



AML Survey – Completion Guide: Insurance

Document version: 1.2

Revision History:

Effective Date	Version Number	Revision Description
24 November 2022	1.0	Initial release of document
14 December 2022	1.1	Update to guidance for products and services questions.
31 July 2023	1.2	Updates to definitions, descriptions, explanations and questions.

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1 INTRODUCTION

The Cayman Islands Monetary Authority (the “Authority”) periodically undertakes sectoral ML/TF/PF and Sanctions 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 Survey 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 Survey Form and submit it through the Authority’s web-based e-mail survey software, to the Anti-Money Laundering Division (the “AML Division”). The AML Survey Form is issued in accordance with section 22(1)(b) of the Insurance Act, 2010.

This Guide provides support to FSPs which carry out insurance business, in accessing, completion and submission of the AML Survey – Insurance.

2 FORM INFORMATION

The AML Survey – Insurance is to be completed by each FSP holding an Insurance licence, who are commonly referred to as “Entity” for purposes of this form.

The AML Survey – Insurance is made up of two (2) sections for collecting AML risk data; the AML Inherent Risks and AML Controls.

3 ACCESSING AND SUBMITTING THE AML SURVEY

3.1 ACCESS TO THE AML SURVEY


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

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

The Authority is using the following entity contacts to distribute the AML Survey: Registered Office, AMLCO, MLROs, AML Officers of the Insurance Manager and other principal contacts. If an Entity is unsure of what their contact details are or to add additional contacts, they can contact the Authority at AMLSurveys@cima.ky.

To access the AML Survey:

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



Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

Confirm Account

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLI86VZVCRbBxmmm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYSoP%2Bk8rPURRSvrPSQt6JA5hgSaBaC6uvcZV4KB266HiFgh4FhAtaTNSa3IE3aiA%3D>

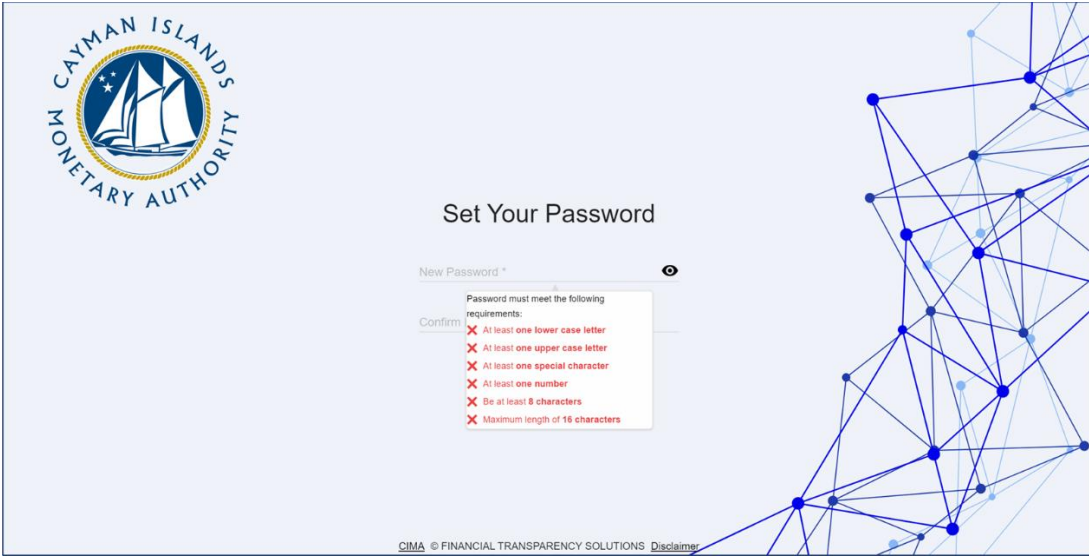
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

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

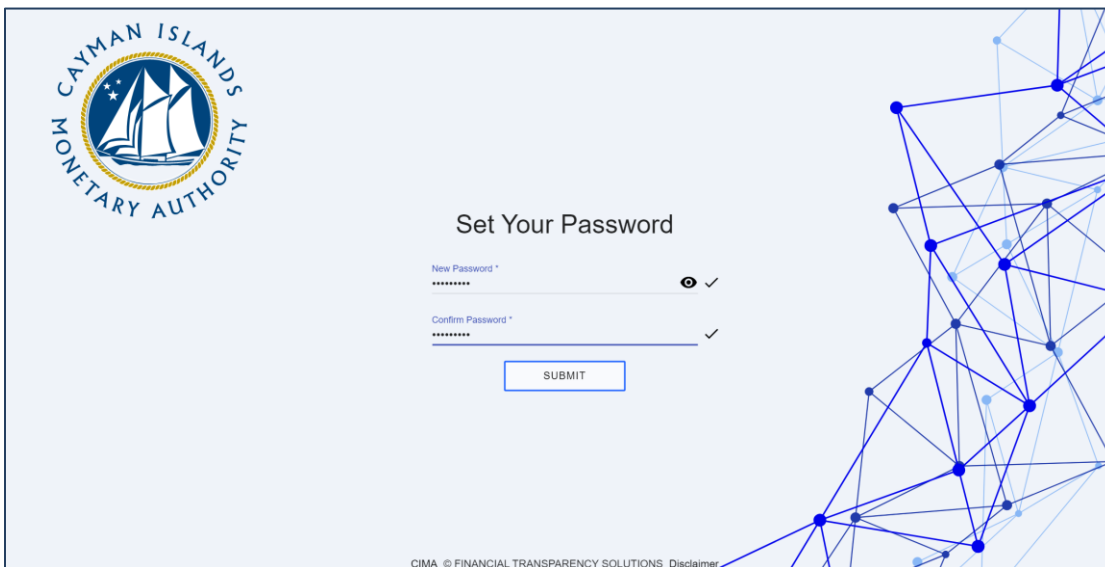
Disclaimer:
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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- The recipient will then be asked to create a password using uppercase, lowercase, number, and a special character. The password is required to be between 8 and 16 characters long.



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



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



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

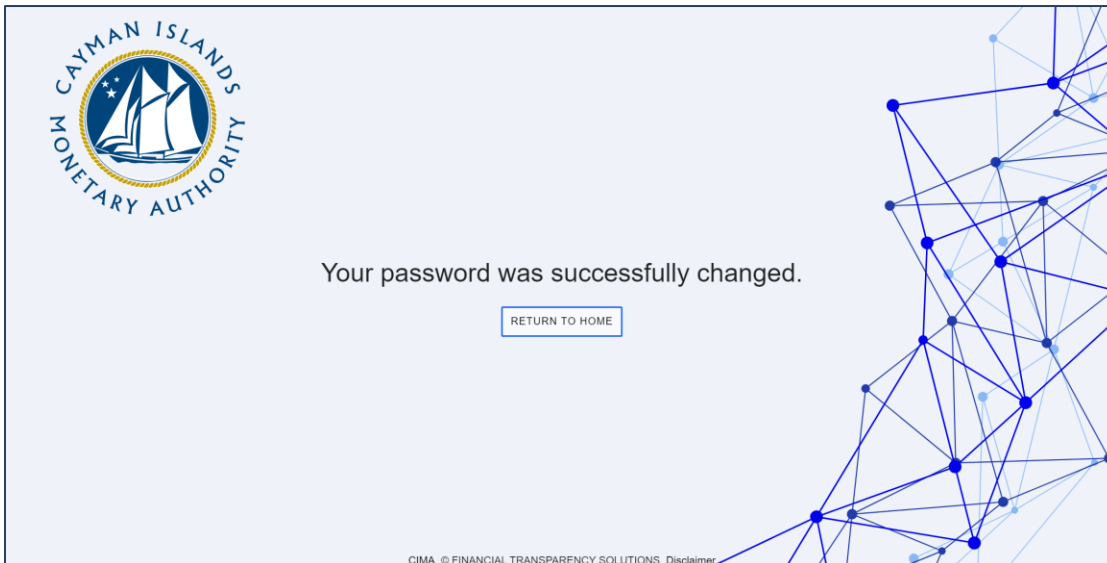
Please do not reply to this email, it is automatically generated.

