



AML Return – Completion Guide: Mutual Fund Administrators

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Revision History:

Effective Date	Version Number	Revision Description
28 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update to definitions
31 May 2023	1.2	Updates to definitions, descriptions, explanations, and questions
31 May 2024	1.3	Updates to definitions, descriptions, explanations, and questions
2 June 2025	1.4	Updates to section 1 and sections 4.3 through 4.6 along with updates to the definitions, descriptions and explanations.
1 June 2026	1.5	Updates to sections 1 to 4.6 and section 5 which includes updates to questions, descriptions and explanations.

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1 INTRODUCTION

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

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

Authority’s web-based portal, Strix, to the Anti-Money Laundering Division (“**AML D**”), within sixty (60) days after distribution by the Authority. The AML Return is issued in accordance with Regulation 53A of the AMLRs, pursuant to which the Authority may require a FSP to provide any information that the Authority reasonably requires in connection with the exercise of its functions. Requiring FSPs to complete this AML Return is necessary to ensure that the Authority has the requisite information to perform its statutory functions as outlined in Section 6 of the MAA, which includes the monitoring of compliance with the AMLRs.

In addition, Section 29(2) of the Mutual Funds Act (2025 Revision) (the “**MFA**”) further sets out the duty of the Authority to maintain a general review of mutual funds business in the Islands and empowers the Authority to examine the affairs of a licensee in any manner as it deems fit for the purposes of the general review or satisfying itself that the MFA or any regulations made under the Proceeds of Crime Act (2025 Revision), particularly the AMLRs, are being complied with. The examination of the affairs of licensee using information obtained through the AML Return is therefore necessary for purposes of discharging the Authority’s functions, including monitoring compliance with the AMLRs pursuant to Section 6(1)(b)(ii) of the MAA and in accordance with Section 29(2)(c) of the MFA, as well as maintaining a general review of mutual fund business in the Islands pursuant to Section 29(2)(a) of the MFA.

This Guide provides instructions and support to FSPs which carry on business of mutual fund administrators, for accessing, completion, and submission of the AML Return.

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

2 FORM INFORMATION

The AML Return – the MFA Return is to be completed by each FSP registered as a Mutual Fund Administrator - commonly referred to as “Entity” for purposes of this form.

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

3 ACCESSING AND SUBMITTING THE AML RETURN

3.1 ACCESS TO THE AML RETURN

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

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

The Authority is using the following Entity contacts to distribute the AML Return: Anti-Money Laundering Compliance Officer (“**AMLCO**”), Money Laundering Reporting Officer (“**MLRO**”), Deputy-Money Laundering Reporting Officer (“**DMLRO**”), Registered Office primary contact, 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=YJa0JBLI86VZVCRbBxnm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYSop%2Bk8rPURRSvrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhATaTNSa3IE3aiA%3D>

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

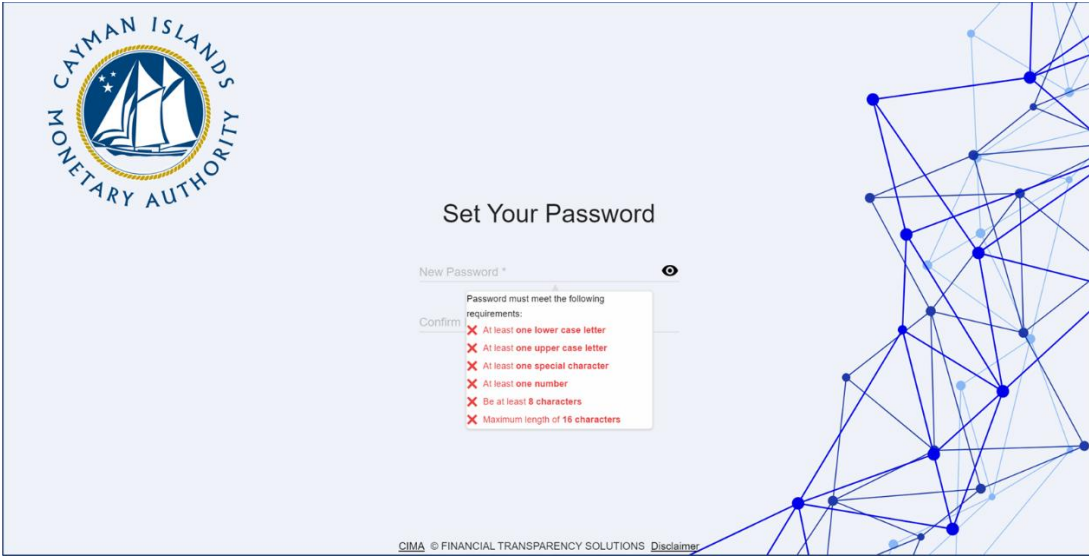
Please do not reply to this email, it is automatically generated.

Disclaimer:

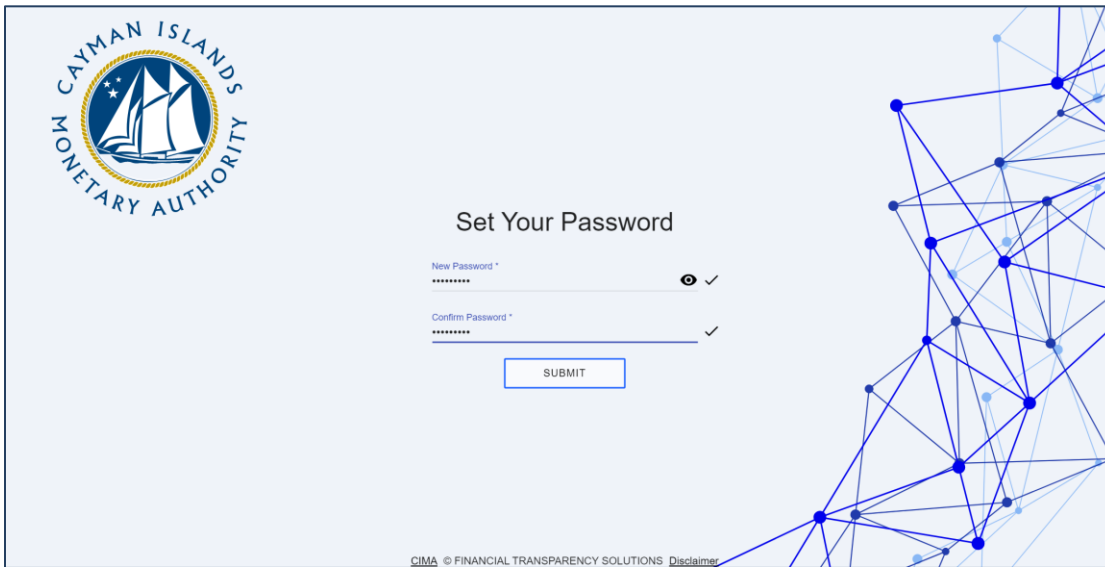
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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

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



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



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



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

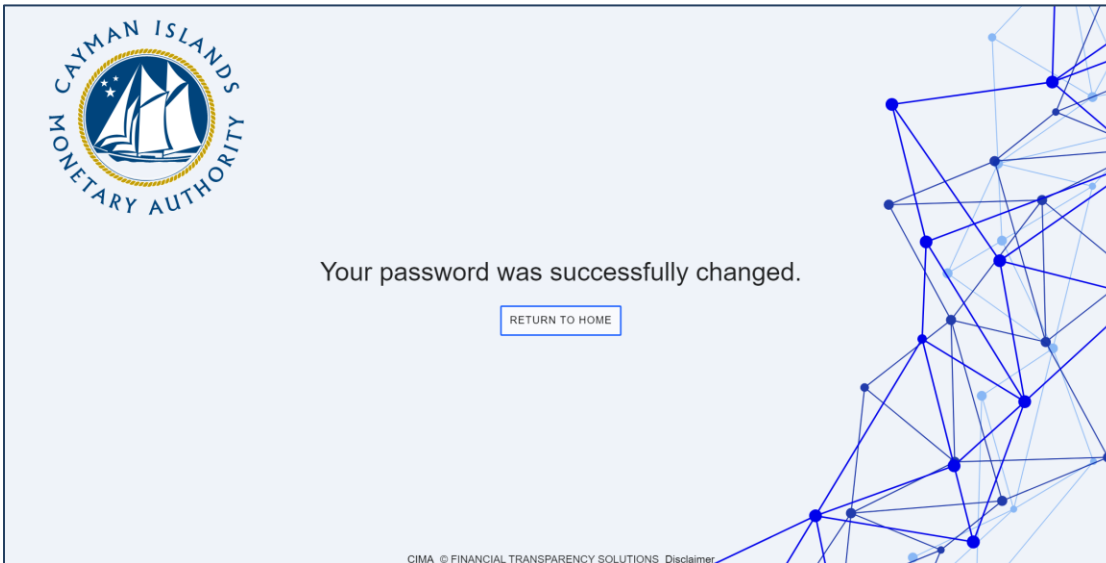
Please do not reply to this email, it is automatically generated.

