



AML Return – Completion Guide: Securities Licence

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Revision History:

Effective Date	Version Number	Revision Description
12 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, and explanations.
31 May 2024	1.3	Updates to definitions, descriptions, and explanations.
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 section 1 to 4.6 and section 5 which includes updates to definitions, descriptions, and explanations.

Contents

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

1 INTRODUCTION

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

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

FSPs are required to provide this data by completing the AML Return Form and submit it through the Authority’s web-based 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 necessary 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 16(1) of the Securities Investment Business Act (2020 Revision) (“**SIBA**”) sets out the duty of the Authority to maintain a general review of securities investment 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 confirming that the AMLRs are being complied with and carrying out any other functions. The examination of the affairs of a 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 16(1)(c)(ii) of SIBA, as well as carrying out the duty of maintaining a general review of securities investment business in the Islands pursuant to Section 16(1)(a) of SIBA.

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

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

The Authority also has powers to take enforcement action pursuant to the relevant provisions of Section 17 of the SIBA for failure to comply with a requirement to provide information, which may include revocation of a licence. Providing false or misleading information to the Authority may also amount to a criminal offence and result in a fine of ten thousand dollars on summary conviction and to imprisonment for six months pursuant to section 16(4) of SIBA.

2 FORM INFORMATION

The AML Return– Securities Licences Form is to be completed by each FSP holding a Securities Licence or Registration, who are commonly referred to as “Entity” for purposes of this form.

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

3 ACCESSING AND SUBMITTING THE AML RETURN

3.1 ACCESS TO THE AML RETURN

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

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

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

To access the AML Return:

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



Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

[Confirm Account](#)

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

<https://amilidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLl86VZVCRbBxrm3fg3fSoAMoPYyQ6XKFtx0MoYGkSpT5b5bDc%2B2cghPQ8d%2BLUVVhbZktQht%2F4d2cbioYpsg%2Bjke0tE3GtlwMOBYSoP%2Bk8rPURRSVrPSQ6JA5hgsaBaC6uvcZV4KB266HfFgh4FhATaTNSa3IE3alA%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

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



Set Your Password

New Password *

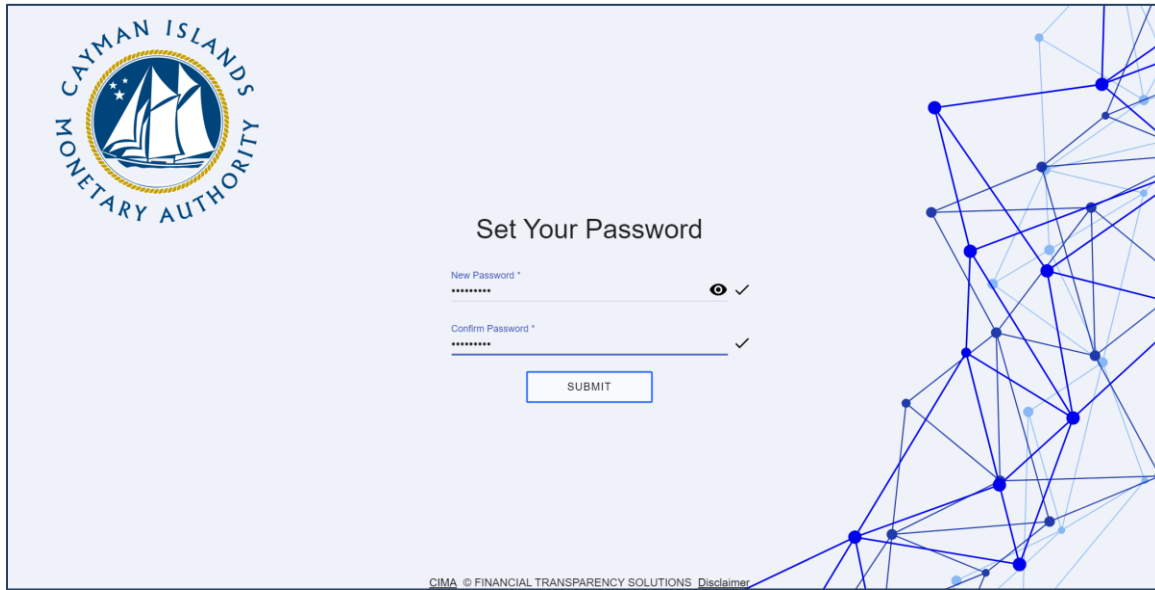
Confirm

Password must meet the following requirements:

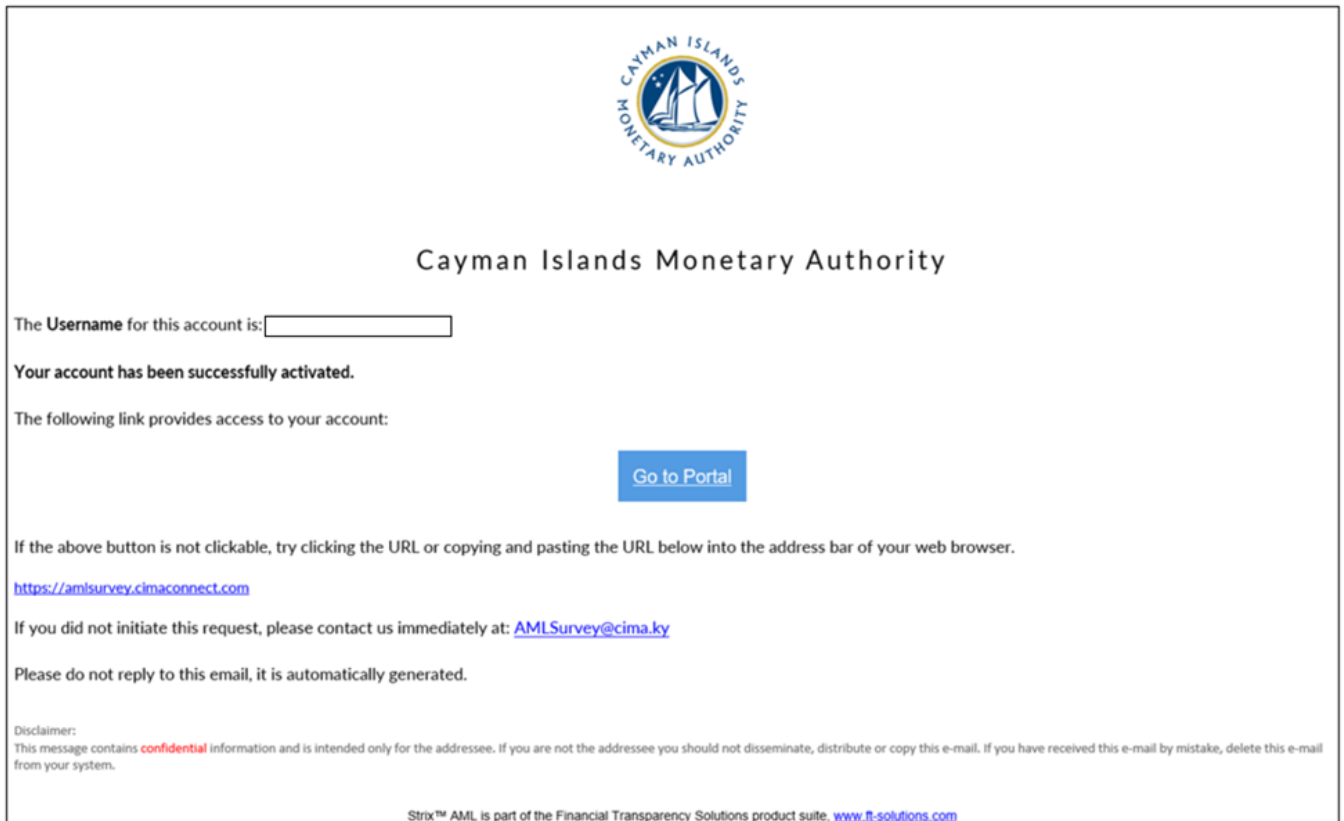
- ✗ At least one lower case letter
- ✗ At least one upper case letter
- ✗ At least one special character
- ✗ At least one number
- ✗ Be at least 8 characters
- ✗ Maximum length of 16 characters