Disclaimer:

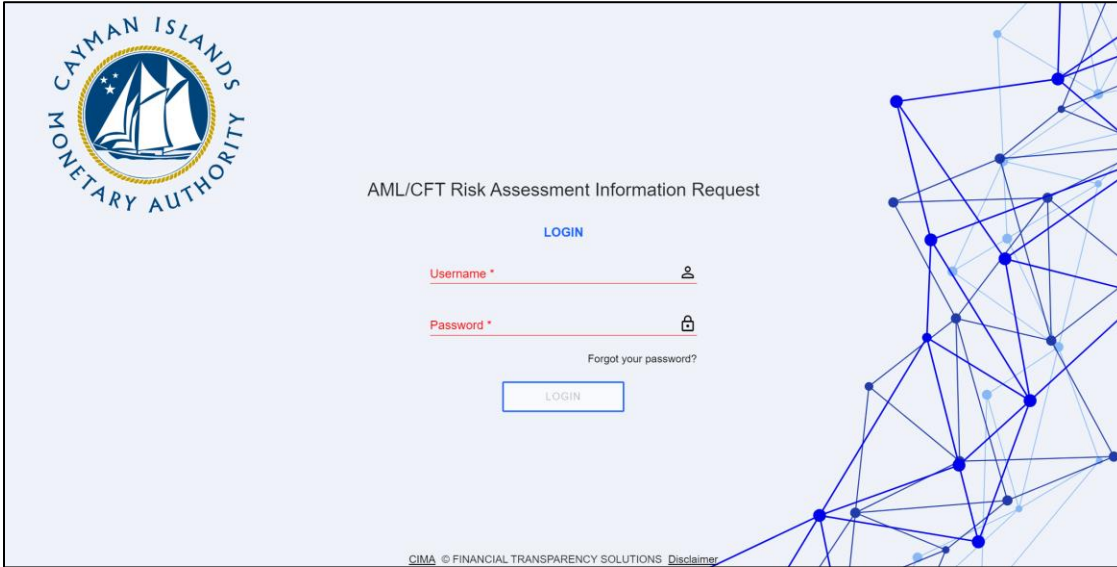
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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



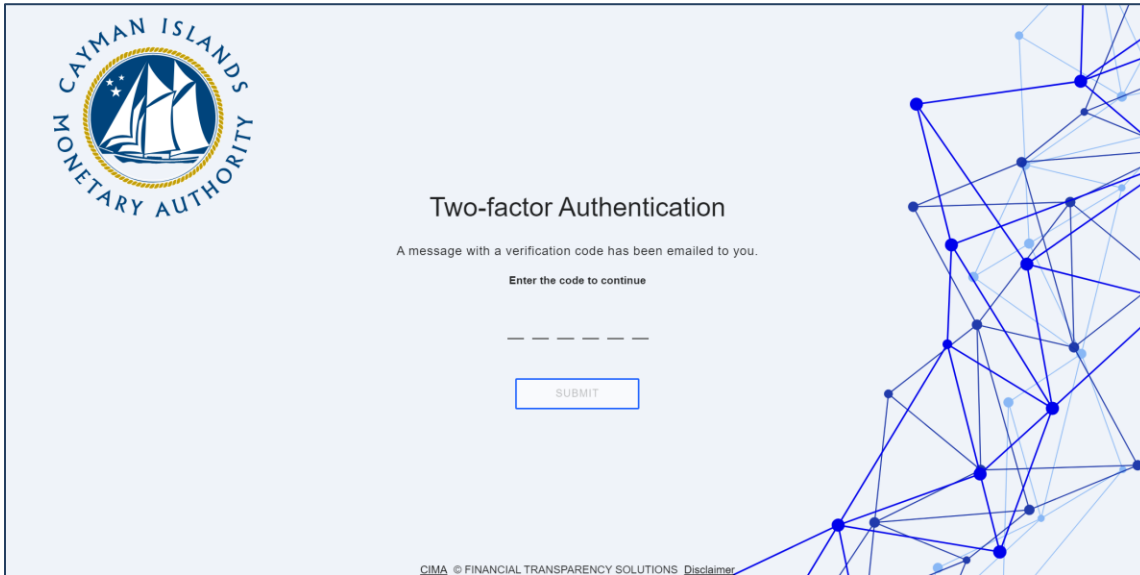
- 6. The recipient should then enter their username, which is their email address where they received the AML Survey invite, and the password they just created.



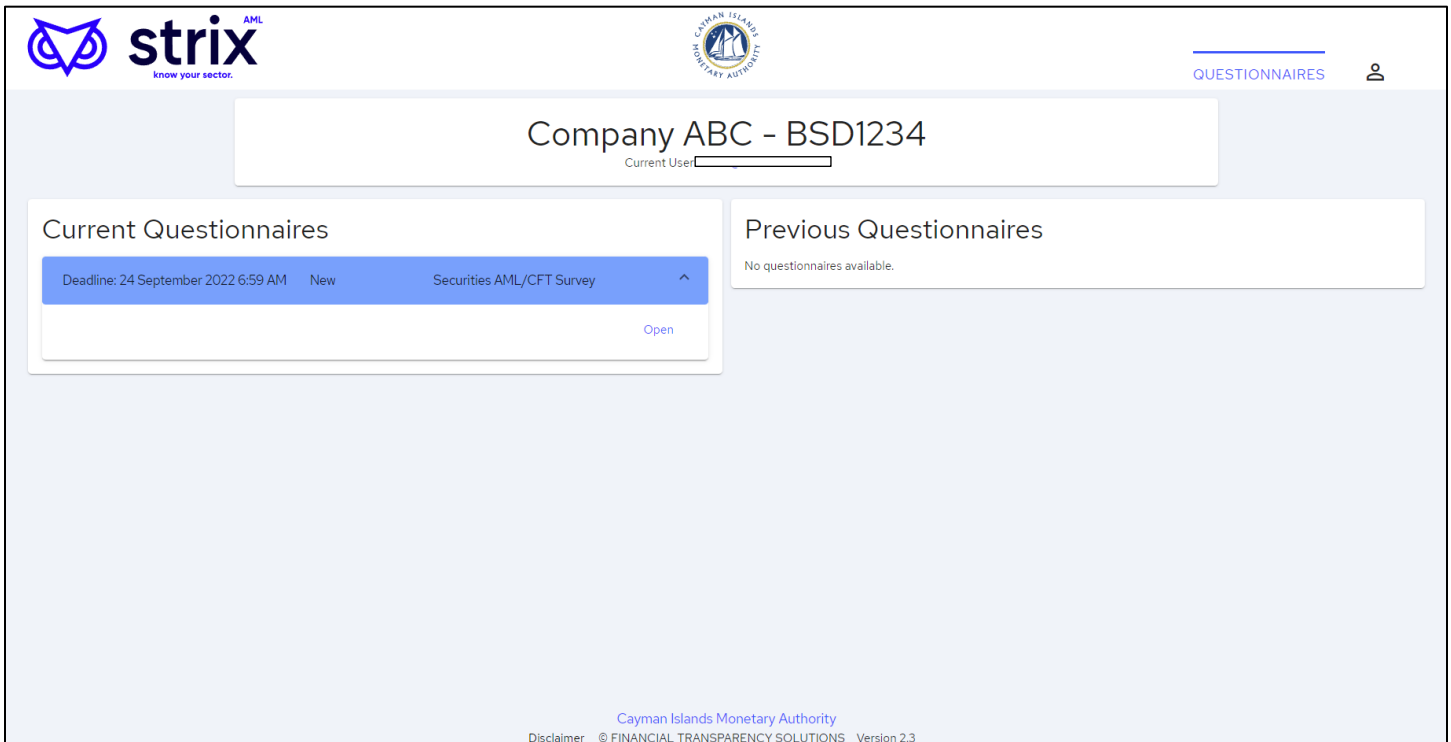
- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email



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



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



3.2 COMPLETING THE AML SURVEY FORM

1. Click the Current Questionnaire to access the AML Survey Form and start populating the form with the required data.
 - a. Completion guidance for the AML Survey is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Survey as many times as needed prior to the survey due date so long as the recipient selects 'Save'.
 - c. Once the AML Survey has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
 - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
 - e. Once the AML Survey is 'Submitted' an Excel and PDF copy of the completed survey will be available under 'Current Questionnaire'.
 - f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Survey 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.
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an 'Incomplete' AML Survey, they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLSurveys@cima.ky detailing the following:
 - i. Licence or Registration Name
 - ii. Licenced or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current directors
 - v. Number of Clients
 - vi. Reason for requesting to make an Incomplete Submission.
2. If a User receives or has access to more than one survey, they will see the additional survey(s) in the 'Current User' section of the web page. At the top of the page, where it shows the Entity's name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.
3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there were several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of imputing individual responses. To upload bulk entries for those country breakdown questions, please do the following:

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

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

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

In the event the AML Survey 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 AMLSurveys@cima.ky to request having their account re-activated.

4.2 INTERNET BROWSER

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

4.3 DATA AND SECURITY

The AML Survey, the auto-generated communication from STRIX, and the data collected from FSPs in the AML Survey are all maintained on-premise 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.

4.4 APPLICABLE FEES

There are no fees associated with this Form.

5 AML SURVEY GUIDANCE

Below are descriptions and explanations to the risk factors and controls factors you are required to provide information about. 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
AMLRs	Anti-Money Laundering Regulations, 2023 Revision, as amended.
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>Clients / Customers can be Natural Persons or Legal Persons and Arrangements.</p>
Controller	A person appointed to assume control of the affairs of a licensee or registrant.
Currency used for the Survey	<p>United States Dollars (US\$).</p> <p>All other currencies must be converted to US\$ unless otherwise stated.</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.
Direct - F2F	The engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Eligible Introducers	A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Exception Report	Exception report – a report that states those instances in which actual performance deviated significantly from expectations, usually in a negative direction. The intent of the report is to focus management’s attention on just those areas requiring immediate action. Examples of what an exception report may identify include 1) inadequate settings in screening software, 2) failures in staff training, and 3) data breach.
Fintech Service	A service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (Revised), except to the extent that it is modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions.
FRA	Financial Reporting Authority.

