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# **AML Survey – Completion Guide: Corporate Service Provider**

Document version: 1.1

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**Revision History:**

Effective Date	Version Number	Revision Description
16 September 2022	1.0	Initial release of document
3 October 2022	1.1	Updates to definitions

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## 1 INTRODUCTION

The Cayman Islands Monetary Authority (“the Authority”) periodically undertakes sectoral ML/TF/PF risk assessments as part of its risk-based approach to AML/CFT supervision of regulated financial service providers (“FSPs”). In conducting sectoral ML/TF risk assessments and other related research, the Authority uses 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 (“AML/D”). The AML Survey Form is issued in accordance with the Authority’s responsibilities under section 6(b)(ii) of the Monetary Authority Act.

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

## 2 FORM INFORMATION

The AML Survey – Corporate Service Provider Form is to be completed by each FSP holding a Corporate Service Provider Licence, who are commonly referred to as the “Entity” for purposes of this form.

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

## 3 ACCESSING AND SUBMITTING THE AML SURVEY

### 3.1 ACCESS TO THE AML SURVEY


Entities will receive an invitation to the web-based survey by email using the current email contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient 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 in is then via clicking on the ‘Return Home’ button available immediately after activating, or via the link provided in the confirmation email. 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: AMLCO, MLRO, DMLRO and other Principal Contacts. If an Entity is unsure of what their contact details are, they can contact the Authority at [AMLSurveys@cima.ky](mailto: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](mailto: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=YJa0JBLI86VZVCRbBxm3f3fSoAMoPYyQ6XKFqtx0MoYgkSpT5b5bDc%2B2cgghPQ8d%2B2BUVVhbZktQht%2F4d2cbioYp%2B2Bjke0tE3GtLwMOBYSoP%2B2Bk8rPURRSVrPSQt6JA5hgsaBaC6uvcZV4KB266HfFgh4FhATaTNSa3IE3aiA%3D>

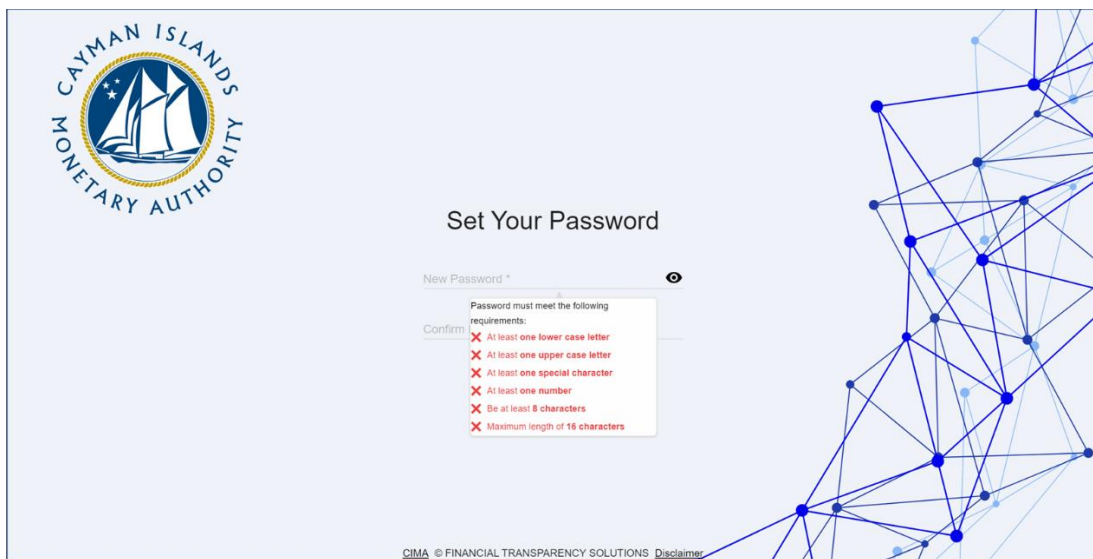
For any questions concerning the survey or the current reporting cycle, please contact: [AMLSurvey@cima.ky](mailto:AMLSurvey@cima.ky)

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

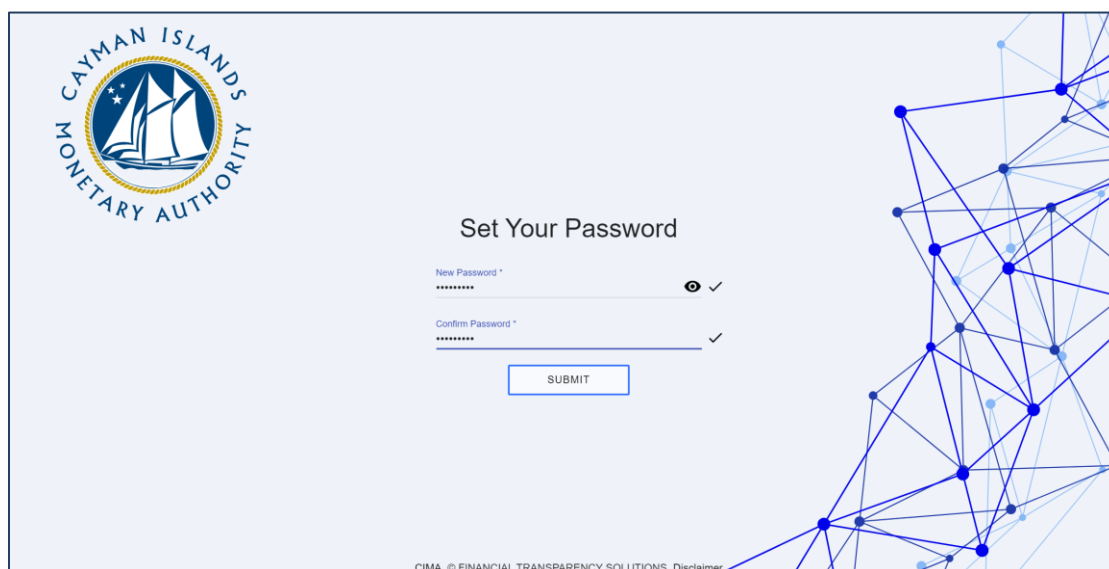
Disclaimer:  
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

