



AML Survey – Completion Guide: Banking

Document version: 1.2

Revision History:

Effective Date	Version Number	Revision Description
26 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update to definitions
1 May 2023	1.2	Amendments to questions, along with updates to definitions, descriptions, and explanations

Contents

1	Introduction	4
2	Form Information	4
3	Accessing and Submitting the AML Survey	4
3.1	Access to the AML Survey	4
3.2	Completing the AML Survey Form	10
4	Other Useful Information	11
4.1	User account lockouts.....	11
4.2	Internet Browser.....	11
4.3	Data and Security	11
4.4	Applicable Fees.....	11
5	<i>AML Survey Guidance</i>	11

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/D”). The AML Survey Form is issued in accordance with section 17(3)(a) of the Banks and Trust Companies Act (2021 Revision).

This Guide gives support to FSPs which carry out banking business for accessing, completion and submission of the AML Survey – Banking Form.

2 FORM INFORMATION

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

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

3 ACCESSING AND SUBMITTING THE AML 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, Anti-Money Laundering Compliance Officer (“AMLCO”), Money Laundering Reporting Officer (“MLRO”) and any other additional contacts, upon request from the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at AMLSurveys@cima.ky.

To access the AML Survey:

1. 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=YJa0JBLI86VZVCrbBxm3fq3fSoAMoPYyQ6XKfqt0MoYgkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYsoP%2Bk8rPURRSVrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhAtaTNSa3IE3aiA%3D>

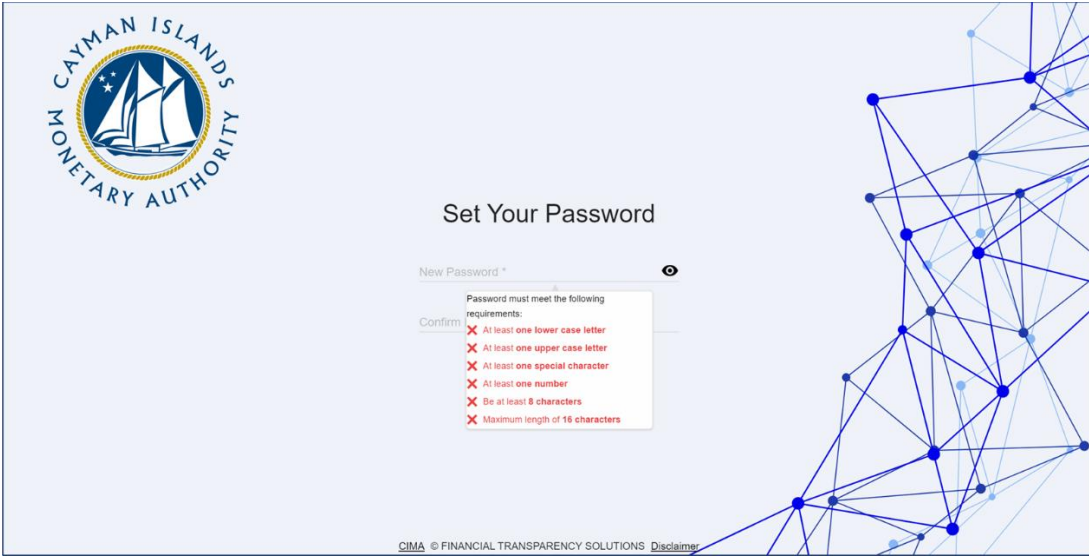
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

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

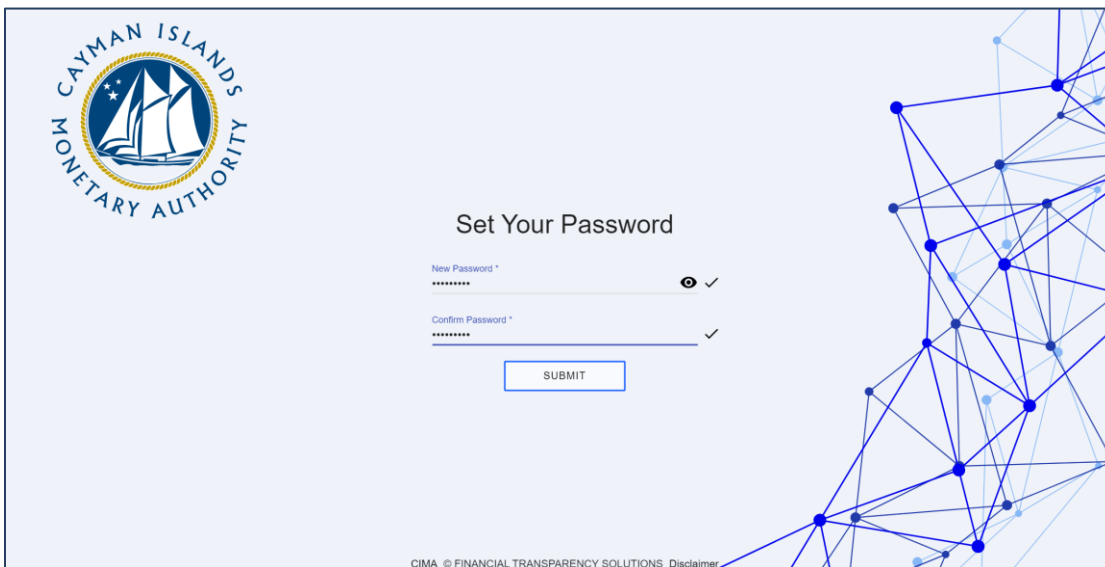
Disclaimer:
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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

2. The recipient will then be asked to create a password 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

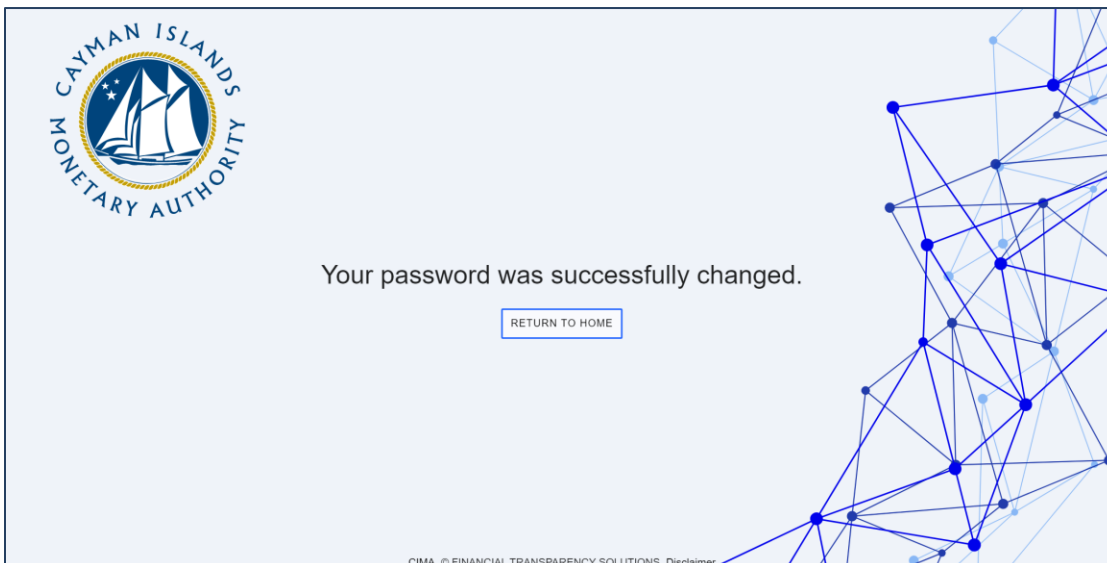
Please do not reply to this email, it is automatically generated.