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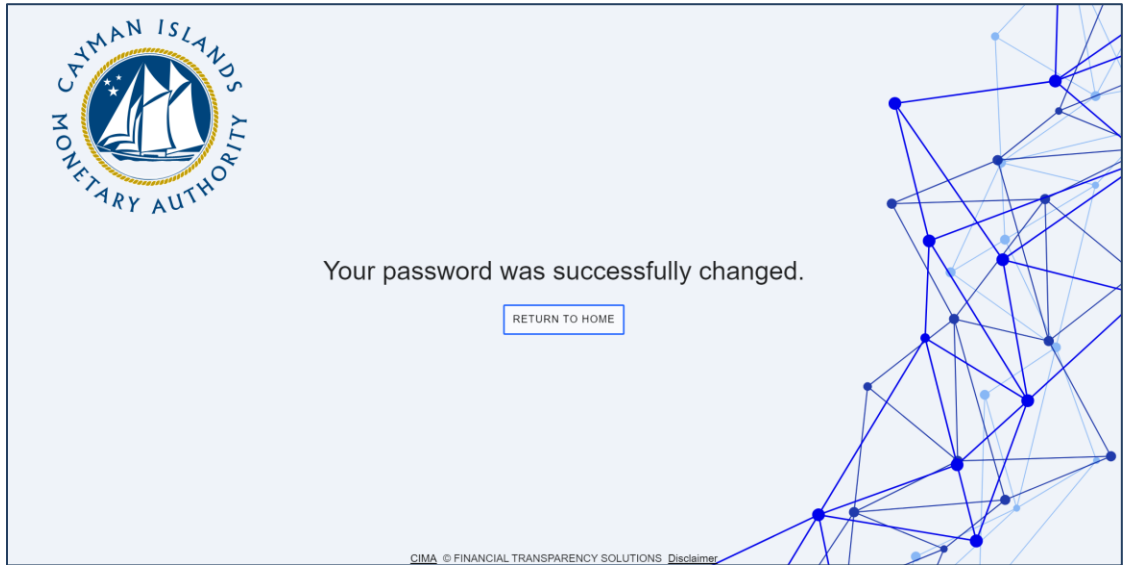
3. The recipient will be asked to re-enter their password.



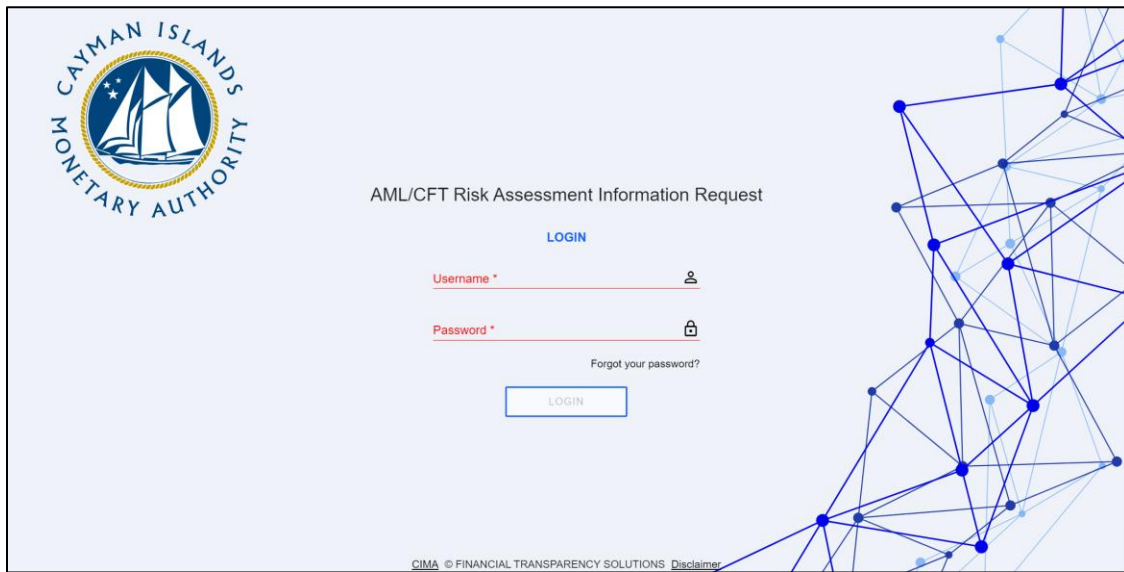
4. Once the recipient’s password has been re-entered, and matches, they can submit and finish the activation process. An email “Notification of Successful Activation” will be sent providing a ‘Go to Portal’ link which can be used for all future access.



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



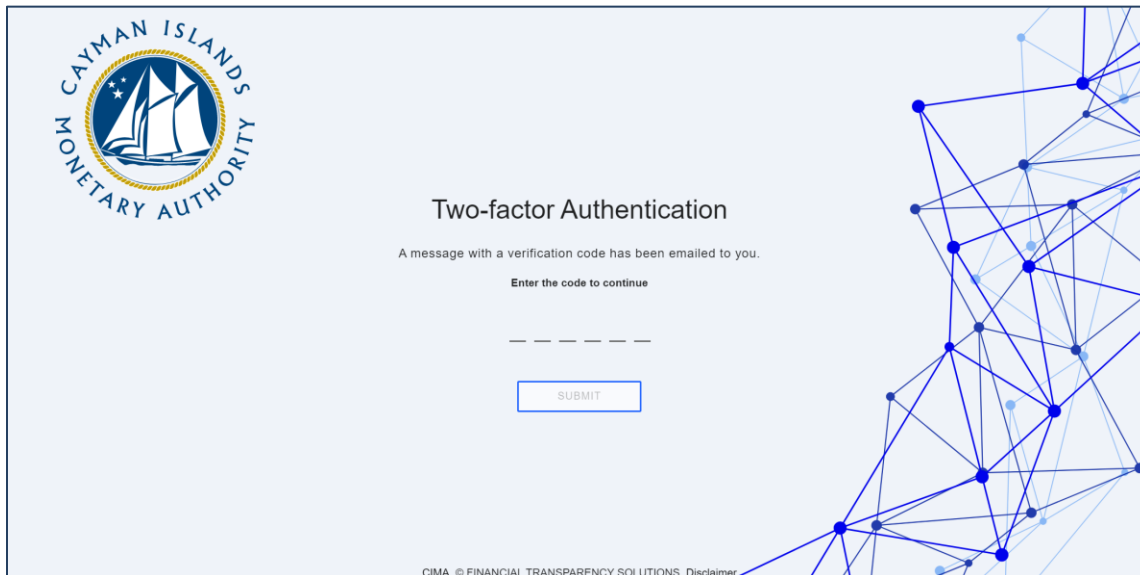
- The recipient should then enter their username, which is their email address where they received the AML Return invite, and the password they just created.



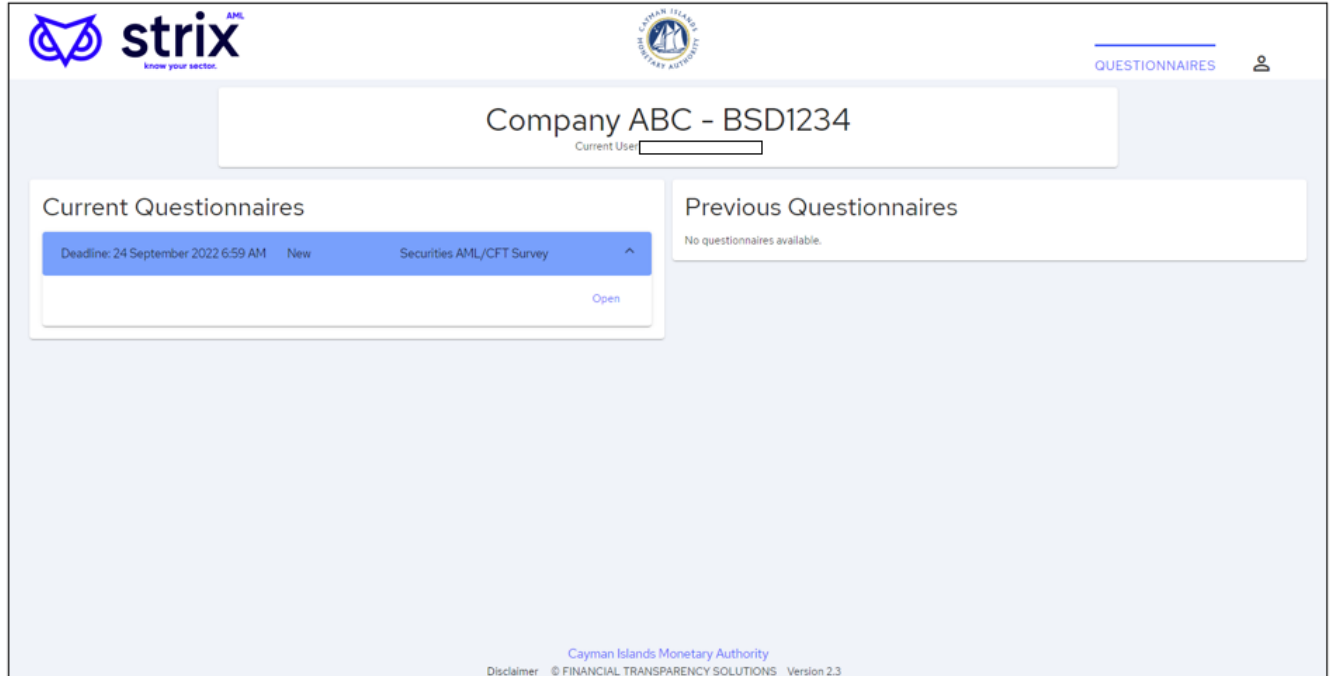
- A six digit two-factor authentication code will be sent to the recipient's email address.