Disclaimer:

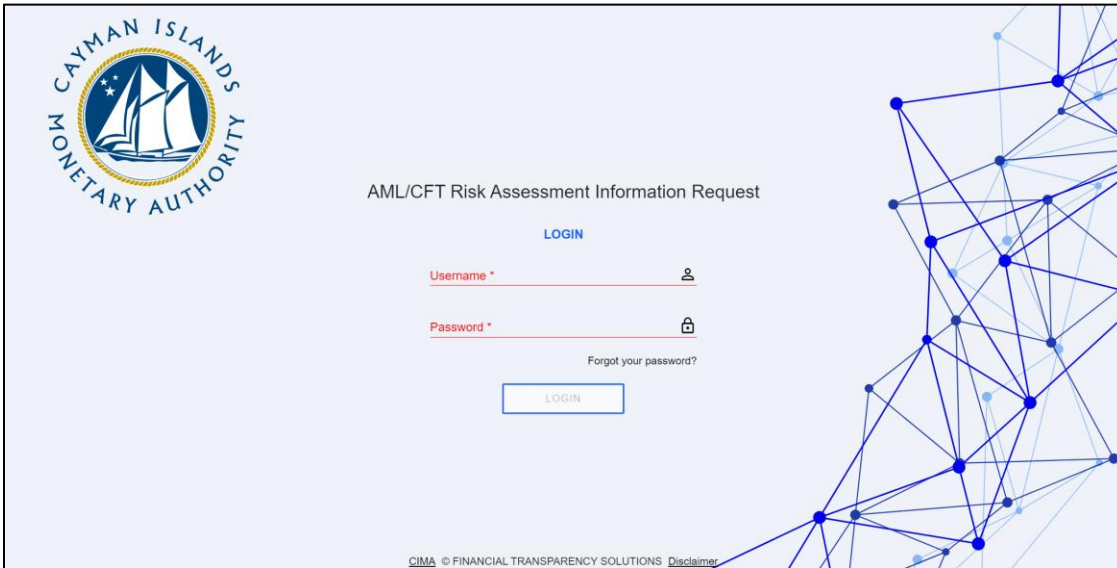
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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

5. The user should then click on the RETURN TO HOME' button.



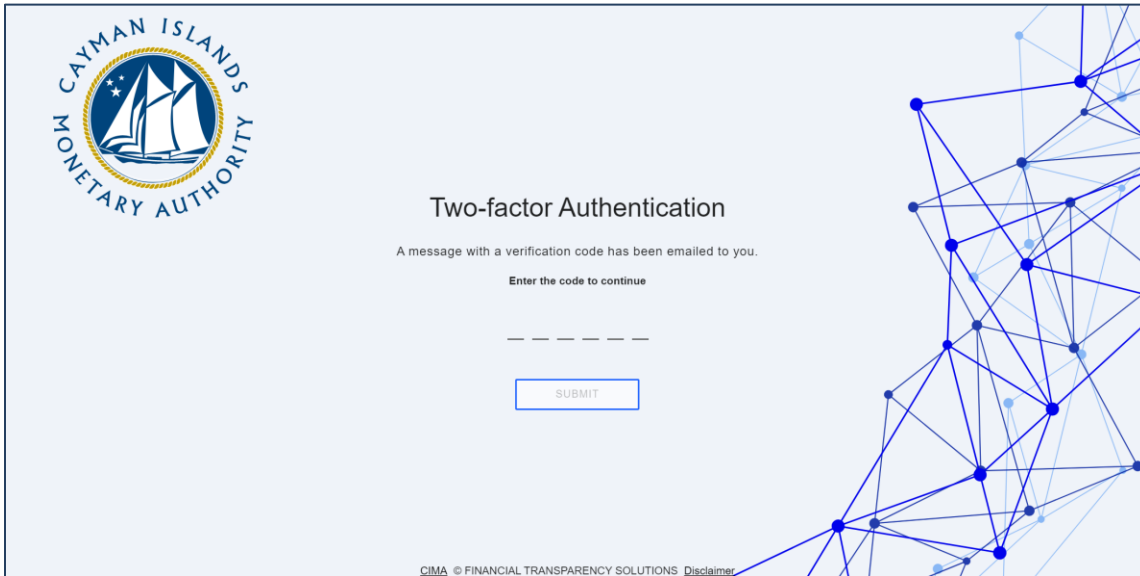
- 6. The recipient should then enter their username, which is their email address where they received the AML Return invite, and the password they just created.



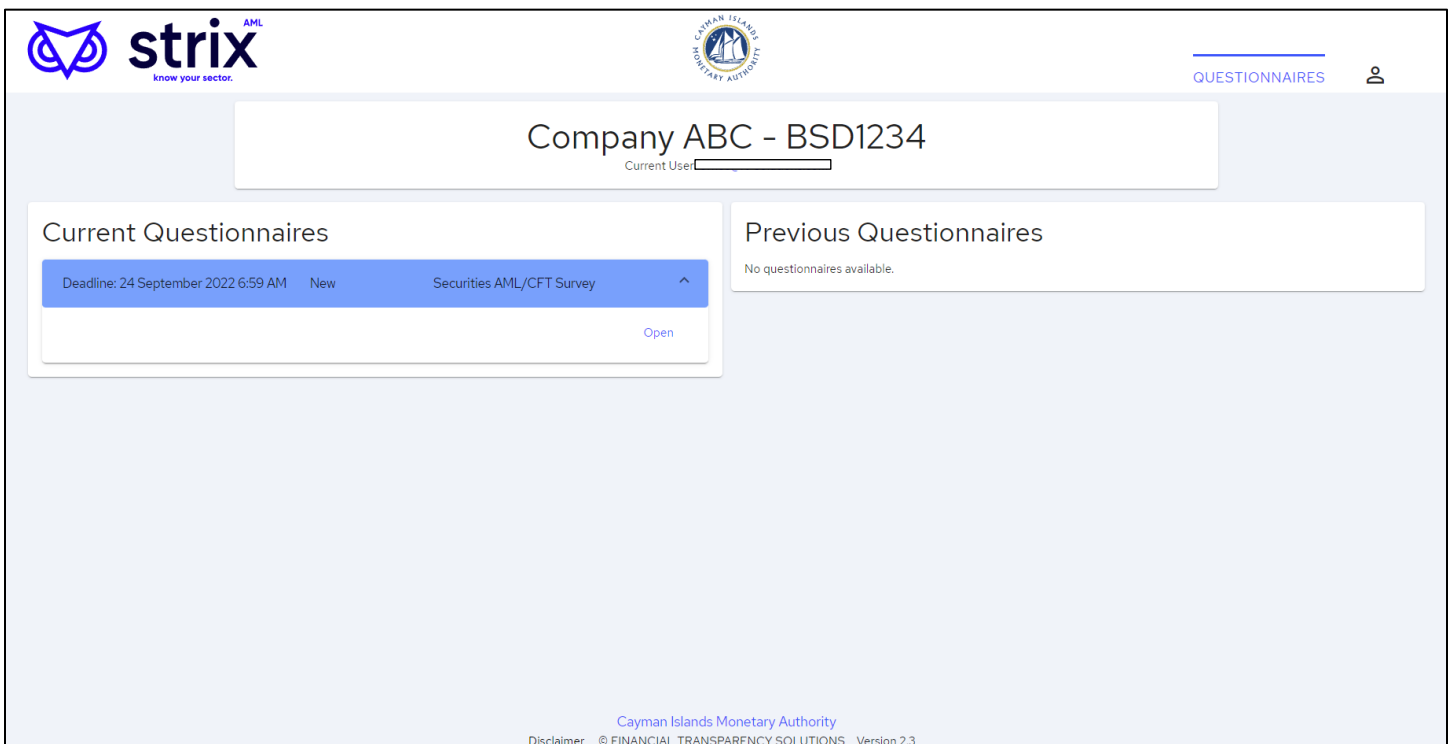
- 7. A six-digit two-factor authentication code will be sent to the recipient’s email address.