Disclaimer:

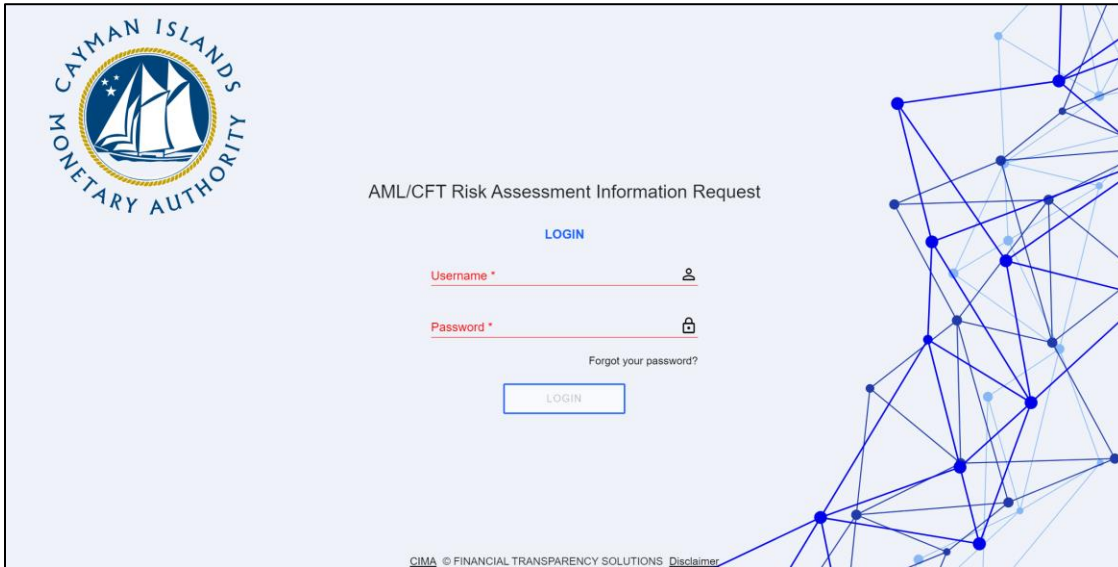
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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

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



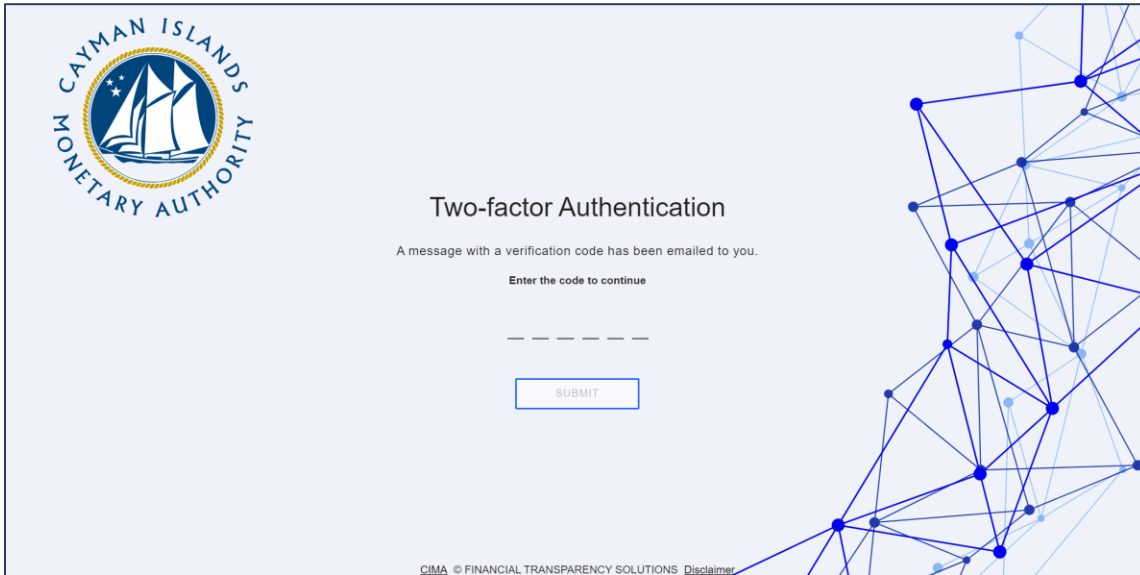
- 6. The recipient should then enter their username, which is their email address where they received the AML Survey invite, and the password they just created.



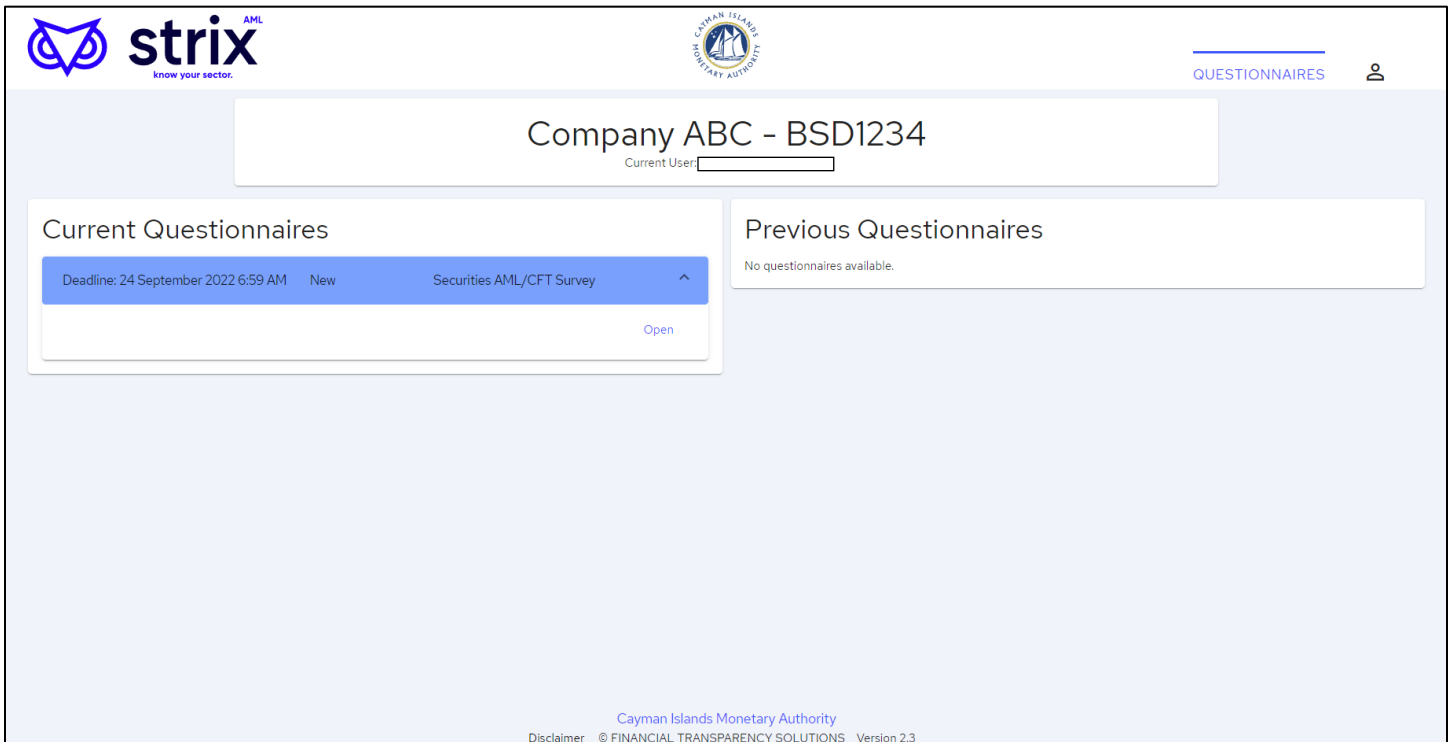
- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email



- 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. Users should note that the survey does not have Excel import functionality.
 - 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. Licence or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current directors
 - v. Number of Clients
 - vi. Reason for requesting to make an Incomplete Submission.
2. If a User receives or has access to more than one 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.

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; **2)** locked out for ten (10) minutes; and, **3)** if the user persists, locked out permanently.