Strix™ AML is part of the Financial Transparency Solutions product suite. [www.ft-solutions.com](http://www.ft-solutions.com)

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



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



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



## Cayman Islands Monetary Authority

The **Username** for this account is:

**Your account has been successfully activated.**

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

If you did not initiate this request, please contact us immediately at: [AMLSurvey@cima.ky](mailto: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](http://www.ft-solutions.com)

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

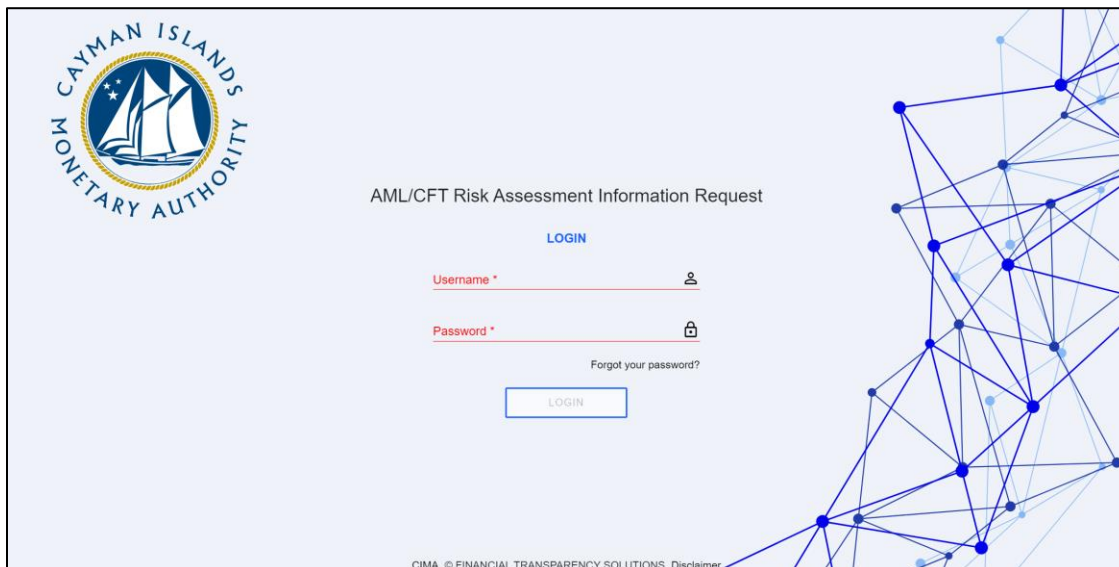


Your password was successfully changed.

[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



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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**

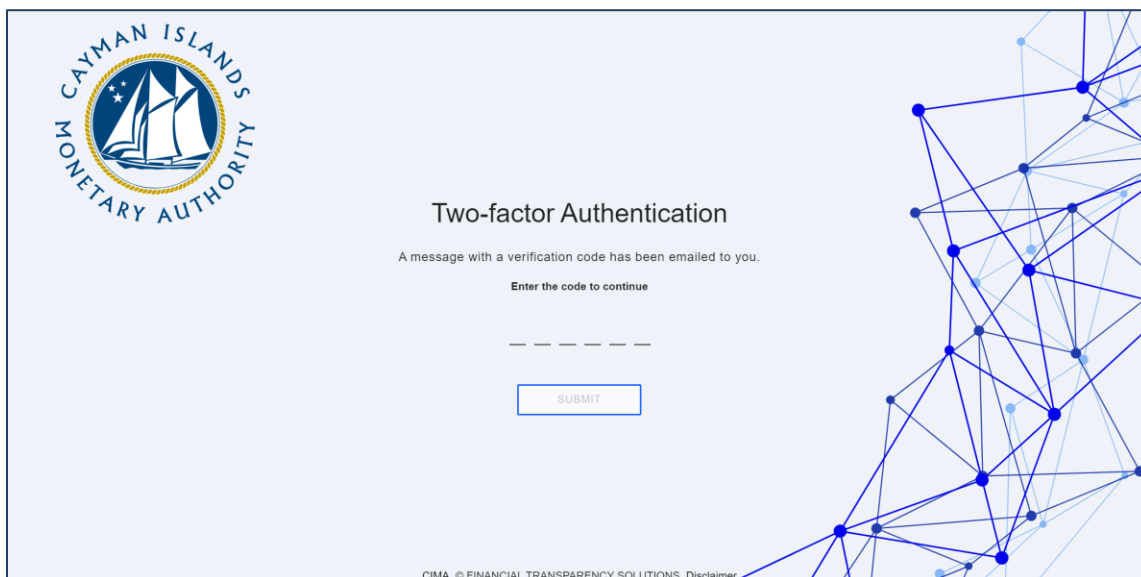
If you did not initiate this request, please contact us immediately at: [AMLSurvey@cima.ky](mailto:AMLSurvey@cima.ky)

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.



