a copy of the completed AML Return for your records. The Authority will not maintain copies of historical Returns of its supervised entities and therefore, it is recommended that entities save a copy of their submissions for their own record-keeping purposes. Additionally, as per the Authority's data management policy, submissions for terminated entities will no longer be made available to their contacts in the Strix portal.

4.5 APPLICABLE FEES

There are no fees associated with this Form.

5 AML RETURN GUIDANCE

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

5.1 TERMS AND DEFINITIONS

AML Inherent Risk Factors Descriptions

Terms/Abbreviations	Definition/Meaning
AMLCO	Anti-Money Laundering Compliance Officer means the person designated in accordance with regulation 3(1) of the Anti-Money Laundering Regulations (2025 Revision), as amended.
AMLRs	Anti-Money Laundering Regulations (2025 Revision), as amended.
Beneficial Owner	Or ("BO") means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to– (a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person; (b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person; or (c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement. <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>
Client / Customer	A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands. <i>Generally, a Bank's clients/ customers are made up of natural persons, legal persons, and legal arrangements.</i>
Controller	A person appointed to assume control of the affairs of a legal person or legal arrangement.
Correspondent Banking	The provision of banking services by one institution (the Correspondent) to another institution (the Respondent) for the purposes of executing third-party payments and trade transactions in a specific currency.

	For example, a Correspondent bank acts as an intermediary or agent, facilitating wire transfers, and conducting business transactions on behalf of the Respondent and its customers. Correspondent banking does not include one-off transactions.
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	United States Dollars (US\$). All other currencies must be converted to US\$, unless otherwise stated, using the prevailing rate of exchange as at the last day of the reporting period.
Dealers in Precious Metals and Stones	Legal and Natural Persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer ("DMLRO") means the "nominated officer" as defined in regulation 33(2) of the AMLRs.
Eligible Introducers	A person that "introduces" applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(1)(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Entity	For the purposes of this form/Return, an 'entity' is the holder of a Banking 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	The Financial Reporting Authority ("FRA") is the Cayman Islands Financial Intelligence Unit responsible for deterring, preventing and detecting money laundering, terrorist financing and the financing of proliferation.
Gov / Pub Sector	Business conducted with companies who are Government or in the public sector. Companies in which a government has a controlling interest; and in respect of such company, includes all subsidiary entities of the company.
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods.
HNWI	For the purpose of the AML Return, a high net worth individual ("HNWI") is: (i) an individual whose net worth is at least US\$1,000,000 or its equivalent in any other currency; or (ii) any person that has total assets of not less than 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.
Internal Bank Transfer	An internal bank transfer is the movement of funds between accounts held within the same entity. These transfers may occur between accounts owned by the same client/ customer or between accounts owned by different clients/ customers of the entity. <i>Generally, a Bank's clients/ customers are made up of Natural Persons, Legal Persons, and Legal Arrangements.</i>

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 FSP without being physically present for identification purposes, at the physical premises/office of the FSP.
Non-Group Loans	Loans to persons/entities that are not part of the reporting Entity’s group structure. Alternative definition: Loans to natural persons or entities which are not included within the reporting Entity’s group structure
Non-Group Respondents	Respondent institutions that are not part of the reporting Entity’s group structure.

	Alternative definition: Respondent institutions that operate independently and are not included within the reporting Entity's group structure.
NPO	A company or body of persons, whether incorporated or unincorporated, or a Trust – (a) established or which identifies itself as established primarily for the promotion of charitable, philanthropic, religious, cultural, educational, social or fraternal purposes, or other activities or programmes for the public benefit or a section of the public within the Islands or elsewhere; and (b) which solicits contributions or raises funds from the public or a section of the public within the Islands or elsewhere.
OSP	Outsourced Service Provider ("OSP") is a third party, either an affiliated entity within a group or an entity that is external to the Entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future. Outsourcing does not include purchasing contracts.
Payable Through Accounts	Correspondent accounts that are used directly by third parties to transact business on their own behalf. <i>For example, if a customer of a Respondent bank has direct access to the said Respondent bank's Correspondent account (to process their own transactions), then the Correspondent account is being used as a Payable Through Account.</i>
PEP	"Politically Exposed Person" includes – (a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, an important political party official; (b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation, an important political party official; and (c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a

	deputy director and a member of the board or equivalent functions.
Reporting Period	January 1 to December 31 of the applicable year
Source of Funds	The origin of the assets that will be used to form and maintain the business relationship. A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together. Take this into account when answering questions relating to the 'Nature of Business' - Source of Funding.
Special Economic Zone Business	Any type of business authorised to be carried on in a special economic zone pursuant to any legislation enforced in the Islands.
Targeted Financial Sanctions ("TFS")	Includes asset freezing, restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").
TCSP	Includes those entities conducting Trust, Company Manager, and Corporate Service Provider business.
Transaction	For the purposes of this AML Return, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction. Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated with securities trades, should be excluded from the report.
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 HNWIs	For the purpose of the AML Return, Ultra-High Net Worth Individuals ("Ultra HNWIs"), also referred to as UHNWIs, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.
Value of Client Assets	The total value of funds held for or on behalf of customers. Client assets include monies belonging to

		customers held in savings, chequing/current accounts, fixed/time deposit accounts, and investment portfolios or custody services.
Virtual Asset		A virtual asset as specified in the Virtual Asset (Service Providers) Act (2024 Revision) ("VASP Act"), or as amended, is a digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies.
Virtual Asset Custodian		A VASP who provides virtual asset custody services in or from within the Islands.
Virtual Asset Custody Service		The business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets.
Virtual Assets Products and Services		Includes those services identified within the VASP Act, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.
Virtual Assets Service Provider (VASP)		An entity that is registered pursuant to section 6(3) of the VASP Act or licensed as a virtual asset custodian or trading platform pursuant to section 8(2)(a) of the VASP Act, 2024 Revision, or as amended.
Timeframe	Value of Client Assets	Total value of client assets as at the end of the reporting period.
Timeframe	Number of Clients	Number of clients as at the end of the reporting period.
Timeframe	Value of Transactions	Value of transactions conducted for the client during the reporting period.
Timeframe	Number of Transactions	Number of Transactions conducted for clients during the reporting period.

AML Inherent Risk Questions:

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers <i>at the end of</i> the reporting period.	Enter the total number of clients the entity had <i>at the end of</i> the reporting period. This number should include all clients the entity provides financial products and services to as opposed to accounts e.g., if the same client,

			individual or legal entity, has two accounts in the same name, then only 1 client should be counted. Do not double count. Where applicable, the number of clients/customers should only include those of the Cayman Islands legal entity. Total clients consist of Natural Persons and Legal Persons and Arrangements.
1.1.2	2	Total Clients / Customers <i>throughout</i> the reporting period.	Enter how many clients, in total, the entity conducted business with, <i>during</i> the reporting period. This category is specific to all clients that the entity dealt with throughout the reporting period. Therefore, the combined total should include both current and past relationships/clients falling within the January to December timeframe. Where applicable, the number of clients/customers should only include those of the Cayman Islands legal entity. Total clients consist of Natural Persons and Legal Persons and Arrangements.
1.1.3	3	Total <i>new</i> Clients / Customers onboarded <i>during</i> the reporting period.	Enter the total number of new clients that were onboarded <i>during</i> the reporting period. This number should include only those client relationships onboarded <i>during</i> the reporting period and <u>not</u> existing clients that requested/received new financial products and services e.g., if an existing client, individual or legal entity, opened a new account in their name, then they should not be counted here.
1.1.4	4	Total Transactions for the reporting period.	Enter the total number of all transactions conducted for clients <i>during</i> the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.5	5	Total Value of Client Assets.	Enter the total value of client assets, including those held on deposit, for the total clients reported in Question 1 as <i>at the end of</i> the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.6	6	Total number of PEP clients/customers <i>at the end of</i> the reporting period.	Enter the total number of PEPs the entity conducts business with as <i>at the</i>