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



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



3.2 COMPLETING THE AML RETURN

1. Click the Current Questionnaire to access the AML Return and start populating the Return with the required data.
 - a. Completion guidance for the AML Return is available at Section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Return as many times as needed prior to the Return's due date so long as the recipient selects 'Save'.
 - c. Once the AML Return has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
 - d. Users should note that the Return does not support Excel import functionality. However, the Entity may utilise the XBRL functionality to assist in completing the Return. The Strix XBRL Overview User Guide is published on the Authority's website and can be accessed at: <https://www.cima.ky/cima-releases-strix-xbrl-overview-user-guide>.
 - e. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the Return name will be listed for verification, which is useful for instances where users are submitting for more than one Entity.
 - f. Once the AML Return is 'Submitted' an Excel and PDF copy of the completed Return will be available under 'Current Questionnaire'.
 - g. Upon submission to the Authority a review of the AML Return will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Return through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
2. If a user receives or has access to more than one Return, they will not see the additional Return(s) in the 'Current Return' section of the web page. At the top of the page, where it shows the Entity's name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

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

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

4.2 INTERNET BROWSER

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

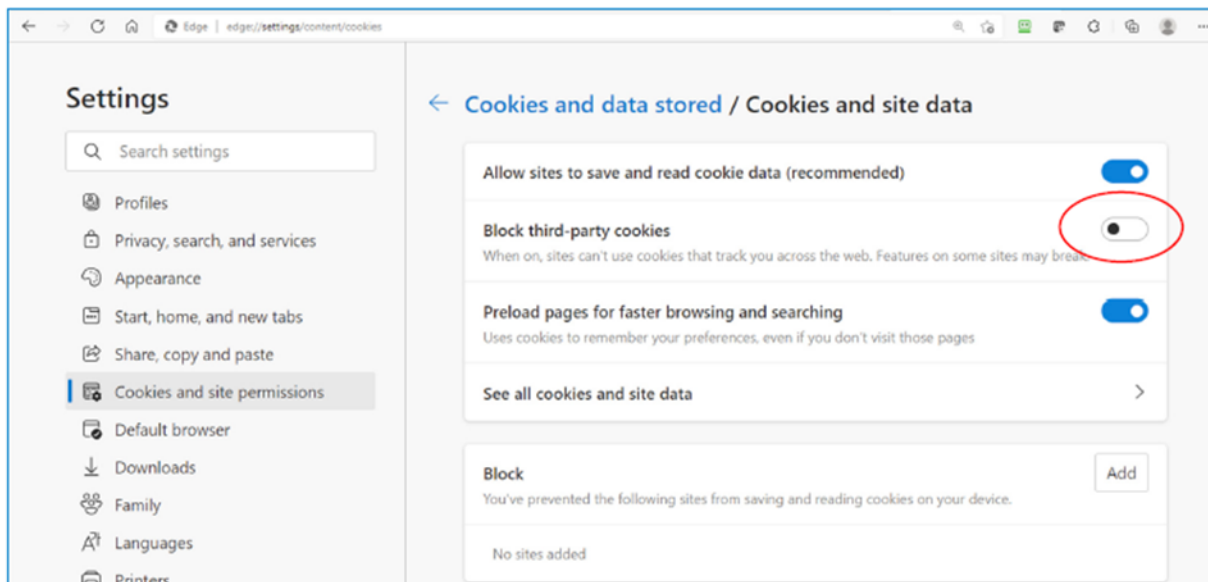
4.3 TWO-FACTOR AUTHENTICATION

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

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

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

Example of Microsoft Edge Cookie Setting:



4.4 USING EXCEL

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

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

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

4.5 PARTIAL OR INCOMPLETE RETURN SUBMISSIONS

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

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

4.6 DATA AND SECURITY

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

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

4.7 APPLICABLE FEES

There are no fees associated with this Return.

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.

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	<p>Or (“BO”) means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to–</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person or</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement.</p> <p><i>As guidance, in instances where a BO has multiple nationalities, where applicable, the entity is to disclose the nationality which could present the higher risks as referenced in Regulation 8A of the AMLRs.</i></p>
Client / Customer	<p>A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands.</p> <p><i>Generally, clients/customers are made up of natural persons, legal persons, and/or legal arrangements. For example, a client of a Mutual Fund Administrator could be a fund. The entity should include all types of its client when responding to the AML Return.</i></p>

Corporate Entity	A corporate body constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Survey	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 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/survey, an ‘Entity’ is the holder of the Mutual Fund Administration licence that is responding to this survey.
F2F	Face-to-Face (“F2F”) engagement with a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Fiat Currency	Currency that is issued exclusively by the relevant body in a country or by a government that is designated as legal tender in its country of issuance through, among other things, government decree or law.

Fintech 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 Survey, a high net worth individual (HNWI) is: (i) an individual whose net worth is approx. US\$1,000,000 or its equivalent in any other currency; or (ii) any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency. HNWIs also include those clients who are Ultra HNWIs.
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it’s a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Individual	A client who is a Natural Person and not a Legal Person or Legal Arrangement.
Investor	“Investor”, in respect of a mutual fund, means the legal holder of record or legal holder of a bearer instrument representing an equity interest in the mutual fund but does not include a promoter or

	operator as defined in the Mutual Funds Act (as amended) “.
Legal Arrangement	A Trust or 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.
Mutual Fund	A company, unit trust or partnership that issues equity interests, the purpose or effect of which is the pooling of investor funds with the aim of spreading investment risks and enabling investors in the mutual fund to receive profits or gains from the acquisition, holding, management or disposal of investments but does not include a person licensed under the Banks and Trust Companies Act (2025 Revision) or the Insurance Act, 2010, or a person registered under the Building Societies Act (2020 Revision) or the Friendly Societies Act (1998 Revision).
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 under Part IV of the AMLRs to satisfy relevant customer due diligence measures.

