



AML Survey – Completion Guide: Company Manager

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3 October 2022	1.1	Update to definitions.
10 October 2022	1.2	Update to display of question numbers.
4 November 2022	1.3	Updates to definitions, descriptions, and explanations
31 May 2023	1.4	Updates to definitions, descriptions, explanations and questions.

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1 INTRODUCTION

The Cayman Islands Monetary Authority (the “Authority”) periodically undertakes sectoral ML/TF/PF and Sanctions risk assessments as part of its risk-based approach to AML/CFT supervision of regulated financial service providers (“FSPs”). In conducting sectoral ML/TF risk assessments and other related research, the Authority uses a software called STRIX to distribute the AML Survey to FSPs and further collect, analyse, model, and score ML/TF/PF and Sanctions risk data.

FSPs are required to provide this data by completing the AML Survey Form and submit it through the Authority’s web-based e-mail survey software, to the Anti-Money Laundering Division (the “AML/D”). This AML Survey Form is issued in accordance with section 16(1)(b) of the Companies Management Act (2021 Revision).

This Guide gives support to FSPs which carry out company management services for accessing, completion and submission of the AML Survey – Company Manager Form.

2 FORM INFORMATION

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

The AML Survey – Company Manager 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 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: 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=YJa0JBLI86VZVCRbBxm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2B2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYSOP%2Bk8rPURRSVrPSQt6JA5hgsaBaC6uvcZV4KB266HfFgh4FhATaTNSa3IE3aiA%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.

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password *

Confirm

Password must meet the following requirements:

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

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

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password *

Confirm Password *

SUBMIT

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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.

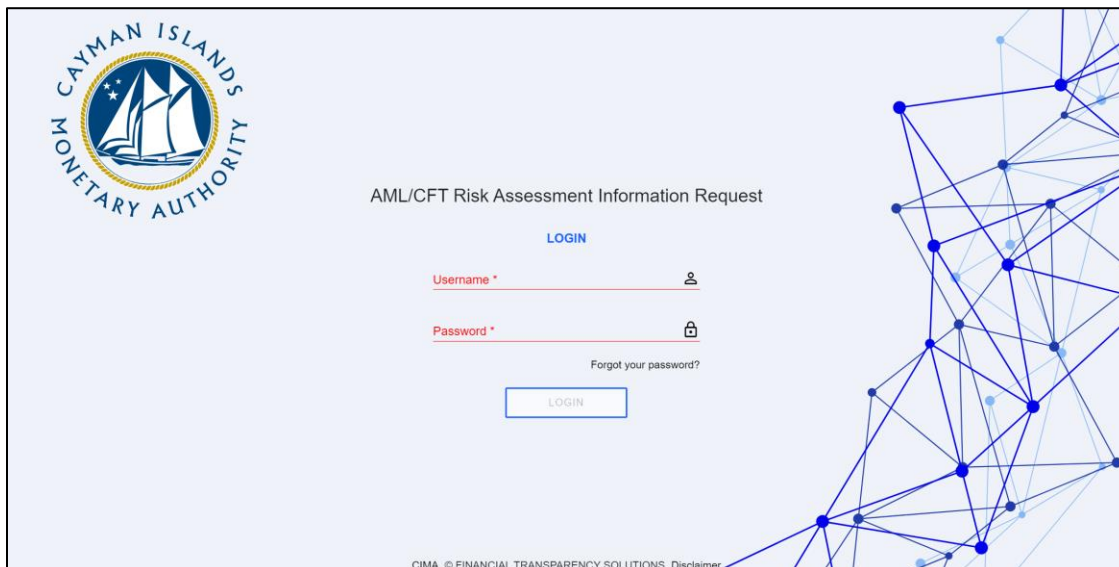


Your password was successfully changed.

[RETURN TO HOME](#)

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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.



AML/CFT Risk Assessment Information Request

LOGIN

Username *

Password *

Forgot your password?