			<i>end of the</i> reporting period, broken down by the nationality of the PEP. This category is specific to all PEPs. Therefore, the combined total should include, but not limited to, Natural Persons/individuals who are direct clients of the entity, Legal Persons where connected persons such as UBOs, directors or other controlling persons are PEPs, and Legal Arrangements where trustees and/or settlors of Trusts are PEPs.
1.1.7	7	Total number of clients that are relatives or close associates of PEPs, <i>at the end of</i> the reporting period.	Enter the total number of clients the entity conducts business with, that are relatives or close associates of PEPs, as <i>at the end of</i> the reporting period, broken down by the nationality of the client.
1.1.8	8	Total number of High-Risk customers <i>at the end of</i> the reporting period.	Enter the total number of high-risk clients/customers the entity has <i>at the end of</i> the reporting period. That is, provide the number of clients that the entity has, that are classified as 'high-risk', after considering relevant risk factors to determine the levels of risk presented in relation to types of applicants/ customers, countries or geographic areas, and particular products, services, transactions or delivery channels.
1.1.9	9	Total number of Non-Compliant Accounts <i>at the end of</i> the reporting period.	Enter the number of customers where sufficient CDD has not been collected, <i>at the end of</i> the reporting period.
1.2.1	10	Clients / customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients that are Natural Persons, subdivided by nationality as <i>at the end of</i> the reporting period. This category is specific to clients who are Natural Persons who have a direct business relationship with the entity.
1.2.2	11	Clients / customers that are Natural Persons, broken down by residency of the client.	Enter the number of clients that are Natural Persons, subdivided by their residency. This category is specific to clients who are Natural Persons who have a direct business relationship with the entity.
1.2.3	12	Total Transactions for the reporting period for clients who are Natural Persons.	Enter the total number of transactions conducted for clients who are Natural Persons, <i>during</i> the reporting period.

			This category is specific to clients who are Natural Persons who have a direct business relationship with the entity. If an entity did not conduct such transactions, a '0' value should be used.
1.2.4	13	Value of Client Assets for clients who are Natural Persons.	Enter the total value of client assets, including those held on deposit, for clients that are Natural Persons as <i>at the end of</i> the reporting period. This category is specific to clients who are Natural Persons who have a direct business relationship with the entity.
1.2.5	14	Natural Person Clients - Does the entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.
1.2.6	15	Number of Natural Person clients who are PEPs, broken down by nationality of the PEP.	Enter the number of clients the entity has that are Natural Persons who are also PEPs, broken down by the nationality of the PEP, <i>at the end of</i> the reporting period.
1.2.7	16	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by or on behalf of clients that are Natural Persons, and are also PEPs, <i>during</i> the reporting period.
1.2.8	17	Natural Persons - PEPs - Value of Client Assets.	Enter the value of client assets, including on deposit, of the clients that are Natural Persons, and also PEPs, as <i>at the end of</i> the reporting period.
1.2.9	18	Does the entity have any Natural Person clients that are HNWIs?	Please answer 'Yes' or 'No'. <i>This category does <u>NOT</u> include those individuals who are Ultra HNWIs.</i>
1.2.10	19	Number of Natural Person clients who are HNWIs.	Enter the number of clients the entity has, that are Natural Persons who are also HNWIs, as <i>at the end of</i> the reporting period. Do <u>NOT</u> include those individuals who are Ultra HNWIs.
1.2.11	20	Natural Person Clients - HNWIs - Number of Transactions.	Enter the number of transactions conducted by or on behalf of clients that are Natural Persons and also HNWIs, <i>during</i> the reporting period. Do <u>NOT</u> include those individuals who are Ultra HNWIs.

1.2.12	21	Natural Person Clients - HNWIs - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are Natural Persons and also HNWIs, as <i>at the end of</i> the reporting period. Do <u>NOT</u> include those individuals who are Ultra HNWIs.
1.2.13	22	Does the entity have any Natural Person clients who are Ultra HNWIs?	Please answer 'Yes' or 'No'. For this category, Ultra HNWIs are those persons with net worth equal to or greater than US\$30,000,000.
1.2.14	23	Number of Natural Person clients who are Ultra HNWIs.	Enter the number of clients the entity has, that are Natural Persons who are also Ultra HNWIs, as <i>at the end of</i> the reporting period.
1.2.15	24	Natural Person Clients – Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted by or on behalf of clients that are Natural Persons who are also Ultra HNWIs, <i>during</i> the reporting period.
1.2.16	25	Natural Persons Clients – Ultra HNWIs - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are Natural Persons who are also Ultra HNWIs, as <i>at the end of</i> the reporting period.
1.2.17	26	Does the entity have any Natural Person clients who are PEPs and HNWIs / Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.2.18	27	Number of Natural Persons who are PEPs and HNWIs / Ultra HNWIs.	Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and HNWIs/Ultra HNWIs, <i>at the end of</i> the reporting period.
1.2.19	28	Natural Persons - PEPs & HNWIs / Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted for or on behalf of clients who are both PEPs and HNWIs / Ultra HNWIs, <i>during</i> the reporting period.
1.2.20	29	Natural Persons - PEPs & HNWIs / Ultra HNWIs - Value of Client Assets.	Enter the value of client assets for clients who are a combination of Natural Persons, PEPs, and HNWIs/Ultra HNWIs, <i>at the end of</i> the reporting period.
1.3.1	30	Clients / customers that are Legal Persons, broken down by country of incorporation of the client.	Enter the total number of clients that are Legal Persons, broken down by country of incorporation, <i>at the end of</i> the reporting period.

			Examples of legal persons include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies. If an entity does not have such clients, a '0' value should be used.
1.3.2	31	Number of Transactions - Legal Persons.	Enter the total number of transactions processed by or on behalf of customers who are Legal Persons, <i>during</i> the reporting period. Examples of legal persons include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies
1.3.3	32	Value of Client Assets for all Legal Persons.	Enter the total value of client assets, including those held on deposit, for clients who are Legal Persons, as <i>at the end of</i> the reporting period. Examples of legal persons include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies.
1.3.4	33	Clients/customers that are Legal Arrangements, broken down by country of establishment of the client.	Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as <i>at the end of</i> the reporting period. Examples of legal arrangements include but are not limited to Trusts and Partnerships. If an entity does not have such clients, a '0' value should be used.
1.3.5	34	Number of Transactions - Legal Arrangements	Enter the total number of transactions processed by or on behalf of clients who are Legal Arrangements, <i>during</i> the reporting period. Examples of legal arrangements include but are not limited to Trusts and Partnerships.
1.3.6	35	Value of Client Assets for all Legal Arrangements.	Enter the total value of client assets, including those held on deposit for clients who are Legal Arrangements, as <i>at the end of</i> the reporting period. Examples of legal arrangements include but are not limited to Trusts and Partnerships.
1.3.7	36	Number of clients that have a nominee appointed on behalf of a	Enter the total number of clients that have a nominee director as <i>at the end of</i> the reporting period, broken down by

		director, broken down by country of nationality of the <i>nominee director</i> .	country of nationality of the <i>nominee director</i> .
1.3.8	37	Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the <i>director</i> .	Enter the total number of clients that have a nominee director as <i>at the end of</i> the reporting period, broken down by country of nationality of the <i>director</i> (not the nominee).
1.3.9	38	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are also PEPs, broken down by nationality of the PEP as <i>at the end of</i> the reporting period.
1.3.10	39	Number of directors and/or senior management of clients who are HNWIIs.	Enter the number of directors and/or senior management of the clients who are also HNWIIs as <i>at the end of</i> the reporting period. HNWIIs is specific to those persons whose net worth is at least US\$1,000,000 or those that have assets valued at least US\$5,000,000.
1.3.11	40	Number of directors and/or senior management of clients who are Ultra HNWIIs.	Enter the number of directors and/or senior management of the clients who are also Ultra HNWIIs as <i>at the end of</i> the reporting period. UHNWIIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.
1.3.12	41	Number of directors and/or senior management of clients who are PEPs & HNWIIs, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are <i>both</i> PEPs <i>and</i> HNWIIs/ Ultra HNWIIs broken down by the nationality of the PEPs, as <i>at the end of</i> the reporting period.
1.4.1	42	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 <i>at the end of</i> the reporting period. <i>This category is specific to Legal Persons and Legal Arrangements. Examples include, but are not limited to, the total number of UBOs of Corporate entities and Settlers of Trusts.</i> <i>A BO should not be counted more than once regardless of the number of business relationships they have with the entity.</i>