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



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



3.2 COMPLETING THE AML RETURN

1. Click the Current Questionnaire to access the AML Return and start populating the form with the required data.
 - a. Completion guidance for the AML Return is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Return as many times as needed prior to the Return's due date so long as the recipient selects 'Save'.
 - c. Once the AML Return has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
 - d. Users should note that the Return does not have Excel import functionality. However, the Entity may utilise the XBRL functionality to assist in completing the Return. The Strix XBRL Overview User Guide is published on the Authority's website and can be accessed at: <https://www.cima.ky/cima-releases-strix-xbml-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 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, if the user persists, locked out permanently.

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

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

4.2 INTERNET BROWSER

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

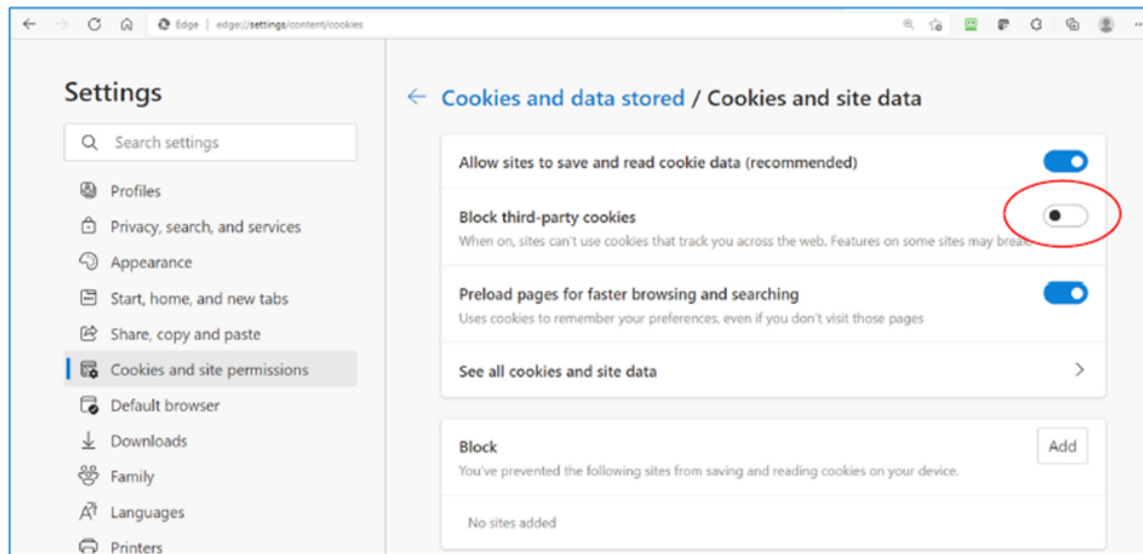
4.3 TWO-FACTOR AUTHENTICATION

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

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

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

Example of Microsoft Edge Cookie Setting:



4.4 USING EXCEL

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

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

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

4.5 PARTIAL OR INCOMPLETE RETURN SUBMISSIONS

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

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

4.6 DATA AND SECURITY

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

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

4.7 APPLICABLE FEES

There are no fees associated with this Form.

5 AML RETURN GUIDANCE

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

AML Inherent Risk 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 higher risks as referenced in Regulation 8A of the AMLRs.</i></p>
Broker-Dealer	<p>A person who carries on one or more of the activities, specified in paragraph 1(a) of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended:</p> <p>Buying, selling, subscribing for or underwriting securities as an agent.</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>Generally, clients/customers are made up of natural persons, legal persons, and/or legal arrangements. For example, a client of an Investment Manager could be a fund. The entity should include all types of its clients when responding to the AML Return.</p>
Controller	A person appointed to assume control of the affairs of a Legal Person or Legal Arrangement.
Corporate Entity	A corporate body constituted under the Laws of the Islands, or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Return	<p>United States Dollars (US\$).</p> <p>All other currencies must be converted to US\$ unless otherwise stated, using the prevailing rate of exchange as at the last day of the reporting period.</p>
Dealers in Precious Metals and Stones	Legal and Natural Persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer means the “nominated officer” as defined in Regulation 33(2) of the AMLRs.

Eligible Introdurers	<p>A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs.</p> <p>The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under Regulation 22(1)(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.</p>
Entity	For the purposes of this Return, an ‘entity’ is the holder of the Securities Licence that is responding to this Return.
F2F	Face-to-Face (F2F) means the engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Fintech Services	Services that use innovative technology to improve, change or enhance how a financial services business is conducted but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2025 Revision), except to the extent that it is modified by the Foundation Companies Act (2025 Revision) or those foundation companies established in other jurisdictions.
FRA	The Financial Reporting Authority (“FRA”) is the Cayman Islands Financial Intelligence Unit responsible for deterring, preventing and detecting Money Laundering, Terrorist Financing and the Financing of Proliferation.
Gov / Pub Sector	Business conducted with companies who are Government or in the public sector. Companies in which a government has a controlling interest; and in respect of such company, includes all subsidiary entities of the company.
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods.
HNWI	For the purpose of the AML Return, a high net worth individual (HNWI) is:

	<p>(i) an individual whose net worth is approx. US\$1,000,000 or its equivalent in any other currency; or</p> <p>(ii) any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.</p> <p>HNWIs also include those clients who are Ultra HNWIs.</p>
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it's a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Individual	A client who is a Natural Person and not a Legal Person or Arrangement.
Legal Arrangement	A Trust or Partnership, or other entity created between parties which lacks separate legal personality.
Legal Person	A company or other entity, such as a foundation, created by operation of law with separate legal personality.
Market Maker	<p>A person who engages in activities specified in paragraph 1(b) of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended, in compliance with the rules of any market in securities operating under the oversight of or rules made by a recognised securities exchange or a recognised overseas regulatory authority:</p> <p>Buying, selling, subscribing for or underwriting securities as principal where the person entering into that transaction –</p> <p>(i) holds themselves out as willing, as principal, to buy, sell or subscribe for securities of the kind to which the transaction relates at prices determined by that person generally and continuously rather than in respect of each particular transaction;</p> <p>(ii) holds themselves out as engaging in the business of underwriting securities of the kind to which the transaction relates; or</p> <p>(iii) regularly solicits members of the public with the purpose of inducing them, as principals or agents, to buy, sell, subscribe for or underwrite securities and such transaction is entered into as a result of such</p>

	person having solicited members of the public in that manner.
MLRO	Money Laundering Reporting Officer “MLRO” means the “nominated officer” as defined in Regulation 33(1) of the AMLRs.
ML/TF/PF	Money Laundering/Terrorism Financing/Proliferation Financing.
MSB	Money Services Business (“MSB”) means the business of providing, in or from within the Islands, any of the following services: (a) money transmission; (b) cheque cashing; (c) currency exchange; (d) the issuance, sale or redemption of money orders or traveller’s cheques.
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 financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP.
NPO	A company or body of persons, whether incorporated or unincorporated, or a trust – (a) established or which identifies itself as established primarily for the promotion of charitable, philanthropic, religious, cultural, educational, social or fraternal purposes, or other activities or programmes for the public benefit or a section of the public within the Islands or elsewhere; and

	(b) which solicits contributions or raises funds from the public or a section of the public within the Islands or elsewhere.
OSP	<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; and</p> <p>(c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p>
Reporting Period	January 1 to December 31 of the applicable year.
Securities Advisor	<p>A person who carries on one or more of the activities, specified in paragraph 4 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended:</p> <p>Advising a person on securities if the advice is –</p> <p>(a) given to the person in that person’s capacity as an investor or potential investor or in that person’s capacity as agent for an investor or a potential investor; and</p> <p>(b) advice on the merits of that person’s doing any of the following (whether as principal or agent) –</p> <p style="padding-left: 40px;">(i) buying, selling, subscribing for or underwriting a particular security; or</p>

	(ii) exercising any right conferred by a security to buy, sell, subscribe for, or underwrite a security.
Securities Arranger	<p>A person who carries on one or more of the activities, specified in paragraph 2 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended:</p> <p>Making arrangements with a view to –</p> <p>(a) another person (whether as a principal or an agent) buying, selling, subscribing for or underwriting securities; or</p> <p>(b) a person who participates in the arrangements buying, selling, subscribing for or underwriting securities.</p>
Securities Manager	<p>A person who carries on one or more of the activities, specified in paragraph 3 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended:</p> <p>Managing securities belonging to another person in circumstances involving the exercise of discretion.</p>
SIBA	Securities Investment Business Act (2020 Revision), as amended.
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		For the purposes of this Return, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction.
Trust		A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
Ultra HNWI		For the purpose of the AML Return, Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWI's whose net worth is greater than or equal to US\$30,000,000.
Value of Assets Under Management		The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM), or if the entity has more than one client, the entire investment portfolio.
Virtual Asset		A digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies.
Virtual Asset Custodian		A VASP who provides virtual asset custody services in or from within the Islands.
Virtual Asset Custody Service		The business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets.
Virtual Assets Service Providers (VASPs)		An entity that is registered pursuant to Section 6(3) of the VASP Act or licensed as a Virtual Asset Custodian or Trading Platform pursuant to Section 8(2)(a) of the VASP Act, 2024 Revision, or as amended.
Timeframe	Assets Under Management	Value of AUM as at the end of the reporting period.