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

If the user is permanently locked out, they should contact 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>Generally, a Bank's Clients/ Customers are made up of Natural Persons, Legal Persons, and Legal Arrangements.</p>
Controller	A person appointed to assume control of the affairs of a licensee or registrant.
Correspondent Banking	<p>The provision of banking services by one institution to another institution (the Respondent institution) for the purposes of executing third-party payments, trade transactions in a specific currency. For example, a correspondent bank acts as an intermediary or agent, facilitating wire transfers, conducting business transactions on behalf of the Respondent and its customers.</p> <p>Correspondent banking does not include one-off transactions.</p>
Corporate Entity	Means a body corporate constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the 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 AMLRs 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.
Fintech Service	Means 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 (2022 Revision), except to the extent that it is modified by the Foundation Companies 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> <ul style="list-style-type: none"> (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 (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>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	"Legal person" means a company or other entity, such as a foundation, created by operation of law

	<p>with separate legal personality.</p> <p>“Legal arrangement” means a trust or partnership, 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> <p>(a) money transmission;</p> <p>(b) cheque cashing;</p> <p>(c) currency exchange;</p> <p>(d) the issuance, sale or redemption of money orders or traveller’s cheques.</p>
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Director	A natural or legal person who takes on the role of company director on the behalf of another.
Nominee Shareholder	A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-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.
NPO	A Non-profit Organisation is a legal person or arrangement that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”.
OSP	<p>Outsourced Service Provider (“OSP”) is a third party, either an affiliated entity within a group or an entity that is external to the corporate group, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>

Payable Through Accounts	Correspondent accounts that are used directly by third parties to transact business on their own behalf. <i>For example, if a customer of a Respondent bank has direct access to the bank's Correspondent account (to process their own transactions) then the Correspondent account is being used as a Payable Through Account.</i>
PEP	<p>"Politically Exposed Person" includes —</p> <p>(a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, an important political party official.</p> <p>(b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation, an 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> <ul style="list-style-type: none"> (i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership. (ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.
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> <p>Take this into account when answering questions relating to the 'Nature of Business' - Source of</p>

	Funding and 'Value of Client Assets Under Management'.
Special Economic Zone Business	Means any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands.
Targeted Financial Sanctions (TSF)	Means 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 include but not limited to those listed in Q167 through Q188.
Trust	A trust is 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> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person.</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement.</p>
Ultra HNWIs	Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.
Value of Client Assets	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 Assets Service Provider (VASP)		An entity that provides a virtual asset service as a business or in the course of business.
Timeframe	Assets Under Management	Total Value of AUM for clients 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 clients during the reporting period.
Timeframe	Value of Transactions	Value 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 at the end of the reporting period.	<p>Enter the total number of clients the entity has at the end of the reporting period.</p> <p>This number should include all clients the entity provides financial products and services to as opposed to accounts e.g., If the same client, individual or legal entity, has two accounts in the same name, then only 1 client should be counted. Do not double count.</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>
1.1.2	2	Total Transactions for the reporting period.	<p>Enter the total number of all transactions conducted for clients during the reporting period.</p> <p>Where applicable, the total transactions should only include those of the Cayman Islands legal entity.</p>

1.1.3	3	Total Value of Client Assets.	<p>Enter the total value of client assets for clients reported in Question 1 as at the end of the reporting period.</p> <p>If an entity does not manage assets for its clients, a '0' value should be used.</p>
1.1.4	4	Clients/customers that are Natural Persons, broken down by nationality of the client.	<p>Enter the number of clients that are natural persons, subdivided by nationality, as at the end of the reporting period.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.5	5	Clients/customers that are Natural Persons, broken down by residency of the client.	<p>Enter the number of clients that are natural persons, subdivided by their residency.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.6	6	Total Transactions for the reporting period for clients who are Natural Persons.	<p>Enter the total number of transactions conducted for clients who are natural persons during the reporting period.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity did not conduct such transactions, a '0' value should be used.</p>
1.1.7	7	Value of Client Assets for clients who are Natural Persons.	<p>Enter the total value of assets under management for clients that are natural persons as at the end of the reporting period.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not manage assets for its clients, a '0' value should be used.</p>
1.1.8	8	Clients/customers that are	Enter the total number of clients that are

		Legal Persons and Arrangements, broken down by country of incorporation of the client.	<p>legal persons and arrangements subdivided by country of incorporation as at the end of the reporting period.</p> <p>Examples of legal persons and arrangements include, but are not limited to, Corporate entities, Foundations and Trusts.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.9	9	Number of Transactions - Legal Persons and Arrangements.	<p>Enter the total number of transactions that were conducted by customers who are legal persons and arrangements during the reporting period.</p> <p>Examples of legal persons and arrangements include, but are not limited to, Corporate entities, Foundations and Trusts.</p> <p>If an entity did not conduct such transactions, a '0' value should be used.</p>
1.1.10	10	Value of Client Assets for all Legal Persons and Arrangements.	<p>Enter the total value of assets under management for clients who are legal persons or arrangements, as at the end of the reporting period.</p> <p>Examples of legal persons and arrangements include, but are not limited to, Corporate entities, Foundations and Trusts.</p> <p>If an entity does not manage assets for these clients, a '0' value should be used.</p>
1.1.11	11	Number of clients/customers rated as High Risk at the end of the reporting period.	<p>Enter the total number of clients/customers that were rated 'high' risk at the end of the reporting period.</p>
1.2.1	12	Total number of UBOs by country of nationality of the UBO.	<p>Enter the total number of UBOs of all clients who are legal persons or arrangements, broken down by nationality of the UBO, as at the end of the review period.</p> <p><i>This category is specific to legal persons and arrangements. Examples include, but are not limited to, the total number of UBOs of Corporate entities and Settlers of Trusts.</i></p> <p><i>A UBO should not be counted more than once regardless of the number of</i></p>

			<p><i>business relationships they have with the entity.</i></p> <p>If the entity does not have any clients that fit this category, record a '0'.</p>
1.2.2	13	Does the entity have any clients that have UBOs who are directors of the client?	Answer 'Yes' or 'No'
1.2.3	14	Number of clients that have UBOs who are directors of the client.	Enter the total number of clients that have UBOs who are also directors of the client as at the end of the reporting period.
1.2.4	15	Does the entity have any clients that have UBOs who are controllers of the client?	Answer 'Yes' or 'No'
1.2.5	16	Number of clients that have UBOs who are controllers of the client.	Enter the total number of clients whose UBOs are also controllers of the client as at the end of the reporting period.
1.2.6	17	Does the entity have any clients that have UBOs who are also senior managing officials of the client?	Please answer 'Yes' or 'No'.
1.2.7	18	Number of clients that have UBOs who 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 the board of directors and/or the shareholders.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.8	19	Does the entity have any clients that have UBOs who are HNWI's?	<p>Please answer 'Yes' or 'No'.</p> <p><i>This category is specific to clients who are Legal Persons and Arrangements. Examples include, but not limited to, instances where a UBO of a Company or Settlor of a Trust is a HNWI.</i></p>
1.2.9	20	Number of Clients that have	Enter the total number of clients that

		UBOs who are HNWIs.	<p>have UBOs who are also HNWIs.</p> <p>HNWIs is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least CI\$4,000,000 (approx. US\$5,000,000)</p> <p>Do Not include 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>
1.2.10	21	Does the entity have any clients that have UBOs who are Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.2.11	22	Number of Clients that have UBOs who are Ultra HNWIs.	<p>Enter the total number of clients who have UBOs who are also Ultra HNWIs.</p> <p>UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p> <p>If the entity does not have any clients that fit this category record a '0'.</p>
1.2.12	23	Does the entity have any clients that have UBOs who are PEPs?	Please answer 'Yes' or 'No'.
1.2.13	24	Number of UBOs of clients who are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who have UBOs who are PEPs as at the end of the reporting period.
1.2.14	25	Does the entity have any clients that have Nominees acting on behalf of a Beneficial Owner (inc. Nominees within the ownership structure)?	Please answer 'Yes' or 'No'.
1.2.15	26	Number of clients that have Nominees acting on behalf of a UBO, or a Nominee within the ownership structure, broken down by nationality of the UBO.	<p>Enter the total number of clients which have Nominees acting on behalf of UBOs, or within its ownership structure, categorised by nationality of the UBO.</p> <p>This category is specific to clients who are legal persons and arrangements.</p>
1.3.1	27	Number of clients that have a	Enter the total number of clients which

		nominee appointed on behalf of a director, broken down by country of nationality of the nominee director.	have a nominee director as at the end of the review period, broken down by country of nationality of the nominee director.
1.3.2	28	Number of clients that 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 a nominee director as at the end of the review period, broken down by country of nationality of the director (not the nominee).
1.3.3	29	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are also PEPs as at the end of the reporting period.
1.3.4	30	Number of directors and/or senior management of clients who are High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are also HNWIs as at the end of the reporting period. Do not count or include senior management who are Ultra HNWIs.
1.3.5	31	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs as at the end of the reporting period.
1.3.6	32	Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs management as at the end of the reporting period.
1.4.1	33	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	34	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	35	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are a Government or Public Sector during the reporting period, broken down by government jurisdiction.
1.4.4	36	Gov / Pub Sector - Value of Transactions.	Enter the value of transactions processed on behalf of clients that are Government or Public sector, during the reporting period.
1.4.5	37	Gov / Pub Sector - Value of Client Assets.	Enter the value of client assets under management of the clients that are Government or Public sector, at the end of the reporting period.
1.4.6	38	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.7	39	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, as at the end of the reporting period.
1.4.8	40	NPO - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are NPOs, during the reporting period.
1.4.9	41	NPO – Value of Transactions.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.
1.4.10	42	NPOs - Value of Client Assets.	Enter the value of client assets under management of clients that are NPOs, as at the end of the reporting period.
1.4.11	43	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.12	44	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has, as at the end of the reporting period, that are a Foundation.
1.4.13	45	Foundations - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are a Foundation, during the reporting period.
1.4.14	46	Foundations – Value of Transactions.	Enter the value of transactions processed for clients that are Foundations, during the reporting period.