			If the entity does not have any clients that fit this category, record a '0'.
1.4.2	43	Does the entity have any clients that have BOs who are directors of the client?	Answer 'Yes' or 'No'
1.4.3	44	Number of clients that have BOs who are directors of the client.	Enter the total number of clients that have BOs who are also directors of the client, as <i>at the end of</i> the reporting period.
1.4.4	45	Does the entity have any clients that have BOs who are controllers of the client?	Answer 'Yes' or 'No'
1.4.5	46	Number of clients that have BOs who are controllers of the client.	Enter the total number of clients whose BOs are also controllers of the client, as <i>at the end of</i> the reporting period.
1.4.6	47	Does the entity have any clients that have BOs who are also senior managing officials of the client?	Please answer 'Yes' or 'No'.
1.4.7	48	Number of clients that have BOs who are also senior managing officials of the client.	Enter the total number of clients whose BOs are also senior managing officials of the client. 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. If an entity does not have such clients, a '0' value should be used.
1.4.8	49	Does the entity have any clients that have BOs who are HNWI's?	Please answer 'Yes' or 'No'. <i>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.</i> HNWI's is specific to those persons whose net worth is at least US\$1,000,000 and/or those that have assets valued at least US\$5,000,000

			Do <u>Not</u> include clients/customers with net worth equal to or greater than US\$30,000,000.
1.4.9	50	Number of Clients that have BOs who are HNWIs.	Enter the total number of clients that have BOs who are also HNWIs. If the entity does not have any clients that fit this category record a '0'.
1.4.10	51	Does the entity have any clients that have BOs who are Ultra HNWIs?	Please answer 'Yes' or 'No'. <i>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.</i> UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.
1.4.11	52	Number of Clients that have BOs who are Ultra HNWIs.	Enter the total number of clients who have BOs who are also Ultra HNWIs. If the entity does not have any clients that fit this category record a '0'.
1.4.12	53	Does the entity have any clients that have BOs who are PEPs?	Please answer 'Yes' or 'No'.
1.4.13	54	Number of BOs of clients who are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who are Legal Persons and Arrangements that have BOs who are PEPs, as <i>at the end of</i> the reporting period.
1.4.14	55	Does the entity have any clients that have Nominees acting on behalf of a BO?	Please answer 'Yes' or 'No'. Please respond 'Yes' if there are any Nominees appointed within the ownership structure.
1.4.15	56	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.
1.5.1	57	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.

1.5.2	58	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction, <i>during</i> the reporting period.	Enter the number of Government or Public Sector clients the entity has, <i>during</i> the reporting period, broken down by government jurisdiction.
1.5.3	59	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed by or on behalf of Government or Public Sector clients, <i>during</i> the reporting period, broken down by government jurisdiction.
1.5.4	60	Gov / Pub Sector - Value of Transactions.	Enter the value of transactions processed by or on behalf of Government or Public sector clients, <i>during</i> the reporting period.
1.5.5	61	Gov / Pub Sector - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are Government or Public sector, as <i>at the end of</i> the reporting period.
1.5.6	62	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.5.7	63	NPOs - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, as <i>at the end of</i> the reporting period.
1.5.8	64	NPOs - Number of Transactions.	Enter the number of transactions processed by or on behalf of clients that are NPOs, <i>during</i> the reporting period.
1.5.9	65	NPOs – Value of Transactions.	Enter the value of transactions processed by or on behalf of clients that are NPOs, <i>during</i> the reporting period.
1.5.10	66	NPOs - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are NPOs, as <i>at the end of</i> the reporting period.
1.5.11	67	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.5.12	68	Foundations – Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity had that are Foundations <i>at the end of</i> the reporting period, broken down by the country of establishment of the client.

1.5.13	69	Foundations – Number of Transactions.	Enter the number of transactions processed on behalf of clients that are a Foundation, <i>during</i> the reporting period.
1.5.14	70	Foundations – Value of Transactions.	Enter the value of transactions processed for clients that are Foundations, <i>during</i> the reporting period.
1.5.15	71	Foundations – Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are a Foundation, <i>as at the end of</i> the reporting period.
1.5.16	72	Does the entity have any clients that are Trusts?	Please answer 'Yes' or 'No'.
1.5.17	73	Trusts - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has that are Trusts, broken down by country where the client was established, <i>as at the end of</i> the reporting period.
1.5.18	74	Trusts - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Trusts, <i>during</i> the reporting period.
1.5.19	75	Trusts – Value of Transactions.	Enter the value of transactions processed for clients that are Trusts, <i>during</i> the reporting period.
1.5.20	76	Trusts - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are Trusts, <i>at the end of</i> the reporting period.
1.5.21	77	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.5.22	78	Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Segregated Portfolio Companies, broken down by country of incorporation of the client, <i>as at the end of</i> the reporting period.
1.5.23	79	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Segregated Portfolio Companies, <i>during</i> the reporting period.
1.5.24	80	Segregated Portfolio Companies – Value of Transactions.	Enter the value of transactions processed on behalf of clients that are

			Segregated Portfolio Companies, <i>during</i> the reporting period.
1.5.25	81	Segregated Portfolio Companies - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are a Segregated Portfolio Company, as <i>at the end of</i> the reporting period.
1.5.26	82	Does the entity have any clients that are registered in a Special Economic Zone?	Please answer 'Yes' or 'No'. <i>Note that one client can fall under multiple categories of structure.</i>
1.5.27	83	Special Economic Zone - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Special Economic Zone companies as <i>at the end of</i> the reporting period.
1.5.28	84	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are Special Economic Zone companies, <i>during</i> the reporting period.
1.5.29	85	Special Economic Zone – Value of Transactions.	Enter the value of transactions processed for clients that are Special Economic Zone Companies, <i>during</i> the reporting period.
1.5.30	86	Special Economic Zone - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are from a Special Economic Zone, as <i>at the end of</i> the reporting period.
1.5.31	87	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'. <i>Note that one client can fall under multiple categories of structure.</i>
1.5.32	88	Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Funds / Collective Investment Vehicles as <i>at the end of</i> the reporting period.
1.5.33	89	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions processed for or on behalf of clients that are Funds / Collective Investment Vehicles, <i>during</i> the reporting period.

1.5.34	90	Funds/Collective Investment Vehicles – Value of Transactions.	Enter the value of transactions processed for or on behalf of clients who are Funds/Collective Investment Vehicles, as <i>at the end of</i> the reporting period.
1.5.35	91	Funds / Collective Investment Vehicles - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are Funds / Collective Investment Vehicles, as <i>at the end of</i> the reporting period.
1.6.1	92	Nature of Business/ Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below: • Banking Institutions • Other Financial Regulated Business* • Civil Service/Government Employment • Financial Leasing • Money Lending • Accountants • Fintech *excluding MSBs, VASPs, and TCSPs.	Provide the total number of clients whose source of funding falls within the list of sectors, broken down by nationality or country of incorporation/ registration/ establishment of the clients as <i>at the end of</i> the reporting period. Total clients consist of Natural Persons and Legal Persons and Arrangements.
1.6.2	93	Does the entity have any clients that are Legal Persons, as well as a Banking Institutions (excluding MSBs), or is a Natural Person employed by a Banking Institution (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.6.3	94	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients who are either Legal Persons or Arrangements as well as Banking Institutions (excluding MSBs), or Natural Persons employed by Banking Institutions (excluding MSBs).
1.6.4	95	Does the entity have any clients that are Legal Persons operating as Other Financial Regulated Businesses, or Natural Persons employed by Other Financial Regulated Businesses not listed in this section?	Please answer 'Yes' or 'No'.