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## Two-factor Authentication

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

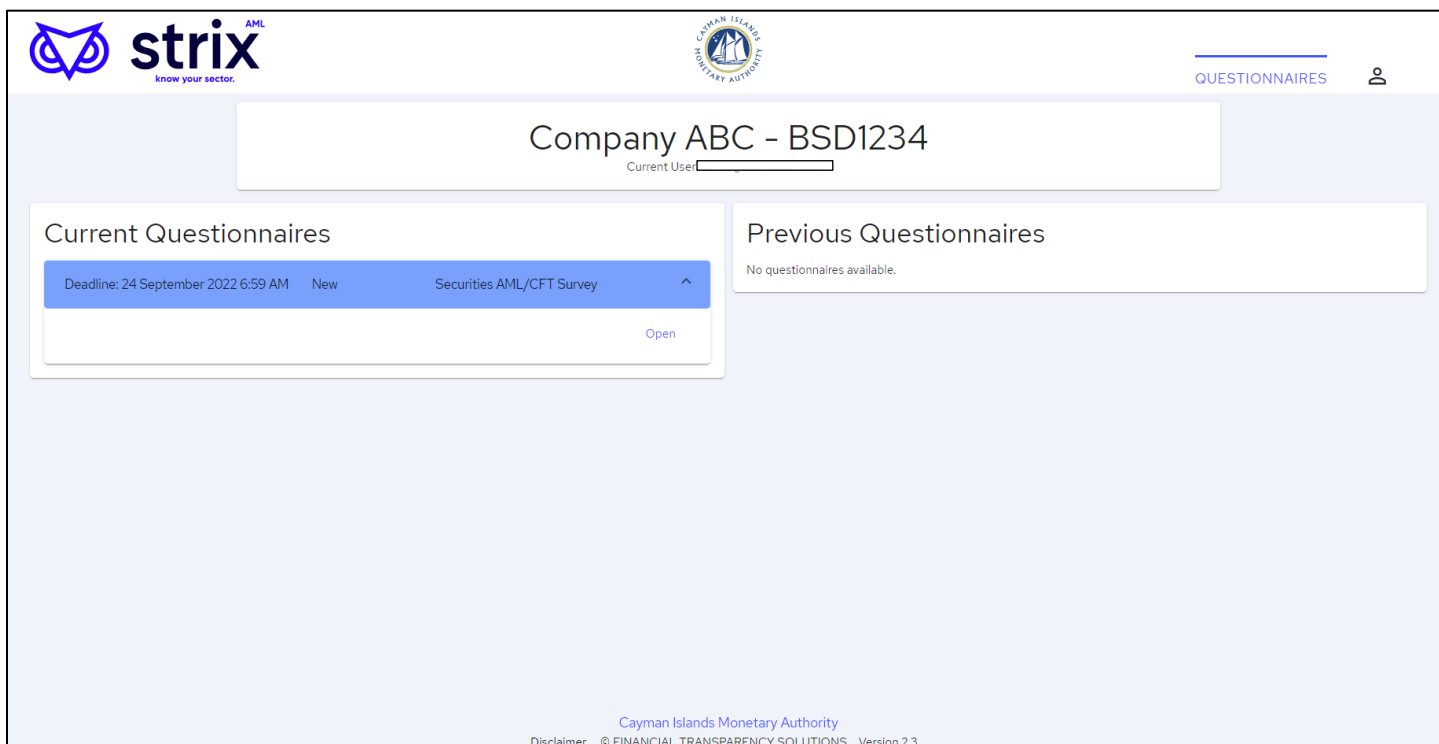
Enter the code to continue

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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.



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QUESTIONNAIRES

### Company ABC - BSD1234

Current User: \_\_\_\_\_

#### Current Questionnaires

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

#### Previous Questionnaires

No questionnaires available.

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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](mailto: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.

## 4 OTHER USEFUL INFORMATION

### 4.1 USER ACCOUNT LOCKOUTS

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

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

If the user is permanently locked out, they should contact [AMLSurveys@cima.ky](mailto: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. 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, 2020 Revision, as amended.
Client / Customer	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.
Controller	A person appointed to assume control of the affairs of a licensee or registrant.
Corporate Entity	Means a body corporate constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Survey	<b>United States Dollars (US\$).</b> All other currencies must be converted to US\$ unless otherwise stated.
Dealers in Precious Metals and Stones	Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
Direct - F2F	The engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Eligible Introducers	A person that "introduces" applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the AMLRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides

	a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Fintech service	Means a service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (Revised), except to the extent that it is modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions.
FRA	Financial Reporting Authority.
Gov / Pub Sector	Business conducted in or with Government or Public Sector.
HNWIs	<p>High net worth individuals (HNWI) is:</p> <ul style="list-style-type: none"> <li>(i) an individual whose net worth is at least US\$960,000 or its equivalent in any other currency; or</li> <li>(ii) any person that has total assets of not less than US\$4,800,000 or its equivalent in any other currency.</li> </ul> <p>Under this AML Survey the number of HNWIs will also include those individuals who are also Ultra HNWIs.</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. In other words, it's a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Legal Person or Arrangement	<p>"Legal person" means a company or other entity created by operation of law with separate legal personality.</p> <p>"Legal arrangement" means a trust or partnership, foundation or other entity created between parties which lacks separate legal personality.</p>