Gov / Pub Sector	Business conducted in or with Government or Public Sector.
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	<p>A high net worth individual (HNWI) is:</p> <p>(i) an individual whose net worth is at least CI\$800,000 (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 CI\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency.</p> <p>HNWIs are NOT Ultra HNWI and should not be double counted.</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 and Arrangement
Legal Person or Arrangement	<p>"Legal person" means a company or other entity created by operation of law with separate legal personality.</p> <p>"Legal arrangement" means a trust or partnership, foundation or other entity created between parties which lacks separate legal personality.</p>
ML/TF/PF	Money Laundering/Terrorism Financing/Proliferation Financing
Money Service Business (MSB)	<p>Money services business means the business of providing, in or from within the Islands, any of the following services:</p> <ol style="list-style-type: none"> money transmission. cheque cashing. currency exchange. 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	An individual who takes the role of company director, and they act in place of the company in that jurisdiction. The Nominee Director does not have any executive say or authority to run the company or make decisions on behalf of the company.
Nominee Shareholder	An individual who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-face-to-face	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.
OSP	<p>Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>
PEP	<p>“Politically Exposed Person” includes –</p> <ul style="list-style-type: none"> a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official. b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-

	<p>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> <p>Politically exposed persons also include:</p> <p>(i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership.</p> <p>(ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.</p>
Reporting Period	January 1 to 31 December 2022.
Source of Funds	<p>Source of funds is 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>
Special Economic Zone Business	Any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands.
Signatories	Signatories are those persons authorised to act on behalf of a client, for example, UBOs, Directors, or other Third Parties.
Targeted Financial Sanctions (TSF)	Consists of both asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury (“OFSI”).
Transaction	Events where services were engaged with or on behalf of a client. Services by licence type include but are not limited to:

	<ul style="list-style-type: none"> • Insurance Company – Payments of premiums, issuance or repayment of loans, premium withdrawals, and policy surrenders. • Insurance Manager – Provision of insurance manager services, provision of directorships, provision of other officer roles, provision of other services. • Agent – Provision of insurance agent services. • Broker – Provision of insurance broker services.
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.
UBO	<p>Ultimate Beneficial Owner - 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> <ul style="list-style-type: none"> a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person. b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person. c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement
Ultra HNWIs	Ultra-High Net Worth Individuals, also referred to as UHNWIs, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.
Value of Business	Based on the insurance licence held, the entity is to record the Value of Business transactions with clients as follows:

		<ul style="list-style-type: none"> • Insurance Company – Value of premiums; • Insurance Manager – Management fees and other income earned; • Insurance Agents – Commissions and fees collected from clients; and • Insurance Brokers – Commissions and fees collected
Value of Assets Under Management		The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio.
Virtual Asset Products and Services		Includes those services identified within the Virtual Asset (Service Providers) Act (2020 Revision) as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.
Timeframe	Assets Under Management	Value of AUM as at the end of the reporting period
Timeframe	Number of Clients	Number of clients as at the end of the reporting period.
Timeframe	Number of Transactions	Number of Transactions conducted for the client during the reporting period.

AML Inherent Risk Questions:

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers.	<p>Enter the total number of clients. This will include all customers on the entity's client list at the end of the reporting period. This number should include all clients the entity provides financial products and services.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p>

1.1.2	2	Total Transactions for the reporting period.	Enter the total number of all transactions conducted for clients during the reporting period.
1.1.3	3	Total Value of Business.	<p>Enter the total Value of Premiums/ Fees/ Commissions collected during the reporting period.</p> <ul style="list-style-type: none"> • Insurance Company - Premiums collected plus, for long term investment contracts, include the total assets under management at the end of the reporting period. • Insurance Manager - Management Fees • Insurance Agent - Fees and Commissions • Insurance Broker - Fees and Commissions
1.2.1	4	Does the entity have any clients that are Legal Persons or Arrangements?	Please answer 'Yes' or 'No'.
1.2.2	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 Arrangements as at the end of the reporting period.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.3	6	Number of Transactions - Legal Persons and Arrangements.	Enter the total number of transactions that were conducted by customers who are Legal Person and Arrangements.
1.2.4	7	Value of Business - Legal Persons and Arrangements.	Enter the total Value of Premiums / Commissions / Fees for clients who are Legal Persons or Arrangements, as at the end of the reporting period.
1.2.5	8	Total number of UBOs by country of nationality of the UBO.	Enter the total number of UBOs of all clients who are Legal Persons or Arrangements, broken down by the nationality of the UBO.
1.2.6	9	Does the entity have any clients that have UBOs that are directors of the client?	Please answer 'Yes' or 'No'.
1.2.7	10	Number of clients which have UBOs that are directors of the client.	Enter the total number of clients which have UBOs that are also directors of the client.
1.2.8	11	Does the entity have any clients that have UBOs that are Controllers of the client?	Please answer 'Yes' or 'No'.

1.2.9	12	Number of clients which have UBOs that are Controllers of the client.	Enter the total number of clients whose UBOs are also Controllers of the client.
1.2.10	13	Does the entity have any clients that have UBOs that are also senior managing officials of the client?	Please answer 'Yes' or 'No'.
1.2.11	14	Number of clients which have UBOs that are also senior managing officials of the client.	<p>Enter the total number of clients whose UBOs are also senior managing officials of the client.</p> <p>Senior managers are individuals at the highest level of organizational management who have the day-to-day responsibilities of managing a company or corporation. They hold specific executive powers conferred onto them by board of directors and/or the shareholders.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.12	15	Does the entity have any clients which have UBOs - HNWI's?	Please answer 'Yes' or 'No'.
1.2.13	16	Number of Clients which have UBOs - HNWI's.	<p>Enter the total number of clients who have UBOs that are HNWI's.</p> <p>HNWI's is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those assets valued at least CI\$4,000,000 (approx. US\$5,000,000).</p> <p><u>Do Not include</u> clients/customers with net worth equal to or greater than US\$30,000,000.</p> <p>If the entity does not have any clients that fit this category record a '0'</p>
1.2.14	17	Does the entity have any clients which have UBOs - Ultra HNWI's?	<p>Please answer 'Yes' or 'No'.</p> <p>UHNWI's is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p>
1.2.15	18	Number of Clients which have UBOs - Ultra HNWI's.	<p>Enter the total number of clients who have UBOs that are Ultra HNWI's.</p> <p>If the entity does not have any clients that fit this category record a '0'.</p>

1.2.16	19	Does the entity have any clients which have UBOs which are PEPs?	Please answer 'Yes' or 'No'.
1.2.17	20	Number of UBOs of clients which are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who have UBOs that are PEPs, broken down by nationality of the PEP.
1.2.18	21	Does the entity have any clients which have Nominees acting on behalf of a UBO?	Please answer 'Yes' or 'No'.
1.2.19	22	Number of clients which have Nominees appointed acting on behalf of a UBO, broken down by nationality of the UBO.	Enter the total number of clients which have nominees acting on behalf of UBOs, broken down by the nationality of the UBO.
1.3.1	23	Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director.	Enter the total number of clients which have nominees appointed on behalf of a director, broken down by the nationality of the director.
1.3.2	24	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are PEPs, broken down by nationality of the director / senior management.
1.3.3	25	Number of directors and/or senior management of clients who are High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are HNWIs. Do No include persons who are directors / senior management who are Ultra HNWIs.
1.3.4	26	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are Ultra HNWIs. Individuals whose net worth is greater than or equal to US\$30,000,000.
1.3.5	27	Number of directors and/or senior management of clients who are PEPs & HNWIs/ Ultra HNWIs.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs/ Ultra HNWIs, as at the end of the reporting period.

1.4.1	28	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	29	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are a Government or Public Sector, broken down by government jurisdiction.
1.4.3	30	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions conducted by clients that are Government or Public Sector during the reporting period.
1.4.4	31	Gov / Pub Sector - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period, for clients that are government or public sector.
1.4.5	32	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.6	33	NPO - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, that are NPOs.
1.4.7	34	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period, broken down by country of incorporation.
1.4.8	35	NPOs - Value of Business for the reporting period.	Enter the Value of premiums / commissions / fees collected during the reporting period, of clients that are NPOs.
1.4.9	36	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'. Answer 'Yes' if the entity has clients that have a Foundation within its structure. <i>Note that one client can fall under multiple categories within this 'Structure' section.</i>
1.4.10	37	Foundations - Number of Clients, broken down by the country of establishment of the client.	Enter the number of clients the entity has for this category.
1.4.11	38	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients for this category during the reporting period.

1.4.12	39	Foundations - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected from clients that are a Foundation, as at the end of the reporting period.
1.4.13	40	Does the entity have any clients that are Trusts?	Please answer 'Yes' or 'No'. Answer 'Yes' if the entity has clients that have a Trust within its structure. <i>Note that one client can fall under multiple categories within this 'Structure' section.</i>
1.4.14	41	Trusts - Number of Clients, broken down by country of formation of the client.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.4.15	42	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients for this category during the reporting period.
1.4.16	43	Trusts - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period, for clients that are Trusts.
1.4.17	44	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'. Answer 'Yes' if the entity has any clients which have a Segregated Portfolio Company within their structure. <i>Note that one client can fall under multiple categories within this 'Structure' section.</i>
1.4.18	45	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.4.19	46	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients, for this category, during the reporting period.
1.4.20	47	Segregated Portfolio Companies - Value of business collected for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period.
1.4.21	48	Does the entity have any clients that are from Special Economic Zone?	Please answer 'Yes' or 'No'. Answer 'Yes' if the entity has any clients which are a member of a Special Economic Zone.

			<i>Note that one client can fall under multiple categories within this 'Structure' section.</i>
1.4.22	49	Special Economic Zone - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.4.23	50	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients, for this category, during the reporting period.
1.4.24	51	Special Economic Zone - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period.
1.5.1	52	Does the entity have any clients that are Natural Persons?	Please answer 'Yes' or 'No'. This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.
1.5.2	53	Clients / customers that are Natural Persons, broken down by Nationality of the client.	Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period. If an entity does not have such clients, a '0' value should be used. <i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i>
1.5.3	54	Clients/customers that are Natural Persons, broken down by Residency of the client.	Enter the number of clients that are natural persons, broken down by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a '0' value should be used. <i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i>
1.5.4	55	Natural Persons - Total Transactions for the reporting period.	Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period. This category is specific to clients who are natural persons who have a direct business relationship with the entity.