1.6.5	96	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements operating as Other Financial Regulated Business or Natural Persons that are employed by Other Financial Regulated Businesses not mentioned above.
1.6.6	97	Does the entity have any clients whose source of funding is derived from Civil Service or Government Employment?	Please answer 'Yes' or 'No'.
1.6.7	98	Civil Service/ Government Employment- Number of Clients	Enter the number of clients the entity has, whose source of funding is from Civil Service or Government employment.
1.6.8	99	Does the entity have any clients that are Legal Persons operating in Financial Leasing, or Natural Persons employed by Financial Leasing?	Please answer 'Yes' or 'No'.
1.6.9	100	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements operating as Financial Leasing companies or Natural Persons that are employed by Financial Leasing companies.
1.6.10	101	Does the entity have any clients that are Legal Persons operating as Money Lending, or Natural Persons employed by Money Lending?	Please answer 'Yes' or 'No'.
1.6.11	102	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements as well as Money Lending institutions, and / or Natural Persons that are employed by Money Lending institutions.
1.6.12	103	Does the entity have any clients that are Legal Persons operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or Natural Persons employed as Accountants?	Please answer 'Yes' or 'No'.
1.6.13	104	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements as well as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or Natural Persons that

			are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.6.14	105	Does the entity have any clients that are Legal Persons operating in the Fintech Industry, or Natural Persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.15	106	Fintech - Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements operating in the Fintech Industry, and Natural Persons that are employed by institutions in the Fintech Industry.
1.6.16	107	Nature of Business/ Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below: ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Services Business (MSBs) ▪ Virtual Asset Service Providers (VASPs) ▪ High Value Dealers ▪ Trusts, Company Managers or Corporate Service Providers (TCSPs) ▪ Import/Export Industry ▪ Shipping and Transport of Goods	Provide the total number of clients whose source of funding falls within the list of sectors, broken down by nationality or country of incorporation/ registration/ establishment of the clients as <i>at the end of</i> the reporting period. Total clients consist of Natural Persons and Legal Persons and Arrangements.
1.6.17	108	Does the entity have any clients that are Legal Persons operating as Legal Practitioners, or Natural Persons employed as Legal Practitioner?	Please answer 'Yes' or 'No'
1.6.18	109	Legal Practitioners – Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements operating as Legal Practitioners, and Natural Persons that are employed by Legal Practitioners.
1.6.19	110	Does the entity have any clients that are Legal Persons operating as Dealers in Precious Metals and	Please answer 'Yes' or 'No'

		Stones, or Natural Persons employed by Dealers in Precious Metals and Stones?	
1.6.20	111	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements operating as Dealers in Precious Metals and Stones, and Natural Persons that are employed by Dealers in Precious Metals and Stones.
1.6.21	112	Does the entity have any clients that are Legal Persons operating as Money Services Businesses, or Natural Persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.6.22	113	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are Legal Persons or Arrangements operating in the Money Services Business, and Natural Persons that are employed in the Money Services Business.
1.6.23	114	Does the entity have any clients that are Legal Persons and Arrangements operating as a VASP, or Natural Persons employed / earned income through VASPs?	Please answer 'Yes' or 'No'.
1.6.24	115	Virtual Asset Service Providers - Number of Clients.	Enter the number of clients the entity has, that are Legal Persons and Arrangements offering virtual assets products and services, and Natural Persons that are employed by, or earned income through virtual asset products and services.
1.6.25	116	Does the entity have any clients whose source of funds is derived through High Value Dealer operations?	Please answer 'Yes' or 'No'.
1.6.26	117	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funds is derived from High Value Dealer operations.
1.6.27	118	Does the entity have any clients whose source of funds is derived from TCSP operations?	Please answer 'Yes' or 'No'.
1.6.28	119	TCSP operations - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from TCSP operations.

1.6.29	120	Does the entity have any clients whose source of funds is derived from the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.30	121	Import / Export - Number of Clients.	Enter the number of clients the entity has, whose source of funding is generated from operating in the Import/ Export business.
1.6.31	122	Does the entity have any clients whose source of funding is derived from the Shipping and Transport of Goods industry?	Please answer 'Yes' or 'No'.
1.6.32	123	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.
1.6.33	124	Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below: • Real Estate Agents/Brokers • Gambling Business • Adult Entertainment Industry • Defence Industry • Oil and Gas Industry • Mining • Construction / Development • Retail / Restaurant • Cannabis Industry	Provide the total number of clients that fall within the list of the sectors, broken down by nationality or country of incorporation/ registration/ establishment of the clients as <i>at the end of</i> the reporting period. Total clients consist of Natural Persons and Legal Persons and Arrangements.
1.6.34	125	Does the entity have any clients whose source of funds is derived from the Real Estate industry (Agents / Brokers / Sellers)?	Please answer 'Yes' or 'No'.
1.6.35	126	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).
1.6.36	127	Does the entity have any clients whose source of funds is derived from the Gambling industry (including online gambling)?	Please answer 'Yes' or 'No'.

1.6.37	128	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).
1.6.38	129	Does the entity have any clients whose source of funds is derived from the adult entertainment industry?	Please answer 'Yes' or 'No'.
1.6.39	130	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Adult Entertainment Industry.
1.6.40	131	Does the entity have any clients whose source of funds is derived from the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.41	132	Defence Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Defence industry.
1.6.42	133	Does the entity have any clients whose source of funds is derived from operating in the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.43	134	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.
1.6.44	135	Does the entity have any clients whose source of funds is derived from the Mining Industry?	Please answer 'Yes' or 'No'.
1.6.45	136	Mining Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Mining Industry.
1.6.46	137	Does the entity have any clients whose source of funds is derived from operating in the Construction/ Development industry?	Please answer 'Yes' or 'No'.
1.6.47	138	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.
1.6.48	139	Does the entity have any clients whose source of funds is derived from operating in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.49	140	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from the Retail & Restaurant Business.
1.6.50	141	Does the entity have any clients whose source of funds is derived from Cannabis Production & Distribution operations?	Please answer 'Yes' or 'No'.
1.6.51	142	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.
1.6.52	143	Does the entity have any clients whose source of funds is Unknown to the entity?	Please answer 'Yes' or 'No'.
1.6.53	144	Unknown Businesses and Professions - Number of Clients.	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.
1.6.54	145	Does the entity have any clients whose business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.55	146	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	147	Source of Funds – Value of Client Assets. Enter the total value of client assets for clients that are employed by or operating in, the following sectors below: ▪ Banking Institutions ▪ Other Financial regulated Business*	Enter the total value of client assets, including those held on deposit, for the clients that are employed by or operating in the list of sectors, as <i>at the end of</i> the reporting period.

		▪ Civil Service/ Government Employment ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech <i>*excluding MSBs, VASPs, and TCSPs</i>	
1.7.2	148	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in Banking Institutions (excluding MSBs).
1.7.3	149	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for the clients that are employed/ operating in Other Financial Regulated Businesses.
1.7.4	150	Civil Service/ Government Employment – Value of Client Assets	Enter the value of client assets, including those held on deposit, for the clients employed in the Civil Service or Government sector.
1.7.5	151	Financial Leasing - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for the clients employed/ operating in the Financial Leasing business.
1.7.6	152	Money Lending- Value of Client Assets.	Enter the value of client assets, including those held on deposit, for the clients employed/ operating in the Money Lending Business.
1.7.7	153	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for the clients that are employed/ operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.7.8	154	Fintech - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients employed/ operating in the Fintech Industry.