Non- F2F	Non-Face-to-Face (" Non-F2F ") is where a customer can open an account and transact with a regulated FSP without being physically present for identification purposes, at the physical premises/office of the FSP.
NPO	<p>A company or body of persons, whether incorporated or unincorporated, or a Trust –</p> <p>(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</p> <p>(b) which solicits contributions or raises funds from the public or a section of the public within the Islands or elsewhere.</p>
OSP	<p>Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to the corporate group, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>
PEP	<p>"Politically Exposed Person" includes –</p> <p>a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official.</p> <p>b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; an</p> <p>a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p>

Reporting Period	January 1 to December 31 of the applicable year.
Signatories	Signatories are those persons authorised to act on behalf of a client, for example, BOs, Directors, or other Third Parties.
Source of Funds	<p>The origin of the assets that will be used to form and maintain the business relationship.</p> <p>A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together.</p> <p>Take this into account when answering questions relating to the Nature of Business - Source of Funding.</p>
Special Economic Zone Business	Any type of business authorised to operate in a Special Economic Zone pursuant to any legislation enforced in the Cayman 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	<p>For the purposes of this AML Return, a transaction is the movement of assets (fiat or virtual currency), whether it be between the client and the Entity, the client account and a third party, or the Entity on behalf of the client.</p> <p>Transactions may include, but is not limited to: transfers, subscriptions, redemptions, payments, buying/selling of securities, dividend distribution or reinvestments.</p> <p>Fees paid from an external source, other than the client account held by the Entity, should be reported as a transaction.</p> <p>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.</p>
Trust	A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages

		and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
Ultra HNWI		For the purpose of the AML Survey, Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWI whose net worth is greater than or equal to US\$30,000,000.
Value of Assets Under Administration		The total market value of assets or investments administered on behalf of a client or clients. The total amount can represent one client's assets under administration (AUA) or the entire investment portfolio being overseen for or on behalf of clients.
Virtual Asset		A digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies.
Virtual Asset Custodian		A VASP who provides virtual asset custody services in or from within the Islands.
Virtual Asset Custody Service		The business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets.
Virtual Assets Products and Services		Includes those services identified within the Virtual Asset (Service Providers) Act (2024 Revision) ("VASP Act"), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.
Virtual Asset 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	Assets Under Administration	Total Value of AUA as at the end of the reporting period.
Timeframe	Value of Transactions	Total Value of transactions processed for clients or investors during the reporting period.
Timeframe	Number of Clients/Funds	Total Number of clients or funds as at the end of the reporting period.
Timeframe	Number of Transactions	Total Number of transactions processed for clients or investors during the reporting period.

AML Inherent Risk Questions			
Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers at the end of the reporting period.	Enter the total number of clients/funds the Entity had at the end of the reporting period. Total clients can consist of Natural Persons, Legal Persons and Legal Arrangements.
1.1.2	2	Total new clients onboarded during the reporting period.	Enter the total number of new clients that were onboarded during the reporting period.
1.1.3	3	Total number of Transactions during the reporting period.	Enter the total number of all transactions processed for clients/funds during the reporting period.
1.1.4	4	Total number of Transactions during the reporting period – Fiat.	Enter the total number of all Fiat transactions processed for clients during the reporting period.
1.1.5	5	Total number of Transactions during the reporting period – Virtual Assets.	Enter the total number of all Virtual Assets transactions processed for clients during the reporting period.
1.1.6	6	Total Value of Assets Under Administration / Management (\$\$)	Enter the total value of assets overseen for or on behalf of clients and investors, at the end of the reporting period.
1.1.7	7	Total number of Clients 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, as at the end of 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.
1.1.8	8	Total number of Clients/Funds that are Legal Arrangements, broken down	Enter the total number of clients that are Legal Arrangements,

		by the country of establishment of the client.	broken down by the country of establishment of the client, as at the end of the reporting period. Examples of Legal Arrangements include, but are not limited to, Trusts and Partnerships.
1.1.9	9	Clients - Total number of PEPs.	Enter the total number of individuals / natural persons with whom the entity conducts business with, who are classified as PEPs, broken down by the nationality of the PEP, as at the end of the reporting period. Total PEPs should include, but may not be limited to, those clients that are Natural Persons, Funds, BOs, Directors, Investors, Promoters, or persons who hold any other form of control, including signatories.
1.1.10	10	Total number of high-risk clients at the end of the reporting period.	Enter the total number of clients, as at the end of the reporting period.
1.1.11	11	Total number of Non-Compliant Clients at the end of the reporting period.	Enter the total number of clients/funds that remain non-compliant with required identification and verification procedures, that is, sufficient CDD documents have not been collected, as at the end of the reporting period. This includes CDD documents that have not been collected for the investors.
1.1.12	12	Total value of Client assets, by primary geographic location of the assets, at the end of the reporting period.	Enter the total value of Clients/ Funds, by the primary geographic location (where the assets of the Funds are custodied), as at the end of the reporting period. The primary geographic location refers to the central geographical location in which the assets are retained.
1.2.1	13	Total number of Investors in the Client/Fund base at the end of the reporting period.	Enter the total number of Investors across all clients of the Entity, at the end of the reporting period.

			The total number should include all investors of clients. If a client has the same investor(s), as another client, then only one investor should be counted. Do not double count.
1.2.2	14	Does the entity have any clients whose Investors are Individuals / Natural Persons?	Please answer 'Yes' or 'No'.
1.2.3	15	Total number of Individual/ Natural Person Investors of all clients, broken down by nationality of the Investor.	Enter the total number of Individual/ Natural Person Investors of all clients, broken down by nationality of the Investor, at the end of the reporting period.
1.2.4	16	Total number of Individual/ Natural Person Investors of all clients, who are PEPs, broken down by the nationality of the PEP.	Enter the total number of Individual / Natural Person Investors of all clients, who are PEPs, broken down by the nationality of the PEP, as at the end of the reporting period.
1.2.5	17	Total number of Individual/ Natural Person Investors of all clients, who are HNWIIs.	<p>Enter the number of Individual / Natural Person Investors, in clients, who are HNWIIs.</p> <p>HNWIIs is specific to those persons whose net worth is approx. US\$1,000,000 or its equivalent in any other currency, or any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.</p> <p>HNWIIs also include those clients who are Ultra HNWIIs.</p>
1.2.6	18	Total number of Individual/ Natural Person Investors of all clients, who are Ultra HNWIIs.	<p>Enter the number of Individual / Investors, in clients, who are Ultra-HNWIIs.</p> <p>UHNWIIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000. The total number of UHNWI should also be included in HNWI.</p>
1.2.7	19	Does the entity have any clients whose Investors are Legal Persons?	Please answer 'Yes' or 'No'.
1.2.8	20	Number of Investors, in clients, who are Registered Companies.	Enter the number of Investors, in clients, who are Registered Companies.

1.2.9	21	Number of Investors, in clients, who are Foundations.	Enter the number of Investors, in clients, who are Foundations.
1.2.10	22	Total number of Investors, of all clients who are Gov/ Pub Sector	Enter the number of investors, in clients, who are Gov / State-owned entities, broken down by the government jurisdiction.
1.2.11	23	Number of Investors, in clients, who are NPOs.	Enter the number of investors, in clients, who are NPOs, broken down by the country of registration.
1.2.12	24	Does the entity have any clients whose Investors are Legal Arrangements?	Please answer 'Yes' or 'No'.
1.2.13	25	Number of Investors, in clients, who are Trusts.	Enter the number of investors, in clients, who are Trusts.
1.2.14	26	Number of Investors, in clients, who are Partnerships.	Enter the number of investors, in clients, who are Partnerships. This category is specific to all Partnerships. Examples include, but are not limited to, General Partnerships, Limited Partnerships, and Limited Liability Partnerships.
1.3.1	27	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 or Legal Arrangements, at the end of the reporting period. This category is specific to all Legal Persons and Arrangements. Examples of BOs include, but are not limited to, BOs of Corporate entities, Settlers of Trusts, and Limited Partners of Partnerships. The total number should include all BOs of clients who are Legal Persons or Legal Arrangements. If a client has a BO who is Legal Person or Legal Arrangement as another client, then only one BO should be counted. Do not double count.
1.3.2	28	Number of BOs of clients who are Legal Persons.	Enter the number of BOs of legal person clients, broken down by the nationality of the BO.
1.3.3	29	Total number of Settlers of clients who are Legal Arrangements.	Enter the total number of settlors of legal arrangement clients, broken down by the nationality of the settlor, at the end of the reporting period.