Timeframe	Number of Transactions	<p>Number of Transactions conducted for the client during the reporting period.</p> <p>This is to be an aggregate of all transactions conducted for clients/customers in this category for the reporting period. For example, if 1 order to trade a security at a specific price is filled over several lots, it is to be counted as a single transaction.</p>
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AML Inherent Risk Questions:			
Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers at <i>the end of</i> the reporting period.	<p>Enter the total number of clients the entity had at <i>the end of</i> the reporting period.</p> <p>Where applicable, the number of clients/customers should only include those of the Cayman Islands legal entity.</p> <p>Total clients consist of Natural Persons, Legal Persons and Legal Arrangements.</p>
1.1.2	2	Total Transactions for the reporting period.	<p>Enter the total number of all transactions conducted for clients <i>during</i> the reporting period.</p> <p>Where applicable, the total transactions should only include those of the Cayman Islands legal entity.</p>
1.1.3	3	Total Number of Transactions	<p>This is a numeric value and not monetary value.</p> <p>Enter the total number of all transactions conducted for clients during the reporting period.</p> <p>It may be possible that a client did not have activity to report. The entity is to refer to the definition of 'Transaction' in the Terms and Definitions section of this Guide.</p>
1.1.4	4	Total Value of Client Assets Under Management – Monetary Value \$\$	<p>Enter the total Value of Assets Under Management (AUM) for clients, as at the end of the reporting period.</p> <p>If an entity does not have any client AUM, a '0' value should be used.</p>

1.1.5	5	Clients / customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client.	<p>Enter the total number of clients that are Legal Persons and Legal Arrangements broken down by their country of incorporation, or formation, at the end of the reporting period.</p> <p>Examples of legal persons and arrangements include Limited Liability Companies, Non-Resident Companies, Foundation companies, Trusts and Partnerships.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.6	6	Number of Transactions - Legal Persons and Legal Arrangements.	<p>Enter the total number of transactions that were conducted by customers who are legal persons and arrangements, during the reporting period.</p> <p>Examples of legal persons and legal arrangements include, but are not limited to: Limited Liability Companies, Non-Resident Companies, Foundation companies, Trusts and Partnerships.</p> <p>If an entity did not conduct such transactions, a '0' value should be used.</p>
1.1.7	7	Value of Assets Held Under Management for clients that are Legal Persons and Arrangements.	<p>Enter the total Value of Assets Under Management (AUM) for clients who are legal persons or arrangements, as at the end of the reporting period.</p> <p>If an entity does not manage assets for these clients, a '0' value should be used.</p>
1.1.8	8	Total Number of PEPs.	<p>Enter the total number of PEPs, by nationality of the PEP, as at the end of the reporting period.</p> <p>Total PEPs should include, but may not be limited to, those clients that are Natural Persons, BOs, Directors, or hold any other form of control, including signatories.</p>
1.1.9	9	Total Number of High Risk Clients.	<p>Enter the total number of clients / customers that are 'high' risk, at the end of the reporting period.</p>
1.1.10	10	Total number of Non-Compliant Accounts at the end of the reporting period.	<p>Enter the number of customers where sufficient CDD has not been collected, at <i>the end of</i> the reporting period.</p>
1.2.1	11	Total number of BOs of clients who are Legal Persons and Arrangements.	<p>Enter the total number of BOs of all clients who are legal persons and arrangements, broken down by</p>

			<p>nationality of the BO, as at the end of the reporting period.</p> <p><i>A BO should not be counted more than once regardless of the number of business relationships they have with the entity.</i></p>
1.2.2	12	Does the entity have any clients who are Legal Arrangements?	Answer 'Yes' or 'No'
1.2.3	13	Number of settlors of clients who are Legal Arrangements.	<p>Enter the number of settlors of legal arrangement clients, broken down by the nationality of the settlor.</p> <p>This category is specific to clients who are Legal Arrangements and are Trusts.</p>
1.2.4	14	Number of Partners of clients who are Legal Arrangements.	Enter the number of partners of legal arrangement clients, broken down by the nationality of the partner.
1.2.5	15	Number of Clients that have BOs who are HNWI.	<p>Enter the total number of clients that have BOs who are also HNWI.</p> <p>This category is specific to clients who are Legal Persons and Legal Arrangements. Examples include but not limited to instances where a BO of a Company, Partners of a Partnership or Settlor of a Trust is a HNWI.</p> <p>HNWI is specific to those persons whose net worth is at least US\$1,000,000 or more, or those that have assets valued at least US\$5,000,000 or more.</p> <p>Entities should report all BOs who fall in excess of the above range (including those BOs who qualify as UHNWI. Approximate values are acceptable.</p> <p><i>Example: If total HNWI is 5 (including UHNWI) and 3 UHNWI, then the entity should respond 5 under HNWI and 3 under UHNWI.</i></p> <p>If the entity does not have any clients that fit this category record a '0'.</p>
1.2.6	16	Number of Clients that have BOs who are Ultra HNWI.	<p>Enter the total number of clients that have BOs who are Ultra HNWI.</p> <p>UHNWI is specific to those persons whose net worth is equal to or greater than \$30,000,000.</p> <p>The count of these individuals should also be included in the HNWI category.</p>
1.2.7	17	Number of BOs of clients who are Legal Persons or Legal Arrangements which are also PEPs.	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.

1.2.8	18	Number of clients that have Nominees acting on behalf of a BO, or a Nominee within the ownership structure, broken down by nationality of the BO.	Enter the total number of clients that have nominees acting on behalf of BOs, or within its ownership structure, categorised by nationality of the BO. This category is specific to clients who are legal persons and arrangements.
1.2.9	19	Number of directors and/or senior management of clients who are PEPs.	Enter the total number of clients who have directors and/or senior management who are <i>also</i> PEPs, as at the end of the reporting period.
1.2.10	20	Number of directors and/or senior management of clients who are High Net Worth Individuals.	Enter the number of directors and/or senior management of clients who are <i>also</i> HNWI, as at the end of the reporting period. HNWI is specific to those persons whose net worth is at least US\$1,000,000 or more, or those that have assets valued at least US\$5,000,000 or more. Entities should report all directors/ senior managers who fall in excess of the above range (including those directors / senior managers who qualify as UHNWI. Approximate values are acceptable.
1.2.11	21	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 <i>also</i> Ultra HNWI, as at the end of the reporting period. UHNWI is specific to those persons whose net worth is equal to or greater than \$30,000,000. The count of these individuals should also be included in the HNWI category.
1.2.12	22	Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are <i>both</i> PEPs <u>and</u> HNWI, as at the end of the reporting period.
Client Structures – Note that clients may fall under multiple categories below			
1.3.1	23	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.3.2	24	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are Government or Public Sector, broken down by government jurisdiction.

1.3.3	25	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions conducted by clients that are Government or Public Sector broken down by government jurisdiction.
1.3.4	26	Gov / Pub Sector - Value of Transactions.	Enter the value of transactions processed on behalf of clients that are Government or Public Sector, during the reporting period.
1.3.5	27	Gov / Pub Sector - Value of Assets Under Management.	Enter the Value of Assets Under Management of the clients that are Government or Public Sector, as at the end of the reporting period.
1.3.6	28	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.3.7	29	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.
1.3.8	30	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period.
1.3.9	31	NPO - Value of Transactions.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.
1.3.10	32	NPOs - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are NPOs, as at the end of the reporting period.
1.3.11	33	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.3.12	34	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has that are Foundations, broken down by country of establishment of the client, at the end of the reporting period.
1.3.13	35	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.
1.3.14	36	Foundations - Value of Transactions.	Enter the value of transactions processed for clients that are Foundations, during the reporting period.