1.4.15	47	Foundations - Value of Client Assets.	Enter the value of client assets under management of clients that are a Foundation, as at the end of the reporting period.
1.4.16	48	Does the entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.17	49	Trusts - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Trusts, as at the end of the reporting period.
1.4.18	50	Trusts - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Trusts, during the reporting period.
1.4.19	51	Trusts – Value of Transactions.	Enter the value of transactions processed for clients that are Trusts, during the reporting period.
1.4.20	52	Trusts - Value of Client Assets.	Enter the value of client assets under management of clients that are Trusts, at the end of the reporting period.
1.4.21	53	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.22	54	Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Segregated Portfolio Companies as at end of the reporting period.
1.4.23	55	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Segregated Portfolio Companies, during the reporting period.
1.4.24	56	Segregated Portfolio Companies – Value of Transactions.	Enter the value of transactions processed on behalf of clients that are Segregated Portfolio Companies, during the reporting period.
1.4.25	57	Segregated Portfolio Companies - Value of Client Assets.	Enter the value of client assets under management of clients that are a Segregated Portfolio Company, as at the end of the reporting period.
1.4.26	58	Does the entity have any clients that are registered in a Special Economic Zone?	Please answer 'Yes' or 'No'. Note that one client can fall under multiple

			categories of structure.
1.4.27	59	Special Economic Zone - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Special Economic Zone companies as at end of the reporting period
1.4.28	60	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are Special Economic Zone companies, during the reporting period.
1.4.29	61	Special Economic Zone - Value of Transactions.	Enter the value of transactions processed for clients that are Special Economic Zone Companies, during the reporting period.
1.4.30	62	Special Economic Zone - Value of Client Assets.	Enter the value of client assets under management of clients that are from a Special Economic Zone, as at the end of the reporting period.
1.4.31	63	Does the entity have any clients that are Funds / Collective Investment Vehicles?	<i>Note that one client can fall under multiple categories of structure.</i> Please answer 'Yes' or 'No'.
1.4.32	64	Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Funds / Collective Investment Vehicles as at the end of the reporting period.
1.4.33	65	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.34	66	Funds/Collective Investment Vehicles – Value of Transactions.	Enter the value of transactions processed on behalf of clients who are Funds/Collective Investment Vehicles, as at the end of the reporting period.
1.4.35	67	Funds / Collective Investment Vehicles - Value of Client Assets.	Enter the value of client assets under management of clients that are Funds / Collective Investment Vehicles, as at the end of the reporting period.
1.5.1	68	Natural Person Clients - Does the entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.

1.5.2	69	Number of Natural Persons clients who are PEPs, broken down by nationality of the PEP.	Enter the number of clients the entity has, as at the end of the reporting period, that are natural persons, and are PEPs, broken down by the nationality of the PEP.
1.5.3	70	Natural Persons Clients - PEPs - Number of Transactions.	Enter the number of transactions conducted by clients that are natural persons, and are PEPs, during the reporting period.
1.5.4	71	Natural Persons Clients- PEPs - Value of Client Assets.	Enter the value of client assets under management of the clients that are natural persons, and are PEPs, as at the end of the reporting period.
1.5.5	72	Does the entity have any Natural Person clients that are HNWI's?	Please answer 'Yes' or 'No'. <i>This category does NOT include those individuals who are Ultra HNWI.</i>
1.5.6	73	Number of Natural Persons Clients who are HNWI's, broken down by nationality of the client.	Enter the number of clients the entity has, that are natural persons, and are HNWI's, broken down by nationality of the client, as at the end of the reporting period.
1.5.7	74	Natural Persons Clients - HNWI's - Number of Transactions.	Enter the number of transactions conducted by clients that are natural Persons, and are HNWI's, during the reporting period.
1.5.8	75	Natural Persons Clients - HNWI's - Value of Client Assets.	Enter the value of client assets under Management of clients that are natural persons, and are HNWI's, as at the end of the reporting period.
1.5.9	76	Does the entity have any Natural Person clients who are Ultra HNWI's?	Please answer 'Yes' or 'No'.
1.5.10	77	Number of Natural Persons clients who are Ultra HNWI's, broken down by nationality of the client.	Enter the number of clients the entity has, that are natural persons, and are also Ultra HNWI's, broken down by nationality of the client, as at the reporting period.
1.5.11	78	Natural Persons Clients – Ultra HNWI's - Number of Transactions.	Enter the number of transactions conducted by clients that are natural persons, and are Ultra HNWI's, during the reporting period.
1.5.12	79	Natural Persons Clients – Ultra HNWI's - Value of Client	Enter the value of client assets under management of clients that are natural

		Assets.	persons, and are Ultra HNWI, as at the end of the reporting period.
1.5.13	80	Does the entity have any Natural Person clients that are PEPs and HNWI / Ultra HNWI?	Please answer 'Yes' or 'No'.
1.5.14	81	Number of Natural Persons who are PEPs and HNWI / Ultra HNWI.	Enter the number of natural person clients the entity has that are both PEPs and HNWI / Ultra HNWI, as at the end of the reporting period.
1.5.15	82	Natural Persons - PEPs & HNWI / Ultra HNWI - Number of Transactions.	Enter the number of transactions conducted on behalf of clients that are natural persons, who are both PEPs and HNWI / Ultra HNWI, during the reporting period.
1.5.16	83	Natural Persons - PEPs & HNWI / Ultra HNWI - Value of Client.	Enter the value of client assets under management of clients that are natural persons, and are both PEPs and HNWI / Ultra HNWI, as at the end of the reporting period.
1.6.1	84	<p>Nature of Business / Source of Funding:</p> <p>Enter the total number of clients that are legal persons 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, VASP Products and Services, Trust service providers, Trusts, Company Managers, and Corporate Service Providers.</i></p>	Enter the total number of clients which fall within the list of the sectors as at the end of the reporting period.
1.6.2	85	Does the entity have any clients that are legal persons,	Please answer 'Yes' or 'No'.

		that are Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)?	
1.6.3	86	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are banking institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs).
1.6.4	87	Does the entity have any clients that are legal persons operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses not listed in this section?	Please answer 'Yes' or 'No'.
1.6.5	88	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above.
1.6.6	89	Does the entity have any clients that are legal persons operating in Financial Leasing, or natural persons employed by Financial Leasing?	Please answer 'Yes' or 'No'.
1.6.7	90	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Financial Leasing companies or natural persons that are employed by Financial Leasing companies.
1.6.8	91	Does the entity have any clients that are legal persons operating as Money Lending, or natural persons employed by Money Lending?	Please answer 'Yes' or 'No'.
1.6.9	92	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Money Lending institutions, and / or natural persons that are employed by Money Lending institutions.
1.6.10	93	Does the entity have any	Please answer 'Yes' or 'No'.

		clients that are legal persons operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or natural persons employed as Accountants?	
1.6.11	94	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.6.12	95	Does the entity have any clients that are legal persons operating in the Fintech industry, or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.13	96	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry.
1.6.14	97	<p>Nature of Business / Source of Funding:</p> <p>Please provide the total number of clients that are legal persons 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"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Service Business (MSBs) ▪ Virtual Asset Service Providers (VASPs) ▪ High Value Dealers ▪ Trust Service Providers, Company Managers or Corporate Service Providers ▪ Import/Export industry 	Enter the total number of clients which fall within the list of the sectors as at the end of the reporting period.