1.7.9	155	Source of Funds – Value of Client Assets. Enter the total value of client assets for clients that are employed by or operating in, the following sectors: ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ MSBs ▪ VASPs ▪ High Value Dealers ▪ TCSPs ▪ Import/Export Industry ▪ Shipping and Transport of Goods	Enter the total value of client assets, including those held on deposit, for the clients that are employed by or operating in the list of sectors, as <i>at the end of</i> the reporting period.
1.7.10	156	Legal Practitioners – Value of Client Assets.	Enter the value of client assets, including those held on deposit, for the clients that are employed/ operating as Legal Practitioners.
1.7.11	157	Dealers in Precious Metals and Stones – Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating as Dealers in Precious Metals and Stones.
1.7.12	158	Money Services Business - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Money Services Business.
1.7.13	159	Virtual Asset Service Providers - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients offering virtual asset products and services, or Natural Persons employed by Virtual Asset Service Providers.
1.7.14	160	High Value Dealers - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients employed/ operating as High Value Dealers.

1.7.15	161	TCSP- Value of Client Assets	Enter the value of client assets, including those held on deposit, for clients employed/ operating as a TCSP.
1.7.16	162	Import / Export - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients employed/ operating in the Import / Export Industry.
1.7.17	163	Shipping and Transport of Goods - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients employed/ operating in the Shipping and Transport of Goods Industry.
1.7.18	164	Source of Funds – Value of Client Assets Enter the total value of client assets for clients that are employed by or operating in, the following sectors: ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry	Enter the total value of client assets, including those held on deposit, for the clients that are employed in the list of sectors, as <i>at the end of</i> the reporting period.
1.7.19	165	Real Estate Agents / Brokers - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients employed/ operating as Real Estate Agents / Brokers.
1.7.20	166	Gambling business (including online gambling) - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Gambling business (including online gambling).
1.7.21	167	Adult Entertainment - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Adult Entertainment Business.

1.7.22	168	Defence Industry - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Defence Industry.
1.7.23	169	Oil and Gas Industry - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Oil and Gas Industry.
1.7.24	170	Mining Industry - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Mining Industry.
1.7.25	171	Construction / Development - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Construction / Development Industry.
1.7.26	172	Retail & Restaurant Business - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Retail & Restaurant Business.
1.7.27	173	Cannabis Production & Distribution - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in the Cannabis Production & Distribution Business.
1.7.28	174	Industry / profession is not known or not recorded - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in unknown or unrecorded Industries / Professions.
1.7.29	175	Other - Not listed above - Value of Client Assets.	Enter the value of client assets, including those held on deposit, for clients that are employed/ operating in Known Businesses /Industries/ Professions not listed above.
1.8.1	176	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.8.2	177	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Please include 'N/A' if no comment.

2.1.1	178	Does the entity provide financial products in the form of Fixed Deposits?	Please answer 'Yes' or 'No'.
2.1.2	179	Fixed Deposits – Number of Transactions.	Enter the number of Fixed Deposit transactions processed, <i>during</i> the reporting period.
2.1.3	180	Fixed Deposits- Value of Funds Transferred.	Enter the total value of Fixed Deposit transactions processed, <i>during</i> the reporting period.
2.1.4	181	Does the entity provide financial products in the form of FOREX?	Please answer 'Yes' or 'No'.
2.1.5	182	FOREX - Number of Transactions.	Enter the number of FOREX transactions processed, <i>during</i> the reporting period.
2.1.6	183	FOREX - Value of Funds Transferred.	Enter the total value of FOREX transactions processed, <i>during</i> the reporting period.
2.1.7	184	Does the entity provide financial products in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.1.8	185	Virtual Currency - Number of Transactions.	Enter the number of Virtual Currency transactions conducted, <i>during</i> the reporting period.
2.1.9	186	Virtual Currency - Value of Funds Transferred.	Enter the total value of Virtual Currency transferred, <i>during</i> the reporting period.
2.1.10	187	Does the entity provide financial products in the form of Lending Trade Finance?	Please answer 'Yes' or 'No'.
2.1.11	188	Lending Trade Finance - Number of Transactions.	Enter the number of transactions processed for Lending Trade Finance, <i>during</i> the reporting period.
2.1.12	189	Lending Trade Finance - Value of Funds Transferred.	Enter the total value of funds transferred for Lending Trade Finance, <i>during</i> the reporting period.
2.1.13	190	Does the entity provide financial products in the form of Prepaid Cards?	Please answer 'Yes' or 'No'.
2.1.14	191	Prepaid Cards - Number of Transactions.	Enter the number of transactions processed through Prepaid Cards, <i>during</i> the reporting period.

2.1.15	192	Prepaid Cards - Value of Funds Transferred.	Enter the total value of funds transferred through Prepaid Cards, <i>during</i> the reporting period.
2.1.16	193	Does the entity offer Payable Through Accounts?	Please answer 'Yes' or 'No'.
2.1.17	194	Payable Through Accounts – Number of Clients.	Enter the number of clients the entity offers Payable Through Accounts services to, <i>during</i> the reporting period.
2.1.18	195	Payable Through Accounts – Number of Transactions.	Enter the number of transactions conducted through Payable Through Accounts, <i>during</i> the reporting period.
2.1.19	196	Payable Through Accounts – Value of Transactions.	Enter the total value of transactions processed through Payable Through Accounts, <i>during</i> the reporting period.
2.1.20	197	Does the entity provide other Banking Products not mentioned above?	Please answer 'Yes' or 'No'.
2.1.21	198	Other Banking Products- Number of Clients	Enter the number of clients the entity provides other banking products to, not mentioned above, <i>during</i> the reporting period.
2.1.22	199	Please indicate the other Banking Products not captured above.	List the other Banking Products not mentioned above.
2.1.23	200	Does the entity conduct business through bank accounts located in another jurisdiction(s)?	Please answer 'Yes' or 'No'.
2.1.24	201	What is the purpose of the bank account(s) in the other jurisdiction(s)	Provide the purpose of the bank account(s) in the other jurisdictions.
2.1.25	202	In which jurisdiction(s), other than the Cayman Islands, does the entity hold bank accounts used for conducting business?	Specify the jurisdiction(s) where the entity holds bank accounts used for conducting business.
2.2.1	203	Does the entity provide financial products in the form of Omnibus Accounts?	Please answer 'Yes' or 'No'.
2.2.2	204	Does the entity provide financial products in the form of Trust & Company Administration?	Please answer 'Yes' or 'No'.
2.2.3	205	Does the entity provide financial products in the form of Trustee & Custodian Services?	Please answer 'Yes' or 'No'.

2.2.4	206	Does the entity provide financial products in the form of Fund Management?	Please answer 'Yes' or 'No'.
2.2.5	207	Does the entity provide financial products in the form of Investment Management?	Please answer 'Yes' or 'No'.
2.2.6	208	Does the entity offer Trading Services or Trading Platforms to clients?	Please answer 'Yes' or 'No'.
2.2.7	209	Does the entity utilize Sweep/ Treasury Accounts as part of their Cash Management system?	Please answer 'Yes' or 'No'.
2.2.8	210	Does the entity service clients as an Authorized Agent?	Please answer 'Yes' or 'No'.
2.2.9	211	Authorized Agent- Number of Clients	Enter the number of clients the entity provides Authorized Agent services to, <i>during</i> the reporting period.
2.2.10	212	Does the entity service clients as a Registered Office?	Please answer 'Yes' or 'No'.
2.2.11	213	Registered Office- Number of Clients	Enter the number of clients the entity provides Registered Office services to, <i>during</i> the reporting period.
2.3.1	214	Does the entity facilitate payments by or on behalf of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	215	Physical Cash - Number of Clients.	Enter the number of clients that made payments in the form of Physical Cash, <i>during</i> the reporting period.
2.3.3	216	Physical Cash - Number of Transactions.	Enter the number of cash transactions processed by or on behalf of clients, <i>during</i> the reporting period. Payments include those between the entity and the client and those conducted on behalf of the client.
2.3.4	217	Physical Cash - Value of Transactions.	Enter the total value of cash transactions processed by or on behalf of clients, <i>during</i> the reporting period.
2.3.5	218	Does the entity facilitate Client payments in the form of Virtual Currency?	Please answer 'Yes' or 'No'.