LOGIN

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





Cayman Islands Monetary Authority

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

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

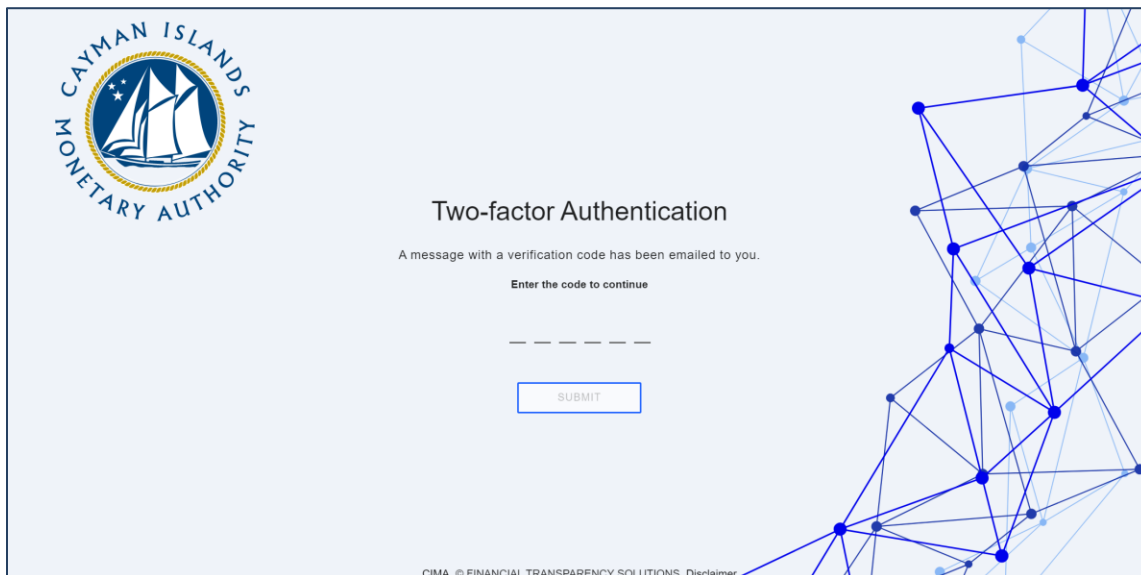
951247

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

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

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

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



**CAYMAN ISLANDS
MONETARY AUTHORITY**

Two-factor Authentication

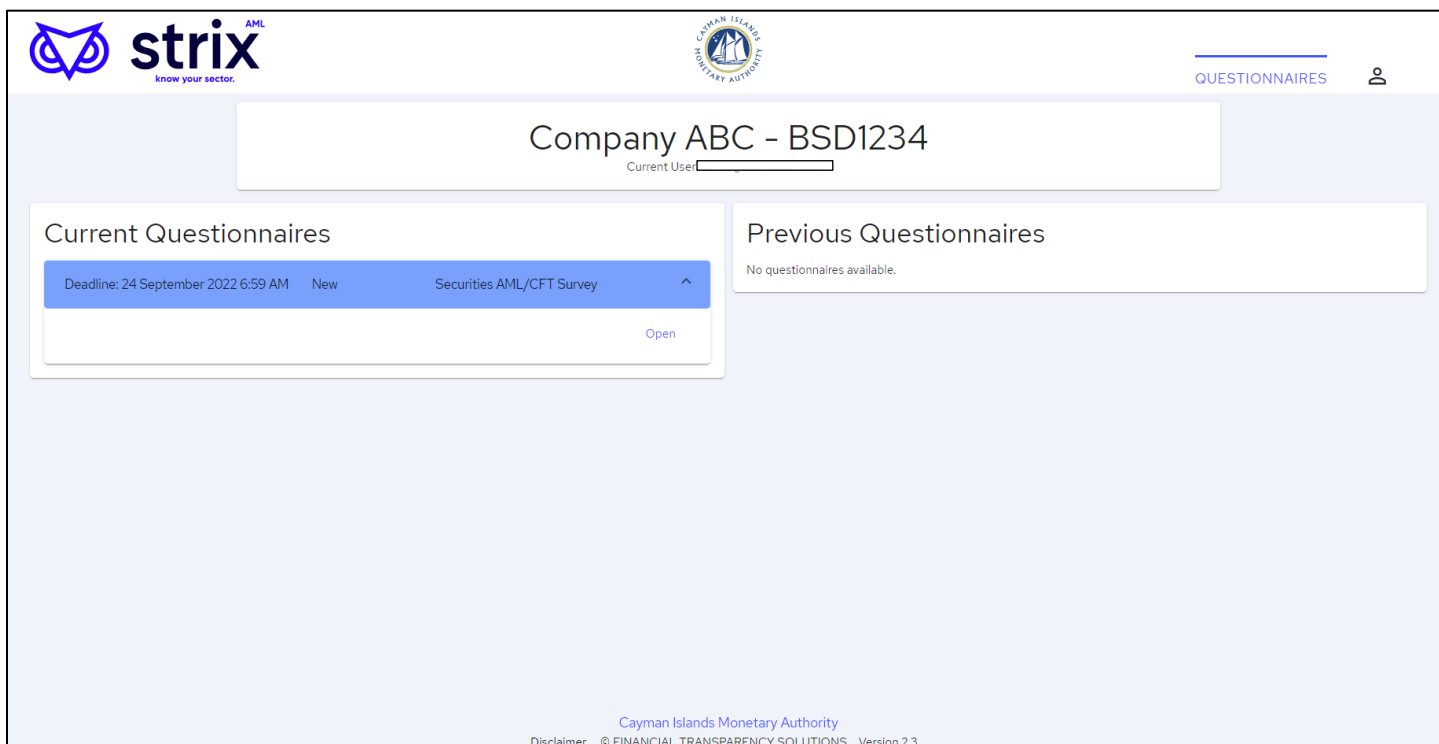
A message with a verification code has been emailed to you.

Enter the code to continue

SUBMIT

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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.



strix AML
know your sector.

**CAYMAN ISLANDS
MONETARY AUTHORITY**

QUESTIONNAIRES

Company ABC - BSD1234

Current User: _____

Current Questionnaires

Deadline: 24 September 2022 6:59 AM	New	Securities AML/CFT Survey	Open

Previous Questionnaires

No questionnaires available.

Cayman Islands Monetary Authority
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3.2 COMPLETING THE AML SURVEY FORM

1. Click the Current Questionnaire to access the AML Survey Form and start populating the form with the required data.
 - a. Completion guidance for the AML Survey is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Survey as many times as needed prior to the survey due date so long as the recipient selects 'Save'.
 - c. Once the AML Survey has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
 - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
 - e. Once the AML Survey is 'Submitted' an Excel and PDF copy of the completed survey will be available under 'Current Questionnaire'.
 - f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Survey through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an 'Incomplete' AML Survey, they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLSurveys@cima.ky detailing the following:
 - i. Licence or Registration Name
 - ii. Licenced or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current directors
 - v. Number of Clients
 - vi. Reason for requesting to make an Incomplete Submission.
2. If a user receives or has access to more than one survey, they will not see the additional survey(s) in the 'Current Surveys' section of the web page. At the top of the page, where it shows the Entity name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.
3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there are several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following:

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

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

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

Terms and Definitions:

Terms/Abbreviations	Definition/Meaning
AMLRs	Anti-Money Laundering Regulations, (2023 Revision), as amended.
AMLCO	Anti-Money Laundering Compliance Officer
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>This includes both Natural Persons and Legal Persons and Arrangement Clients.</p>
Corporate Entity	A corporate body constituted under the Laws of the Islands, or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Survey	<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.
DMLRO	Deputy Money Laundering Reporting Officer
Direct - F2F	The engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Eligible Introducers	A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible

	Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Fintech Service	A service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2022 Revision), except to the extent that it is modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions.
FRA	Financial Reporting Authority.
Gov / Pub Sector	Business conducted in or with Government or Public Sector.
HNWI	<p>A high net worth individuals (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 <u>NOT</u> Ultra HNWI and should not be double counted.</p>
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.
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies such as 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 Natural Person and not a Legal Person and Arrangement.
Legal Person or Arrangement	<p>“Legal person” means a company or other entity, such as a foundation, created by operation of law 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>
MLRO	Money Laundering Reporting Officer
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 behalf of another.
Nominee Shareholder	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 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>
PEP	<p>“Politically Exposed Person” includes —</p> <p>(a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official.</p> <p>(b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and</p> <p>(c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p> <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 through December 31, 2022
Source of Funds	<p>The origin of the assets that will be used to form and maintain the business relationship.</p> <p>A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together.</p> <p>Take this into account when answering questions relating to the 'Nature of Business – Source of Funding.</p>
Special Economic Zone Business	Any type of business authorised to be carried on in a special economic zone pursuant to any legislation enforced in the Islands.
Signatories	Signatories are those persons authorised to act on behalf of a client, for example, UBOs, Directors, or other Third Parties.
Targeted Financial Sanctions (TSF)	Includes 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").
TCSP	Includes those entities conducting Trusts, Company Manager, and Corporate Service Provider business.
Transaction	<p>Events where services were engaged with or on behalf of a client or where payments are made to, from, or on behalf of clients</p> <p>Services include but are not limited to those listed in Q123 through Q135.</p>
Trust	A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the

		beneficiaries or for the furtherance of certain purposes.
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 HNWI		Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWI whose net worth is greater than or equal to US\$30,000,000.
Virtual Assets Products and Services		Includes those services identified within the Virtual Asset (Service Providers) Act (2020 Revision) as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.
Timeframe	Number of Clients	Number of clients as at the end of the reporting period.
Timeframe	Number of Transactions	Number of Transactions conducted for the client during the reporting period.

AML Inherent Risk Questions:

Ref. No.	Question No.	Question	Description/Explanation
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1.1.1	1	Total Clients / Customers.	<p>Enter the total number of clients the entity has at the end of the reporting period.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p>
1.1.2	2	Total Transactions for the reporting period.	Enter the total number of all transactions conducted for clients during the reporting period.
1.1.3	3	Clients / Customers that are Legal Persons, broken down by country of incorporation of the client.	<p>Enter the total number of clients that are legal persons subdivided by their country of incorporation as at the end of the reporting period.</p> <p>Examples include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies.</p>
1.1.4	4	Clients / Customers who are Legal Arrangements, broken down by the country of establishment of the client.	<p>Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as at the end of the reporting period.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p>Example of legal arrangement include but are not limited to Trusts and Partnerships.</p>
1.1.5	5	Total number of PEPs.	<p>Enter the total number of PEPs, by nationality of the PEP, as at the end of the reporting period.</p> <p>Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, UBOs, Directors, or hold any other form of control, including signatories.</p>
1.1.6	6	Total number of High Risk Clients.	Enter the total number of clients / customers that are high risk, at the end of the reporting period.
1.2.1	7	Total number of UBOs of clients who are Legal Persons or Arrangements.	<p>Enter the total number of UBOs of all clients who are Legal Persons or Arrangements.</p> <p>This category is specific to all Legal persons and Arrangements. Examples include, but are not limited to, the total number of UBOs of Corporate entities, Settlers of Trusts and General Partners of limited Partnerships.</p> <p>A UBO should not be counted more than once regardless of the number of business relationships they have with the entity.</p>

1.2.2	8	Does the entity have any clients who are Legal Persons?	Answer 'Yes' or 'No'
1.2.3	9	Number of UBOs of clients who are Legal Persons.	Enter the number of UBOs of legal person clients, broken down by the nationality of the UBO.
1.2.4	10	Does the entity have any clients who are Legal Arrangements?	Answer 'Yes' or 'No'
1.2.5	11	Number of settlors of clients who are Legal Arrangements.	Enter the number of settlors of legal arrangement clients, broken down by the nationality of the settlor. This category is specific to clients who are legal arrangements and are Trusts.
1.2.6	12	Number of Partners of clients who are Legal Arrangements.	Enter the number of partners of legal arrangement clients, broken down by the nationality of the partner.
1.2.7	13	Does the entity have any clients that have UBOs who are HNWIIs?	Please answer 'Yes' or 'No'. This category is specific to clients who are Legal Persons and Arrangements. Examples include, but not limited to, instances where a UBO of a LLC, Partners of a Partnership or Settlor of a Trust is a HNWI.
1.2.8	14	Number of Clients that have UBOs who are HNWIIs.	Enter the total number of clients that have UBOs who are HNWIIs. HNWIIs 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) <u>Do Not include</u> clients/customers with net worth equal to or greater than US\$30,000,000 If the entity does not have any clients that fit this category record a '0'
1.2.9	15	Does the entity have any clients that have UBOs who are Ultra HNWIIs?	Please answer 'Yes' or 'No'. UHNWIIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.

1.2.10	16	Number of Clients that have UBOs who are Ultra HNWIs.	Enter the total number of clients who have UBOs who are Ultra HNWIs. If the entity does not have any clients that fit this category record a '0'.
1.2.11	17	Does the entity have any clients who are Legal Persons or Arrangements that have UBOs who are PEPs?	Please answer 'Yes' or 'No'.
1.2.12	18	Number of UBOs of clients who are Legal Persons or Arrangements which are also PEPs.	Enter the total number of clients who are Legal Person and Arrangements that have UBOs who are PEPs, as at the end of the reporting period.
1.2.13	19	Does the entity have any clients that have Nominees acting on behalf of a beneficial owner (inc. any Nominees within the ownership structure)?	Please answer 'Yes' or 'No'.
1.2.14	20	Number of clients that have Nominees acting on behalf of a beneficial owner, or a Nominee within the ownership structure, broken down by nationality of the beneficial owner.	Enter the total number of clients that have nominees acting on behalf of beneficial owners, or within its ownership structure, broken down by nationality of the beneficial owner. This category is specific to clients who are Legal Persons and Arrangements.
1.3.1	21	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 nominee directors appointed, as at the end of the reporting period, broken down by country of nationality of the director and <u>not</u> the nominee director.
1.3.2	22	Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the nominee director.	Enter the total number of clients which have a nominee director as at the end of the reporting period, broken down by country of nationality of the director (not the nominee).
1.3.3	23	Number of directors and/or senior management of clients who are PEPs.	Enter the total number of clients who have directors and/or senior management who are also PEPs, as at the end of the reporting period.
1.3.4	24	Number of directors and/or senior management of	Enter the number of directors and/or senior management of the clients who are