ML/TF/PF	Money Laundering/Terrorism Financing/Proliferation Financing.
Money Service Businesses (MSB)	<p>Money services business means the business of providing, in or from within the Islands, any of the following services:</p> <p>(a) money transmission;</p> <p>(b) cheque cashing.</p> <p>(c) currency exchange.</p> <p>(d) the issuance, sale or redemption of money orders or traveller's cheques.</p>
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Director	A natural or legal person who takes on the role of company director on the behalf of another.
Nominee Shareholder	A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-face-to-face	Where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP.
OSP	<p>Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>
PEP	<p>"Politically Exposed Person" includes —</p> <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</p>

	<p>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"> <li>(i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership.</li> <li>(ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.</li> </ul>
Reporting Period	January 1 to 31 December 2021, and future calendar years thereafter.
Special Economic Zone Business	Means any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands.
Targeted Financial Sanctions (TSF)	Means both asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").
Trust	A trust is a legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
UBO	<p>Ultimate Beneficial Owner - The natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to —</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p>

		<p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person.</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement</p>
Ultra 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.
Value of Assets Under Management		The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio.
Virtual Assets Service Providers (VASPs)		An entity that provides a virtual asset service as defined in the Virtual Asset (Service Providers) Act (2020 Revision).
Timeframe	Value of Transactions	Value of transactions processed <b>during the reporting period.</b>
Timeframe	Number of Clients	Number of clients <b>as at the end of the reporting period.</b>
Timeframe	Number of Transactions	Number of Transactions conducted for the client <b>during the reporting period.</b>
Transaction		Events where services were engaged with or on behalf of a client. Services include but are not limited to those listed in Q125 through Q139.
Source of Funds		<p>A client can have multiple sources of funds. As such, a client with multiple sources of funds should be recorded as such and counted on all the sources of funds that was used when forming the business relationship and the ongoing activity with the business relationship.</p> <p>Take this into account when answering questions relating to the 'Nature of Business (Source of Funding)'.</p>



<b>AML Inherent Risk Questions:</b>			
<b>Ref. No.</b>	<b>Question No.</b>	<b>Question</b>	<b>Description/Explanation</b>
1.1.1	1	Total Clients / Customers.	Enter the total number of clients. This will include all customers on the entity's client list at the end of the reporting period. This number should include all clients the entity provides financial products and services to as opposed to accounts e.g., If the same client, individual or legal entity, has two accounts in the same name, then only 1 client should be counted. Do not double count. Total clients consist of natural persons and legal persons and arrangements.
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 Natural Persons, broken down by Nationality of the client.	Enter the number of clients that are natural persons did the entity have, broken down by their nationality. If an entity does not have such clients, a '0' value should be used.
1.1.4	4	Clients/customers that are Natural Persons, broken down by Residency of the client.	Enter the number of clients that are natural persons did the entity have, broken down by the clients' residency. If an entity does not have such clients, a '0' value should be used.
1.1.5	5	Total Transactions for the reporting period for all Natural Persons.	Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period.
1.1.6	6	Clients/customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client.	Enter the total number of clients that are Legal Persons and Arrangements reported in question as at the end of the reporting period. If an entity does not have such clients, a '0' value should be used.
1.1.7	7	Number of Transactions - Legal Persons and Arrangements.	Enter the total number of transactions that were conducted by customers who are legal person and arrangements.
1.2.1	8	Total number of UBOs by country of nationality of the UBO.	Enter the total number of UBOs of all clients who are legal persons or arrangements, broken down by nationality of the UBO.

1.2.2	9	Does your entity have any clients that have UBOs that are directors of the client?	Answer 'Yes' or 'No'
1.2.3	10	Number of clients which have UBOs that are directors of the client.	Enter the total number of clients which have UBOs that are directors of the client.
1.2.4	11	Does your entity have any clients that have UBOs that are controllers of the client?	Answer 'Yes' or 'No'
1.2.5	12	Number of clients which have UBOs that are controllers of the client.	Enter the total number of clients whose UBOs are controllers of the client.
1.2.6	13	Does your entity have any clients that have UBOs that are also senior managing officials of the client?	Please answer 'Yes' or 'No'.
1.2.7	14	Number of clients which have UBOs that are also senior managing officials of the client.	<p>Enter the total number of clients whose UBOs are also senior managing officials of the client.</p> <p>Senior managers are individuals at the highest level of organizational management who have the day-to-day responsibilities of managing a company or corporation. They hold specific executive powers conferred onto them by board of directors and/or the shareholders.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.8	15	Does your entity have any clients which have UBOs - HNWIs?	Please answer 'Yes' or 'No'.
1.2.9	16	Number of Clients which have UBOs - HNWIs.	Enter the total number of clients who have UBOs that are HNWIs.
1.2.10	17	Does your entity have any clients which have UBOs - Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.2.11	18	Number of Clients which have UBOs - Ultra HNWIs.	Enter the total number of clients who have UBOs that are Ultra HNWIs.
1.2.12	19	Does your entity have any clients which have UBOs which are PEPs?	Please answer 'Yes' or 'No'.