			This category is specific to clients who are legal arrangements and are Trusts.
1.3.4	30	Total number of Partners of clients who are Legal Arrangements.	Enter the total number of limited partners of Legal Arrangement clients, broken down by the nationality of the Limited Partner, at the end of the reporting period.
1.3.5	31	Total number of Clients that have BOs who are HNWIs.	<p>Enter the total number of clients that have BOs who are HNWIs.</p> <p>Examples of BOs include, but are not limited to, BOs of Corporate entities, Settlers of Trusts, and Limited Partners of Partnerships.</p> <p>HNWIs is specific to those persons whose net worth is approx. US\$1,000,000 or its equivalent in any other currency, or any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.</p> <p>If the Entity does not have any clients that fit this category record a '0'.</p>
1.3.6	32	Total number of Clients that have BOs who are Ultra-HNWIs.	<p>Enter the total number of clients that have BOs who are Ultra-HNWIs.</p> <p>Examples of BOs include, but are not limited to, BOs of Corporate entities, Settlers of Trusts, and Limited Partners of Limited Partnerships.</p> <p>UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p> <p>If the Entity does not have any clients that fit this category record a '0'.</p>
1.3.7	33	Total number of Legal Persons and Legal Arrangements clients that have BOs which are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who are Legal Persons and Legal Arrangements that have BOs who are PEPs, as at the end of the reporting period.
1.3.8	34	Total 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.	<p>Enter the total number of clients that have Nominees acting on behalf of BOs, or within its ownership structure, broken down by nationality of the BO.</p> <p>This category is specific to clients who</p>

			are Legal Persons and Arrangements. If the Entity does not have any clients that fit this category record a '0'.
1.3.9	35	Total Number of Directors appointed to clients.	Enter the total number of Directors of clients, at the end of the reporting period.
1.3.10	36	Total number of Directors and/or Senior Management of clients who are PEPs.	Enter the total number of Directors and/or Senior Management of the clients who are PEPs, at the end of the reporting period.
1.3.11	37	Number of Directors and/or Senior Management of clients who are High Net Worth Individuals.	Enter the number of Directors and/or Senior Management of the clients who are also HNWI, as at the end of the reporting period.
1.3.12	38	Number of Directors and/or Senior Management of clients who are Ultra High Net Worth Individuals.	Enter the number of Directors and/or Senior Management of the clients who are also Ultra HNWI, as at the end of the reporting period.
1.3.13	39	Number of Directors and/or Senior Management of clients who are PEPs & HNWI / Ultra-HNWI.	Enter the number of Directors and/or Senior Management of the clients who are both PEPs and HNWI / Ultra-HNWI, as at the end of the reporting period.
1.4.1	40	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	41	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are a government or Public Sector, broken down by government jurisdiction.
1.4.3	42	Gov / Pub Sector – Total number of Transactions.	Enter the number of transactions processed by or on behalf of clients that are Government or Public Sector, during the reporting period.
1.4.4	43	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.5	44	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, as at the end of the reporting period, broken

			down by country of incorporation of the client.
1.4.6	45	NPO – Total number of Transactions.	Enter the number of transactions conducted by or on behalf of clients that are NPOs, during the reporting period.
1.4.7	46	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.8	47	Foundations - Number of Clients.	Enter the number of clients the entity has that are a Foundation, broken down by country of establishment of the client, at the end of the reporting period.
1.4.9	48	Foundations – Total number of Transactions.	Enter the number of transactions processed by or on behalf of clients that are a Foundation, during the reporting period.
1.4.10	49	Does the entity have any clients that are Trusts?	Please answer 'Yes' or 'No'.
1.4.11	50	Trusts – Total 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 of establishment, as at the end of the reporting period.
1.4.12	51	Trusts – Total number of Transactions.	Enter the number of transactions processed by or on behalf of clients that are Trusts, during the reporting period.
1.4.13	52	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.14	53	Segregated Portfolio Companies - Number of Clients.	Enter the total number of clients which are Segregated Portfolio Companies, during the reporting period.
1.4.15	54	Segregated Portfolio Companies – Total number of Transactions.	Enter the number of transactions processed by or on behalf of clients, that are Segregated Portfolio Companies, during the reporting period.
1.4.16	55	Does the entity have any clients that operate from Special Economic Zone?	Please answer 'Yes' or 'No'.

1.4.17	56	Special Economic Zone - Number of Clients.	Enter the number of clients the entity has, that are registered / operate in a Special Economic Zone, as at the end of reporting period.
1.4.18	57	Special Economic Zone – Total number of Transactions.	Enter the number of transactions conducted by or on behalf of clients, that are registered / operate in a Special Economic Zone, during the reporting period.
1.4.19	58	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.
1.4.20	59	Funds / Collective Investment Vehicles - Number of Clients.	Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles as at the end of reporting period.
1.4.21	60	Funds / Collective Investment Vehicles - Total number of Transactions.	Enter the number of transactions processed by or on behalf of clients, that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.22	61	Does the entity have any clients that are Partnerships?	Please answer 'Yes' or 'No'.
1.4.23	62	Partnerships – Number of clients.	Enter the number of clients the entity has that are Partnerships, as at the end of the reporting period.
1.4.24	63	Partnerships – Total number of Transactions.	Enter the number of transactions processed for or on behalf of clients that are Limited Partnerships during the reporting period.
1.5.1	64	Does the Entity have any clients whose Promoters are Individuals / Natural Persons?	Please answer 'Yes' or 'No'.
1.5.2	65	Number of Promoters of clients who are Natural Persons.	Enter the number of Natural Person Promoters of clients, broken down by the nationality

			of the Promoter.
1.5.3	66	Number of Natural Person Promoters of clients who are PEPs.	Enter the number of Natural Person Promoters of clients who are PEPs, broken down by the nationality of the PEP.
1.5.4	67	Number of Natural Person Promoters of clients who are HNWIs.	Enter the number of Natural Person Promoters of clients who are HNWIs.
1.5.5	68	Number of Natural Person Promoters of clients who are Ultra HNWIs.	Enter the number of Natural Person Promoters of clients who are Ultra-HNWIs.
1.5.6	69	Does the Entity have any clients with promoters who are Legal Persons or Legal Arrangements?	Please answer 'Yes' or 'No'.
1.5.7	70	Number of Promoters of clients, who are Legal Persons.	Enter the number of Legal Person Promoters of clients, broken down by country of incorporation of the Promoter.
1.5.8	71	Number of Promoters of clients, who are Legal Arrangements.	Enter the number of Legal Arrangement Promoters of clients, broken down by country of formation.
1.5.9	72	Number of Promoters, of clients who are Gov / Pub Sector.	Enter the number of Gov / Pub Sector Promoters of clients, broken down by government jurisdiction of the Promoter.
1.5.10	73	Number of Promoters, of clients who are NPOs.	Enter the number of Promoters that are NPOs, broken down by the country of incorporation of the Promoter.
1.6.1	74	<p>Investors – Nature of Business / Source of Funding:</p> <p>Does the entity have clients, or investors of clients, whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> • Banking Institutions • Other Financial regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech 	Please answer 'Yes' or 'No'.