		clients who are High Net Worth Individuals.	also HNWIs, as at the end of the reporting period. <u>Do not include</u> senior management who are Ultra HNWIs.
1.3.5	25	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs, as at the end of the reporting period.
1.3.6	26	Number of directors and/or senior management of clients who are PEPs & HNWIs / Ultra-HNWIs.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs / Ultra-HNWIs, as at the end of the reporting period.
1.4.1	27	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	28	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	29	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed by clients that are Government or Public Sector during the reporting period.
1.4.4	30	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.5	31	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, as at the end of the reporting period broken down by country of incorporation of the client.
1.4.6	32	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period.
1.4.7	33	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.8	34	Foundations - Number of Clients.	Enter the number of clients the entity has that are a Foundation, broken down by country of establishment of the client, at the end of the reporting period.
1.4.9	35	Foundations - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are a Foundation during the reporting period.

1.4.10	36	Does the entity have any clients that are Trusts?	Please answer 'Yes' or 'No'.
1.4.11	37	Trusts - Number of Clients.	Enter the number of clients the entity has, that are Trusts, broken down by country of establishment, as at the end of the reporting period.
1.4.12	38	Trusts - Number of Transactions.	Enter the number of transactions processed for clients that are Trusts, during the reporting period.
1.4.13	39	Trusts – Value of Legal Arrangements.	Enter the value of clients who are Trusts at the end of the reporting period.
1.4.14	40	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.15	41	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients which are Segregated Portfolio Companies, as at the end of the reporting period.
1.4.16	42	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.
1.4.17	43	Does the entity have any clients that operate from Special Economic Zone?	Please answer 'Yes' or 'No'.
1.4.18	44	Special Economic Zone - Number of Clients.	Enter the number of clients the entity has, that are registered / operate in a Special Economic Zone, as at the end of reporting period.
1.4.19	45	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients, that are registered / operate in a Special Economic Zone, during the reporting period.
1.4.20	46	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.
1.4.21	47	Funds / Collective Investment Vehicles - Number of Clients.	Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles as at the end of reporting period.

1.4.22	48	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.
1.4.23	49	Does the entity have any clients that are Partnerships?	Please answer 'Yes' or 'No'.
1.4.24	50	Partnerships – Number of clients.	Enter the number of clients the entity has that are Partnerships, as at the end of the reporting period.
1.4.25	51	Partnerships – Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Partnerships during the reporting period.
1.5.1	52	Does the entity have any clients that are Natural Persons?	Please answer 'Yes' or 'No'. This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.
1.5.2	53	Clients / customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period. If an entity does not have such clients, a '0' value should be used. <i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i>
1.5.3	54	Clients/customers that are Natural Persons, broken down by Residency of the client.	Enter the number of clients that are natural persons, broken down by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a '0' value should be used. <i>Note: This category <u>does not</u> include clients/ customers that are Legal Persons and Arrangements.</i>
1.5.4	55	Natural Persons - Total Transactions for the reporting period.	Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period. This category is specific to clients who are natural persons who have a direct business relationship with the entity.

			<p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients / customers that are Legal Persons and Arrangements.</i></p>
1.5.5	56	Natural Person Clients - Does the entity have any clients that are PEPs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.6	57	Number of Natural Person clients who are PEPs.	<p>Enter the total number of Natural Person clients that are PEPs, as at the end of the reporting period.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.7	58	Natural Persons - PEPs - Number of Transactions.	<p>Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.</p>
1.5.8	59	Does the entity have any Natural Person clients that are HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIIs.</p>
1.5.9	60	Number of Natural Person clients who are HNWIIs.	<p>Enter the number of Natural Person clients the entity has that are HNWIIs.</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIIs.</p>
1.5.10	61	Natural Person Clients - HNWIIs - Number of Transactions.	<p>Enter the number of transactions conducted by Natural Person clients, who are HNWIIs, during the reporting period.</p>
1.5.11	62	Does the entity have any Natural Person clients that are Ultra HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.12	63	Number of Natural Person clients who are Ultra HNWIIs.	<p>Enter the number of Natural Person clients the entity has that are Ultra-HNWIIs at the end of the reporting period.</p>
1.5.13	64	Natural Person Clients - Ultra HNWIIs- Number of Transactions.	<p>Enter the number of transactions conducted by Natural Person who are Ultra HNWIIs, during the reporting period.</p>
1.5.14	65	Does the entity have any Natural Person clients that are PEPs and HNWIIs /Ultra HNWIIs?	<p>Please answer 'Yes' or 'No'.</p>

1.5.15	66	Number of Natural Person Clients who are PEPs and HNWIs / Ultra HNWIs.	Enter the number of Natural Person clients the entity has that are both PEPs and HNWIs / Ultra HNWIs, at the end of the reporting period.
1.5.16	67	Natural Person Clients - PEPs and HNWIs / UHNWIs - Number of Transactions.	Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWIs/Ultra HNWIs, during the reporting period.
1.6.1	68	<p>Nature of Business / Source of Funding:</p> <p>Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> • Banking Institutions exc. MSBs • Other Financial regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech <p><i>*excluding MSBs, Virtual Assets Products and Services Providers, and TCSPs.</i></p>	Enter the total number of clients which fall within the list of sectors, broken down by nationality or country of incorporation of the clients, as at the end of the reporting period.
1.6.2	69	Does the entity have any clients that are legal persons or arrangements, operating as Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.6.3	70	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs).