			<p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients / customers that are Legal Persons and Arrangements.</i></p>
1.5.5	56	Value of Business - Natural Persons.	Enter the total value of Premiums / Commissions / Fees earned for clients that are Natural Persons as at the end of the reporting period.
1.5.6	57	Natural Person Clients - Does the entity have any clients that are PEPs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.7	58	Number of Natural Person clients who are PEPs, broken down by the nationality of the client.	<p>Enter the total number of Natural Person clients that are PEPs, broken down by the nationality of the client.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.8	59	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.
1.5.9	60	Does the entity have any Natural Person clients that are HNWIs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIs.</p>
1.5.10	61	Number of Natural Person clients who are HNWIs.	<p>Enter the number of Natural Person clients the entity has that are HNWIs.</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIs.</p>
1.5.11	62	Natural Person Clients - HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are HNWIs, during the reporting period.
1.5.12	63	Does the entity have any Natural Person clients that are Ultra HNWIs?	<p>Please answer 'Yes' or 'No'.</p> <p>Individuals whose net worth is equal to or greater than US\$30,000,000.</p>
1.5.13	64	Number of Natural Person clients who are Ultra HNWIs.	Enter the number of Natural Person clients the entity has that are Ultra-

			HNWIs at the end of the reporting period.
1.5.14	65	Natural Person Clients - Ultra HNWI's- Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are Ultra HNWI's, during the reporting period.
1.5.15	66	Does the entity have any Natural Person clients that are PEPs and HNWI's /Ultra HNWI's?	Please answer 'Yes' or 'No'.
1.5.16	67	Number of Natural Person clients who are PEPs and HNWI's / Ultra HNWI's.	Enter the number of Natural Person clients the entity has that are both PEPs and HNWI's / Ultra HNWI's, at the end of the reporting period.
1.5.17	68	Natural Person Clients - PEPs and HNWI's / UHNWI's - Number of Transactions.	Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWI's/Ultra HNWI's, during the reporting period.
1.6.1	69	Total Number of Beneficiaries, Natural and Legal Persons.	Enter the Total Number of Beneficiaries, for clients that are Natural and Legal Persons.
1.6.2	70	Number of Beneficiaries Clients that are Natural Persons.	Enter the Number of Beneficiaries for Clients that are Natural Persons.
1.6.3	71	Number of Beneficiaries Clients that are Corporations.	Enter the Number of Beneficiaries for Clients that are Corporations.
1.6.4	72	Number of Beneficiaries Clients that are Corporate Group Structures.	Enter the Number of Beneficiaries for Clients that are Corporate Group Structures.
1.6.5	73	Number of Beneficiaries Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary.	Enter the Number of Beneficiaries for Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary.
1.6.6	74	Number of Beneficiaries Clients that are NPOs.	Enter the Number of Beneficiaries for Clients that are NPOs.
1.6.7	75	Number of Beneficiaries Clients that are Trusts.	Enter the Number of Beneficiaries for Clients that are Trusts.
1.6.8	76	Number of Beneficiaries Clients that are Foundations.	Enter the Number of Beneficiaries for Clients that are Foundations.

1.6.9	77	Number of Beneficiaries Clients that are PEPs, broken down by nationality of the Beneficiary.	Enter the Number of Beneficiaries for Clients that are PEPs, broken down by nationality of the Beneficiary.
1.7.1	78	<p>Nature of Business / Source of Funding:</p> <p>Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> • Banking Institutions exc. MSBs • Other Financial regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech <p><i>*excluding MSBs, Virtual Assets Products and Services and TCSPs.</i></p>	Enter the total number of clients which fall within the list of sectors, broken down by nationality or country of incorporation of the clients, as at the end of the reporting period.
1.7.2	79	Does the entity have any clients that are legal persons or arrangements, operating as Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.7.3	80	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs).
1.7.4	81	Does the entity have any clients that are legal persons or arrangements operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated	Please answer 'Yes' or 'No'.

		Businesses not listed in this section?	
1.7.5	82	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above.
1.7.6	83	Does the entity have any clients that are legal persons or arrangements operating in Financial Leasing, or natural persons employed by Financial Leasing?	Please answer 'Yes' or 'No'.
1.7.7	84	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Financial Leasing companies or natural persons that are employed by Financial Leasing companies.
1.7.8	85	Does the entity have any clients that are legal persons or arrangements operating as Money Lending, or natural persons employed by Money Lending?	Please answer 'Yes' or 'No'.
1.7.9	86	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are Money Lending institutions, and / or natural persons that are employed by Money Lending institutions.
1.7.10	87	Does the entity have any clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or natural persons employed as Accountants?	Please answer 'Yes' or 'No'.
1.7.11	88	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants

			(Audit / Assurance / Bookkeeping / Insolvency).
1.7.12	89	Does the entity have any clients that are legal persons or arrangements operating in the Fintech industry, or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.7.13	90	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry.
1.7.14	91	<p>Nature of Business / Source of Funding: Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors, broken down by nationality, country of incorporation / formation of the clients:</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Services Business (MSBs) ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	Enter the total number of clients which fall within the list of sectors, broken down by nationality, country of incorporation / formation of the clients, as at the end of the reporting period.
1.7.15	92	Does the entity have any clients that are legal persons or arrangements operating as Legal Practitioners, or natural persons employed as Legal Practitioner?	Please answer 'Yes' or 'No'
1.7.16	93	Legal Practitioners – Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by a Legal Practitioner.

1.7.17	94	Does the entity have any clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, or natural persons employed by Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'
1.7.18	95	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.7.19	96	Does the entity have any clients that are legal persons or arrangements operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.7.20	97	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Money Services Business, and / or are natural persons that are employed in the Money Services Business.
1.7.21	98	Does the entity have any clients that are legal persons or arrangements offering Virtual Asset products or services or natural persons employed by or earning income from Virtual Asset products or services?	Please answer 'Yes' or 'No'.
1.7.22	99	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements offering virtual assets products and services, and natural persons that are employed by institutions which offer virtual assets products and services.
1.7.23	100	Does the entity have any clients that are legal persons or arrangements operating as High Value Dealers or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.

1.7.24	101	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.7.25	102	Does the entity have any clients that are legal persons or arrangements operating as TCSPs, or natural persons employed by TCSPs?	Please answer 'Yes' or 'No'.
1.7.26	103	Trusts, Company Managers, or Corporate Service Providers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as a TCSP, and natural persons that are employed by TCSPs.
1.7.27	104	Does the entity have any clients that are legal persons or arrangements operating in the Import / Export Industry, or natural persons employed by the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.7.28	105	Import / Export - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Import / Export business, and natural persons that are employed in the Import / Export industry.
1.7.29	106	Does the entity have any clients that are legal persons or arrangements operating in the Shipping and Transport of Goods industry, or natural persons employed by the Shipping and Transport of Goods industry?	Please answer 'Yes' or 'No'.
1.7.30	107	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Shipping and Transport of Goods business, and natural persons that are employed within the Shipping and Transport of Goods industry.
1.7.31	108	Nature of Business / Source of Funding:	Provide the total number of clients which fall within the list of sectors, broken down by nationality or country

		<p>Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors, broken down by nationality, or country of incorporation / formation of the clients:</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 	of incorporation / formation of the clients, as at the end of the reporting period.
1.7.32	109	Does the entity have any clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, or natural persons employed as Real Estate Agents / Brokers?	Please answer 'Yes' or 'No'.
1.7.33	110	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.7.34	111	Does the entity have any clients that are legal persons or arrangements operating in the Gambling business (including online gambling), or natural persons employed or earning income in the Gambling business?	Please answer 'Yes' or 'No'.
1.7.35	112	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are in the Gambling business (including online gambling), and natural persons that are employed

			in the Gambling business (including online gambling).
1.7.36	113	Does the entity have any clients that are legal persons or arrangements operating in the Adult Entertainment industry, or natural persons employed or earning income in the Adult Entertainment industry?	Please answer 'Yes' or 'No'.
1.7.37	114	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry.
1.7.38	115	Does the entity have any clients that are legal persons or arrangements operating in the Defence Industry, or natural persons employed by the Defence Industry?	Please answer 'Yes' or 'No'.
1.7.39	116	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.7.40	117	Does the entity have any clients that are legal persons or arrangements operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.7.41	118	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.7.42	119	Does the entity have any clients that are legal persons or arrangements operating in the Mining Industry, or natural persons employed by the Mining Industry?	Please answer 'Yes' or 'No'.