		<ul style="list-style-type: none"> Civil Service/Government Employment <p><i>*Excluding MSBs, VASPs, and TCSPs.</i></p>	
1.6.2	75	Banking Institutions (excluding MSBs) - Number of Investors.	Enter the number clients, or investors of clients, the entity has, whose source of funding is from the Banking sector.
1.6.3	76	Other Financial Regulated Business - Number of Investors.	Enter the number of clients, or investors of clients, the entity has, whose source of funding is from the Financial sector (excluding Banking, VASPs, MSBs and TCSPs).
1.6.4	77	Financial Leasing- Number of Investors.	Enter the number of clients, or investors of clients, the entity has, whose source of funding is from Financial Leasing operations.
1.6.5	78	Money Lending - Number of Investors.	Enter the number of clients, or investors of clients, whose source of funding is from Money Lending operations.
1.6.6	79	Accountants (Audit / Assurance / Bookkeeping / Insolvency) – Total number of Investors.	Enter the number of clients, or investors of clients, whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, and Insolvency).
1.6.7	80	Fintech - Number of Investors.	Enter the number of clients, or investors of clients, the entity has, whose source of funding is from the Fintech Industry.
1.6.8	81	Civil Service/ Government Employment- Total number of Investors	Enter the total of clients, or investors of clients, the Entity has, whose source of funding is from civil service or government employment.
1.6.9	82	<p>Investors – Nature of Business / Source of Funding:</p> <p>Does the entity have clients, or investors of clients, whose source of funding falls within the list of sectors below:</p>	Please answer 'Yes' or 'No'

		<ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Services Business (MSBs) ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ Trust, Company Manager, and Corporate Service Providers (TCSPs) ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	
1.6.10	83	Legal Practitioners – Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived from Legal Practitioner business.
1.6.11	84	Dealers in Precious Metals and Stones – Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.6.12	85	Money Services Business - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds are derived from Money Services Business operations.
1.6.13	86	Virtual Asset Products and Services - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived from the Virtual Asset Products and Services (products, services, investments).
1.6.14	87	High Value Dealers - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived through High Value Dealer operations.
1.6.15	88	TCSPs - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived from TCSP operations.
1.6.16	89	Import / Export - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived from the Import / Export Industry.
1.6.17	90	Shipping and Transport of Goods - Number of Investors.	Enter the total of clients, or investors of clients, whose

			source of funding is derived from the Shipping and Transport of Goods industry.
1.6.18	91	<p>Investors – Nature of Business / Source of Funding:</p> <p>Does the entity have clients, or investors of clients, whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry 	Please answer 'Yes' or 'No'.
1.6.19	92	Real Estate Agents / Brokers - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived through the Real Estate industry (Agents / Brokers / Sellers).
1.6.20	93	Gambling business (including online gambling) - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived through the Gambling industry (including online gambling).
1.6.21	94	Adult Entertainment - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived from the Adult Entertainment Industry.
1.6.22	95	Defence Industry - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds are derived from the Defence Industry.
1.6.23	96	Oil and Gas Industry - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds are derived from operating in the Oil and Gas Industry.

1.6.24	97	Mining Industry - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds is derived from the Mining Industry.
1.6.25	98	Construction / Development Industry - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds are derived through operating in the Construction / Development Industry.
1.6.26	99	Retail & Restaurant Business - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds are derived from operating in the Retail & Restaurant Business.
1.6.27	100	Cannabis Production & Distribution Industry - Number of Investors.	Enter the total of clients, or investors of clients, whose source of funds are derived through Cannabis Production & Distribution operations.
1.6.28	101	Unknown Businesses and Professions - Number of Investors.	<p>Enter the total of clients, or investors of clients, the entity has, that are legal persons or arrangements of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions.</p> <p>Unknown business and profession are where the entity does not know, was not provided with, and was unable to verify the nature of business or profession (source of funds) of the Investor or other forms of clients.</p>
1.6.29	102	Other - Not mentioned above - Number of Investors.	Enter the number of investors, of clients whose source of funds is not listed in a category above.
1.7.1	103	Does the Entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.7.2	104	Please use this area to provide any comments or feedback for this tab.	<p>Provide any comments or feedback that may be relevant, which you could not provide on the tabs above.</p> <p>Enter 'N/A' if no comments.</p>

2.1.1	105	Number of Clients - Registered Fund.	Enter the number of clients who are a Registered Fund, at the end of the reporting period.
2.1.2	106	Number of Clients - Master Fund.	Enter the number of clients who are a Master Fund at the end of the reporting period.
2.1.3	107	Number of Clients - Limited Investor Fund.	Enter the number of clients who are a Limited Investor Fund, at the end of the reporting period.
2.1.4	108	Number of Clients - Administered Fund.	Enter the number of clients who are an Administered Fund, as at last date of reporting period.
2.1.5	109	Number of Clients - Licensed Fund.	Enter the number of clients who are a Licensed Fund, at the end of the reporting period.
2.1.6	110	Number of Clients - Private Fund.	Enter the number of clients who are a Private Fund, at the end of the reporting period.
2.1.7	111	Total Number of Clients – Open-Ended Mutual Fund	Enter the total number of clients who are an Open-Ended Mutual Fund, at the end of the reporting period.
2.1.8	112	Total Number of Clients – Closed - Ended Mutual Fund	Enter the total number of clients who are a Closed-Ended Mutual Fund, at the end of the reporting period.
2.1.9	113	Number of Clients - Non-fund Arrangements.	Enter the number of clients who are a Non-Fund Arrangement, at the end of the reporting period.
2.1.10	114	Number of Clients – Unregulated.	Enter the number of clients who are Unregulated, at the end of the reporting period.
2.2.1	115	Number of Clients - Principal Office.	Enter the number of clients, provided the service of Principal Office by the entity, at the end of the reporting period.
2.2.2	116	Number of Clients - Registrar and Transfer Agency (RTA) Services.	Enter the number of clients provided the service of Registrar and Transfer Agency (RTA) by the entity, at the end of the reporting period.

2.2.3	117	Number of Clients - Net Asset Value (NAV) Calculation Services.	Enter the number of clients provided the service of Net Asset Value (NAV) Calculations by the entity, at the end of the reporting period.
2.2.4	118	Number of Clients - Operator Services.	Enter the number of clients provided the service of Operator Services (Director or General Partner) by the entity at the end of the reporting period.
2.2.5	119	Number of Clients - Registered Office Services.	Enter the number of clients provided the service of a Registered Office by the entity, at the end of the reporting period.
2.2.6	120	Number of Clients - Director Services.	Enter the number of clients provided Director Services by the entity, at the end of the reporting period.
2.2.7	121	Number of Clients - Nominee Shareholder.	Enter the number of clients provided Nominee Shareholder services by the entity, at the end of the reporting period.
2.2.8	122	Number of Clients – BO Filing Services.	Enter the number of clients provided BO Filing Services by the entity, at the end of the reporting period.
2.2.9	123	Number of Clients - Company Secretary Services.	Enter the number of clients provided Company Secretary Services by the entity, at the end of the reporting period.
2.2.10	124	Number of Clients - Statutory Filing Services.	Enter the number of clients provided Statutory Filing Services by the entity, at the end of the reporting period.
2.2.11	125	Number of Clients - MLRO Services.	Enter the number of clients provided the service of MLRO &/or Deputy MLRO by the entity, at the end of the reporting period.
2.2.12	126	Number of Clients - AML Compliance Officer Services.	Enter the number of clients provided the service of an AMLCO by the entity, at the end of the reporting period.

2.2.13	127	Does the Entity facilitate transactions on behalf of both its Clients and Investors?	Please answer 'Yes' or 'No'.
2.2.14	128	Does the entity provide other services, under its Trust Licence, to clients that are not listed above?	Please answer 'Yes' or 'No'.
2.2.15	129	Number of Clients the entity provides other services not mentioned above.	Enter the total number of clients, the Entity provides other services, not mentioned above.
2.2.16	130	Please describe the other types of services, that are not listed above, provided to clients.	List all other types of services the Entity provides to clients which are not listed above.
2.3.1	131	Does the Entity facilitate transactions in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	132	Physical Cash Transactions- Total Number of Clients / Investors.	Enter the total number of transactions processed by, or on behalf of clients and/ or investors via physical cash, <i>during</i> the reporting period.
2.3.3	133	Physical Cash – Total Value (\$\$) of Transactions.	Enter the total value of physical cash transactions processed by or on behalf of clients and / or investors, <i>during</i> the reporting period. Transactions include those between the Entity and the client, the client account and a third party or the Entity on behalf of the client.
2.3.4	134	Does the Entity facilitate transactions in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.5	135	Virtual Currency Transactions - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, in the form of Virtual Currency, <i>during</i> the reporting period.
2.3.6	136	Virtual Currency – Total Value (\$\$) of Transactions.	Enter the total value of Virtual Currency transactions processed by or on behalf of clients <i>during</i> the reporting period.