1.6.4	71	Does the entity have any clients that are legal persons or arrangements operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses not listed in this section?	Please answer 'Yes' or 'No'.
1.6.5	72	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above.
1.6.6	73	Does the entity have any clients that are legal persons or arrangements operating in Financial Leasing, or natural persons employed by Financial Leasing?	Please answer 'Yes' or 'No'.
1.6.7	74	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Financial Leasing companies or natural persons that are employed by Financial Leasing companies.
1.6.8	75	Does the entity have any clients that are legal persons or arrangements operating as Money Lending, or natural persons employed by Money Lending?	Please answer 'Yes' or 'No'.
1.6.9	76	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are Money Lending institutions, and / or natural persons that are employed by Money Lending institutions.
1.6.10	77	Does the entity have any clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or natural persons employed as Accountants?	Please answer 'Yes' or 'No'.

1.6.11	78	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.6.12	79	Does the entity have any clients that are legal persons or arrangements operating in the Fintech industry, or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.13	80	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry.
1.6.14	81	<p>Nature of Business / Source of Funding: Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors, broken down by nationality, country of incorporation / formation of the clients:</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Services Business (MSBs) ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	Enter the total number of clients which fall within the list of sectors, broken down by nationality, country of incorporation / formation of the clients, as at the end of the reporting period.
1.6.15	82	Does the entity have any clients that are legal persons or arrangements operating as Legal Practitioners, or natural	Please answer 'Yes' or 'No'

		persons employed as Legal Practitioner?	
1.6.16	83	Legal Practitioners – Number of clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by Legal Practitioner.
1.6.17	84	Does the entity have any clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, or natural persons employed by Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'
1.6.18	85	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.6.19	86	Does the entity have any clients that are legal persons or arrangements operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.6.20	87	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Money Services Business, and / or are natural persons that are employed in the Money Services Business.
1.6.21	88	Does the entity have any clients that are legal persons or arrangements offering Virtual Asset products or services or natural persons employed by or earning income from Virtual Asset products or services?	Please answer 'Yes' or 'No'.
1.6.22	89	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements offering virtual assets products and

			services, and natural persons that are employed by institutions which offer virtual assets products and services.
1.6.23	90	Does the entity have any clients that are legal persons or arrangements operating as High Value Dealers or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.
1.6.24	91	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.6.25	92	Does the entity have any clients that are legal persons or arrangements operating as TCSPs, or natural persons employed by TCSPs?	Please answer 'Yes' or 'No'.
1.6.26	93	TCSPs - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as a TCSP, and natural persons that are employed by TCSPs.
1.6.27	94	Does the entity have any clients that are legal persons or arrangements operating in the Import / Export Industry, or natural persons employed by the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.28	95	Import / Export - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Import / Export business, and natural persons that are employed the Import / Export industry.
1.6.29	96	Does the entity have any clients that are legal persons or arrangements operating in the Shipping and Transport of Goods industry, or natural persons employed by the Shipping and Transport of Goods industry?	Please answer 'Yes' or 'No'.

1.6.30	97	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Shipping and Transport of Goods business, and natural persons that are employed within the Shipping and Transport of Goods industry.
1.6.31	98	<p>Nature of Business / Source of Funding:</p> <p>Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors, broken down by nationality, or country of incorporation / formation of the clients:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry ▪ Unknown Sector / Industry (not recorded) 	Provide the total number of clients which fall within the list of sectors, broken down by nationality or country of incorporation / formation of the clients, as at the end of the reporting period.
1.6.32	99	Does the entity have any clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, or natural persons employed as Real Estate Agents / Brokers?	Please answer 'Yes' or 'No'.
1.6.33	100	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.6.34	101	Does the entity have any clients that are legal persons or arrangements	Please answer 'Yes' or 'No'.

		operating in the Gambling business (including online gambling), or natural persons employed or earning income in the Gambling business?	
1.6.35	102	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.6.36	103	Does the entity have any clients that are legal persons or arrangements operating in the Adult Entertainment industry, or natural persons employed or earning income in the Adult Entertainment industry?	Please answer 'Yes' or 'No'.
1.6.37	104	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry.
1.6.38	105	Does the entity have any clients that are legal persons or arrangements operating in the Defence Industry, or natural persons employed by the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.39	106	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.6.40	107	Does the entity have any clients that are legal persons or arrangements operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.

1.6.41	108	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.6.42	109	Does the entity have any clients that are legal persons or arrangements operating in the Mining Industry, or natural persons employed by the Mining Industry?	Please answer 'Yes' or 'No'.
1.6.43	110	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.6.44	111	Does the entity have any clients that are legal persons or arrangements operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.6.45	112	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry.
1.6.46	113	Does the entity have any clients that are legal persons or arrangements operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.47	114	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.

1.6.48	115	Does the entity have any clients that are legal persons or arrangements operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry?	Please answer 'Yes' or 'No'.
1.6.49	116	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in Cannabis Production & Distribution Business, and natural persons that are employed in the Cannabis Production & Distribution industry.
1.6.50	117	Does the entity have any clients that are legal persons or arrangements of Unknown Businesses, or natural persons employed in Unknown Professions or Industries?	Please answer 'Yes' or 'No'.
1.6.51	118	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions. Unknown business and profession are where the entity does not know, was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.
1.6.52	119	Does the entity have any clients where the nature of business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.53	120	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in known businesses, not mentioned above, or natural persons that are employed in known businesses/industries, not mentioned above.
1.7.1	121	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.