1.2.13	20	Number of UBOs of clients which are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who have UBOs that are PEPs.
1.2.14	21	Does your entity have any clients which have Nominees acting on behalf of a UBO?	Please answer 'Yes' or 'No'.
1.2.15	22	Number of clients which have Nominees acting on behalf of a UBO, broken down by nationality of the client.	Enter the total number of clients which have nominees acting on behalf of UBOs.
1.3.1	23	Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director.	Enter the total number of clients which have nominees appointed on behalf of a director.
1.3.2	24	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are PEPs.
1.3.3	25	Number of directors and/or senior management of clients who are High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are HNWI's, broken down by nationality of the director / senior management.
1.3.4	26	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are Ultra HNWI's, broken down by nationality of the director / senior management.
1.3.5	27	Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI's, broken down by nationality of the director / senior management.
1.4.1	28	Does your entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	29	Gov / Pub Sector - Number of Clients, broken down by	Enter the number of clients that the entity has, as at the end of the reporting period,

		country of the government jurisdiction.	that are a government or public sector, broken down by government jurisdiction.
1.4.3	30	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions conducted by clients that are government or public sector during the reporting period, broken down by government jurisdiction.
1.4.4	31	Does your entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.5	32	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at the end of the reporting period, that are NPOs.
1.4.6	33	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period, broken down by government jurisdiction.
1.4.7	34	Does your entity have any clients that are Other corporate entities - Non-Financial Institutions?	Please answer 'Yes' or 'No'.
1.4.8	35	Other corporate entities - Non-Financial Institutions - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at the end of the reporting period, that are Corporate Entities which are Non-Financial Institutions.
1.4.9	36	Other corporate entities - Non-Financial Institutions - Number of Transactions.	Enter the number of transactions conducted by clients that are Corporate Entities which are Non-Financial Institutions, during the reporting period.
1.4.10	37	Does your entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.11	38	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has, as at the end of the reporting period, that are a Foundation.
1.4.12	39	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.
1.4.13	40	Does your entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.14	41	Trusts - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at the end of the reporting period, that are Trusts.

1.4.15	42	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are a Trusts, during the reporting period.
1.4.16	43	Does your entity have any clients that are Special Purpose Vehicles?	Please answer 'Yes' or 'No'.  Note that one client can fall under multiple categories of structure.
1.4.17	44	Special Purpose Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at the end of reporting period, that are a Special Purpose Vehicle.
1.4.18	45	Special Purpose Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are a Special Purpose Vehicle, during the reporting period.
1.4.19	46	Does your entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.  Note that one client can fall under multiple categories of structure.
1.4.20	47	Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are a Segregated Portfolio Company.
1.4.21	48	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients that are a Segregated Portfolio Company, during the reporting period.
1.4.22	49	Does your entity have any clients that are from Special Economic Zone?	Please answer 'Yes' or 'No'.  Note that one client can fall under multiple categories of structure.
1.4.23	50	Special Economic Zone - Number of Clients, broken down by country of incorporation of the clients.	Enter the number of clients the entity has, as at last date of reporting period, that are a Special Economic Zone.
1.4.24	51	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are a Special Economic Zone, during the reporting period.
1.4.25	52	Does your entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.  Note that one client can fall under multiple categories of structure.
1.4.26	53	Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are Funds / Collective Investment Vehicles.

1.4.27	54	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.5.1	55	Does your entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.
1.5.2	56	Number of Natural Persons who are PEPs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are PEPs, broken down by nationality of the client.
1.5.3	57	Natural Persons - PEPs - Number of Transactions - PEPs.	Enter the number of transactions conducted by clients that are Natural Persons, and are PEPs, during the reporting period.
1.5.4	58	Does your entity have any Natural Person clients that are HNWIIs?	Please answer 'Yes' or 'No'.
1.5.5	59	Number of Natural Persons who are HNWIIs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are HNWIIs, broken down by nationality of the client.
1.5.6	60	Natural Persons - HNWIIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are HNWIIs, during the reporting period.
1.5.7	61	Does your entity have any Natural Person clients that are PEPs and HNWIIs?	Please answer 'Yes' or 'No'.
1.5.8	62	Natural Persons - PEP & HNWIIs - Number of Natural Persons who are PEPs & HNWIIs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are PEPs and HNWIIs, broken down by nationality of the client.
1.5.9	63	Natural Persons - PEPs & HNWIIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are PEPs and HNWIIs, during the reporting period.
1.5.10	64	Does your entity have any Natural Person clients that are Ultra HNWIIs?	Please answer 'Yes' or 'No'.
1.5.11	65	Number of Natural Persons who are Ultra HNWIIs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are Ultra HNWIIs, broken down by nationality of the client.