2.3.7	137	Does the entity facilitate client transactions via Third Parties?	Please answer 'Yes' or 'No'.
2.3.8	138	Third Parties – Total Number of Clients.	Enter the total number of clients and/ or investors that conducted payments via Third Parties during the reporting period. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction.
2.3.9	139	Third Parties – Total Value (\$\$) of Transactions.	Enter the total value of transactions processed by or on behalf of clients via Third Parties, during the reporting period.
2.3.10	140	Does the entity facilitate transactions via Credit/Debit Card?	Please answer 'Yes' or 'No'.
2.3.11	141	Credit Card Transactions – Total Number of Clients.	Enter the total number of clients where transactions were processed by or on behalf of Clients and/ or investors via Credit Card, during the reporting period.
2.3.12	142	Credit Card - Value of Transactions.	Enter the total value of Credit Card transactions processed by or on behalf of clients, <i>during</i> the reporting period.
2.3.13	143	Does the entity facilitate transactions in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.3.14	144	Wire Transfers – Total Number of Clients.	Enter the total number of clients where transactions were processed by or on behalf of clients, in the form of Wire Transfers, <i>during</i> the reporting period.
2.3.15	145	Wire Transfers – Total Value (\$\$) of Transactions	Enter the total value of Wire Transfer transactions conducted by or on behalf of clients <i>during</i> the reporting period.

2.3.16	146	Does the entity facilitate transactions in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.17	147	Transfer of Securities – Total Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, via Transfer of Securities from another provider, <i>during</i> the reporting period.
2.3.18	148	Transfer of Securities – Total Value (\$\$) of Transactions.	Enter the total value of funds transferred by or on behalf of clients, <i>during</i> the reporting period, by way of Transfer of Securities from another provider.
2.3.19	149	Does the entity facilitate transactions to / from clients in other forms of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.3.20	150	Internal Bank Transfers - Total number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, via Internal Bank Transfer, <i>during</i> the reporting period.
2.3.21	151	Internal Bank Transfers - Total Value (\$\$) of Funds Transferred.	Enter the total value of funds transferred by or on behalf of clients, <i>during</i> the reporting period, by way of Internal Bank Transfer.
2.3.22	152	Does your entity facilitate transactions to/ from clients in other forms of payments not listed above?	Please answer 'Yes' or 'No'.
2.3.23	153	Other Forms of Payment - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, using other Forms of Payment not listed above, <i>during</i> the reporting period.
2.3.24	154	Other Forms of Payment – Total Value (\$\$) of Funds Transferred.	Enter the total value of funds transferred by or on behalf of clients, using Other Forms of Payments, <i>during</i> the reporting period.

2.3.25	155	Please indicate the types of Other Forms of Payments.	List the other forms of payment conducted by or on behalf of clients during the reporting period, which are not listed above.
2.4.1	156	Total value of funds received, broken down by originating country of payment.	Enter the total value of all funds received by or on behalf of clients and investors, during the reporting period, broken down by the country where the funds originated.
2.4.3	157	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of all transactions received by or on behalf of clients and investors, during the reporting period, broken down by country of origin of the funds. These transactions involve funds transferred into the jurisdiction, either directly to the regulated entity, through the jurisdiction's banking system, or both.
2.4.5	158	Total value of all funds transferred out (not only those relating to client funds), broken down by the country of payment destination.	Enter the total value of funds transferred out (not only those relating to client funds), during the reporting period, broken down by the country of payment destination. Recipients of transferred funds may include, but is not limited to; Investors, Fund Managers, Investment Managers, Service Providers, Vendors, Broker-Dealers or Platforms.
2.4.7	159	Total number of all transactions transferred out, not only those relating to client funds, broken down by the country of payment destination.	Enter the total number of all transactions transferred out for or on behalf of clients and investors, broken down by the country of payment destination.
2.5.1	160	Does the Entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	161	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Enter 'N/A' if no comments.

3.1.1	162	Number of Clients - F2F.	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 during the reporting period.
3.1.2	163	Number of Clients - Non-F2F.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and not only those onboarded during the reporting period. Examples of Non-F2F include instances where the Entity is onboarding clients through phone, email or online platform (portal); however, they do not have F2F contact with the clients.
3.1.3	164	Total number of Clients onboarded via Online Platforms or portals.	Provide the total number of clients, in the Entity's entire portfolio, that were onboarded via Online platforms such as portals, and <u>not only</u> those onboarded during the reporting period.
3.1.4	165	Number of Clients onboarded through Referrals within Group - F2F during the reporting year.	Enter the number of clients which were onboarded using referrals within Group - F2F for the reporting period. An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients.
3.1.5	166	Number of Clients onboarded through Referrals within Group - Non F2F during the reporting year.	Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period. Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.
3.1.6	167	Total number of Clients onboarded through Eligible Introducers.	Total clients in the entity's entire portfolio that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for

			verification of the clients' identity.
3.1.7	168	Number of Clients onboarded through Eligible Introducers during the reporting period.	Enter the total number of clients which were onboarded through Eligible Introducers during the reporting period, broken down by the nationality of the BO.
3.1.8	169	Total Number of clients onboarded through use of Agents or Nominees during the reporting period.	Enter the total number of clients onboarded through Agents or Nominees, during the reporting period.
3.1.9	170	Total Number of Clients onboarded through Other Introducers - Non-F2F during the reporting period.	<p>Enter the total number of clients, that were onboarded through Other Introducers Non – F2F during the reporting period.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Other Introducers and, not only those onboarded during the reporting period.</p>
3.1.10	171	Number of Clients onboarded via Online Platforms during the reporting period.	Enter the number of clients which were onboarded during the reporting period.
3.2.1	172	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	173	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsourced relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Compliance Officer turnover that includes one of each within the reporting period.</p>
3.2.3	174	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer at the end of the reporting period.
3.2.4	175	How many AML Compliance Officers has the entity had within the past 3 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".

3.2.5	176	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	177	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Money Laundering Reporting Officer turnover that includes one of each within the reporting period.</p>
3.2.7	178	What was the country of residency of the Money Laundering Reporting Officer at the end of the reporting period?	Enter the country of residency of the Money Laundering Reporting Officer at the end of the reporting period.
3.2.8	179	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	180	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	181	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Deputy Money Laundering Reporting Officer turnover that includes one of each within the reporting period.</p>
3.2.11	182	What was the country of residency of the Deputy Money Laundering	Enter the country of residency of the Deputy Money Laundering

		Reporting Officer at the end of the reporting period?	Reporting Officer at the end of the reporting period.
3.2.12	183	How many Deputy Money Laundering Reporting Officers has the entity had in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	184	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	185	To whom has the Targeted Financial Sanction screening function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the screening of targeted financial sanctions:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the screening of targeted financial sanctions turnover that includes one of each within the reporting period.</p>
3.2.15	186	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.16	187	How many TFS Screening platforms / software did the entity have in the past 3 years?	If there was no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	188	Has the entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	189	To whom has the Transaction Monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsourced relationship transaction monitoring:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of transaction monitoring services turnover that</p>

			includes one of each within the reporting period.
3.2.19	190	What was the outsourcing country of the Transaction Monitoring function at the end of the reporting period?	Enter the country the entity outsourced the transaction monitoring function to at the end of the reporting period.
3.2.20	191	How many Transaction Monitoring platforms / software did the entity have in the past 3 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.2.21	192	Has the Entity outsourced any other MFA functions during the reporting period?	Please answer 'Yes' or 'No'.
3.2.22	193	To whom has the other MFA Services function been outsourced?	<p>If any other outsourced 'select' the status that best describes the outsourced relationship for the MFA services function:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the MFA services function turnover includes one of each within the reporting period.</p>
3.2.23	194	What was the outsourcing country/countries of the other MFA services function at the end of the reporting period?	Select the country/countries the Entity outsourced other MFA services function to, at the end of the reporting period.
3.2.24	195	How many other MFA services functions did the Entity outsource in the past 3 years?	If there was no turnover of the other MFA services functions in the three- year period, answer "1".
3.3.1	196	Physical presence - Place of Business.	Select the country of the Entity's physical business operations.
3.3.2	197	Does the entity form part of a group structure?	Please answer 'Yes' or 'No'.
3.3.3	198	In which country is the entity's ultimate Parent Company incorporated?	<p>Select the country of incorporation of the entity's Parent Company.</p> <p>If no Parent, select 'Cayman Islands'</p>