1.7.2	122	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	123	Number of clients the entity provides the service of Registered Office or Registered Agent.	Enter the number of clients the entity provides the services of Registered Office or Registered Agent.
2.1.2	124	Number of Clients the entity provides the service of Formation Agent.	Enter the number of clients the entity provides the service of Formation Agent.
2.1.3	125	Number of Clients the entity provides the service of Statutory Filings.	Enter the number of clients the entity provides the service of Statutory Filings, as at the end of the reporting period.
2.1.4	126	Number of Clients the entity provides the service of UBO Filings.	Enter the number of clients the entity provides the service of UBO Filings, as at the end of the reporting period.
2.1.5	127	Number of Clients the entity provides services of Nominee Shareholder, broken down by nationality of the shareholder who has the nominee appointed on their behalf.	Enter the number of clients the entity provides the service of Nominee Shareholder, broken down by nationality of the shareholder who the entity acts as a Nominee on their behalf, as at the end of the reporting period.
2.1.6	128	Number of Clients the entity provides services of Nominee Director services, broken down by nationality of the director who has the nominee appointed on their behalf.	Enter the number of clients the entity provides Nominee Director services, broken down by the nationality of the director who has the entity, or its principals / staff, appoint a nominee on their behalf.
2.1.7	129	Number of Clients the entity provides the services of Directorship.	Enter the number of clients the entity provides the service of Directorship.
2.1.8	130	Number of Clients - Secretarial Services.	Enter the number of clients the entity provides secretarial services.
2.1.9	131	Number of Clients the entity provides MLRO services.	Enter the number of clients the entity provides MLRO.
2.1.10	132	Number of Clients the entity provides AML	Enter the number of clients the entity provides AML Compliance Officer services.

		Compliance Officer services.	
2.1.11	133	Does the entity provide other services to clients that are not listed above?	Please answer 'Yes' or 'No'.
2.1.12	134	Number of Clients the entity provides Other Services not mentioned above.	Enter the number of clients the entity provides Other Services that are not mentioned above.
2.1.13	135	Please describe the other types of services, that are not listed above, provided to clients.	Enter all other types of services, that are not listed above, provided to clients.
2.2.1	136	Does the entity facilitate payments to / from Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.2.2	137	Physical Cash - Number of Clients.	Enter the number of clients where payments were made, to / from, in the form of Physical Cash, during the reporting period.
2.2.3	138	Physical Cash – Value of Transactions	Enter the value of the Physical Cash transactions conducted for or on behalf of clients, during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.4	139	Does the entity facilitate payments to / from Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.2.5	140	Virtual Currency – Number of Clients.	Enter the number of clients where payments were made, to / from, in the form of Virtual Currency, during the reporting period.
2.2.6	141	Virtual Currency - Value of Transactions.	Enter the value of the Virtual Currency transactions conducted for or on behalf of clients during the reporting period.
2.2.7	142	Does the entity facilitate payments to / from Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.2.8	143	Third Parties - Number of Clients.	Enter the number of clients where payments to / from the client were

			<p>conducted via Third Parties, during the reporting period.</p> <p>Payments via third party means that the payment was paid to / from a third party not associated with the direct business relationship or transaction.</p>
2.2.9	144	Third Parties - Value of Transactions.	Enter the value of transactions where payments to / from the client were conducted via Third Parties, during the reporting period.
2.2.10	145	Does the entity facilitate payments to / from Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.2.11	146	Credit Card Payments - Number of Clients	Enter the number of clients where payments to / from clients were conducted via Credit Card, during the reporting period.
2.2.12	147	Credit Card Payments - Value of Transactions.	Enter the value of Credit Card payments processed for clients during the reporting period.
2.2.13	148	Does the entity facilitate payments to / from Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.2.14	149	Wire Transfers - Number of Clients.	Enter the number of clients where wire payments were made to / from clients, during the reporting period.
2.2.15	150	Wire Transfers - Value of Funds Transferred.	Enter the value of Wire Transfers transactions conducted to / from clients during the reporting period.
2.2.16	151	Does the entity facilitate payments to / from Clients in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.2.17	152	Transfer of Securities - Number of Clients.	Enter the number of clients where payments were made to / from clients, during the reporting period.
2.2.18	153	Transfer of Securities - Value of Funds Transferred.	Enter the value of all transactions relating to Transfer of Securities conducted to / from clients, during the reporting period.
2.2.19	154	Does the entity facilitate payments to / from Clients	Please answer 'Yes' or 'No'.

		in other forms not listed above?	
2.2.20	155	Other Forms of Payment - Number of Clients.	Enter the number of clients where Other Forms of Payments, not listed above, were conducted to / from clients, during the reporting period.
2.2.21	156	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were transferred to / from clients using Other Forms of Payments, during the reporting period.
2.2.22	157	Please indicate the types of Other Forms of Payments.	List the Other Forms of Payment processed to / from clients, during the reporting period, which are not listed above.
2.3.1	158	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated.
2.3.2	159	Total number of transactions received, broken down by origin of the funds.	Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds.
2.3.3	160	Total value of funds transferred out, broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients during the reporting period, broken down by the country of payment destination.
2.3.4	161	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of outgoing transactions during the reporting period relating, broken down by destination country of the transaction.
2.4.1	162	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.4.2	163	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Please include 'N/A' if no comment.
3.1.1	164	Number of Clients - Direct - F2F.	Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period.

			F2F channels include: Direct-F2F, Referrals within Group – F2F, Eligible Introducers – F2F, and Other Introducers-F2F.
3.1.2	165	Number of Clients - Direct - Non-F2F.	<p>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.</p> <p>Examples of Direct Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have Direct F2F contact with the clients.</p>
3.1.3	166	Total number of clients via Online Platforms.	Provide the total number of clients, in the <u>entity's entire portfolio</u> , that were onboarded via Online platforms, and not only those onboarded during the reporting period.
3.1.4	167	Number of Clients through Referrals within Group - F2F.	<p>Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the UBOs nationality.</p> <p>An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients.</p>
3.1.5	168	Number of Clients through Referrals within Group - Non F2F.	<p>Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the UBOs.</p> <p>Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.</p>
3.1.6	169	Total number of Clients onboarded through Eligible Introducers.	Total clients in the entity's <u>entire portfolio</u> that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients' identity.