1.5.12	66	Natural Persons - UHNWIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are Ultra HNWIs, during the reporting period.
1.5.13	67	Does your entity have any Natural Person clients that are PEPs and Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.5.14	68	Number of Natural Persons who are PEPs & Ultra HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are PEPs and Ultra HNWIs, broken down by nationality of the client.
1.5.15	69	Natural Persons - PEPs & UHNWIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are PEPs and Ultra HNWIs, during the reporting period.
1.6.1	70	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> <li>▪ Banking Institutions exc. MSBs</li> <li>▪ Other Financial regulated Business*</li> <li>▪ Financial Leasing</li> <li>▪ Money Lending</li> <li>▪ Legal Practitioners</li> <li>▪ Accountants</li> <li>▪ Fintech</li> </ul> <p>*excluding MSBs, VASP Products and Services Providers, and Trusts, Company Managers, or Corporate Service Providers."</p>	Provide the total number of clients which fall within the list of the sectors.
1.6.2	71	Does your entity have any clients that are legal persons, that are Banking Institutions exc. MSBs or natural persons that are employed by Banking Institutions exc. MSBs?	Please answer 'Yes' or 'No'.
1.6.3	72	Banking Institutions - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are banking institutions, or natural persons that are employed by banking institutions, broken

			down by country of incorporation and / or the individuals nationality.  This section excludes MSBs
1.6.4	73	Does your entity have any clients that are legal persons, that are Other Financial Regulated Businesses or natural persons employed by Other Financial Regulated Businesses?	Please answer 'Yes' or 'No'.
1.6.5	74	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above, broken down by country of incorporation and / or the individuals nationality.
1.6.6	75	Does your entity have any clients that are legal persons, that are Financial Leasing or natural persons employed by Financial Leasing?	Please answer 'Yes' or 'No'.
1.6.7	76	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Financial Leasing companies or natural persons that are employed by Financial Leasing companies, broken down by country of incorporation and / or the nationality of the individual.
1.6.8	77	Does your entity have any clients that are legal persons, that are Money Lending or natural persons employed by Money Lending?	Please answer 'Yes' or 'No'.
1.6.9	78	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Money Lending institutions, and / or natural persons that are employed by Money Lending institutions, broken down by country of incorporation and nationality, respectively.
1.6.10	79	Does your entity have any clients that are legal persons, that are Legal Practitioners or natural persons employed as Legal Practitioners?	Please answer 'Yes' or 'No'.



1.6.11	80	Legal Practitioner - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Legal Practitioners, and natural persons that are employed by Legal Practitioners, broken down by country of incorporation and nationality, respectively.
1.6.12	81	Does your entity have any clients that are legal persons, that are Accountants (Audit / Assurance / Bookkeeping / Insolvency)?	Please answer 'Yes' or 'No'.
1.6.13	82	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency), broken down by country of incorporation and nationality, respectively.
1.6.14	83	Does your entity have any clients that are legal persons, that are in the Fintech industry or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.15	84	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry, broken down by country of incorporation and nationality, respectively.
1.6.16	85	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> <li>▪ Money Service Business (MSBs)</li> <li>▪ VASP products and services providers</li> <li>▪ High value dealers</li> <li>▪ Trusts, Company managers or corporate service providers</li> <li>▪ Import/Export industry</li> <li>▪ Shipping and transport"</li> </ul>	Enter the total number of clients which fall within the list of the sectors.

1.6.17	86	Does your entity have any clients that are legal persons, that are Money Services Businesses or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.6.18	87	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Money Services Business, and / or are natural persons that are employed in the Money Services Business, broken down by country of incorporation and nationality, respectively.
1.6.19	88	Does your entity have any clients that are legal persons, that are VASP Products and Services providers, or natural persons employed by VASP Products and Services providers?	Please answer 'Yes' or 'No'.
1.6.20	89	VASP Products and Services - Number of Clients.	Enter the number of clients the entity has, that are legal persons and offer VASP Products and Services, and natural persons that are employed by institutions which offer VASP Products and Services, broken down by country of incorporation and nationality, respectively.
1.6.21	90	Does your entity have any clients that are legal persons, that are High Value Dealers or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.
1.6.22	91	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are High Value Dealers, and natural persons that are employed by High Value Dealers, broken down by country of incorporation and nationality, respectively.
1.6.23	92	Does your entity have any clients that are legal persons, that are Trusts, Company Managers, or Corporate Service Providers or natural persons employed by Trusts, Company Managers, or Corporate Service Providers?	Please answer 'Yes' or 'No'.

1.6.24	93	Trusts, Company Managers, or Corporate Service Providers - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Trusts, Company Managers, or Corporate Service Providers, and natural persons that are employed by Trusts, Company Managers, or Corporate Service Providers, broken down by country of incorporation and nationality, respectively.
1.6.25	94	Does your entity have any clients that are legal persons, that are in the Import / Export Industry or natural persons employed by the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.26	95	Import / Export - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Import / Export business, or Corporate Service Providers, and natural persons that are employed the Import / Export industry, broken down by country of incorporation and nationality, respectively.
1.6.27	96	Does your entity have any clients that are legal persons, that are 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'.
1.6.28	97	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Shipping and Transport of Goods business, or Corporate Service Providers, and natural persons that are employed the Shipping and Transport of Goods industry, broken down by country of incorporation and nationality, respectively.
1.6.29	98	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Dealers in Precious Metals and Stones</li> <li>▪ Gambling Business</li> </ul>	Provide the total number of clients which fall within the list of the sectors.