2.3.6	219	Virtual Currency - Number of Clients.	Enter the number of clients that conducted transactions in the form of Virtual Currency, <i>during</i> the reporting period.
2.3.7	220	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions conducted by clients, <i>during</i> the reporting period.
2.3.8	221	Virtual Currencies - Value of Funds Transferred.	Enter the value of virtual currency transactions processed by or on behalf of clients.
2.3.9	222	Does the entity facilitate Client payments via Third Parties?	Please answer 'Yes' or 'No'.
2.3.10	223	Third Parties - Number of Clients.	Enter the number of clients that conducted payments via Third Parties, <i>during</i> the reporting period. <i>Payments via third party means that the payment was paid to a third party <u>not</u> associated with the business relationship or transaction.</i>
2.3.11	224	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions processed by clients, <i>during</i> the reporting period.
2.3.12	225	Third Parties - Value of Transactions.	Enter the value of transactions processed by clients, <i>during</i> the reporting period, using payments via Third Parties.
2.3.13	226	Does the entity facilitate Client payments via Credit Card?	Please answer 'Yes' or 'No'.
2.3.14	227	Credit Card Payments - Number of Clients.	Enter the number of clients that made payments via Credit Card, <i>during</i> the reporting period.
2.3.15	228	Credit Card Payments - Number of Transactions.	Enter the number of transactions processed via Credit Card payments, <i>during</i> the reporting period.
2.3.16	229	Credit Card Payments - Value of Transactions.	Enter the value of Credit Card payments processed for clients, <i>during</i> the reporting period.
2.3.17	230	Does the entity facilitate Client payments in the form of Wire Transfers?	Please answer 'Yes' or 'No'.

2.3.18	231	Wire Transfers - Number of Clients.	Enter the number of clients that made payments in the form of Wire Transfers, <i>during</i> the reporting period.
2.3.19	232	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions that were conducted by clients, <i>during</i> the reporting period.
2.3.20	233	Wire Transfers - Value of Funds Transferred.	Enter the value of Wire Transfer transactions conducted by clients, <i>during</i> the reporting period.
2.3.21	234	Does the entity facilitate Client payments in the form of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.3.22	235	Internal Bank Transfers - Number of Clients.	Enter the number of clients that conducted Internal Bank Transfers, <i>during</i> the reporting period.
2.3.23	236	Internal Bank Transfers - Number of Transactions.	Enter the number of Internal Bank Transfer transactions conducted by clients, <i>during</i> the reporting period.
2.3.24	237	Internal Bank Transfers - Value of Funds Transferred.	Enter the value of transactions conducted by clients via Internal Bank Transfers, <i>during</i> the reporting period.
2.3.25	238	Does the entity facilitate Client payments in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.26	239	Transfer of Securities - Number of Clients.	Enter the number of clients that made payments in the form of Transfer of Securities, <i>during</i> the reporting period.
2.3.27	240	Transfer of Securities - Number of Transactions.	Enter the number transactions made by clients, <i>during</i> the reporting period, in the form of Transfer of Securities.
2.3.28	241	Transfer of Securities - Value of Funds Transferred.	Enter the value of funds transferred by clients, <i>during</i> the reporting period, by way of Transfer of Securities.
2.3.29	242	Does the entity facilitate payments of Clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.3.30	243	Other Forms of Payment - Number of Clients.	Enter the number of clients that made payments using other Forms of Payment not listed above, <i>during</i> the reporting period.

2.3.31	244	Other Forms of Payment - Number of Transactions.	Enter the number of transactions conducted by clients, <i>during</i> the reporting period, using Other Forms of Payment other than the ones listed above.
2.3.32	245	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were transferred by clients using Other Forms of Payments, <i>during</i> the reporting period.
2.3.33	246	Please indicate the types of Other Forms of Payment.	List the Other Forms of Payment processed by clients, <i>during</i> the reporting period, which are not listed above.
2.4.1	247	Does the entity accept Cash Deposits?	Please answer 'Yes' or 'No'.
2.4.2	248	Total Number of Cash Deposits.	Enter the number of cash deposits made, <i>during</i> the reporting period.
2.4.3	249	Cash Deposits - Total value of funds deposited.	Enter the total value of cash deposits made, <i>during</i> the reporting period.
2.4.4	250	Total Number of Non-Account Based Cash Deposits.	Enter the total number of Non-Account Based cash deposits, or third-party deposits made, <i>during</i> the reporting period.
2.4.5	251	Total value of Non-Account Based cash deposits.	Enter the total number of Non-Account Based cash deposits made, <i>during</i> the reporting period.
2.4.6	252	Number of Cash Deposits - PEPs.	Enter the number of cash deposits made by PEPs, <i>during</i> the reporting period.
2.4.7	253	Cash Deposits - Total value of cash deposited by PEPs.	Enter the total value of cash deposits made by PEPs, <i>during</i> the reporting period.
2.4.8	254	Number of Cash Deposits – HNWIs.	Enter the number of cash deposits made by HNWIs, <i>during</i> the reporting period.
2.4.9	255	Cash Deposits - Total value of cash deposited by HNWIs.	Enter the total value of cash deposits made by HNWIs, <i>during</i> the reporting period.
2.4.10	256	Number of Cash Deposits by Natural Persons for >US\$10,000 (or equivalent).	Enter the number of cash deposits made by Natural Persons for amounts greater than US\$10,000 (or equivalent), <i>during</i> the reporting period.

2.4.11	257	Total value of cash deposits by Natural Persons for >US\$10,000 (or equivalent)	Enter the total value of cash deposits made by Natural Persons for amounts greater than US\$10,000 (or equivalent), <i>during</i> the reporting period.
2.4.12	258	Number of Cash Deposits - Real Estate Agents & Brokers.	Enter the number of cash deposits made by Real Estate Agents & Brokers, <i>during</i> the reporting period.
2.4.13	259	Total value of Cash Deposits - Real Estate Agents & Brokers.	Enter the total value of cash deposits made by Real Estate Agents & Brokers, <i>during</i> the reporting period.
2.4.14	260	Number of Cash Deposits - Dealers in Precious Metals and Stones.	Enter the number of cash deposits made by Dealers in Precious Metals and Stones, <i>during</i> the reporting period.
2.4.15	261	Total value of Cash Deposits - Dealers in Precious Metals and Stones.	Enter the total value of cash deposits made by Dealers in Precious Metals and Stones, <i>during</i> the reporting period.
2.4.16	262	Number of Cash Deposits - NPOs.	Enter the number of cash deposits made by NPOs, <i>during</i> the reporting period.
2.4.17	263	Total value of Cash Deposits - NPOs.	Enter the total value of cash deposits made by NPOs, <i>during</i> the reporting period.
2.4.18	264	Number of Cash Deposits - Foundations.	Enter the number of cash deposits made by Foundations, <i>during</i> the reporting period.
2.4.19	265	Total value of Cash Deposits - Foundations.	Enter the total value of cash deposits made by Foundations, <i>during</i> the reporting period.
2.4.20	266	Number of Cash Deposits - High Value Dealers.	Enter the number of cash deposits made by High Value Dealers, <i>during</i> the reporting period.
2.4.21	267	Value of Cash Deposits - High Value Dealers.	Enter the total value of cash deposits made by High Value Dealers, <i>during</i> the reporting period.
2.4.22	268	Number of Cash Deposits - Money Lenders.	Enter the number of cash deposits made by Money Lenders, <i>during</i> the reporting period.
2.4.23	269	Total value of Cash Deposits - Money Lenders.	Enter the total value of cash deposits made by Money Lenders, <i>during</i> the reporting period.