		<ul style="list-style-type: none"> ▪ Shipping and Transport of Goods 	
1.6.15	98	Does the entity have any clients that are legal persons operating as Legal Practitioners, or natural persons employed as Legal Practitioner?	Please answer 'Yes' or 'No'
1.16.16	99	Legal Practitioners – Number of Clients	Enter the number of clients the entity has, that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.16.17	100	Does the entity have any clients that are legal persons operating as Dealers in Precious Metals and Stones, or natural persons employed by Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'
1.16.18	101	Dealers in Precious Metals and Stones – Number of Clients	Enter the number of clients the entity has, that are legal persons operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.6.19	102	Does the entity have any clients that are legal persons operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.6.20	103	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Money Services Business, and / or are natural persons that are employed in the Money Services Business.
1.6.21	104	Does the entity have any clients that are legal persons operating as a VASP, or natural persons employed by VASP?	Please answer 'Yes' or 'No'.
1.6.22	105	Virtual Asset Service Providers - Number of Clients.	Enter the number of clients the entity has, that are legal persons offering virtual assets products and services, and

			natural persons that are employed by institutions which offer virtual asset products and services.
1.6.23	106	Does the entity have any clients that are legal persons operating as High Value Dealers or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.
1.6.24	107	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.6.25	108	Does the entity have any clients that are legal persons or arrangements operating as Trust Service Providers, Company Managers, or Corporate Service Providers, or natural persons employed by Trust service providers, Company Managers, or Corporate Service Providers?	Please answer 'Yes' or 'No'.
1.6.26	109	Trust service providers, 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 Trust service provider, Company Manager, or Corporate Service Providers, and natural persons that are employed by Trust service providers, Company Managers, or Corporate Service Providers.
1.6.27	110	Does the entity have any clients that are legal persons operating in the Import / Export Industry, or natural persons employed by the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.28	111	Import / Export - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Import / Export business, or Corporate Service Providers, and natural persons that are employed within the Import / Export industry.
1.6.29	112	Does the entity have any clients that are legal persons operating in the Shipping and Transport of Goods industry,	Please answer 'Yes' or 'No'.

		or natural persons employed by the Shipping and Transport of Goods industry?	
1.6.30	113	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Shipping and Transport of Goods business, or Corporate Service Providers, and natural persons that are employed within the Shipping and Transport of Goods industry.
1.6.31	114	<p>Nature of Business / Source of Funding:</p> <p>Please provide the total number of clients that are legal persons 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"> ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry <p>Unknown Sector / Industry (not recorded)"</p>	Enter the total number of clients that fall within the list of the sectors as at the end of the reporting period.
1.6.32	115	Does the entity have any clients that are legal persons operating as Real Estate Agents / Brokers, or natural persons employed as Real Estate Agents / Brokers?	Please answer 'Yes' or 'No'.
1.6.33	116	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.

1.6.34	117	Does the entity have any clients that are legal persons are operating in the Gambling business (including online gambling), or natural persons employed by a Gambling business?	Please answer 'Yes' or 'No'.
1.6.35	118	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.6.36	119	Does the entity have any clients that are legal persons operating in the adult entertainment industry, or natural persons employed in the adult entertainment industry?	Please answer 'Yes' or 'No'.
1.6.37	120	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry.
1.6.38	121	Does the entity have any clients that are legal persons operating in the Defence Industry, or natural persons employed by the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.39	122	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.6.40	123	Does the entity have any clients that are legal persons operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.41	124	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and

			Gas Industry.
1.6.42	125	Does the entity have any clients that are legal persons in the Mining Industry, or natural persons employed by the Mining Industry?	Please answer 'Yes' or 'No'.
1.6.43	126	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.6.44	127	Does the entity have any clients that are legal persons operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.6.45	128	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry.
1.6.46	129	Does the entity have any clients that are legal persons operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.47	130	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.6.48	131	Does the entity have any clients that are legal persons that are operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry?	Please answer 'Yes' or 'No'.
1.6.49	132	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in Cannabis Production & Distribution Business, and natural persons that are

			employed in the Cannabis Production & Distribution industry.
1.6.50	133	Does the entity have any clients that are legal persons of Unknown Businesses, or natural persons employed in Unknown Professions or Industries?	Please answer 'Yes' or 'No'.
1.6.51	134	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions. Unknown businesses and professions 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.
1.6.52	135	Does the entity have any clients where their nature of business / source of funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.53	136	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in known business, not mentioned above, or natural persons that are employed in known businesses/industries, not mentioned above.
1.7.1	137	<p>Source of Funds – Value of Client Assets.</p> <p>Provide the total value of client assets for clients that are legal persons of, or are natural persons employed in, the following sector:</p> <ul style="list-style-type: none"> ▪ Banking Institutions excluding MSBs ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech 	Enter the total value of client assets under management of the clients that are legal persons operating as, and natural persons employed in the listed sectors.

		<i>*excluding MSBs, VASP Products and Services Providers, and Trusts, Company Managers, or Corporate Service Providers.*</i>	
1.7.2	138	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs).
1.7.3	139	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets under management of the clients that are legal persons operating as Other Financial Regulated Business, not already mentioned in this section, and natural persons that are employed in these Other Financial Regulated Business.
1.7.4	140	Financial Leasing - Value of Client Assets.	Enter the value of client assets under management of the clients that are legal persons operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business.
1.7.5	141	Money Lending- Value of Client Assets.	Enter the value of client assets under management of the clients that are legal persons operating in the Money Lending business, and natural persons that are employed by Money Lending businesses.
1.7.6	142	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets under management of the clients that are legal persons operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.7.7	143	Fintech - Value of Client Assets.	Enter the value of client assets under management of the clients that are legal persons operating in the Fintech industry, and natural persons that are employed in the Fintech industry.
1.7.8	144	Source of Funds – Value of Client Assets. Please provide the total value of client assets under management from clients	Enter the total value of client assets under management of the clients that are legal persons of, and are natural persons employed in the listed sectors.

		<p>that are legal persons 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 ▪ VASPs ▪ High Value Dealers ▪ Trust service providers, Company Managers or Corporate Service Providers ▪ Import/Export industry ▪ Shipping and Transport of Goods 	
1.7.9	145	Legal Practitioners – Value of Client Assets.	Enter the value of client assets under management of the clients that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.7.10	146	Dealers in Precious Metals and Stones	Enter the value of client assets under management of clients that are legal persons operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.7.11	147	Money Services Business - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Money Services Business, and natural persons that are employed in the Money Services Business.
1.7.12	148	Virtual Asset Service Providers - Value of Client Assets.	Enter the value of client assets under management of clients that are legal offering virtual asset products and services, and natural persons that are employed by providers of virtual asset products and services.
1.7.13	149	High Value Dealers - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.7.14	150	Trust service providers, Company Managers and Corporate Service Providers -	Enter the value of client assets under management of clients that are legal persons or arrangements operating as

		Value of Client Assets.	Trust service providers, Company Managers and Corporate Service Providers, and natural persons that are employed in by Trust service providers, Company Managers or Corporate Service Providers.
1.7.15	151	Import / Export - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Import / Export Industry, and natural persons that are employed in the Import / Export Industry.
1.7.16	152	Shipping and Transport of Goods - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Shipping and Transport of Goods Industry, and natural persons that are employed in the Shipping and Transport of Goods Industry.
1.7.17	153	<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 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 of, and are natural persons employed in the listed sectors.
1.7.18	154	Real Estate Agents / Brokers - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents /

			Brokers.
1.7.19	155	Gambling business (including online gambling) - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.7.20	156	Adult Entertainment - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business.
1.7.21	157	Defence Industry - Value of Client Assets.	Enter the value of assets under management of clients that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.7.22	158	Oil and Gas Industry - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.7.23	159	Mining Industry - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.7.24	160	Construction / Development - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Construction / Development business, and natural persons that are employed in the Construction / Development industry.
1.7.25	161	Retail & Restaurant Business - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.7.26	162	Cannabis Production & Distribution - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in the Cannabis Production & Distribution business, and natural persons that are employed in the