		<ul style="list-style-type: none"> <li>▪ Adult Entertainment Industry</li> <li>▪ Defense Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> <li>▪ Unknown Sector / Industry (not recorded)"</li> </ul>	
1.6.30	99	Does your entity have any clients that are legal persons, that are Real Estate Agents / Brokers or natural persons employed as Real Estate Agents / Brokers?	Please answer 'Yes' or 'No'.
1.6.31	100	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers, broken down by country of incorporation and nationality, respectively.
1.6.32	101	Does your entity have any clients that are legal persons, that are Dealers in Precious Metals and Stones, or natural persons employed as Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'.
1.6.33	102	Dealers in Precious Metals and Stones - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones, broken down by country of incorporation and nationality, respectively.
1.6.34	103	Does your entity have any clients that are legal persons, that are in the Gambling business (including online gambling) or natural persons employed by Gambling business?	Please answer 'Yes' or 'No'.
1.6.35	104	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling), broken down by

			country of incorporation and nationality, respectively.
1.6.36	105	Does your entity have any clients that are legal persons, that are in the adult entertainment industry or natural persons employed in the adult entertainment industry?	Please answer 'Yes' or 'No'.
1.6.37	106	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry, broken down by country of incorporation and nationality, respectively.
1.6.38	107	Does your entity have any clients that are legal persons, that are in the Defense Industry or natural persons employed by the Defense Industry?	Please answer 'Yes' or 'No'.
1.6.39	108	Defense Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Defense Industry, and natural persons that are employed in the Defense Industry, broken down by country of incorporation and nationality, respectively.
1.6.40	109	Does your entity have any clients that are legal persons, that are in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.41	110	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry, broken down by country of incorporation and nationality, respectively.
1.6.42	111	Does your entity have any clients that are legal persons, that are in the Mining Industry or natural persons employed by the Mining Industry?	Please answer 'Yes' or 'No'.

1.6.43	112	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Mining Industry, and natural persons that are employed in the Mining Industry, broken down by country of incorporation and nationality, respectively.
1.6.44	113	Does your entity have any clients that are legal persons, that are in the Construction / Development industry or natural persons employed in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.6.45	114	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry, broken down by country of incorporation and nationality, respectively.
1.6.46	115	Does your entity have any clients that are legal persons, that are in the Retail & Restaurant Business or natural persons employed in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.47	116	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business, broken down by country of incorporation and nationality, respectively.
1.6.48	117	Does your entity have any clients that are legal persons, that are in the Cannabis Production & Distribution industry or natural persons employed in the Cannabis Production & Distribution industry?	Please answer 'Yes' or 'No'.
1.6.49	118	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in Cannabis Production & Distribution Business, and natural persons that are employed in the Cannabis Production & Distribution industry, broken down by country of incorporation and nationality, respectively.

1.6.50	119	Does your entity have any clients that are legal persons of unknown business, or natural persons employed in unknown professions or industries?  <i>Clients where their industry / profession is not known or not recorded.</i>	Please answer 'Yes' or 'No'.
1.6.51	120	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons of Unknown Business and Profession, and natural persons that are employed in Unknown Businesses and Professions, broken down by country of incorporation and nationality, respectively.  Unknown business and profession are where the entity does not know, and was not provided with, and verified, the line of business or profession of the client.
1.6.52	121	Does your entity have any clients where their business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.53	122	Other - Not mentioned above - Number of Clients, broken down by nationality or country of incorporation of the client.	Enter the number of clients the entity has, that are legal persons and have known business which are however, not mentioned above, and natural persons that are employed in known business which are not mentioned above, broken down by country of incorporation and nationality, respectively.
1.7.1	123	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.7.2	124	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.
2.1.1	125	Does your entity provide the service of Registered Office?	Please answer 'Yes' or 'No'.
2.1.2	126	Number of clients where your entity provides the service of Registered Office, broken down by country of incorporation of the client.	Enter the number of clients, as at the end of the reporting period, that the entity provides the service of Registered Office, broken down by country of incorporation of the client.

2.1.3	127	Does your entity provide the service of Formation Agent?	Please answer 'Yes' or 'No'.
2.1.4	128	Number of Clients where your entity provides the service of Formation Agent, broken down by country of incorporation of the client.	Enter the number of clients, as at the end of the reporting period, that the entity provides the service of Formation Agent, broken down by country of incorporation of the client.
2.1.5	129	Does your entity provide the service of Statutory Filings?	Please answer 'Yes' or 'No'.
2.1.6	130	Number of Clients where your entity provides the service of Statutory Filings, broken down by country of incorporation of the client.	Enter the number of clients, as at the end of the reporting period, that the entity provides the service of Statutory Filings, broken down by country of incorporation of the client.
2.1.7	131	Does your entity provide the service of UBO Filings?	Please answer 'Yes' or 'No'.
2.1.8	132	Number of Clients where your entity provides the service of UBO Filings, broken down by nationality of the UBO.	Enter the number of clients, as at the end of the reporting period, that the entity provides the service of UBO Filings, broken down by nationality of the UBO.
2.1.9	133	Does your entity provide the service of MLRO?	Please answer 'Yes' or 'No'.
2.1.10	134	Number of Clients where your entity provides the service of MLRO, broken down by country of incorporation of the client.	Enter the number of clients, as at the end of the reporting period, that the entity provides the service of MLRO, broken down by country of incorporation of the client.
2.1.11	135	Does your entity provide the service of AML Compliance Officer?	Please answer 'Yes' or 'No'.
2.1.12	136	Number of Clients where your entity provides the service of AML Compliance Officer, broken down by country of incorporation of the client.	Enter the number of clients, as at the end of the reporting period, that the entity provides the service of AML Compliance Officer, broken down by country of incorporation of the client.
2.1.13	137	Does your entity provide any other services not listed above?	Please answer 'Yes' or 'No'.
2.1.14	138	Number of Clients where your entity provides other service not mentioned above, broken down by country of incorporation of the client.	Enter the number of clients, as at the end of the reporting period, that the entity provides other service not mentioned above, broken down by country of incorporation of the client.