1.7.43	120	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.7.44	121	Does the entity have any clients that are legal persons or arrangements operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.7.45	122	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry.
1.7.46	123	Does the entity have any clients that are legal persons or arrangements operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.7.47	124	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.7.48	125	Does the entity have any clients that are legal persons or arrangements operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry?	Please answer 'Yes' or 'No'.
1.7.49	126	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in Cannabis Production & Distribution Business, and natural persons that are employed in

			the Cannabis Production & Distribution industry.
1.7.50	127	Does the entity have any clients that are legal persons or arrangements of Unknown Businesses, or natural persons employed in Unknown Professions or Industries?	Please answer 'Yes' or 'No'.
1.7.51	128	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions. Unknown business and profession are where the entity does not know, was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.
1.7.52	129	Does the entity have any clients where the nature of business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.7.53	130	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in known businesses, not mentioned above, or natural persons that are employed in known businesses/industries, not mentioned above.
1.8.1	131	<p>Source of Funds – Value of Client Assets.</p> <p>Please provide the total value of client assets for clients that are legal persons or arrangements of, or are natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> ▪ Banking Institutions exc.MSBs ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech 	<p>Enter the total value of client assets under management, of the clients that are legal persons or arrangements operating as, and natural persons employed in the listed sectors.</p> <p>If there are no client assets under management, please record '0'.</p>

		<i>*excluding MSBs, Virtual Asset Products and Services, Trusts, Company Managers, or Corporate Service Providers.</i>	
1.8.2	132	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs).
1.8.3	133	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Other Financial Regulated Business, not already mentioned in this section, and natural persons that are employed in these Other Financial Regulated Business.
1.8.4	134	Financial Leasing - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business.
1.8.5	135	Money Lending- Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Money Lending business, and natural persons that are employed by Money Lending businesses.
1.8.6	136	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.8.7	137	Fintech - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed in the Fintech industry.

1.8.8	138	<p>Source of Funds – Value of Client Assets.</p> <p>Please provide the total value of client assets under management, from clients that are legal persons or arrangements of, or are natural persons employed in the following sector:</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ MSBs ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ Trusts, Company Managers or Corporate Service Providers ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	Enter the total value of client assets under management, of the clients that are legal persons or arrangements of, and are natural persons employed in the listed sectors.
1.8.9	139	Legal Practitioners – Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.8.10	140	Dealers in Precious Metals and Stones- Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.8.11	141	Money Services Business - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Money Services Business, and natural persons that are employed in the Money Services Business.
1.8.12	142	Virtual Asset Products and Services - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements offering virtual asset products and services, and natural persons that are employed by providers or earning income through virtual asset products and services.

1.8.13	143	High Value Dealers - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.8.14	144	Trusts, Company Managers and Corporate Service Providers - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as TCSPs, and natural persons that are employed by TCSPs.
1.8.15	145	Import / Export Industry – Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Import / Export Industry, and natural persons that are employed by the Import / Export Industry.
1.8.16	146	Shipping and Transport of Goods - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Shipping and Transport of Goods, and natural persons that are employed by the Shipping and Transport Industry.
1.8.17	147	<p>Source of Funds – Value of Client Assets</p> <p>Please provide the total value of client assets under management from clients that are legal persons or arrangements of, or are natural persons employed in, the following sector:</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 ▪ Unknown Sector / Industry (not recorded) 	Enter the total value of client assets under management, of the clients that are legal persons or arrangements of, and are natural persons employed in the listed sectors.

1.8.18	148	Real Estate Agents / Brokers - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.8.19	149	Gambling Business (including online gambling) - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in Gambling business (including online gambling), and natural persons that are employed in, or earning income, in the Gambling business (including online gambling).
1.8.20	150	Adult Entertainment - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business.
1.8.21	151	Defence Industry - Value of Client Assets.	Enter the value of assets under management, of clients that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.8.22	152	Oil and Gas Industry - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.8.23	153	Mining Industry - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.8.24	154	Construction / Development - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Construction / Development business, and natural persons that are employed in the Construction / Development industry.

1.8.25	155	Retail & Restaurant Business - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.8.26	156	Cannabis Production & Distribution - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Cannabis Production & Distribution business, and natural persons that are employed in the Cannabis Production & Distribution business.
1.8.27	157	Industry / profession not known or not recorded - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in unknown or unrecorded Industries / Professions, and natural persons that are employed in unknown or unrecorded Industries / Professions.
1.8.28	158	Other - Not listed above - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in Known Businesses /industries/ Professions not listed above, and natural persons that are employed in Known Businesses / Industries / Professions, not listed above.
1.9.1	159	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.9.2	160	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	161	Does the entity provide any products / services related to Professional Indemnity insurance?	Please answer 'Yes' or 'No'.
2.1.2	162	Professional Indemnity – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Professional Indemnity, broken down by the country of the insured.
2.1.3	163	Professional Indemnity - Value of Business.	Enter the Value of Premiums / Commissions / Fees collected from

			clients provided products related to Professional Indemnity.
2.1.4	164	Does the entity provide any products / services related to Life & Annuity?	Please answer 'Yes' or 'No'.
2.1.5	165	Life & Annuity - Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Life & Annuity, broken down by the country of the insured.
2.1.6	166	Life & Annuity - Value of Business.	Enter the Value of Premiums / Commissions / Fees collected for products related to Life & Annuity, which the entity provides to clients, as at the end of the reporting period.
2.1.7	167	Life & Annuity - Value of Policyholder Assets.	Enter the Value of Policyholder Assets for products related to Life & Annuity, the entity provides to clients, as at the end of the reporting period. If the entity is not an insurance company or this question is not applicable enter '0'
2.1.8	168	Life & Annuity – Reinsurance – Is all activity transacted for this line of business reinsurance coverage?	Enter 'Yes' or 'No' Responding 'Yes' means this business activity falls under reinsurance transactions by the entity. If less than 100% reinsurance include the percentage in the Feedback section.
2.1.9	169	Does your entity provide any products / services related to Collateralized Insurance?	Please answer 'Yes' or 'No'. Includes those Class C insurer licences who are collateralised by funding sources which include the issuance of bonds or other instruments, contracts for differences and such other funding mechanisms which fall under investment products.
2.1.10	170	Collateralized Insurance – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Collateralized Insurance, broken down by the country of the insured.
2.1.11	171	Collateralized Insurance - Value of business.	Enter the Value of Premiums / Commissions / Fees from products related to Collateralized Insurance, which the entity provides to clients, as at the end of the reporting period.

2.1.12	172	Does your entity provide any products / services related to Long Term Disability, AD&D, Critical Illness +5 years?	Please answer 'Yes' or 'No'.
2.1.13	173	Long Term Disability, AD&D, Critical Illness +5 years – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Long Term Disability, AD&D, Critical Illness +5 years, broken down by the country of the insured.
2.1.14	174	Long Term Disability, AD&D, Critical Illness +5 years – Value of business.	Enter the Value of Premiums / Commissions / Fees from products related to Long Term Disability, AD&D, Critical Illness +5 years, which the entity provides to clients, as at the end of the reporting period.
2.1.15	175	Long Term Disability, AD&D, Critical Illness +5 years – Is all activity transacted for this line of business reinsurance?	Enter 'Yes' or 'No' Responding 'Yes' means this business activity falls under reinsurance transactions by the entity. If less than 100% reinsurance include the percentage in the Feedback section.
2.1.16	176	Does your entity provide any products / services related to Other Long-Term Health +5 years?	Please answer 'Yes' or 'No'.
2.1.17	177	Other Long-Term Health +5 years – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Other Long-Term Health +5 years, broken down by the country of the insured.
2.1.18	178	Other Long-Term Health +5 years - Value of Business.	Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Health +5 years, which the entity provides to clients, as at the end of the reporting period.
2.1.19	179	Other Long-Term Health +5 years - Is all activity transacted for this line of business reinsurance?	Enter 'Yes' or 'No' Responding 'Yes' means this business activity falls under reinsurance transactions by the entity. If less than 100% reinsurance include the percentage in the Feedback section.

2.1.20	180	Does the entity provide any products / services related to Coverage of Market Outcome?	Please answer 'Yes' or 'No'.
2.1.21	181	Coverage of Market Outcome – Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Coverage of Market Outcome, broken down by the country of the insured.
2.1.22	182	Coverage of Market Outcome - Value of business	Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Market Outcome, which the entity provides to clients, as at the end of the reporting period.
2.1.23	183	Does your entity provide any products / services related to Coverage of Legal Outcome?	Please answer 'Yes' or 'No'.
2.1.24	184	Coverage of Legal Outcome – Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Coverage of Legal Outcome, broken down by the country of the insured.
2.1.25	185	Coverage of Legal Outcome - Value of Business	Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Legal Outcome, which the entity provides to clients, as at the end of the reporting period.
2.1.26	186	Does your entity provide any products / services related to Pension Coverage?	Please answer 'Yes' or 'No'.
2.1.27	187	Pension Coverage- Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Pension Coverage, broken down by the country of the insured.
2.1.28	188	Pension Coverage - Value of Business	Enter the Value of Premiums / Commissions/ Fees from products related to Pension Coverage, which the entity provides to clients, as at the end of the reporting period.
2.1.29	189	Pension Coverage - Is all activity transacted for this line of business reinsurance?	Enter 'Yes' or 'No' Responding 'Yes' means this business activity falls under reinsurance transactions by the entity. If less than 100% reinsurance include the percentage in the Feedback section.