			Cannabis Production & Distribution business.
1.7.27	163	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 operating in unknown or unrecorded Industries / Professions, and natural persons that are employed in unknown or unrecorded Industries / Professions.
1.7.28	164	Other - Not listed above - Value of Client Assets.	Enter the value of client assets under management of clients that are legal persons operating in Known Businesses /industries/ Professions not listed above, and natural persons that are employed in Known Businesses/Industries/Professions, not listed above.
1.8.1	165	Does the entity have any comments or feedback for this tap?	Please answer 'Yes' or 'No'.
1.8.2	166	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	167	Does the entity provide financial products in the form of FOREX?	Please answer 'Yes' or 'No'.
2.1.2	168	FOREX - Number of Transactions.	Enter the number of FOREX transactions processed during the reporting period.
2.1.3	169	FOREX - Value of Funds Transferred.	Enter the total value of FOREX transactions processed during the reporting period.
2.1.4	170	Does the entity provide financial products in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.1.5	171	Virtual Currency - Number of Transactions.	Enter the number of Virtual Currency transactions conducted, during the reporting period.
2.1.6	172	Virtual Currency - Value of Funds Transferred.	Enter the total value of Virtual Currency transferred, during the reporting period.
2.1.7	173	Does the entity provide financial products in the form	Please answer 'Yes' or 'No'.

		of Lending Trade Finance?	
2.1.8	174	Lending Trade Finance - Number of Transactions.	Enter the number of transactions processed for Lending Trade Finance, during the reporting period.
2.1.9	175	Lending Trade Finance - Value of Funds Transferred.	Enter the total value of funds transferred for Lending Trade Finance, during the reporting period.
2.1.10	176	Does the entity provide financial products in the form of Prepaid Cards?	Please answer 'Yes' or 'No'.
2.1.11	177	Prepaid Cards - Number of Transactions.	Enter the number of transactions processed through Prepaid Cards, during the reporting period.
2.1.12	178	Prepaid Cards - Value of Funds Transferred.	Enter the total value of funds transferred through Prepaid Cards, during the reporting period.
2.1.13	179	Does the entity offer Payable Through Accounts?	Please answer 'Yes' or 'No'.
2.1.14	180	Payable Through Accounts – Number of Clients.	Enter the number of clients the entity offers services of payable through accounts.
2.1.15	181	Payable Through Accounts – Number of Transactions.	Enter the number of transactions conducted through Payable Through Accounts, during the reporting period.
2.1.16	182	Payable Through Accounts – Value of Transactions.	Enter the total value of transactions processed through Payable Through Accounts, during the reporting period.
2.2.1	183	Does the entity provide financial products in the form of Omnibus Accounts?	Please answer 'Yes' or 'No'.
2.2.2	184	Does the entity provide financial products in the form of Trust & Company Administration?	Please answer 'Yes' or 'No'.
2.2.3	185	Does the entity provide financial products in the form of Trustee & Custodian Services?	Please answer 'Yes' or 'No'.
2.2.4	186	Does the entity provide financial products in the form of Fund Management?	Please answer 'Yes' or 'No'.

2.2.5	187	Does the entity provide financial products in the form of Investment Management?	Please answer 'Yes' or 'No'.
2.2.6	188	Does the entity offer trading services or trading platforms to clients?	Please answer 'Yes' or 'No'.
2.3.1	189	Does the entity facilitate payments on behalf of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	190	Physical Cash - Number of Clients.	Enter the number of clients that made payments in the form of Physical Cash during the reporting period.
2.3.3	191	Physical Cash - Number of Transactions.	Enter the number of cash transactions processed on behalf of clients during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity.
2.3.4	192	Physical Cash - Value of transactions.	Enter the total value of cash transactions processed on behalf of clients during the reporting period.
2.3.5	193	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.6	194	Virtual Currency - Number of Clients.	Enter the number of clients that conducted transactions in the form of Virtual Currency during the reporting period.
2.3.7	195	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions clients conducted, during the reporting period.
2.3.8	196	Virtual Currencies - Value of Funds Transferred.	Enter the value of virtual currency transactions processed by or on behalf of clients.
2.3.9	197	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.3.10	198	Third Parties - Number of Clients.	Enter the number of clients that conducted payments via Third Parties during the reporting period. Payments via third party means that the

			payment was paid to a third party not associated with the business relationship or transaction.
2.3.11	199	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions processed by clients during the reporting period.
2.3.12	200	Third Parties - Value of Transactions.	Enter the value of transactions processed by clients during the reporting period, using payments via Third Parties.
2.3.13	201	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.3.14	202	Credit Card Payments - Number of Clients.	Enter the number of clients that made payments via Credit Card during the reporting period.
2.3.15	203	Credit Card Payments - Number of Transactions.	Enter the number of transactions processed via credit card payments during the reporting period.
2.3.16	204	Credit Card Payments - Value of Transactions.	Enter the value of Credit Card payments processed for clients during the reporting period.
2.3.17	205	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.3.18	206	Wire Transfers - Number of Clients.	Enter the number of clients that made payments in the form of Wire Transfers during the reporting period.
2.3.19	207	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions that were conducted by clients, during the reporting period.
2.3.20	208	Wire Transfers - Value of Funds Transferred.	Enter the value of Wire Transfer transactions conducted by clients during the reporting period.
2.3.21	209	Does the entity facilitate payments of Clients in the form of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.3.22	210	Internal Bank Transfers - Number of Clients.	Enter the number of clients which conducted Internal Bank Transfers, during the reporting period.
2.3.23	211	Internal Bank Transfers - Number of Transactions.	Enter the number of Internal Bank Transfer transactions conducted by

			clients, during the reporting period.
2.3.24	212	Internal Bank Transfers - Value of Funds Transferred.	Enter the value of transactions conducted via Internal Bank Transfers by clients during the reporting period.
2.3.25	213	Does the entity facilitate payments of Clients in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.26	214	Transfer of securities - Number of Clients.	Enter the number of clients that made payments in the form of Transfer of Securities during the reporting period.
2.3.27	215	Transfer of securities - Number of Transactions.	Enter the number transactions made by clients, during the reporting period, in the form of Transfer of Securities.
2.3.28	216	Transfer of securities - Value of Funds Transferred.	Enter the value of funds transferred o by clients during the reporting period, by way of Transfer of Securities.
2.3.29	217	Does the entity facilitate payments of Clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.3.30	218	Other Forms of Payment - Number of Clients.	Enter the number of clients which made payments using other Forms of Payment not listed above during the reporting period.
2.3.31	219	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.
2.3.32	220	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.
2.3.33	221	Please indicate the types of Other Forms of Payment.	List the Other Forms of Payment processed by clients during the reporting period, which are not listed above.
2.4.1	222	Does your entity accept Cash Deposits?	Please answer 'Yes' or 'No'.
2.4.2	223	Total Number of Cash Deposits.	Enter the number of cash deposits made, during the reporting period.
2.4.3	224	Cash Deposits - Total value of funds deposited.	Enter the total value of cash deposits made, during the reporting period.

2.4.4	225	Total Number of Non-Account Based Cash Deposits.	Enter the total number of Non-Account Based Cash Deposits, third-party deposits, made during the reporting period.
2.4.5	226	Total value of Non-Account Based cash deposits.	Enter the value number of Non-Account Based Cash Deposits made, during the reporting period.
2.4.6	227	Number of Cash Deposits - PEPs.	Enter the number of cash deposits made by PEPs, during the reporting period.
2.4.7	228	Cash Deposits - Total value of cash deposited by PEPs.	Enter the total value of cash deposits made by PEPs, during the reporting period.
2.4.8	229	Number of Cash Deposits – HNWI's.	Enter the number of cash deposits made by HNWI's, during the reporting period.
2.4.9	230	Cash Deposits - Total value of cash deposited by HNWI's.	Enter the total value of cash deposits made by HNWI's, during the reporting period.
2.4.10	231	Number of Cash Deposits by Natural Persons > US \$10,000 (or equivalent).	Enter the number of cash deposits made by Natural Persons greater than US\$10,000 (or equivalent), during the reporting period.
2.4.11	232	Total value of cash deposits - Natural Persons > US \$10,000	Enter the total value of cash deposits made by Natural Persons greater than US\$10,000 (or equivalent), during the reporting period.
2.4.12	233	Number Cash Deposits - Real Estate Agents & Brokers.	Enter the number of cash deposits made by Real Estate Agents & Brokers, during the reporting period.
2.4.13	234	Total value of cash deposits - Real Estate Agents & Brokers.	Enter the total value of cash deposits made by Real Estate Agents & Brokers, during the reporting period.
2.4.14	235	Number of cash deposits - Dealers in Precious Metals and Stones.	Enter the number of cash deposits made by Dealers in Precious Metals and Stones, during the reporting period.
2.4.15	236	Total value of cash deposits - Dealers in Precious Metals and Stones.	Enter the total value of cash deposits made by Dealers in Precious Metals and Stones, during the reporting period.
2.4.16	237	Number of cash deposits - NPOs.	Enter the number of cash deposits made by NPOs, during the reporting period.