2.4.24	270	Number of Cash Deposits – Financial Lessors.	Enter the number of cash deposits made by Financial Lessors, <i>during</i> the reporting period.
2.4.25	271	Total value of Cash Deposits – Financial Lessors.	Enter the total value of cash deposits made by Financial Lessors, <i>during</i> the reporting period.
2.5.1	272	Does the entity offer Correspondent Banking Services?	Please answer 'Yes' or 'No'
2.5.2	273	Correspondent Banking Services – Number of respondent institutions/ clients.	Enter the number of Respondent Institutions (clients) that have been offered correspondent banking services by the entity, as <i>at the end of</i> the reporting period.
2.5.3	274	Respondent Institutions - Number of Transactions.	Enter the total number of transactions conducted by Respondent Institutions, <i>during</i> the reporting period.
2.5.4	275	Respondent Institutions - Value of Funds Transferred.	Enter the total value of funds transferred by Respondent Institutions, <i>during</i> the reporting period.
2.5.5	276	Non-Group Respondents - Number of Transactions.	Enter the total number of transactions conducted by Non-Group Respondents, <i>during</i> the reporting period.
2.5.6	277	Non-Group Respondents - Value of Funds Transferred.	Enter the total value of funds transferred by Non-Group Respondents, <i>during</i> the reporting period.
2.5.7	278	Respondent Institutions - Money Service Providers - Number of Transactions.	Enter the number of transactions conducted by Respondent Institutions operating as Money Service Providers, <i>during</i> the reporting period.
2.5.8	279	Respondent - Money Service Providers - Value of Funds Transferred.	Enter the value of funds transferred by Respondent Institutions operating as Money Service Providers, <i>during</i> the reporting period.
2.6.1	280	Total Number of Loans issued.	Enter the total number of loans issued by the entity, <i>during</i> the reporting period.
2.6.2	281	Total value of Loans issued.	Enter the total value of loans issued by the entity, <i>during</i> the reporting period.

2.6.3	282	Non-Group Loans - Number of Transactions.	Enter the number of transactions processed for Non-Group Loans, <i>during</i> the reporting period.
2.6.4	283	Non-Group Loans - Total value of funds transferred.	Enter the total value of funds transferred for Non-Group Loans, <i>during</i> the reporting period.
2.6.5	284	Non-Group Back-2-Back Loans - Number of Transactions.	Enter the number of transactions processed for Non-Group Back-2-Back Loans, <i>during</i> the reporting period.
2.6.6	285	Non-Group Back-2-Back Loans - Total value of funds transferred.	Enter the total value of funds transferred for Non-Group Back-2-Back Loans, <i>during</i> the reporting period.
2.6.7	286	Loans - PEPs - Number of Transactions.	Enter the number of loan transactions processed for PEPs, <i>during</i> the reporting period.
2.6.8	287	Loans - PEPs - Total value of funds transferred.	Enter the total value of funds transferred as Loans to PEPs, <i>during</i> the reporting period.
2.6.9	288	Loans – High Net Worth Individuals – Number of Transactions.	Enter the number of loan transactions processed for HNWI, <i>during</i> the reporting period.
2.6.10	289	Loans - High Net Worth Individuals - Total value of funds transferred.	Enter the total value of funds transferred as Loans to HNWI, <i>during</i> the reporting period.
2.6.11	290	Loans -Ultra High Net Worth Individuals - Number of Transactions.	Enter the number of loan transactions processed for UHNWI, <i>during</i> the reporting period.
2.6.12	291	Loans - Ultra High Net Worth Individuals - Total value of funds transferred.	Enter the total value of funds transferred as Loans to UHNWI, <i>during</i> the reporting period.
2.6.13	292	Loans - Exempt Companies - Number of Transactions.	Enter the number of loan transactions processed for Exempt Companies, <i>during</i> the reporting period.
2.6.14	293	Loans - Exempt Companies - Total value of funds transferred.	Enter the total value of funds transferred as Loans to Exempt Companies, <i>during</i> the reporting period.
2.8.1	294	Does the entity have any comments or feedback for this tab?	Enter 'Yes' or 'No'
2.8.2	295	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback. Please include 'N/A' if no comment.

3.1.1	296	Number of Clients - Direct - F2F	Enter the total number of clients that were onboarded using Face-to-Face (F2F) channels, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded <i>during</i> the reporting period. Examples of F2F channels include Direct – F2F; Referrals within Group – F2F; Eligible Introducers – F2F; Other Introducers – F2F
3.1.2	297	Number of Clients - Direct - Non-F2F.	Enter the total number of clients that were onboarded using Non-Face-to-Face (Non-F2F) channels, broken down by nationality or country of incorporation/ establishment of the client. 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 <i>during</i> the reporting period. An example of Direct Non-F2F would include where the entity is onboarding clients through phone or email; however, they do not have Direct F2F contact with the clients.
3.1.3	298	Number of Clients via Online Platforms	Enter the total number of clients that were onboarded via Online Platforms, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and <u>not only</u> those onboarded <i>during</i> the reporting period.
3.1.5	299	Number of Clients onboarded through Referrals within Group - F2F.	Enter the total number of clients that were onboarded, using referrals within Group - F2F, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded using referrals within Group F2F, and <u>not only</u> those onboarded <i>during</i> the reporting period.

			An example of Group – F2F is where the entity onboarded clients that were introduced through its group channels and the entity itself also has F2F interaction with the clients.
3.1.6	300	Number of Clients onboarded through Referrals within Group - Non F2F.	Enter the total number of clients that were onboarded, using referrals within Group and via Non-Face-to-Face channels, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded using referrals within Group and via Non-Face to Face channels, and <u>not only</u> those onboarded <i>during</i> the reporting period. An example of Group Non-F2F is where the entity onboarded clients that were introduced through its group channels, but the entity itself does not have F2F interaction with the clients.
3.1.7	301	Number of Clients onboarded through Eligible Introducers Non-F2F	Enter the total number of clients that were onboarded through Eligible Introducers, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Eligible Introducers, and <u>not only</u> those onboarded <i>during</i> the reporting period.
3.1.8	302	Number of Clients onboarded through Other Introducers and not Eligible Introducers, (Non-F2F),	Enter the total number of clients that were onboarded through Other Introducers, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Other Introducers and, <u>not only</u> those onboarded <i>during</i> the reporting period.
3.2.1	303	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	304	To whom has the AML Compliance Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource

			relationship for the AML Compliance Officer (AMLCO): • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the AMLCO turnover includes one of each <i>within</i> the reporting period.
3.2.3	305	What was the country of residency of the AML Compliance Officer <i>at the end of</i> the reporting period?	Enter the country of residency of the AML Compliance Officer <i>at the end of</i> the reporting period.
3.2.4	306	How many AML Compliance Officers did the entity have in the past 3 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".
3.2.5	307	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	308	To whom has the Money Laundering Reporting Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer (MLRO): • Member within Group • 3rd Party and Member within Group 3rd Party Select "3rd Party and Member within Group", in cases where the MLRO turnover includes one of each <i>within</i> the reporting period.
3.2.7	309	What was the country of residency of the Money Laundering Reporting Officer <i>at the end of</i> the reporting period?	• Enter the country of residency of the Money Laundering Reporting Officer, <i>at the end of</i> the reporting period.
3.2.8	310	How many Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years?	If no turnover of the Money Laundering Reporting Officer role in the three-year period, answer "1".
3.2.9	311	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.

3.2.10	312	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsourced relationship for the Deputy Money Laundering Reporting Officer (DMLRO): • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the DMLRO turnover includes one of each <i>within</i> the reporting period.
3.2.11	313	What was the country of residency of the Deputy Money Laundering Reporting Officer <i>at the end of</i> the reporting period?	Enter the country of residency of the Deputy Money Laundering Reporting Officer <i>at the end of</i> the reporting period.
3.2.12	314	How many Deputy Money Laundering Reporting Officers did the entity have in the past 3 years?	If there was no turnover of the Deputy Money Laundering Reporting Officer role in the three-year period, answer "1".
3.2.13	315	Has the entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	316	To whom has the Targeted Financial Sanction screening function been outsourced?	Select one of the following options which best describes the outsourced relationship for the screening of Targeted Financial Sanctions (TFS): • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the screening of TFS turnover includes one of each <i>within</i> the reporting period.
3.2.15	317	What was the outsourcing country of the Targeted Financial Sanction screening function <i>at the end of</i> the reporting period?	Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, <i>during</i> the reporting period.
3.2.16	318	How many TFS screening platforms have the entity had in the past three years?	If there was no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".