2.1.30	190	Does your entity provide any products / services related to Hull Coverage?	Please answer 'Yes' or 'No'.
2.1.31	191	Hull Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Hull Coverage, broken down by the country of the insured.
2.1.32	192	Hull Coverage - Value of Business	Enter the Value of Premiums / Commissions / Fees from products related to Hull Coverage, which the entity provides to clients, as at the end of the reporting period.
2.1.33	193	Does your entity provide any products / services related to Aviation coverage?	Please answer 'Yes' or 'No'.
2.1.34	194	Aviation Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Aviation Coverage, broken down by the country of the insured.
2.1.35	195	Aviation Coverage - Value of Business.	Enter the Value of Premiums / Commissions / Fees from products related to Aviation Coverage, which the entity provides to clients, as at the end of the reporting period.
2.1.36	196	Does your entity provide any Products with Loan Features?	Please answer 'Yes' or 'No'. Loans include promissory notes.
2.1.37	197	Loan Features - Number of active loans at the end of the reporting period, broken down by country of the borrower.	Enter the number of active loans the entity processed for or on behalf of customers, related parties or third parties, broken down by the country of the insured.
2.1.38	198	Loan Features - Value of active loans	Enter the value of loans issued by the entity, including for or on behalf of clients, for the reporting period.
2.1.39	199	Does your entity provide any products / services relating to Early Surrenders?	Please answer 'Yes' or 'No'.
2.1.40	200	Early Surrenders - Number of clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Loan Features, broken down by the country of the insured.

2.1.41	201	Early Surrenders - Value of Surrenders for the reporting period.	Enter the Value of Premiums / Commissions / Fees from products related to Early Surrenders, which the entity provides to clients, as at the end of the reporting period.
2.1.42	202	Does your entity provide any Other Long-Term Coverage insurance products / services not included in the above questions?	Please answer 'Yes' or 'No'.
2.1.43	203	Other Long-Term Coverage - Number of clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Other Long-Term Coverages, broken down by the country of the insured.
2.1.44	204	Other Long-Term Coverage - Value of Business	Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Coverage, which the entity provides to clients, as at the end of the reporting period.
2.2.1	205	Does the entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.2.2	206	Physical Cash - Number of Clients.	Enter the number of clients which made payments in the form of Physical Cash during the reporting period.
2.2.3	207	Physical Cash - Number of Transactions.	Enter the number of Physical Cash transactions conducted by clients during the reporting period.
2.2.4	208	Physical Cash - Value of Funds Transferred.	Enter the value of the Physical Cash transactions conducted by clients during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity.
2.2.5	209	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.2.6	210	Virtual Currencies - Number of Clients.	Enter the number of clients which had payments in the form of Virtual Currency during the reporting period.

2.2.7	211	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions conducted by clients during the reporting period.
2.2.8	212	Virtual Currencies - Value of Funds Transferred.	Enter the value of the Virtual Currency transactions conducted by clients during the reporting period.
2.2.9	213	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.2.10	214	Third Parties - Number of Clients.	Enter the number of clients which conducted payments via Third Parties during the reporting period. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction.
2.2.11	215	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions conducted by clients during the reporting period.
2.2.12	216	Third Parties - Value of Funds Transferred.	Enter the value of the Third-Party transactions conducted by clients during the reporting period.
2.2.13	217	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.2.14	218	Credit Card Payments - Number of Clients	Enter the number of clients which made payments via Credit Card during the reporting period.
2.2.15	219	Credit Card Payments - Number of Transactions.	Enter the number of Credit Card transactions conducted by clients during the reporting period.
2.2.16	220	Credit Card Payments - Value of Funds Transferred.	Enter the value of Credit Card transactions conducted by clients during the reporting period.
2.2.17	221	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.2.18	222	Wire Transfers - Number of Clients.	Enter the number of clients which made payments in the form of Wire Transfers during the reporting period.

2.2.19	223	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions conducted by clients during the reporting period.
2.2.20	224	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.2.21	225	Does your entity facilitate payments of Clients in the form of Transfer of securities?	Please answer 'Yes' or 'No'.
2.2.22	226	Transfer of securities - Number of Clients.	Enter the number of clients which facilitated payments via transfer of securities, during the reporting period.
2.2.23	227	Transfer of securities- Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, relating to transfer of securities.
2.2.24	228	Transfer of securities- Value of Transactions.	Enter the value of transactions relating to payments via Transfer of securities, conducted by clients during the reporting period.
2.2.25	229	Does your entity facilitate payments of Clients in Other Forms of Payment not mentioned above?	Please answer 'Yes' or 'No'.
2.2.26	230	Other Forms of Payment - Number of Clients.	Enter the number of clients who made payments using other forms of payment not listed above, during the reporting period.
2.2.27	231	Other Forms of Payment - Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, using other forms of payment other than the ones listed above.
2.2.28	232	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were transferred by clients using other forms of payments, during the reporting period.
2.2.29	233	Please indicate the types of other forms of payments.	List the other forms of payment conducted by clients during the reporting period, which are not listed above.

2.3.1	234	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated. These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.
2.3.2	235	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, during the reporting period, broken down by country of origin of the funds. These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.
2.3.3	236	Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination.	Enter the total value of funds transferred out by clients, broken down by the country of payment destination.
2.3.4	237	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of transactions relating to outward transfers by the clients, or on behalf of clients, broken down by country of destination of the transaction.
2.4.1	238	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.4.2	239	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Please include 'N/A' if no comment.
3.1.1	240	Number of Clients - Direct - F2F.	Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period. F2F channels include: Direct-F2F, Referrals within Group – F2F, Eligible Introducers – F2F, and Other Introducers-F2F.
3.1.2	241	Number of Clients - Direct - Non-F2F.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and

			<p><u>not only</u> those onboarded during the reporting period.</p> <p>Examples of Direct Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have Direct F2F contact with the clients.</p>
3.1.3	242	Total number of clients via Online Platforms.	Provide the total number of clients, in the <u>entity's entire portfolio</u> , that were onboarded via Online platforms, and not only those onboarded during the reporting period.
3.1.4	243	Number of Clients through Referrals within Group - F2F.	<p>Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the UBOs nationality.</p> <p>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.</p>
3.1.5	244	Number of Clients through Referrals within Group - Non F2F.	<p>Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the UBOs.</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	245	Number of Clients onboarded through Eligible Introducers.	<p>Total clients in the entity's <u>entire portfolio</u> that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients' identity.</p> <p>An Eligible Introducer is a person who falls within one of the categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.</p>
3.1.7		Number of Clients through Eligible Introducers.	Enter the number of clients which were onboarded through Eligible Introducers,

	246		during the reporting period, broken down by the nationality of the UBO.
3.1.8	247	Number of Clients through Other Introducers - Non-F2F.	Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the UBOs.
3.1.9	248	Number of Clients via Online Platforms.	Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the UBO.
3.2.1	249	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	250	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 cases where the AML Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	251	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer as at the end of the reporting period.
3.2.4	252	How many AML Compliance Officers has the entity had within the past 3 years?	If no turnover of the Compliance Officer role in the three-year period, answer "1".
3.2.5	253	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	254	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

			<ul style="list-style-type: none"> • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	255	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	256	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover within the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	257	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	258	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 cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.11	259	What was the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period?	Enter the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period.
3.2.12	260	How many Deputy Money Laundering Reporting Officers have you had in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	261	Has the entity outsourced the function of Targeted Financial	Please answer 'Yes' or 'No'.

		Sanction screening within the reporting period?	
3.2.14	262	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 cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.</p>
3.2.15	263	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.16	264	How many TFS Screening platforms / software did the entity have in the past 3 years?	If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	265	Has the entity outsourced the function of transaction or client monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	266	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship of the transaction monitoring function:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.</p>
3.2.19	267	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	268	How many Transaction monitoring platforms / software did the entity have in the past 3 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	269	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.3.2	270	In which countries, by percentage of equity ownership, are all shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Enter the countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.3	271	Number of Branches, broken down by country of operation.	Enter the number of branches the entity has, broken down by country of operation.
3.3.4	272	Number of Subsidiaries, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.
3.3.5	273	In which country is the parent or holding company incorporated?	Enter the country in which the parent or holding company is incorporated.
3.4.1	274	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	275	Please use this area to provide any comments or feedback for this tab.	Use this area to provide any comments or feedback for this tab. Please enter 'NA' if no comment.

AML Controls Factors Description:

No.	Question No.	Question	Description/Explanation
1.1.1	276	The total number of Directors / Members of the Governing Body.	Enter the total number of Directors / Members of the Governing Body of the institution?
1.1.2	277	Indicate the number of Independent Directors / Non-Executive Directors.	Enter the number of Directors / Members of the Governing Body that

			<p>are Independent Directors/Non-Executive Directors?</p> <p>An Independent Directors/Non-Executive Directors is an individual who is a director (member) of the board of directors who does not have a material or pecuniary relationship with the entity or related persons and provides independent oversight and constructive challenge to the executive directors.</p>
1.1.3	278	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.4	279	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.5	280	Does the approved Charter include the roles and responsibilities of the Directors/General Partners/Managers?	Please answer 'Yes' or 'No'.
1.1.6	281	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	282	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF and Sanctions risks and issues?	Please answer 'Yes' or 'No'.
1.1.8	283	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.9	284	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'.
1.1.10	285	When was the last Board/Principal and/or Board committee meeting held which discussed AML/CFT/CPF, including regulatory audit findings?	Enter the Date of the last Board/Principal and/or Board committee meeting, which discussed AML/CFT/CPF, including regulatory audit findings.
1.1.11	286	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'.
1.1.12	287	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.
1.1.13	288	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors or Senior Management a PEP?	Please answer 'Yes' or 'No'.
1.2.1	289	Is there regular reporting of AML/CFT/CPF and Sanctions matters by Senior Management to the board?	Please answer 'Yes' or 'No'.
1.2.2	290	What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?	Enter how often, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board by Senior Management.
1.2.3	291	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.2.4	292	When was the last review of the AML/CFT/CPF and Sanctions policies and procedures?	Enter the date of the last review of the AML/CFT/CPF and Sanctions policies and procedures.
1.2.5	293	Does Senior Management ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.2.6	294	Does Senior Management ensure that relevant, adequate, and timely information regarding AML/CFT/CPF and Sanctions matters is provided to the Board?	Please answer 'Yes' or 'No'.
1.2.7	295	Does Senior Management ensure that ML/TF/PF business risk assessments are done prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.2.8	296	How many risk assessments relating to new products/services/delivery channels/technologies did the entity carry out during the period under review?	Enter the total number of risk assessments relating to new products/services/delivery channels/technologies that were carried out during the period under review.
1.2.9	297	Does Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.