2.4.17	238	Total value of cash deposits - NPOs.	Enter the total value of cash deposits made by NPOs, during the reporting period.
2.4.18	239	Number of cash deposits - Foundations.	Enter the number of cash deposits made by Foundations, during the reporting period.
2.4.19	240	Total value of cash deposits - Foundations.	Enter the total value of cash deposits made by Foundations, during the reporting period.
2.4.20	241	Number of cash deposits - High Value Dealers.	Enter the number of cash deposits made by High Value Dealers, during the reporting period.
2.4.21	242	Value of cash deposits - High Value Dealers.	Enter the total value of cash deposits made by High Value Dealers, during the reporting period.
2.4.22	243	Number of cash deposits - Money Lenders.	Enter the number of cash deposits made by Money Lenders, during the reporting period.
2.4.23	244	Total value of cash deposits - Money Lenders.	Enter the total value of cash deposits made by Money Lenders, during the reporting period.
2.4.24	245	Number of Cash Deposits – Financial Lessors.	Enter the number of cash deposits made by Financial Lessors, during the reporting period.
2.4.25	246	Total value of cash deposits – Financial Lessors.	Enter the total value of cash deposits made by Financial Lessors, during the reporting period.
2.5.1	247	Does the entity offer correspondent banking services?	Please answer 'Yes' or 'No'
2.5.2	248	Correspondent Banking Services – Number of respondent institutions / clients.	Enter the number of Respondents institutions (clients) that have been offered correspondent banking services by the entity at the end of the reporting period.
2.5.3	249	Respondent Institutions - Number of Transactions.	Enter the total number of transactions conducted by Respondent Institutions, during the reporting period.
2.5.4	250	Respondent Institutions - Value of Funds Transferred.	Enter the total value of funds transferred by Respondent Institutions, during the reporting period.

2.5.5	251	Non-Group Respondents - Number of Transactions.	Enter the total number of transactions conducted by Non-Group Respondents, during the reporting period.
2.5.6	252	Non-Group Respondents - Value of Funds Transferred.	Enter the total value of funds transferred by Non-Group Respondents, during the reporting period.
2.5.7	253	Respondent Institutions - Money Service Providers - Number of Transactions.	Enter the number of transactions conducted by Respondent Institutions operating as Money Service Providers, during the reporting period.
2.5.8	254	Respondent - Money Service Providers - Value of Funds Transferred.	Enter the value of funds transferred by Respondent Institutions operating as Money Service Providers, during the reporting period.
2.6.1	255	Total Number of Loans issued.	Enter the total number of loans issued by the entity during the reporting period.
2.6.2	256	Total value of Loans issued.	Enter the total value of loans issued by the entity during the reporting period.
2.6.3	257	Non-Group Loans - Number of Transactions.	Enter the number of transactions processed for Non-Group Loans, during the reporting period.
2.6.4	258	Non-Group Loans - Total value of funds transferred.	Enter the total value of funds transferred for Non-Group Loans, during the reporting period.
2.6.5	259	Non-Group Back-2-Back Loans - Number of Transactions.	Enter the number of transactions processed for Non-Group Back-2-Back Loans, during the reporting period.
2.6.6	260	Non-Group Back-2-Back Loans - Total value of funds transferred.	Enter the total value of funds transferred for Non-Group Back-2-Back Loans, during the reporting period.
2.6.7	261	Loans - PEPs - Number of Transactions.	Enter the number of loan transactions processed PEPs, during the reporting period.
2.6.8	262	Loans - PEPs - Total value of funds transferred.	Enter the total value of funds transferred as Loans to PEPs, during the reporting period.
2.6.9	263	Loans – High Net Worth Individuals – Number of Transactions.	Enter the number of loan transactions processed for HNWI, during the reporting period.
2.6.10	264	Loans - High Net Worth Individuals - Total value of	Enter the total value of funds transferred as Loans to HNWI, during the reporting

		funds transferred.	period.
2.6.11	265	Loans -Ultra High Net Worth Individuals - Number of Transactions.	Enter the number of loan transactions processed for UHNWIs, during the reporting period.
2.6.12	266	Loans - Ultra High Net Worth Individuals - Total value of funds transferred.	Enter the total value of funds transferred as Loans to UHNWIs, during the reporting period.
2.6.13	267	Loans - Exempt Companies - Number of Transactions.	Enter the number of loan transactions processed for Exempt Companies, during the reporting period.
2.6.14	268	Loans - Exempt Companies - Total value of funds transferred.	Enter the total value of funds transferred as Loans to Exempt Companies, during the reporting period.
	269	Do you have any comments or feedback for this tab?	Enter 'Yes' or 'No'
	270	Please use this area to provide any comments or feedback for this tab.	If no feedback enter 'N/A'.
3.1.1	271	Number of Clients - Direct - F2F, broken down by nationality or country of incorporation of the client.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period. F2F channels include Direct – F2F; Referrals within Group – F2F; Eligible Introducers - F2F; Other Introducers - F2F
3.1.2	272	Number of Clients - Direct - Non-F2F, broken down by nationality or country of incorporation of the client.	Enter the total number of clients which were onboarded using Non-Face-to-Face (Non-F2F) channels, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and <u>not only</u> those onboarded during the reporting period. Example of Direct Non-F2F would include where the entity is onboarding clients through phone or email; however, they do not have Direct F2F contact with the clients.
3.1.3	273	Number of Clients via Online Platforms, broken down by	Provide the total number of clients, in the entity's entire portfolio, that were

		nationality or country of incorporation of the client.	onboarded via Online platforms, and <u>not only</u> those onboarded during the reporting period.
3.1.4	274	Number of Clients through Referrals within Group - F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded during the reporting period, using referrals within Group - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded using referrals within Group F2F for the reporting period.</p> <p>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	275	Number of Clients through Referrals within Group - Non F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients that were onboarded, using referrals within Group and via a Non-Face to Face channels for the reporting period.</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	276	Number of Clients through Eligible Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients that were onboarded during the reporting period, through Eligible Introducers, broken down by nationality or country of incorporation of the client.</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	277	Number of Clients through Other Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Other Introducers Non-F2F for the reporting period.

3.1.8	278	Number of Clients via Online Platforms, broken down by nationality or country of incorporation of the client.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms during the reporting period.
3.2.1	279	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	280	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	281	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer at the end of the reporting period.
3.2.4	282	How many AML Compliance Officers has the entity had in the reporting period and the previous 2 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".
3.2.5	283	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	284	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	285	What was the country of	Enter the country of residency of the

		residency of the Money Laundering Reporting Officer at the end of the reporting period?	Money Laundering Reporting Officer at the end of the reporting period.
3.2.8	286	How many Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years?	If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	287	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	288	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	289	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	290	How many Deputy Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	291	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	292	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

			<p>Group</p> <ul style="list-style-type: none"> • 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	293	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, during the reporting period.
3.2.16	294	How many TFS Screening platforms did the entity have in the reporting period and the previous 2 years?	If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	295	Has the entity outsourced the function of transaction monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	296	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship 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 that includes one of each within the reporting period.</p>
3.2.19	297	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	298	How many Transaction monitoring platforms did the entity have in the reporting period and the previous 2 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	299	In which countries, by percentage of equity ownership, are all shareholders of the entity located.	Enter the countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.

			For publicly listed entities please list beneficial ownership of 10% or more.
3.3.2	300	Number of branches by location, broken down by country of operation.	Enter the number of branches the entity has, broken down by country of operation.
3.3.3	301	Number of Subsidiaries by location, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.
3.3.4	302	In which country is the parent or holding company incorporated?	Enter the country the parent or holding company is incorporated.
3.4.1	303	Does the entity have any comments or feedback for this tap?	Please answer 'Yes' or 'No'.
3.4.2	304	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 Control Questions:

No.	Question No.	Question	Description/Explanation
1.1.1	305	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	306	Indicate the number of Independent Directors / Non-Executive Directors.	Enter the number of Directors / Members of the Governing Body that are Independent Directors/Non-Executive Directors? 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 company or related persons and provides independent oversight and constructive challenge to the executive directors.
1.1.3	307	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.4	308	Is there an approved Charter for the	Please answer 'Yes' or 'No'.