1.3.15	37	Foundations - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are a Foundation, as at the end of the reporting period.
1.3.16	38	Does the entity have any clients that are Trusts?	Please answer 'Yes' or 'No'.
1.3.17	39	Trusts - Number of Clients, broken down by country of registration of the Trust.	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.
1.3.18	40	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are Trusts, during the reporting period.
1.3.19	41	Trusts - Value of Transactions.	Enter the Value of transactions conducted by clients that are Trust, during the reporting period.
1.3.20	42	Trusts - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are Trusts, as at the end of the reporting period.
1.3.21	43	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'. Note that one client can fall under multiple categories of structure.
1.3.22	44	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients the entity has that are a Segregated Portfolio Company, as at the end of the reporting period.
1.3.23	45	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients that are a Segregated Portfolio Company, during the reporting period.
1.3.24	46	Segregated Portfolio Companies - Value of Transactions	Enter the value of transactions conducted by clients that are a Segregated Portfolio Company, during the reporting period.
1.3.25	47	Segregated Portfolio Companies - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are a Segregated Portfolio Company, as at the end of the reporting period.
1.3.26	48	Does the entity have any clients that operate from a Special Economic Zone?	Please answer 'Yes' or 'No'. Note that one client can fall under multiple categories of structure.

1.3.27	49	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.
1.3.28	50	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients, that are registered / operate in a Special Economic Zone, during the reporting period.
1.3.29	51	Special Economic Zone - Value of Transactions.	Enter the value of transactions conducted by clients, that are registered / operate in a Special Economic Zone, during the reporting period.
1.3.30	52	Special Economic Zone - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are registered / operate in a Special Economic Zone, as at the end of the reporting period.
1.3.31	53	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'. Note that one client can fall under multiple categories of structure.
1.3.32	54	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.
1.3.33	55	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.3.34	56	Funds/Collective Investment Vehicles – Value of Transactions.	Enter the value of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.3.35	57	Funds / Collective Investment Vehicles - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are Funds / Collective Investment Vehicles, as at the end of the reporting period.
The following questions are specific to Natural Person clients ONLY – this section should only be completed if you have clients who are Natural Persons and <i>Not</i> Legal Persons or Arrangements			
1.4.1	58	Does the entity have any clients that are Natural Persons?	Please answer 'Yes' or 'No'. This question <u>does not</u> apply to clients that are Legal Persons or Legal Arrangements.

1.4.2	59	Clients / customers that are Natural Persons, broken down by nationality of the client.	<p>Enter the number of clients that are Natural Persons, broken down by their nationality, at the end of the reporting period.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p>Note: This category <u>does not</u> include clients/customers that are Legal Persons and Legal Arrangements.</p>
1.4.3	60	Clients/customers that are Natural Persons, broken down by Residency of the client.	<p>Enter the number of clients that are Natural Persons, broken down by their residency.</p> <p>This category is specific to clients who are Natural Persons who have a direct business relationship with the Entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p>Note: This category <u>does not</u> include clients/customers that are Legal Persons and Legal Arrangements.</p>
1.4.4	61	Natural Person Clients – Total Transactions.	<p>Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period.</p> <p>This category is specific to Natural Person clients who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p>Note: This category <u>does not</u> include clients / customers that are Legal Persons and Legal Arrangements.</p>
1.4.5	62	Value of Assets Held Under Management for clients who are Natural Persons.	<p>Enter the value of assets under management for clients that are Natural Persons, at the end of the reporting period.</p>
1.4.6	63	Does the entity have any Natural Person clients that are PEPs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.</p>
1.4.7	64	Number of Natural Person Clients who are PEPs, broken down by nationality of the client.	<p>Enter the total number of Natural Person clients that are PEPs, broken down by the nationality of the client, as at the end of the reporting period.</p>

1.4.8	65	Natural Person Clients - PEPs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.
1.4.9	66	Natural Person Clients - PEPs - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients who are PEPs, during the reporting period.
1.4.10	67	Natural Person Clients - PEPs - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients who are PEPs, at the end of the reporting period.
1.4.11	68	Does the entity have any Natural Person Clients that are HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p>HNWIIs is specific to those persons whose net worth is at least US\$1,000,000 or more, or those that have assets valued at least US\$5,000,000 or more.</p> <p>Entities should report all natural person clients who fall in excess of the above range including those who qualify as UHNWI.</p> <p>Approximate values are acceptable.</p>
1.4.12	69	Number of Natural Person Clients who are HNWIIs.	Enter the number of Natural Person clients the entity has that are HNWIIs.
1.4.13	70	Natural Person Clients - HNWIIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are HNWIIs, during the reporting period.
1.4.14	71	Natural Person Clients - HNWIIs - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients that are HNWIIs, during the reporting period.
1.4.15	72	Natural Person Clients - HNWIIs - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients that are HNWIIs, as at the end of the reporting period.
1.4.16	73	Does the entity have any Natural Person clients that are Ultra HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p>For this category, Ultra HNWIIs are those natural persons with net worth equal to or greater than US\$30,000,000.</p> <p>This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.</p>
1.4.17	74	Number of Natural Person Clients who are Ultra HNWIIs.	Enter the number of Natural Person clients that are Ultra HNWIIs, at the end of the reporting period.

1.4.18	75	Natural Person Clients – Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Persons who are Ultra HNWIs, during the reporting period.
1.4.19	76	Natural Person Clients – Ultra HNWIs - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients that are Ultra HNWIs, during the reporting period.
1.4.20	77	Natural Person Clients – Ultra HNWIs - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients that are Ultra HNWIs, at the end of the reporting period.
1.4.21	78	Does the entity have any Natural Person clients that are PEPs and HNWIs?	Please answer 'Yes' or 'No'. Include all PEPs, both HNWI and Ultra HNWIs.
1.4.22	79	Number of Natural Person Clients who are PEPs and HNWIs.	Enter the number of Natural Person clients that are both PEPs and HNWIs. Include all PEPs, both HNWI and Ultra HNWIs.
1.4.23	80	Natural Person Clients - PEPs and HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are both PEPs and HNWIs, during the reporting period. Include all PEPs, both HNWI and Ultra HNWIs.
1.4.24	81	Natural Person Clients - PEPs & HNWIs - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients that are both PEPs and Ultra HNWIs, during the reporting period. Include all PEPs, both HNWI and Ultra HNWIs.
1.4.25	82	Natural Person Clients - PEPs & HNWIs - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients that are both PEPs and HNWIs, at the end of the reporting period. Include all PEPs, both HNWI and Ultra HNWIs.
Nature of Business / Source of Funding			
1.5.1	83	Nature of Business / Source of Funding: Does the entity have clients whose source of funding falls within the list of sectors below: • Banking Institutions	Please answer 'Yes' or 'No'.

		<ul style="list-style-type: none"> • Other Financial Regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech • Civil Service / Gov Employment <p>*excluding MSBs, VASPs, and TCSPs.</p>	
1.5.2	84	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the Banking sector.
1.5.3	85	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from the Financial Sector (excluding Banking, VASPs, MSBs and TCSPs).
1.5.4	86	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations.
1.5.5	87	Money Lending - Number of Clients.	Enter the number of clients the entity has whose source of funding is from Money Lending operations.
1.5.6	88	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived through being an Accountant (including but not limited to the areas of: Audit, Assurance, Bookkeeping, and Insolvency).
1.5.7	89	Fintech - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Fintech Industry.
1.5.8	90	Civil Service / Gov Employees – Number of Clients	Enter the number of clients the Entity has whose source of funding is from the government employment / civil service employment.
1.5.9	91	<p>Nature of Business / Source of Funding: Does the entity have clients whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> ▪ Legal Practitioners 	Please answer 'Yes' or 'No'.

		<ul style="list-style-type: none"> ▪ Dealers in Precious Metals and Stones ▪ Money Services Business (MSBs) ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ TCSPs ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	
1.5.10	92	Legal Practitioners – Number of clients.	Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner.
1.5.11	93	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.5.12	94	Money Services Business - Number of Clients.	Enter the number of clients whose source of funds are derived from Money Services Business operations.
1.5.13	95	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Virtual Asset Sector (products, services, or investments).
1.5.14	96	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funds is derived from High Value Dealer operations.
1.5.15	97	TCSPs - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from TCSP operations.
1.5.16	98	Import / Export - Number of Clients.	Enter the number of clients the entity has, which are Legal Persons or Legal Arrangements operating in the Import / Export business, and Natural Persons employed in the Import / Export industry.
1.5.17	99	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Shipping and Transport of Goods Industry.
1.5.18	100	Nature of Business / Source of Funding: Does the entity have clients whose source of funding falls	Please answer 'Yes' or 'No'.