			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.
3.1.7	170	Number of Clients through Eligible Introducers.	Enter the number of clients which were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the UBO.
3.1.8	171	Number of Clients through Other Introducers - Non-F2F.	Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the UBOs.
3.1.9	172	Number of Clients via Online Platforms.	Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the UBO.
3.2.1	173	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	174	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	175	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer as at the end of the reporting period.
3.2.4	176	How many AML Compliance Officers has the entity had within the past 3 years?	If no turnover of the Compliance Officer role in the three-year period, answer "1".
3.2.5	177	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.

3.2.6	178	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	179	What was the country of residency of the Money Laundering Reporting Officer at the end of the reporting period?	Enter the country of residency of the Money Laundering Reporting Officer at the end of the reporting period.
3.2.8	180	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover within the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	181	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	182	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	183	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	184	How many Deputy Money Laundering Reporting Officers have you had in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".

3.2.13	185	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	186	To whom has the Targeted Financial Sanction screening function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the screening of targeted financial sanctions:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.</p>
3.2.15	187	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.16	188	How many TFS Screening platforms / software did the entity have in the past 3 years?	If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	189	Has the entity outsourced the function of transaction or client monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	190	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship of the transaction monitoring function:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.</p>
3.2.19	191	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	192	How many Transaction monitoring platforms / software did the entity have in the past 3 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	193	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.3.2	194	In which countries, by percentage of equity ownership, are shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Enter the countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.3	195	Number of Branches, broken down by country of operation.	Enter the number of branches the entity has, broken down by country of operation.
3.3.4	196	Number of Subsidiaries, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.
3.3.5	197	In which country is the parent or holding company incorporated?	Enter the country in which the parent or holding company is incorporated.
3.4.1	198	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	199	Please use this area to provide any comments or feedback for this tab.	Use this area to provide any comments or feedback for this tab. Please enter 'NA' if no comment.

AML Controls Questions

No.	Question No.	Question	Description/Explanation
1.1.1	200	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	201	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	202	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.4	203	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.5	204	Does the approved Charter include the roles and responsibilities of the Directors/General Partners/Managers?	Please answer 'Yes' or 'No'.
1.1.6	205	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	206	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	207	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.9	208	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	209	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	210	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	211	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	212	Are any of the entity's AML Officers, Shareholders, Beneficial Owners,	Please answer 'Yes' or 'No'.

		Directors or Senior Management a PEP?	
1.2.1	213	Is there regular reporting of AML/CFT/CPF and Sanctions matters by Senior Management to the board?	Please answer 'Yes' or 'No'.
1.2.2	214	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	215	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.2.4	216	When was the last review of the AML/CFT/CPF and Sanctions policies and procedures?	Enter the date of the last review of the AML/CFT/CPF and Sanctions policies and procedures.
1.2.5	217	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	218	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	219	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	220	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	221	Does Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.

1.2.10	222	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	223	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.3.2	224	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.3.3	225	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.3.4	226	Is the AMLCO employed at a managerial level of the entity?	Please answer 'Yes' or 'No'.
1.3.5	227	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.6	228	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.7	229	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.3.8	230	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.3.9	231	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	232	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	233	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	234	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	235	Does the MLRO report to the Board and Senior Management on AML/CFT/CPF and Sanctions related issues on the adequacy of the	Please answer 'Yes' or 'No'.

		AML/CFT/CPF and Sanctions framework?	
1.3.14	236	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	237	Does the AMLCO provide oversight of risk assessment procedures?	Please answer 'Yes' or 'No'.
1.3.16	238	Does the AMLCO conduct AML/CFT/CPF and Sanctions training for all Directors and relevant staff of the entity?	Please answer 'Yes' or 'No'.
1.3.17	239	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	240	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.19	241	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	242	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	243	Does the AMLCO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.22	244	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	245	Does the MLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.24	246	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	247	Does the DMLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.26	248	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	249	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	250	Is there an Internal AML Audit Charter/Plan?	Please answer 'Yes' or 'No'.
1.4.3	251	Is the AML compliance plan or charter reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.4	252	Is the internal AML audit function outsourced?	Please answer 'Yes' or 'No'.
1.4.5	253	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	254	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	255	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	256	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	257	When was the last AML/CFT audit conducted by Internal Audit?	Enter the date of last Internal AML Audit.

1.4.10	258	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.11	259	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	260	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.5.2	261	Is AML/CFT/CPF and Sanctions training provided to Directors and all relevant staff?	Please answer 'Yes' or 'No'.
1.5.3	262	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	263	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.5.5	264	Does the entity assess AML knowledge of its employees?	Please answer 'Yes' or 'No'.
1.5.6	265	Please indicate percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period.	Enter the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period.
1.6.1	266	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	267	Are any records NOT retained or accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.3	268	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	269	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	270	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.7.2	271	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	272	What was the date of the last review?	Enter the date of the last review of the Risk Assessment.
1.7.4	273	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	274	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	275	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	276	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	277	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	278	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'
17.10	279	Does the entity consider other risk factors, other than those listed above in their risk assessment?	Please answer 'Yes' or 'No'
1.7.11	280	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	281	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	282	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	283	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	284	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	285	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	286	Where applicable, does the entity have a Group Wide AML/CFT programme?	Please answer 'Yes' or 'No'.
1.8.2	287	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	288	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	289	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	Please answer 'Yes' or 'No'.