1.2.10	298	How many trainings did the AMLCO/MLRO/DMLRO attend for the reporting period?	Enter the total number of trainings the AMLCO/MLRO/DMLRO attended during the reporting period.
1.3.1	299	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.3.2	300	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.3.3	301	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.3.4	302	Is the AMLCO employed at a managerial level of the entity?	Please answer 'Yes' or 'No'.
1.3.5	303	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.6	304	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.7	305	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.3.8	306	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.3.9	307	Has the AMLCO received specialised AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.10	308	Has the MLRO received specialised AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.11	309	Has the DMLRO received specialised AML/CFT/CPF and sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.12	310	Does the AMLCO report to the Board and Senior Management 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'.
1.3.13	311	Does the MLRO report to the Board and Senior Management on AML/CFT/CPF and Sanctions related issues on the adequacy of the	Please answer 'Yes' or 'No'.

		AML/CFT/CPF and Sanctions framework?	
1.3.14	312	Does the DMLRO report to the Board and Senior Management on AML/CFT/CPF and Sanctions related issues?	Please answer 'Yes' or 'No'.
1.3.15	313	Does the AMLCO provide oversight of risk assessment procedures?	Please answer 'Yes' or 'No'.
1.3.16	314	Does the AMLCO conduct AML/CFT/CPF and Sanctions training for all Directors and relevant staff of the entity?	Please answer 'Yes' or 'No'.
1.3.17	315	How many internal trainings did the AMLCO conduct or organize for staff and directors during the reporting period?	Enter the number of internal trainings that were conducted by the AMLCO during the reporting period.
1.3.18	316	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.19	317	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'. Exception report – a report that states those instances in which actual performance deviated significantly from expectations, usually in a negative direction. The intent of the report is to focus management's attention on just those areas requiring immediate action. Examples of what an exception report may identify include 1) inadequate settings in screening software, 2) failures in staff training, and 3) data breach.
1.3.20	318	How many sample testing and reviews of exception reports did the AMLCO do during the period under review?	Enter the number of sample testing and reviews of exception reports that were conducted by the AMLCO, during the period under review.
1.3.21	319	Does the AMLCO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.22	320	What percentage of time does the AMLCO spend on additional functions?	Enter the percentage of time the AMLCO spends on additional functions outside of the compliance function.

1.3.23	321	Does the MLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.24	322	What percentage of time does the MLRO spend on additional functions?	Enter the percentage of time the MLRO spends on additional functions outside of reviewing internal SARs, investigating SARs and filing SARs to the FRA.
1.3.25	323	Does the DMLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.26	324	What percentage of time does the DMLRO spend on additional functions?	Enter the percentage of time the DMLRO spends on additional functions outside of reviewing internal SARs, investigating SARs and filing SARs to the FRA.
1.4.1	325	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	326	Is there an Internal AML Audit Charter/Plan?	Please answer 'Yes' or 'No'.
1.4.3	327	Is the AML Audit plan or charter reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.4	328	Is the internal AML audit function outsourced?	Please answer 'Yes' or 'No'.
1.4.5	329	Who is the internal AML audit function outsourced to?	Enter the name of the OSP which the entity outsourced internal AML audit function to.
1.4.6	330	Does the internal AML auditor perform regular reviews of the AML/CFT/CPF and Sanctions-related policies, procedures, and processes?	Please answer 'Yes' or 'No'.
1.4.7	331	Has the internal AML auditor performed an AML/CFT/CPF and Sanctions audit and issued a report of findings and conclusions?	Please answer 'Yes' or 'No'.
1.4.8	332	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 the how often an internal AML audit for the AML/CFT/CPF and Sanctions Programme is conducted.
1.4.9	333	When was the last AML/CFT audit conducted by Internal Audit?	Enter the date of last Internal AML Audit.

1.4.10	334	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.11	335	What is the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, in months, of the Board review of the AML audit program.
1.5.1	336	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.5.2	337	Is AML/CFT/CPF and Sanctions training provided to Directors and all relevant staff?	Please answer 'Yes' or 'No'.
1.5.3	338	How many AML/CFT/CPF and Sanctions training sessions in total were conducted for the Directors and relevant staff within the reporting period?	Enter the total number of AML/CFT/CPF and Sanctions training sessions conducted for the Directors and relevant staff during the reporting period.
1.5.4	339	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.5.5	340	Does the entity assess AML knowledge of its employees?	Please answer 'Yes' or 'No'.
1.5.6	341	Please indicate percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity 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.
1.6.1	342	How many years after the end of the business relationship are records retained?	Enter the number of years records are retained after the end of the business relationship. Enter '20' if 20 or more years.
1.6.2	343	Are any records NOT retained or accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.3	344	In which countries does the entity retain its records?	Enter the name of jurisdiction(s) where the entity's records are retained.
1.6.4	345	How accessible and swiftly available are records for competent authorities/law enforcement - in hours?	Enter the number of hours it takes for the entity to provide records upon request from competent authorities/law enforcement agencies.

1.7.1	346	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.7.2	347	How frequent is the Risk Assessment methodology reviewed, and / or revised or updated by the entity during the year?	Enter the number of times the entity reviewed, and / or revised or updated the Risk Assessment during the year.
1.7.3	348	What was the date of the last review?	Enter the date of the last review of the Risk Assessment.
1.7.4	349	Does the entity consider ML/TF/PF risks of the clients, including those risks relating to UBOs, in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.5	350	Does the entity consider the ML/TF/PF risks relating to geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.6	351	Does the entity consider the ML/TF/PF risks associated with products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.7	352	Does the entity consider the ML/TF/PF risks associated with delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.8	353	Does the entity consider the ML/TF/PF risks associated with technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.9	354	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'
17.10	355	Does the entity consider other risk factors, other than those listed above in their risk assessment?	Please answer 'Yes' or 'No'
1.7.11	356	How often, in months, does the entity review High-Risk relationships/accounts?	Select the frequency range of reviewing 'high risk' accounts: 'Never Implemented', 'More than 18 months', '13 – 18 months', '7 – 12 months', and '1 – 6 months'.
1.7.12	357	How many high-risk business relationships or client accounts did the	Enter the number of 'high' risk business relationships or client

		entity review during the reporting period?	accounts the entity reviewed during the reporting period.
1.7.13	358	How often, in months, does the entity review medium-Risk relationships/accounts?	Select the frequency range of reviewing 'medium risk' accounts: 'Never Implemented', 'More than 18 months', '13 – 18 months', '7 – 12 months', and '1 – 6 months'.
1.7.14	359	How many medium-risk business relationships or client accounts did the entity review during the reporting period?	Enter the number of 'medium' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.15	360	How often, in months, does the entity review low-risk relationships / accounts?	Select the frequency range of reviewing 'low risk' accounts: 'Never Implemented', 'More than 18 months', '13 – 18 months', '7 – 12 months', and '1 – 6 months'.
1.7.16	361	How many low-risk business relationships or client accounts did the entity review during the reporting period?	Enter the number of 'low' risk business relationships or client accounts the entity reviewed during the reporting period.
1.8.1	362	Where applicable, does the entity have a Group Wide AML/CFT programme?	Please answer 'Yes' or 'No'.
1.8.2	363	If yes, has the entity conducted a gap analysis to identify whether the AML/CFT programme of each branch/majority owned subsidiary complies with Cayman's legislation and regulatory framework?	Please answer 'Yes' or 'No'.
1.8.3	364	Has the board ensured that necessary amendments are made to ensure entities apply AML/CFT measures consistent with Cayman's requirements?	Please answer 'Yes' or 'No'.
1.8.4	365	Does the entity have Governing Body approved policies and procedures for Customer due diligence measures i.e., customer identification and verification as well as monitoring of customers and updating customer information?	Please answer 'Yes' or 'No'.
1.8.5	366	Does the entity have Governing Body approved policies and procedures for	Please answer 'Yes' or 'No'.

		identification of high-risk customers and PEPs?	
1.8.6	367	Does the entity have Governing Body approved policies and procedures for Internal Reporting i.e., Identification and Reporting of Suspicious Activities and Transactions including for TF and PF?	Please answer 'Yes' or 'No'.
1.8.7	368	Does the entity have Governing Body approved policies and procedures for reporting to the Financial Reporting Authority?	Please answer 'Yes' or 'No'.
1.8.8	369	Does the entity have Governing Body approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.8.9	370	Does the entity have Governing Body approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.8.10	371	Does the entity have Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.8.11	372	Does the entity have Governing Body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?	Please answer 'Yes' or 'No'.
1.8.12	373	Does the entity have Governing Body approved policies and procedures for the freezing of funds/assets of designated persons?	Please answer 'Yes' or 'No'.
1.8.13	374	Does the entity have Governing Body approved policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.14	375	When were the AML/CFT/CPF and Sanctions policies and procedures last updated?	Enter the date when the AML/CFT/CPF policies and procedures were last updated.
1.8.15	376	For the governing process, is information collected on	Please answer 'Yes' or 'No'.