		<p>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 	
1.5.19	101	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Real Estate Industry (Agents / Brokers / Sellers).
1.5.20	102	Gambling Business (including online gambling) - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Gambling Industry (including online gambling).
1.5.21	103	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Adult Entertainment Industry.
1.5.22	104	Defence Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Defence Industry.
1.5.23	105	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from operating in the Oil and Gas Industry.
1.5.24	106	Mining Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Mining Industry.
1.5.25	107	Construction / Development - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from operating in the Construction / Development Industry.
1.5.26	108	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from operating in the Retail & Restaurant Business.
1.5.27	109	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.

1.5.28	110	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has whose source of funds is Unknown to the entity. Unknown Business and Profession are where the entity does not know, and was not provided with, and is unable to verify the nature of business or profession (source of funds) of the client.
1.5.29	111	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has whose source of funds is from known businesses however not mentioned above.
1.6.1	112	<p>Source of Funds – Value of Client Assets Under Management</p> <p>Does the entity have client assets under management which the source of funds was derived from the following categories:</p> <ul style="list-style-type: none"> ▪ Banking Institutions ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech ▪ Civil Service / Gov Employment <p><i>*excluding MSBs, VASPs, and TCSPs.</i></p>	Please answer 'Yes' or 'No' as applicable.
1.6.2	113	Banking Institutions (excluding MSBs) - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds are derived from the Banking Institutions (excluding MSBs).
1.6.3	114	Other Financial Regulated Business - Value of Client Assets Under Management.	Enter the value of client assets under management of the clients whose source of funds is derived from 'Other Financial Regulated Business' and <u>not</u> the following: banking, MSBs, VASP Products and Services Providers, and TCSPs.
1.6.4	115	Financial Leasing - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from Financial Leasing operations.
1.6.5	116	Money Lending- Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of

			funds are derived from Money Lending operations.
1.6.6	117	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds are derived through Accountant operations (Audit / Assurance / Bookkeeping / Insolvency).
1.6.7	118	Fintech - Value of Client Assets Under Management.	Enter the value of client assets under management of the clients whose source of funds are derived through the Fintech Industry.
1.6.8	119	Civil Service – Value of Client Assets Under Management.	Enter the value of client assets under management of the clients whose source of funds are derived through the Civil Service / Gov. employment. This category is only for Natural Person clients
1.6.9	120	Source of Funds – Value of Client Assets Under Management Does the entity have client assets under management which the source of funds was derived from the following categories: <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ MSBs ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ TCSPs ▪ Import/Export industry ▪ Shipping and Transport of Goods 	Please answer 'Yes' or 'No' as applicable.
1.6.10	121	Legal Practitioners – Value of Client Assets Under Management.	Enter the value of client assets under management of the clients whose source of funds is derived from Legal Practitioner operations.
1.6.12	122	Dealers in Precious Metals and Stones – Value of Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from Dealers in Precious Metals and Stones operations.

1.6.13	123	Money Services Business - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from Money Services Business operations.
1.6.14	124	Virtual Asset Products and Services - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from the Virtual Asset sector (products, services, and investments).
1.6.15	125	High Value Dealers - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from High Value Dealer operations.
1.6.16	126	TCSPs - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from TCSP operations.
1.6.17	126	Import / Export Industry - Value Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds are derived from Import / Export operations.
1.6.18	128	Shipping and Transport of Goods - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds are derived from Shipping and Transport of Goods operations.
1.6.19	129	<p>Source of Funds – Value of Client Assets Under Management</p> <p>Does the entity have client assets under management which the source of funds was derived from the following categories:</p> <ul style="list-style-type: none"> ▪ 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' as applicable.
1.6.20	130	Real Estate Agents / Brokers - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from the Real Estate Industry (Agents, Brokers, and Sellers).

1.6.21	131	Gambling Business (including online gambling) - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from operating Gambling business.
1.6.22	132	Adult Entertainment - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Adult Entertainment Industry.
1.6.23	133	Defence Industry - Value of Client Assets Under Management.	Enter the value of assets under management of clients whose source of funds is derived from operating in the Defence Industry.
1.6.24	134	Oil and Gas Industry - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Oil and Gas Industry.
1.6.25	135	Mining Industry - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Mining Industry.
1.6.26	136	Construction / Development - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Construction / Development Industry.
1.6.26	137	Retail & Restaurant Business - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from Retail & Restaurant Business operations.
1.6.27	138	Cannabis Production & Distribution - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Cannabis Production & Distribution business.
1.6.28	139	Industry / Profession not known or not recorded - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from unknown or unrecorded Industries / Professions.
1.6.29	140	Other - Not listed above - Value of Client Assets Under Management.	Enter the value of client assets under management of clients whose source of funds is derived from Industries/ Professions not listed above.

1.7.1	141	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.7.2	142	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback that may be relevant, which you could not provide on the tabs above. Enter 'N/A' if no comments.
2.1.1	143	Does the entity provide products or services for Shares Trading (listed or unlisted)?	Please answer 'Yes' or 'No'.
2.1.2	144	Shares Trading - Number of Clients.	Enter the number of clients the entity provides Shares Trading services and holds shares, during the reporting period.
2.1.3	145	Shares Trading - Value of Transactions.	Enter the Value of Transactions of clients that the entity provides Shares Trading services and holds shares, during the reporting period.
2.1.4	146	Does the entity provide any products related to Instruments of Indebtedness?	Please answer 'Yes' or 'No'.
2.1.5	147	Instruments of Indebtedness - Number of Clients.	Enter the number of clients the entity provides products related to Instruments of Indebtedness, during the reporting period.
2.1.6	148	Instruments of Indebtedness - Value of Transactions.	Enter the Value of Transactions for clients that the entity provides products related to Instruments of Indebtedness, during the reporting period.
2.1.7	149	Does the entity provide any products related to Securities Traded - Securities Entitlements?	Please answer 'Yes' or 'No'.
2.1.8	150	Securities Traded - Securities Entitlements- Number of Clients.	Enter the number of clients to whom the entity provides Securities Trading services related to Securities Entitlements, during the reporting period.
2.1.9	151	Securities Traded - Securities Entitlements - Value of Transactions.	Enter the Value of Transactions of clients that the entity provides Securities Trading products related to Securities Entitlements, for the reporting period.

2.1.10	152	Does the entity provide any products related to Certificates?	Please answer 'Yes' or 'No'.
2.1.11	153	Securities Traded – Certificates - Number of Clients.	Enter the number of clients the entity provides Securities Trading services related to Certificates, during the reporting period.
2.1.12	154	Securities Traded - Certificates - Value of Transactions.	Enter the Value of Transactions of clients the entity provides Securities Trading products related to Certificates for the reporting period.
2.1.13	155	Does the entity provide any products related to Options?	Please answer 'Yes' or 'No'.
2.1.14	156	Securities Traded - Options – Number of Clients.	Enter the number of clients the entity provides Securities Trading services related to Options to, for the reporting period.
2.1.15	157	Securities Traded - Options Value of Transactions.	Enter the Value of Transactions for clients the entity provides Securities Trading products related to Options, for the reporting period.
2.1.16	158	Does the entity provide any products related to Futures?	Please answer 'Yes' or 'No'.
2.1.17	159	Securities Traded - Futures - Number of Clients.	Enter the number of clients the entity provides Securities Trading services related to futures to, during the reporting period.
2.1.18	160	Securities Traded - Futures - Value of Transactions.	Enter the Value of Transactions for clients the entity provides Securities Trading products related to futures, during the reporting period.
2.1.19	161	Does the entity provide any products related to Forward Contracts?	Please answer 'Yes' or 'No'.
2.1.20	162	Securities Traded - Forward Contracts - Number of Clients.	Enter the number of clients the entity provides Securities Trading services related to Forward Contracts, during the reporting period.
2.1.21	163	Securities Traded - Forward Contracts - Value of Transactions.	Enter the Value of Transactions of clients the entity provides Securities Trading products related to Forward Contracts, during the reporting period.