		customers and updating customer information?	
1.8.5	290	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	291	Does the entity have Governing Body approved policies and procedures for Internal Reporting i.e., Identification and Reporting of Suspicious Activities and Transactions including for TF and PF?	Please answer 'Yes' or 'No'.
1.8.7	292	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	293	Does the entity have Governing Body approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.8.9	294	Does the entity have Governing Body approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.8.10	295	Does the entity have Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.8.11	296	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	297	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	298	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	299	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	300	For the governing process, is information collected on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.8.16	301	Total Clients	<p>Enter the total number of clients the entity has as at end of the reporting period.</p> <p>Where applicable, the number of clients/ customers should only include those of the Cayman Islands legal entity.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p> <p>Answer to this question should be the same as Question 1 of this Survey, as information requested is the same.</p>
1.8.17	302	Did the entity decline, de-risk/ terminate / restrict any business relationships due to AML/CFT/CPF and Sanctions related reasons for the current reporting period?	Please answer 'Yes' or 'No'.
1.8.18	303	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	304	How many customer accounts remain non-compliant with required identification and verification procedures?	Enter the Number of customer accounts that remain non-compliant with required identification and verification procedures, as at the end of the reporting period
1.8.21	305	Does the entity have processes in place to verify client signatories?	Please answer 'Yes' or 'No'.
1.8.22	306	Does the entity conduct due diligence on client signatories?	Please answer 'Yes' or 'No'.
1.9.1	307	Is there a screening process?	Please answer 'Yes' or 'No'.

1.9.2	308	Is the screening process manual, automated or a combination?	Select: 'Manual', 'Automated', or 'Automated with Manual Checks'.
1.9.3	309	Is the screening process fully or partially outsourced?	Please select: 'Fully', 'Partially', or 'Not Applicable'.
1.9.4	310	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	311	Do screening parameters include risk indicators for TF and PF monitoring?	Please answer 'Yes' or 'No'.
1.9.6	312	Is the existing customer database screened periodically against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.9.7	313	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	314	Number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.	Enter the number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period. An alert is generated during screening process, indicating a match of some or all, of the customer or business partner's identification details, against those of designated persons and entities on the HM Treasury Sanctions list. A match needs to be verified, to confirm or discount whether it is a true or false positive.
1.9.9	315	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	316	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.9.12	317	Are customers / counterparties screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.9.13	318	Have the assets of any customers identified as persons or entities designated by the United Nations	Please answer 'Yes' or 'No'.

		Security Council or by the High Court as terrorists or for PF been frozen?	
1.9.14	319	Does the entity maintain a report of positive matches resulting from sanctions screening?	Please answer 'Yes' or 'No'.
1.9.15	320	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	321	Is there an approved process, including policies and procedures, for sanctions monitoring?	Please answer 'Yes' or 'No'.
1.9.19	322	Is the sanctions monitoring process manual, automated or a combination?	Select which applies: 'No Process', 'Manual', 'Automated', or 'Automated with Manual Checks'.
1.9.20	323	Is sanctions monitoring done in real time or after the event?	Select what applies: 'No process', 'After the event', or 'Real time'.
1.9.21	324	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	325	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	326	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	327	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	328	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	329	Has the automated system been adapted for use in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	330	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	331	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	332	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	333	Please provide the total number of Alerts issued by the automated system related to Terrorism Financing/Proliferation Financing, during the reporting period.	Enter the Total number of Alerts related to Terrorism Financing/Proliferation Financing, that were generated by the automated system during the reporting period. Alerts are transactions or activities that fall outside the norm or expected conduct of business by a client, which are flagged out by the automated system whenever they occur.
1.10.8	334	Please provide the total number of Alerts resulting in the filing of	Enter the total number of alerts produced by the monitoring system

		Suspicious Activity Reports related to Terrorism Financing/Proliferation Financing	(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	335	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	336	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	337	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	338	Please provide the total value of outgoing funds rejected due to insufficient applicant for business or beneficiary information.	Enter the total value of outgoing funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.13	339	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering, Terrorism Financing or Sanctions considerations during the reporting period.	Enter the number of new client business relationships (potential clients) the entity rejected due to Money Laundering or Terrorism Financing concerns, during the reporting period.
1.10.14	340	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering, Terrorism Financing or Sanctions considerations during the reporting period.	The number of transactions (both incoming and outgoing) the entity blocked/rejected due to Money Laundering, Terrorism Financing or Sanctions concerns during the reporting period.
1.10.15	341	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	342	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	343	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	344	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	345	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	346	How many Transactions did the entity apply EDD 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	347	Does the entity have enhanced procedures for monitoring PEPs?	Please answer 'Yes' or 'No'.
1.12.1	348	Does the entity have a documented process for reporting Internal Suspicious Activity to the MLRO?	Please answer 'Yes' or 'No'.
1.12.2	349	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	350	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	351	How many hours on average does it take the entity to file a SAR to the FRA?	Select the option which best applies: 'More than one week', 'Between 72 hours and 1 week', 'Between 24 and 72 hours', and 'Less than 24 hours'.
1.12.5	352	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its	Please answer 'Yes' or 'No'.

		customers, business activities, directors or senior management?	
1.12.6	353	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.12.7	354	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.13.1	355	If applicable, is there a board approved documented policy on outsourcing?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsources any activities / functions.
1.13.2	356	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.3	357	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.4	358	In total, how many services does the entity outsource from either third parties, within its group or subsidiaries?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries. Material functions such as AML/Compliance, Information Technology, Internal Audit and any other functions that fall within the definition of an outsourced function.
1.13.5	359	Does the outsourcing agreement clearly set out the obligations of both parties?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.6	360	If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.

1.13.7	361	If relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity?	Please answer 'Yes', 'No' or 'N/A'.
1.13.8	362	If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.9	363	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.
1.13.10	364	If relevant, are there data protection restrictions which would delay access to data and documents?	Select which best applies: 'Yes', 'No' or 'N/A' The question is only applicable if entity outsource any activities.
1.13.11	365	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.
1.13.12	366	Is the entity satisfied that the OSP(s) has measures in place to comply with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities
1.14.1	367	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.14.2	368	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.