3.2.17	319	Has the entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	320	To whom has the Transaction Monitoring function been outsourced?	Select one of the following options which best describes the outsourced Transaction Monitoring relationship: • Member within Group • 3rd Party and Member within Group • 3rd Party Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover that includes one of each <i>within</i> the reporting period.
3.2.19	321	What was the outsourcing country of the Transaction Monitoring function <i>at the end of</i> the reporting period?	Enter the country the entity outsourced the Transaction Monitoring function to <i>at the end of</i> the reporting period.
3.2.20	322	How many Transaction monitoring platforms did the entity have in the past three years?	If there was no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	323	Where is the entity's physical place of business?	Select the country where the entity's physical business operations are located.
3.3.2	324	Does the entity form part of a group structure?	Please answer 'Yes' or 'No'.
3.3.3	325	In which country is the entity's <i>ultimate</i> Parent Company incorporated?	Select the country of incorporation of the entity's Parent Company. <i>If no Parent, select "Cayman Islands"</i>
3.3.4	326	In which country is the entity's Holding Company incorporated?	Select the country of incorporation of the entity's Holding Company. <i>If no separate Holding Company, select the country of incorporation of the Parent Company.</i>
3.3.5	327	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	328	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	329	In which countries, by percentage of equity ownership, are all Shareholders of the entity located.	Enter 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	330	Percentage of Controlling Interests in the entity, broken down by country location of the controlling interests.	Insert countries where persons or beneficial owners who control the entity are located, and their percentage of controlling interest in the entity. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.9	331	Does the entity have a licence or registration in another jurisdiction?	Please answer 'Yes' or 'No'.
3.3.10	332	List the other jurisdiction(s) where the entity is licensed or registered.	Enter the name(s) of the jurisdiction(s) where the entity is licensed or registered, if any. If none, use '0' to indicate none.
3.3.11	333	Did the entity receive a penalty or any other enforcement action in another jurisdiction(s)?	Please answer 'Yes' or 'No'.
3.3.12	334	List the jurisdiction(s) in which enforcement action was taken.	Enter the name(s) of the jurisdiction(s) in which enforcement action was taken, if any. If none, use '0' to indicate none.
3.3.13	335	Does the entity operate in the Cayman Islands Special Economic Zone (SEZ)?	Please answer 'Yes' or 'No'.
3.3.14	336	Does the entity hold a Controlling Interest in another Legal Person or Arrangement engaged in Banking services?	Please answer 'Yes' or 'No'.
3.3.15	337	List the jurisdiction(s) where the entity holds a Controlling Interest in another Legal Person or Arrangement engaged in Banking services.	Enter the name(s) of the jurisdiction(s) where the entity holds a Controlling Interest in another Legal Person or Arrangement engaged in Banking services. If none, use '0' to indicate none.
3.4.1	338	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.

3.4.2	339	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback. Please include 'N/A' if no comment.
-------	-----	--	---

AML Controls Questions:

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	340	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	341	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	342	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	343	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	344	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	345	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	346	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	347	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	348	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	349	Has the entity, or its Directors, Shareholders, Beneficial Owners, or	Please answer 'Yes' or 'No'.

		Senior Officers been denied an application by any Regulatory Body?	
1.1.11	350	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	351	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	352	Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	353	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.2.2	354	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	355	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	356	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	357	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	358	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	359	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	360	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	361	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	362	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	363	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	364	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	365	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	366	Have the Directors received AML/CFT/CPF and Sanctions training <i>during</i> the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	367	Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	368	Has the MLRO received specialized compliance/AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	369	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	370	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	371	Are changes to policy and procedures communicated to all Staff/Directors and Senior Management?	Please answer 'Yes' or 'No'.
1.3.8	372	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	373	What percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company <i>during</i> 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 <i>during</i> the reporting period.

1.3.10	374	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	375	Does the entity have an Internal Audit Department / Unit / Function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	376	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?	Please answer 'Yes' or 'No'.
1.4.3	377	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	378	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	379	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	380	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	381	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	382	What is the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, in months, of the Board review of the AML audit program.
1.4.9	383	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	384	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	385	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	386	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	387	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	388	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	389	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	390	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	391	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	392	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	393	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	394	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	395	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	396	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	397	Does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.
1.5.12	398	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	399	How often, in months, do you review High-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.14	400	How often, in months, do you review Medium-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.15	401	How often, in months, do you review Low-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.6.1	402	Does the entity rely on Group AML/CFT policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	403	If yes, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?	Please answer 'Yes' or 'No'.
1.6.3	404	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	405	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	406	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	407	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	408	Does the entity have Board, or Governing Body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	409	Does the entity have Board or Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.

1.6.9	410	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	411	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	412	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	413	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	414	Does the entity have a Sanctions screening process including policies and procedures?	Please answer 'Yes' or 'No'.
1.7.2	415	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	416	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	417	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	418	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	419	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	420	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.

1.7.8	421	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	422	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	423	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	424	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	425	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	426	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	427	Does the entity have transaction monitoring policies and procedures developed that commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	428	Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with	Please answer 'Yes' or 'No'.

		countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	
1.8.3	429	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	430	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	431	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	432	Does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	433	Where high risk clients are identified, did the entity conduct EDD measures for every transaction carried out by such customers?	Please answer 'Yes' or 'No'.
1.8.8	434	Enter the total number of Alerts resulting in Suspicious Activity Reports related to ML/TF/PF and Sanctions matters identified <i>during</i> transaction monitoring.	The total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR.
1.9.1	435	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	436	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	437	Does the entity have policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.9.4	438	How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO <i>during</i> the reporting period.
1.9.5	439	How many Suspicious Activity Reports have been reported, to the FRA, by the MLRO for the current reporting period?	Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, <i>during</i> the reporting period.

1.9.6	440	How many hours on average does it take to file a SAR to the FRA?	Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.
1.9.7	441	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	442	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	443	Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	444	Does the entity maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.
1.9.11	445	If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	446	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	447	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	448	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	449	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	450	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	451	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	452	If applicable, is there a Board approved documented policy on outsourcing?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.

1.11.2	453	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.
1.11.3	454	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.4	455	In total, how many services does the entity outsource to either third parties, or within its group or subsidiaries, <i>during</i> the reporting period?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.11.5	456	Does the outsourcing agreement clearly set out the obligations of both parties?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.6	457	If applicable, does the outsourcing agreement require the Outsourced Service Provider to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.7	458	If applicable, is there a contingency plan in the event the Outsourced Service Provider fails to perform the outsourced activity?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.8	459	If applicable, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced Service Provider?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.9	460	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.
1.11.10	461	If applicable, are there policies and procedures to ensure data protection restrictions would NOT delay access to data and documents?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.11	462	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.

			This question is only applicable if the entity outsources any activities.
1.11.12	463	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	464	Does the entity conduct correspondent type business relationships, where the entity acts as the correspondent?	Please answer 'Yes' or 'No'.
1.12.2	465	Does the entity's policies and procedures require the entity to obtain approval from senior management before establishing new correspondent relationships?	Please answer 'Yes' or 'No'.
1.12.3	466	Does the entity have policies and procedures for assessing an institution's AML/CFT controls prior to establishing a correspondent banking relationship?	Please answer 'Yes' or 'No'.
1.12.4	467	Does the entity's policies and procedures require the entity to conduct CDD on the institution prior to establishing correspondent banking relationships?	Please answer 'Yes' or 'No'.
1.12.5	468	Does the entity have policies and procedures to ensure that it does not enter or continue a correspondent relationship with a shell bank?	Please answer 'Yes' or 'No'.
1.13.1	469	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.13.2	470	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.