		Governing Body and Sub-Committees?	
1.1.5	309	Does the approved Charter include the roles and responsibilities of the Directors/General Partners/Managers?	Please answer 'Yes' or 'No'.
1.1.6	310	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	311	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	312	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.9	313	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	314	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	315	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	316	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	317	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	318	Is there regular reporting of AML/CFT/PF matters by Senior Management to the board?	Please answer 'Yes' or 'No'.
1.2.2	319	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	320	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.2.4	321	When was the last review of the AML/CFT/PF and Sanctions policies and procedures?	Enter the date of the last review of the AML/CFT/PF and Sanctions policies and procedures.
1.2.5	322	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	323	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	324	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	325	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	326	Does Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.10	327	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	328	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.3.2	329	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.3.3	330	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.3.4	331	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.

1.3.5	332	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.6	333	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.7	334	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.3.8	335	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.3.9	336	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	337	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	338	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	339	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	340	Does the MLRO report to the Board and Senior Management on AML/CFT/CPF and Sanctions related issues on the adequacy of the AML/CFT/CPF and Sanctions framework?	Please answer 'Yes' or 'No'.
1.3.14	341	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	342	Does the AMLCO provide oversight of risk assessment procedures?	Please answer 'Yes' or 'No'.
1.3.16	343	Does the AMLCO conduct	Please answer 'Yes' or 'No'.

		AML/CFT/CPF and Sanctions training for all Directors and relevant staff of the entity?	
1.3.17	344	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	345	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.19	346	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	347	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	348	Does the AMLCO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.22	349	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	350	Does the MLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.24	351	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	352	Does the DMLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.

1.3.26	353	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	354	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	355	Is there an Internal Audit Charter/Plan?	Please answer 'Yes' or 'No'.
1.4.3	356	Is the AML compliance plan or charter reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.4	357	Is the internal AML audit function outsourced?	Please answer 'Yes' or 'No'.
1.4.5	358	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	359	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	360	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	361	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	362	When was the last AML/CFT audit conducted by Internal Audit?	Enter the date of last Internal AML Audit.
1.4.10	363	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.11	364	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	365	Has the company developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.

1.5.2	366	Is AML/CFT/CPF and Sanctions training provided to Directors and all relevant staff?	Please answer 'Yes' or 'No'.
1.5.3	367	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	368	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.5.5	369	Does the entity assess AML knowledge of its employees?	Please answer 'Yes' or 'No'.
1.5.6	370	Please indicate percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company during the reporting period.	Enter the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period.
1.6.1	371	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	372	Are any records NOT retained or accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.3	373	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	374	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	375	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.7.2	376	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	377	What was the date of the last review?	Enter the date of the last review of the Risk Assessment.

1.7.4	378	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	379	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	380	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	381	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	382	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	383	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
17.10	384	Does the entity consider other risk factors, other than those listed above in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.11	385	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	386	How many high-risk business relationships or client accounts did the entity review during the reporting period?	Enter the number of 'high' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.13	387	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	388	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	389	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	390	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	391	Where applicable, does the entity have a Group Wide AML/CFT programme?	Please answer 'Yes' or 'No'.
1.8.2	392	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	393	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	394	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	395	Does the entity have Governing Body approved policies and procedures for identification of high-risk customers and PEPs?	Please answer 'Yes' or 'No'.
1.8.6	396	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	Please answer 'Yes' or 'No'.

		PF?	
1.8.7	397	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	398	Does the entity have Governing Body approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.8.9	399	Does the entity have Governing Body approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.8.10	400	Does the entity have Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.8.11	401	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	402	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	403	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	404	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	405	For the governing process, is information collected on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.8.16	406	Total Clients	Enter the total number of clients the entity has as at end of the reporting period. Where applicable, the number of clients/ customers should only

			<p>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	407	Did the company 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	408	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	409	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
1.9.1	410	Is there a screening process?	Please answer 'Yes' or 'No'.
1.9.2	411	Is the screening process manual, automated or a combination?	Select: 'Manual', 'Automated', or 'Automated with Manual Checks'.
1.9.3	412	Is the screening process fully or partially outsourced?	Please select: 'Fully', 'Partially', or 'Not Applicable'.
1.9.4	413	If outsourced, please identify the vendor and the measures in place to ensure that the vendor is screening against the most recent lists.	Enter the name of the vendor along with the measures in place to ensure that the vendor is screening against the most recent lists.
1.9.5	414	Do screening parameters include risk indicators for TF and PF monitoring?	Please answer 'Yes' or 'No'.
1.9.6	415	Is the existing customer database screened periodically against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.9.7	416	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	417	Number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.	<p>Enter the number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.</p> <p>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.</p>
1.9.9	418	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	419	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.9.12	420	Are customers / counterparties screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.9.13	421	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	422	Does the entity maintain a report of results of positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.9.15	423	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	424	Is there an approved process, including policies and procedures, for sanctions monitoring?	Please answer 'Yes' or 'No'.
1.9.19	425	Is the sanctions monitoring process manual, automated or a combination?	<p>Select which applies:</p> <p>'Manual', 'Automated', or 'Automated with Manual Checks'.</p>
1.9.20	426	Is sanctions monitoring done in real time or after the event?	<p>Select what applies:</p> <p>'No process', 'After the event', or 'Real time'.</p>

1.9.21	427	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	428	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	429	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	430	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	431	What is the name of the Transaction Monitoring System or name of the provider of the Transaction Monitoring System if bought or outsourced?	Enter the name of the Transaction Monitoring System or name of the provider of the Transaction Monitoring System if bought or outsourced.
1.10.3	432	Has the automated system been adapted for use in Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	433	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	434	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	435	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	436	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing/Proliferation Financing.	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	437	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	438	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	439	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	440	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	441	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.
1.10.11	442	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering or Terrorism Financing 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.
1.10.12	443	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.
1.10.13	444	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	445	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	446	Does the entity exercise additional caution and conduct EDD on individuals and/or entities based in high-risk countries?	Please answer 'Yes' or 'No'.
1.11.3	447	How many clients did the entity conduct EDD on during the reporting period?	The number of clients, legal persons and arrangements and natural persons where the entity applied enhance due diligence.
1.11.4	448	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	449	How many Client's KYC/CDD files were reviewed by the entity as part of applying EDD measures on during the reporting period?	The number of clients' CDD files, both legal persons and arrangements and natural persons, that the entity reviewed as part applying enhance due diligence.

1.11.6	450	Does the entity have enhanced procedures for monitoring PEPs?	Please answer 'Yes' or 'No'.
1.12.1	451	Does the entity have a documented process for reporting Internal Suspicious Activity to the MLRO?	Please answer 'Yes' or 'No'.
1.12.2	452	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	453	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	454	How many hours on average does it take you 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	455	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	456	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.12.7	457	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.13.1	458	Does your entity conduct correspondent-type business relationships, where your entity acts as the correspondent?	Please answer 'Yes' or 'No'.
1.13.2	459	Does the entity obtain approval from senior management before establishing new correspondent relationships where the entity acts as the correspondent bank?	Please answer 'Yes' or 'No'.
1.13.3	460	Prior to establishing correspondent banking relationships does the entity assess the institution's AML/CFT controls?	Please answer 'Yes' or 'No'.
1.13.4	461	Prior to establishing correspondent banking relationships does the entity	Please answer 'Yes' or 'No'.

		conduct CDD on the institution?	
1.13.5	462	Does the entity ensure that it does not enter or continue a correspondent relationship with a shell bank?	Please answer 'Yes' or 'No'.
1.14.1	463	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.
1.14.2	464	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.
1.14.3	465	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.
1.14.4	466	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.
1.14.5	467	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.
1.14.6	468	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.
1.14.7	469	if relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the	Please answer 'Yes', 'No' or 'N/A'.

		outsourced activity?	
1.14.8	470	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.
1.14.9	471	If relevant, does the outsourced AMLCO/MLRO have access to the compliance committee and board of the entity?	Select which best applies: 'Yes', 'No' or 'N/A' The question is only applicable if entity outsource any activities.
1.14.10	472	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.
1.14.11	473	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes' or Enter 'No' where not applicable' The question is only applicable if entity outsource any activities.
1.14.12	474	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
1.15.1	475	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.15.2	476	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.