		counterparties and business associates?	
1.8.16	377	Total Clients	<p>Enter the total number of clients the entity has as at end of 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 and legal persons and arrangements.</p> <p>Answer to this question should be the same as Question 1 of this Survey, as information requested is the same.</p>
1.8.17	378	Did the entity decline, de-risk/ terminate / restrict any business relationships due to AML/CFT/CPF and Sanctions related reasons for the current reporting period?	Please answer 'Yes' or 'No'.
1.8.18	379	Please provide 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 business relationships or clients' accounts that were de-risked/ declined/ terminated / restricted due to AML/CFT/CPF and Sanctions concerns-as at the end of the reporting period.
1.8.20	380	How many customer accounts remain non-compliant with required identification and verification procedures?	Enter the Number of customer accounts that remain non-compliant with required identification and verification procedures, as at the end of the reporting period
1.8.21	381	Does the entity have processes in place to verify client signatories?	Please answer 'Yes' or 'No'.
1.8.22	382	Does the entity conduct due diligence on client signatories?	Please answer 'Yes' or 'No'.
1.9.1	383	Is there a screening process?	Please answer 'Yes' or 'No'.
1.9.2	384	Is the screening process manual, automated or a combination?	Select: 'Manual', 'Automated', or 'Automated with Manual Checks'.
1.9.3	385	Is the screening process fully or partially outsourced?	Please select: 'Fully', 'Partially', or 'Not Applicable'.
1.9.4	386	If outsourced, please identify the vendor and the measures in place to	Enter the name of the vendor along with the measures in place to ensure

		ensure that the vendor is screening against the most recent lists.	that the vendor is screening against the most recent lists.
1.9.5	387	Do screening parameters include risk indicators for TF and PF monitoring?	Please answer 'Yes' or 'No'.
1.9.6	388	Is the existing customer database screened periodically against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.9.7	389	Number of clients and related parties / counterparties screened against the H.M. Treasury List within the reporting period.	Enter the number of clients and related parties / counterparties screened against the H.M. Treasury List within the reporting period.
1.9.8	390	Number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.	Enter the number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period. An alert is generated during screening process, indicating a match of some or all, of the customer or business partner's identification details, against those of designated persons and entities on the HM Treasury Sanctions list. A match needs to be verified, to confirm or discount whether it is a true or false positive.
1.9.9	391	How many false positive hits did the entity encounter during the reporting period?	Number of false positive hits the entity encountered during the reporting period.
1.9.11	392	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.9.12	393	Are customers / counterparties screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.9.13	394	Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen?	Please answer 'Yes' or 'No'.
1.9.14	395	Does the entity maintain a report of positive matches resulting from sanctions screening?	Please answer 'Yes' or 'No'.

1.9.15	396	How many positive hits for TFS did the entity encounter during the reporting period?	Total number of positive hits related to TFS the entity encountered during the reporting period.
1.9.18	397	Is there an approved process, including policies and procedures, for sanctions monitoring?	Please answer 'Yes' or 'No'.
1.9.19	398	Is the sanctions monitoring process manual, automated or a combination?	Select which applies: 'No Process', 'Manual', 'Automated', or 'Automated with Manual Checks'.
1.9.20	399	Is sanctions monitoring done in real time or after the event?	Select what applies: 'No process', 'After the event', or 'Real time'.
1.9.21	400	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries, counterparties, directors or officers is the target of any economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.9.22	401	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'.
1.9.23	402	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.10.1	403	Does the Entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.10.2	404	What is the name of the Transaction Monitoring System or name of the	Enter the name of the Transaction Monitoring System or name of the provider of the Transaction

		provider of the Transaction Monitoring System if bought or outsourced?	Monitoring System if bought or outsourced.
1.10.3	405	Has the automated system been adapted for use in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	406	How many instances of unusual or suspicious activity have been flagged by the screening tool during the reporting period?	Enter the number of instances where unusual or suspicious activity has been flagged by the screening tool during the reporting period.
1.10.5	407	Please provide the total number of Alerts generated by the automated system that related to Money Laundering during the reporting period.	Enter the total number of Alerts relating to money laundering, that were generated by the automated system during the reporting period. Alerts are notifications flagged by a screening monitoring system identifying that a FSP should conduct further review to verify if the alert is a true match or a false positive.
1.10.6	408	Please provide the total number of Alerts which resulted in the filing of Suspicious Activity Reports related to Money Laundering.	Enter the total number of alerts produced by the monitoring system (automated or manual) which resulted in generation of suspicious activity reports (SAR) internally, relating to money laundering. This number includes false positive alerts.
1.10.7	409	Please provide the total number of Alerts issued by the automated system related to Terrorism Financing/Proliferation Financing, during the reporting period.	Enter the Total number of Alerts related to Terrorism Financing/Proliferation Financing, that were generated by the automated system during the reporting period. Alerts are transactions or activities that fall outside the norm or expected conduct of business by a client, which are flagged out by the automated system whenever they occur.
1.10.8	410	Please provide the total number of Alerts resulting in the filing of Suspicious Activity Reports related to Terrorism Financing/Proliferation Financing	Enter the total number of alerts produced by the monitoring system (automated or manual) which resulted in generation of suspicious activity reports (SAR) internally, relating to Terrorism Financing/Proliferation Financing. This number includes all alerts including false positives.

1.10.9	411	Please provide the total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information.	Enter the number of incoming transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.10	412	Please provide the total value of incoming funds rejected due to insufficient applicant for business or beneficiary information.	Enter the total value of incoming funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.11	413	Please provide the total number of outgoing transactions rejected due to insufficient applicant for business or beneficiary information.	Enter the number of outgoing transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.12	414	Please provide the total value of outgoing funds rejected due to insufficient applicant for business or beneficiary information.	Enter the total value of outgoing funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.13	415	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering, Terrorism Financing or Sanctions considerations during the reporting period.	Enter the number of new client business relationships (potential clients) the entity rejected due to Money Laundering or Terrorism Financing concerns, during the reporting period.
1.10.14	416	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering, Terrorism Financing or Sanctions considerations during the reporting period.	The number of transactions (both incoming and outgoing) the entity blocked/rejected due to Money Laundering, Terrorism Financing or Sanctions concerns during the reporting period.
1.10.15	417	Please provide the total number of client business relationships (clients) that have been terminated due to Money Laundering, Terrorism Financing or Sanctions considerations during the reporting period.	The number of client business relationships the entity terminated due to Money Laundering, Terrorism Financing or Sanctions concerns, during the reporting period.
1.11.1	418	Is there a requirement for senior management approval before establishing high risk business relationships for example with PEPs?	Please answer 'Yes' or 'No'.
1.11.2	419	Does the entity exercise additional caution and conduct EDD on	Please answer 'Yes' or 'No'.

		individuals and/or entities based in high-risk countries?	
1.11.3	420	How many clients did the entity conduct EDD on during the reporting period?	Enter the number of clients the entity applied enhance due diligence.
1.11.4	421	Where EDD was applied, did the entity conduct EDD measures for every transaction such customers carried out?	Please answer 'Yes' or 'No'.
1.11.5	422	How many Transactions did the entity apply EDD on during the reporting period?	Enter the number of transactions the entity applied EED on during the reporting period.
1.11.6	423	Does the entity have enhanced procedures for monitoring PEPs?	Please answer 'Yes' or 'No'.
1.12.1	424	Does the entity have a documented process for reporting Internal Suspicious Activity to the MLRO?	Please answer 'Yes' or 'No'.
1.12.2	425	How many internal Suspicious Activity Reports have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity Reports reported to the MLRO during the reporting period.
1.12.3	426	How many Suspicious Activity Reports have been reported to the FRA by the MLRO for the current reporting period?	Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period.
1.12.4	427	How many hours on average does it take the entity to file a SAR to the FRA?	Select the option which best applies: 'More than one week', 'Between 72 hours and 1 week', 'Between 24 and 72 hours', and 'Less than 24 hours'.
1.12.5	428	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'.
1.12.6	429	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.12.7	430	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.13.1	431	If applicable, is there a board approved documented policy on outsourcing?	Select which best applies: 'Yes', 'No' or 'Not applicable'

			The question is only applicable if entity outsources any activities / functions.
1.13.2	432	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.3	433	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.4	434	In total, how many services does the entity outsource from either third parties, within its group or subsidiaries?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries. Material functions such as AML/Compliance, Information Technology, Internal Audit and any other functions that fall within the definition of an outsourced function.
1.13.5	435	Does the outsourcing agreement clearly set out the obligations of both parties?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.6	436	If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.7	437	if relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity?	Please answer 'Yes', 'No' or 'N/A'.
1.13.8	438	If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.9	439	If relevant, does the outsourced AMLCO/MLRO have access to the	Select which best applies: 'Yes', 'No' or 'N/A'

		compliance committee and board of the entity?	The question is only applicable if entity outsource any activities.
1.13.10	440	If relevant, are there data protection restrictions which would delay access to data and documents?	Select which best applies: 'Yes', 'No' or 'N/A' The question is only applicable if entity outsource any activities.
1.13.11	441	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes' or 'No' where not applicable' The question is only applicable if entity outsource any activities.
1.13.12	442	Is the entity satisfied that the OSP(s) has measures in place to comply with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities
1.14.1	443	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.14.2	444	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback for this tab. Enter 'N/A' if no comment.