2.1.22	164	Does the entity provide any products related to Contracts for Differences?	Please answer 'Yes' or 'No'.
2.1.23	165	Securities Traded - Contracts for Differences- Number of Clients.	Enter the number of clients the entity provides Securities Trading services related to Contracts for Differences, during the reporting period.
2.1.24	166	Securities Traded - Contracts for Differences - Value of Transactions.	Enter the Value of Transactions for clients the entity provides Securities Trading products related to Contracts for Differences, during the reporting period.
2.1.25	167	Does the entity provide any products related to Securities Traded - Virtual Assets?	Please answer 'Yes' or 'No'.
2.1.26	168	Securities Traded - Virtual Assets - Number of Clients.	Enter the number of clients the entity provides Securities Trading services related to Virtual Assets to, during the reporting period.
2.1.27	169	Securities Traded - Virtual Assets - Value of Transactions.	Enter the Value of Transactions for clients the entity provides Securities Trading products related to Virtual Assets, during the reporting period.
2.1.28	170	Does the entity provide any Products related to Securities Traded - Penny / Micro Stocks?	Please answer 'Yes' or 'No'.
2.1.29	171	Securities Traded - Penny / Micro Stocks - Number of Clients.	Enter the number of clients the entity provides Securities Trading services related to Penny / Micro Stocks, during the reporting period.
2.1.30	172	Securities Traded - Penny / Micro Stocks - Value of Transactions.	Enter the Value of Transactions for clients that the entity provides Securities Trading products related to Penny / Micro Stocks, during the reporting period.
2.1.31	173	Does the entity provide any other products related to Securities not mentioned above?	Please answer 'Yes' or 'No'.
2.1.32	174	Securities Traded - Other Securities - Number of Clients.	Enter the number of clients the entity provides Securities Trading services not mentioned above, during the reporting period.

2.1.33	175	Please indicate the Other Securities Products not captured above.	List the other Securities Products not mentioned above.
2.2.1	176	Does the entity provide Custody or Depository services?	Please answer 'Yes' or 'No'.
2.2.2	177	Custody / Depository - Number of Clients.	Enter the number of clients the entity provides Custody Services to, during the reporting year.
2.2.3	178	Custody / Depository - Value of Client Assets.	Enter the value of client assets held in Custody / Depository services, as at the end of the reporting year.
2.2.4	179	Custody / Depository - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides Custody / Depository services to during the reporting period.
2.2.5	180	Does the entity service Clients as Broker Dealer?	Please answer 'Yes' or 'No'.
2.2.6	181	Broker Dealer - Number of Clients.	Enter the number of clients the entity provides Broker Dealer services, during the reporting period.
2.2.7	182	Broker Dealer - Value of Transactions for the reporting period.	Enter the Value of Transactions for the reporting period, for clients the entity provides Broker Dealer services to.
2.2.8	183	Does the entity service Clients as Market Maker?	Please answer 'Yes' or 'No'.
2.2.9	184	Market Maker - Number of Clients.	Enter the number of clients the entity provided Market Maker services to during the reporting period.
2.2.10	185	Market Maker - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides Market Maker services, during the reporting period.
2.2.11	186	Does the entity service Clients as Securities Advisor?	Please answer 'Yes' or 'No'.
2.2.12	187	Securities Advisor - Number of Clients.	Enter the number of clients to whom the entity provides Securities Advisor services, during the reporting period.
2.2.13	188	Securities Advisor - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides Securities Advisor services, during the reporting period.

2.2.14	189	Does the entity service Clients as Securities Arranger?	Please answer 'Yes' or 'No'.
2.2.15	190	Securities Arranger - Number of Clients.	Enter the number of clients the entity provides Securities Arranger services to, during the reporting period.
2.2.16	191	Securities Arranger - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides Securities Arranger services to, during the reporting period.
2.2.17	192	Does the entity service Clients as Securities Manager?	Please answer 'Yes' or 'No'.
2.2.18	193	Securities Manager - Number of Clients.	Enter the number of clients the entity provides Securities Manager services to, during the reporting period.
2.2.19	194	Securities Manager - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides Securities Manager services to, during the reporting period.
2.2.20	195	Does the entity have any clients that are Administered Funds?	Please answer 'Yes' or 'No'.
2.2.21	196	Administered Fund Clients - Number of Clients.	Enter the number of clients the entity has who are administered funds, during the reporting period.
2.2.22	197	Administered Fund Clients - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients who are administered funds during the reporting period.
2.3.1	198	Does the entity facilitate transactions in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	199	Physical Cash Transactions - Number of Clients.	Enter the number of clients where transactions were conducted, by or on behalf of clients, via Physical Cash, <i>during</i> the reporting period.
2.3.3	200	Physical Cash - Number of Transactions.	Enter the number of Physical Cash Transactions conducted by, for or on behalf of clients, <i>during</i> the reporting period.
2.3.4	201	Physical Cash – Value of Transactions.	Enter the total value of Physical Cash transactions processed by or on behalf of clients, <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.
2.3.5	202	Does the entity facilitate transactions in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.6	203	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.
2.3.7	204	Virtual Currency Transactions - Number of Transactions.	Enter the number of Virtual Currency Transactions clients conducted by, for or on behalf of clients, <i>during</i> the reporting period.
2.3.8	205	Virtual Currency - Value of Transactions.	Enter the total value of Virtual Currency Transactions processed by or on behalf of clients <i>during</i> the reporting period.
2.3.9	206	Does the entity facilitate client transactions via Third Parties?	Please answer 'Yes' or 'No'.
2.3.10	207	Third Party Transactions - Number of Clients.	Enter the number of clients where transactions to and from the client were conducted via Third Parties, <i>during</i> the reporting period. Third Party means an individual or entity not associated with the business relationship or transaction.
2.3.11	208	Third Party - Number of Transactions.	Enter the number of Third Party transactions conducted by, for or on behalf of, clients <i>during</i> the reporting period.
2.3.12	209	Third Party - Value of Transactions.	Enter the total value of transactions where payments to / from the client were conducted via Third Parties, <i>during</i> the reporting period.
2.3.13	210	Does the entity facilitate transactions via Credit Card?	Please answer 'Yes' or 'No'.
2.3.14	211	Credit Card Transactions - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients via Credit Card, <i>during</i> the reporting period.
2.3.15	212	Credit Card - Number of Transactions.	Enter the number of Credit Card transactions conducted by, for or on

			behalf of the client, during the reporting period.
2.3.16	213	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.
2.3.17	214	Does the entity facilitate transactions in the form of Wire Transfers?	Please answer 'Yes' or 'No'. This excludes internal bank transfers.
2.3.18	215	Wire Transfers - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, in the form of Wire Transfers, <i>during</i> the reporting period.
2.3.19	216	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions that were conducted by, for or on behalf of clients, <i>during</i> the reporting period.
2.3.20	217	Wire Transfers - Value of Funds Transferred.	Enter the total value of Wire Transfer transactions conducted by or on behalf of clients <i>during</i> the reporting period.
2.3.21	218	Does the entity facilitate transactions in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.22	219	Transfer of Securities - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, via Transfer of Securities, <i>during</i> the reporting period.
2.3.23	220	Transfer of Securities - Number of Transactions.	Enter the number of instances of Transfers of Securities that were conducted by, for or on behalf of clients,
2.3.24	221	Transfer of Securities - 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 Transfer of Securities.
2.3.25	222	Does the entity facilitate transactions in the form of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.3.26	223	Internal Bank Transfers - 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.
2.3.27	224	Internal Bank Transfers - Number of Transactions.	Enter the number of Internal Bank Transfer transactions that were

			conducted by, for or on behalf of clients, <i>during</i> the reporting period.
2.3.28	225	Internal Bank Transfers - Value of Funds Transferred.	Enter the total value of Internal Bank Transfer transactions conducted by or on behalf of clients <i>during</i> the reporting period.
2.3.29	226	Does the entity facilitate transactions to / from clients in other forms of payments not listed above?	Please answer 'Yes' or 'No'.
2.3.30	227	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.
2.3.31	228	Other Forms of Payment - Number of Transactions.	Enter the number of transactions conducted by, for or on behalf of clients, <i>during</i> the reporting period, using Other Forms of Payment other than the ones listed above.
2.3.32	229	Other Forms of Payment - 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.
2.3.33	230	Please indicate the types of Other Forms of Payments.	List the other forms of payment conducted by, for or on behalf of clients, during the reporting period, which are not listed above.
2.4.1	231	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated.
2.4.2	232	Total number of transactions received, broken down by origin of the funds.	Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds.
2.4.3	233	Total value of funds transferred out, broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients during the reporting period, broken down by the country of payment destination.
2.4.4	234	Total number of transactions transferred out, broken down by	Enter the total number of outgoing transactions during the reporting period,

		destination country of the transaction.	broken down by destination country of the transaction.
2.5.1	235	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	236	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	237	Number of Clients onboarded via F2F.	Enter the total number of clients that were onboarded using Face-to-Face (F2F) channels, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period.
3.1.2	238	Number of Clients onboarded via Non-F2F.	Enter the total number of clients that were onboarded using Non-Face-to-Face (Non-F2F) channels, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and <u>not only</u> those onboarded during the reporting period. An example of Non-F2F would include where the entity is onboarding clients through phone or email; however, they do not have F2F contact with the clients.
3.1.3	239	Number of Clients onboarded via Online Platforms.	Enter the total number of clients that were onboarded via Online Platforms, broken down by nationality or country of incorporation/ establishment of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and <u>not only</u> those onboarded during the reporting period.
3.1.4	240	Number of Clients onboarded through Referrals within Group - F2F.	Enter the total number of clients that were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the BOs nationality. An example of Group – F2F is where the entity is onboarding clients that are introduced through its

			group channels and the entity itself have F2F interaction with the clients.
3.1.5	241	Number of Clients onboarded through Referrals within Group - Non F2F.	<p>Enter the total number of clients that were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the BOs.</p> <p>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.</p>
3.1.6	242	Number of total Clients onboarded through Eligible Introducers.	Enter the total number of 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	243	Number of Clients onboarded through Eligible Introducers during the reporting period.	Enter the total number of clients that were onboarded through Eligible Introducers, <i>during</i> the reporting period, broken down by the nationality of the BO.
3.1.8	244	Number of Clients onboarded via Online Platform or Portals.	Enter the total number of clients onboarded using Online platforms or portals during the reporting period, broken down by nationality of the BO.
3.2.1	245	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	246	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> • 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	247	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	248	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 <u>three-year period</u> , answer "1".
3.2.5	249	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	250	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	251	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	252	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 <u>three-year period</u> , answer "1".
3.2.9	253	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	254	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	255	What was the country of residency of the Deputy Money	Enter the country of residency of the Deputy Money Laundering Reporting