3.3.4	199	In which country is the entity's Holding Company incorporated?	Select the country of incorporation of the entity's Holding company. If no 'holding company', select 'Cayman Islands'
3.3.5	200	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	201	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.
3.3.8	202	In which countries, by percentage of equity ownership, are shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Select the countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.9	203	How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period?	Enter the number of Beneficial Owners of the entity, holding 10% or more, broken down by country of nationality of the shareholder(s).
3.3.10	204	How many Directors does the entity have appointed, by country of nationality of the Director, at the end of the reporting period?	Enter the number of Directors of the entity, broken down by country of nationality of the directors.
3.4.1	205	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	206	Please use this area to provide any comments or feedback for this tab.	Use this area to provide any comments or feedback for this tab. Please enter 'NA' if no comment.

AML Controls Questions			
No.	Question No.	Question	Description/Explanation
1.1.1	207	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	208	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	209	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	210	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	211	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	212	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	213	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	214	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	215	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	216	Has the entity, or its Directors, Shareholders, Beneficial Owners, or Senior Officers been denied an	Please answer 'Yes' or 'No'.

		application by any Regulatory Body?	
1.1.11	217	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	218	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	219	Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	220	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.2.2	221	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	222	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	223	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	224	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	225	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	226	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	227	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	228	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	229	Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions	Please answer 'Yes' or 'No'.

		risk assessment framework and procedures?	
1.2.11	230	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	231	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	232	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	233	Have the Directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	234	Has the AML Compliance Officer received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	235	Has the MLRO received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	236	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	237	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	238	Are changes to policy and procedures communicated to all Staff/Directors and Senior Management?	Please answer 'Yes' or 'No'.
1.3.8	239	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.

1.3.9	240	What percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company during the reporting period?	Enter the percentage of employees/agents/ directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period.
1.3.10	241	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	242	Does the entity have an Internal Audit Department, Unit, or function (including outsourced) with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	243	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?	Please answer 'Yes' or 'No'.
1.4.3	244	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	245	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	246	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	247	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	248	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	249	What is the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, <u>in months</u> , of the Board review of the AML audit program.
1.4.9	250	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.

1.4.10	251	Where applicable, does the internal audit include testing of EI relationships?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.11	252	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	253	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	254	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	255	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	256	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	257	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	258	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	259	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	260	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	261	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	262	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	263	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	264	Where applicable, does the entity consider outsourcing risk factors in its risk assessment?	Please select 'Yes', 'No', or 'Not Applicable'.
1.5.12	265	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	266	How often, in months, does the entity review High-Risk relationships/accounts?	Please select the most appropriate response: 'Not Applicable – no high risk clients', 'More than 18 months', '7 – 12 months', '1 – 6 months'.
1.5.14	267	How often, in months, does the entity review Medium-Risk relationships/accounts?	Please select the most appropriate response: 'Not Applicable – no 'Medium' risk clients', More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.15	268	How often, in months, does the entity review Low-Risk relationships/accounts?	Please select the most appropriate response: 'Not Applicable – no low risk clients', More than 18 months, 7 – 12 months, 1 – 6 months.
1.6.1	269	Does the entity rely on Group AML/CFT policies and procedures?	Please select the most appropriate response: 'Not Applicable – No group structure', 'Yes', or 'No'.
1.6.2	270	If yes to use of group policies and procedures, has the entity conducted a GAP Analysis to identify whether the AML/CFT	Please select the most appropriate response: 'Yes', 'No', or 'Not Applicable'

		programme complies with Cayman's legislation and regulatory framework?	
1.6.3	271	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	272	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	273	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	274	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	275	Does the entity have Board, or Governing Body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	276	Does the entity have Board or Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	277	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	278	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	279	Does the entity have procedures for declining, de-risking, terminating or restricting business	Please answer 'Yes' or 'No'.

		relationships due to AML/CFT/CPF and Sanctions related reasons?	
1.6.12	280	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	281	Does the entity have a Sanctions screening process including policies and procedures?	Please answer 'Yes' or 'No'.
1.7.2	282	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	283	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	284	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	285	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	286	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	287	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	288	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	289	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	290	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	291	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	292	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	293	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	294	Does the entity have transaction monitoring policies and procedures developed that commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	295	Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.3	296	Does the entity have in place an automated system for monitoring transactions for potential suspicion	Please answer 'Yes' or 'No'.

		and reporting suspicious transactions?	
1.8.4	297	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	298	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	299	Where applicable, does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	300	Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.
1.8.8	301	Enter the total number of Alerts resulting in internal Suspicious Activity Reports to the MLRO related to ML/TF/PF and Sanctions matters identified during transaction monitoring only.	The total number of alerts produced through <u>transaction monitoring</u> systems and processes which resulted in the escalation of an internal SAR to the MLRO.
1.9.1	302	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	303	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	304	Does the entity have policies and procedures for reporting to the Cayman Islands Financial Reporting Authority?	Please answer 'Yes' or 'No'.
1.9.4	305	How many internal Suspicious Activity Reports in total have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity Reports reported to the MLRO in total during the reporting period.
1.9.5	306	How many Suspicious Activity Reports have been reported, to the Cayman Financial Reporting Authority, by the entity (through	Enter the total number of Suspicious Activity Reports filed by the entity's MLRO, to the FRA, during the reporting period.

		the MLRO) for the current reporting period?	
1.9.6	307	How many hours on average does it take to file a Suspicious Activity Report 'SAR' to the FRA?	Enter the number of hours (average) the entity, through the MLRO, takes to file a Suspicious Activity Report to the FRA.
1.9.7	308	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	309	Has the entity been penalized or received a warning for non-compliance, relating to reporting requirements or failure to comply with a direction, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	310	Does the have procedures to maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	311	Does the entity have procedures to maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.
1.9.11	312	If the MLRO decides not to file a SAR to the FRA, are there procedures to ensure the MLRO's reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	313	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	314	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	315	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	316	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	317	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	318	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.

1.11.1	319	Does the entity have outsourced arrangements for any of its functions and services?	Please answer 'Yes' or 'No'.
1.11.2	320	In total, how many functions and services does the entity outsource to either third parties, or within its group or subsidiaries, during the reporting period?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.11.3	321	Is there a Board approved documented policy on outsourcing?	Please answer 'Yes' or 'No'.
1.11.4	322	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', or 'No'
1.11.5	323	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', or 'No'
1.11.6	324	Does the outsourcing agreement(s) clearly set out the obligations of both parties?	Select which best applies: 'Yes', or 'No'
1.11.7	325	Does the outsourcing agreement(s) require the Outsourced Service Provider to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', or 'No'
1.11.8	326	Is there a contingency plan in the event the Outsourced Service Provider fails to perform the outsourced activity?	Select which best applies: 'Yes', or 'No'
1.11.9	327	Does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced Service Provider?	Select which best applies: 'Yes', or 'No'
1.11.10	328	If applicable, does the outsourced AMLCO/MLRO have access to the entity's Board?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.11	329	Are there policies and procedures for outsource arrangements to ensure data protection restrictions	Select which best applies: 'Yes', or 'No'

		would NOT delay access to data and documents?	
1.11.12	330	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.13	331	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	332	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	333	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.