		Laundering Reporting Officer at the end of the reporting period?	Officer at the end of the reporting period.
3.2.12	256	How many Deputy Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the <u>three-year period</u> , answer "1".
3.2.13	257	Has the entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	258	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	259	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	260	How many TFS Screening platforms / software did the entity have in the past 3 years?	If no turnover of the Targeted Financial Sanction screening function in the <u>three-year period</u> , answer "1".
3.2.17	261	Has the entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	262	To whom has the Transaction Monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource 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 includes one of each within the reporting period.</p>

3.2.19	263	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	264	How many Transactions Monitoring platforms / software did the entity have in the past 3 years?	If no turnover of the Transaction Monitoring platform in the <u>three-year period</u> , answer "1".
3.2.21	265	Has the entity outsourced the function of Trading Platform within the reporting period?	Please answer 'Yes' or 'No'.
3.2.22	266	To whom has the Trading Platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Trading Platform:</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 Trading Platform turnover that includes one of each within the reporting period.</p>
3.2.23	267	What was the outsourcing country of the Trading Platform function at the end of the reporting period?	Enter the country the entity outsourced the Trading Platform function to, at the end of the reporting period.
3.2.24	268	How many Trading Platforms has the entity utilized in the past 3 years?	If no turnover of the Trading Platform function in the <u>three-year period</u> , answer "1".
3.2.25	269	Has the entity outsourced the function of Liquidity Platforms within the reporting period?	Please answer 'Yes' or 'No'.
3.2.26	270	To whom has the Liquidity Platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Liquidity Platform:</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 Liquidity Platform turnover that includes one of each within the reporting period.</p>

3.2.27	271	What was the outsourcing country of the Liquidity Platform function at the end of the reporting period?	Enter the country the entity outsourced the Liquidity Platform function to, at the end of the reporting period.
3.2.28	272	How many Liquidity Platforms has the entity utilized in the past 3 years?	If no turnover of the Liquidity Platform function in the <u>three-year period</u> , answer "1".
3.3.1	273	Where is the entity's physical place of business?	Select the country where the entity's physical business operations are located.
3.3.2	274	Does the entity form part of a group structure?	Please answer 'Yes' or 'No'.
3.3.3	275	In which country is the entity's ultimate Parent Company incorporated?	Select the country of incorporation of the entity's Parent Company. <i>If no Parent, select "Cayman Islands"</i>
3.3.4	276	In which country is the entity's Holding Company incorporated?	Select the country of incorporation of the entity's Holding Company. <i>If no separate Holding Company, select the country of incorporation of the Parent Company.</i>
3.3.5	277	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	278	Number of Subsidiaries by location, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.
3.3.7	279	In which countries, by percentage of equity ownership, are all shareholders of the entity located.	Insert countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.8	280	How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period?	Enter the number of beneficial Owners the entity has, broken down by nationality of the beneficial owner, at the end of the reporting period.
3.3.9	281	How many Directors does the entity have appointed, by country of nationality of the	Enter the number of Directors appointed to the entity at the end of the reporting period, broken down by the nationality of the Directors.

		Directors, at the end of the reporting period?	
3.3.10	282	Is the entity a Single Family Office?	Please answer 'Yes' or 'No'.
3.4.1	283	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	284	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. Enter 'N/A' if no comments.

AML Controls Questions:			
No.	Question No.	Question	Description/Explanation
1.1.1	285	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	286	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	287	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	288	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	289	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	290	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	291	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.

1.1.8	292	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	293	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	294	Has the entity, or its Directors, Shareholders, Beneficial Owners, or Senior Officers been denied an application by any Regulatory Body?	Please answer 'Yes' or 'No'.
1.1.11	295	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	296	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	297	Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	298	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.2.2	299	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	300	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	301	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	302	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	303	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	304	Does the AMLCO have sufficient compliance/AML skills and	Please answer 'Yes' or 'No'.

		experience to perform their function?	
1.2.8	305	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	306	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	307	Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures?	Please answer 'Yes' or 'No'.
1.2.11	308	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	309	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	310	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	311	Have the Directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	312	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	313	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	314	Has the DMLRO received specialized AML/CFT/CPF and Sanctions training over the last	Please answer 'Yes' or 'No'.

		year relevant to the current position?	
1.3.6	315	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	316	Are changes to policy and procedures communicated to all Staff/Directors and Senior Management?	Please answer 'Yes' or 'No'.
1.3.8	317	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	318	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	319	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	320	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	321	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?	Please answer 'Yes' or 'No'.
1.4.3	322	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	323	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	324	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	325	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	326	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	327	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	328	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	329	Where applicable, does the internal audit include testing of EI relationships?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.11	330	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	331	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	332	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	333	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	334	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	335	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	336	Does the entity consider the ML/TF/PF and Sanctions risks associated with products and	Please answer 'Yes' or 'No'.

		services (existing and new) in their risk assessment?	
1.5.6	337	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	338	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	339	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	340	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	341	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	342	Where applicable, does the entity consider outsourcing risk factors in its risk assessment?	Please select 'Yes', 'No', or 'Not Applicable'.
1.5.12	343	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	344	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	345	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	346	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	347	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	348	If yes to use of group policies and procedures, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?	Please select the most appropriate response: 'Yes', 'No', or 'Not Applicable'
1.6.3	349	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	350	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	351	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	352	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	353	Does the entity have Board, or Governing Body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	354	Does the entity have Board or Governing Body approved policies	Please answer 'Yes' or 'No'.

		and procedures for training of staff?	
1.6.9	355	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	356	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	357	Does the entity have procedures for declining, de-risking, terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons?	Please answer 'Yes' or 'No'.
1.6.12	358	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	359	Does the entity have a Sanctions screening process including policies and procedures?	Please answer 'Yes' or 'No'.
1.7.2	360	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	361	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	362	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	363	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	364	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.

1.7.7	365	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	366	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	367	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	368	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	369	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	370	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	371	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	372	Does the entity have transaction monitoring policies and procedures developed that commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	373	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	374	Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.8.4	375	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	376	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	377	Where applicable, does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	378	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	379	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	380	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	381	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	382	Does the entity have policies and procedures for reporting to the Cayman Islands Financial Reporting Authority?	Please answer 'Yes' or 'No'.
1.9.4	383	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	384	How many Suspicious Activity Reports have been reported, to the Cayman Financial Reporting Authority, by the entity (through the MLRO) for the current reporting period?	Enter the total number of Suspicious Activity Reports filed by the entity's MLRO, to the FRA, during the reporting period.
1.9.6	385	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	386	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	387	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	388	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	389	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	390	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	391	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	392	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	393	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	394	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	395	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	396	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	397	Does the entity have outsourced arrangements for any of its functions and services?	Please answer 'Yes' or 'No'.
1.11.2	398	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	399	Is there a Board approved documented policy on outsourcing?	Please answer 'Yes' or 'No'.
1.11.4	400	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	401	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', or 'No'
1.11.6	402	Does the outsourcing agreement(s) clearly set out the obligations of both parties?	Select which best applies: 'Yes', or 'No'
1.11.7	403	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	404	Is there a contingency plan in the event the Outsourced Service	Select which best applies: 'Yes', or 'No'

		Provider fails to perform the outsourced activity?	
1.11.9	405	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	406	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	407	Are there policies and procedures for outsource arrangements to ensure data protection restrictions would NOT delay access to data and documents?	Select which best applies: 'Yes', or 'No'
1.11.12	408	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	409	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	410	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	411	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.