2.1.15	139	Please describe the other types of services provided.	List the other types of services provided to clients, which are not listed above.
2.2.1	140	Does your entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.2.2	141	Physical Cash - Number of Clients.	Enter the number of clients which made payments in the form of Physical Cash, or which the entity facilitated their payments in the form of Physical Cash, during the reporting period.
2.2.3	142	Physical Cash - Value of Funds Transferred.	Enter the value of the Physical Cash transactions conducted by clients during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.4	143	Does your entity facilitate payments of Clients in the form of Travellers Cheques?	Please answer 'Yes' or 'No'.
2.2.5	144	Travellers Cheques - Number of Clients.	Enter the number of clients which made payments in the form of Travellers Cheques, or which the entity facilitated their payments in the form of Travellers Cheques, during the reporting period.
2.2.6	145	Travellers Cheques - Value of Funds Transferred.	Enter the value of the Travellers Cheques transactions conducted by clients during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.7	146	Does your entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.2.8	147	Virtual Currency - Number of Clients.	Enter the number of clients which made payments in the form of Virtual Currency, or which the entity facilitated their payments in the form of Virtual Currency, during the reporting period.
2.2.9	148	Virtual Currencies - Value of Funds Transferred.	Enter the value of the Virtual Currency transactions conducted by clients during the reporting period.

			Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.10	149	Does your entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.2.11	150	Third Parties - Number of Clients.	Enter the number of clients which made payments via Third Parties, or which the entity facilitated their payments via Third Parties, during the reporting period.
2.2.12	151	Value of Funds transferred to Third-Parties.	Enter the value funds transferred for Third-Party transactions conducted by clients during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.13	152	Does your entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.2.14	153	Credit Card Payments - Number of Clients	Enter the number of clients which made payments via Credit Card, or which the entity facilitated their payments via Credit Card, during the reporting period.
2.2.15	154	Credit Card Payments - Value of Funds Transferred.	Enter the value of Credit Card transactions conducted by clients during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.16	155	Does your entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.2.17	156	Wire Transfers - Number of Clients.	Enter the number of clients which made payments via Wire Transfers, or which the entity facilitated their payments via Wire Transfers, during the reporting period.
2.2.18	157	Wire Transfers - Value of Funds Transferred.	Enter the value of Wire Transfers transactions conducted by clients during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.

2.2.19	158	Does your entity facilitate payments of Clients in the form of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.2.20	159	Internal Bank Transfer - Number of Clients.	Enter the number of clients which made payments via Internal Bank Transfers, or which the entity facilitated their payments via Internal Bank Transfers, during the reporting period.
2.2.21	160	Internal Bank Transfer - Value of Funds Transferred.	Enter the value of Internal Bank Transfers transactions conducted by clients during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.22	161	Does your entity facilitate payments of Clients in the form of Transfer of securities?	Please answer 'Yes' or 'No'.
2.2.23	162	Transfer of securities- Number of Clients.	Enter the number of clients which made payments in the form of Transfer of securities, or which the entity facilitated their payments in the form of Transfer of securities, during the reporting period.
2.2.24	163	Transfer of securities from another provider- Value of Funds Transferred.	Enter the value of payments made by clients in the form of Transfer of securities, during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.25	164	Does your entity facilitate payments of Clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.2.26	165	Other Forms of Payment - Number of Clients.	Enter the number of clients which made payments in other forms not listed above, or which the entity facilitated their payments in other forms not listed above, during the reporting period.
2.2.27	166	Other Forms of Payment - Value of Funds Transferred.	Enter the value of payments made by clients in other forms not listed above, during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the client.

2.2.28	167	Please indicate the types of other forms of payments.	List the other forms of payment conducted by clients during the reporting period, which are not listed above.
2.3.2	168	Total value of funds received, broken down by originating country of payment.	<p>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.</p> <p>These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.</p>
2.3.3	169	Total number of transactions received, broken down by origin country of the transaction.	<p>Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, during the reporting period, broken down by country of origin of the funds.</p> <p>These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.</p>
2.3.5	170	Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients, broken down by the country of payment destination.
2.3.6	171	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of transactions relating to outward transfers by the clients, or on behalf of clients, broken down by country of destination of the transaction, for the reporting period.
2.4.1	172	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.4.2	173	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	174	Number of Clients - Direct - F2F, broken down by nationality or country of incorporation of the clients.	Enter the number of clients which were onboarded during the reporting period, using Direct - F2F, broken down by nationality or country of incorporation of the client.
3.1.2	175	Number of Clients - Direct - Non-F2F, broken down by nationality or country of incorporation of the clients.	Enter the number of clients which were onboarded during the reporting period, using Direct Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.3	176	Number of Clients through Referrals within Group - F2F,	Enter the number of clients which were onboarded during the reporting period, using

		broken down by nationality or country of incorporation of the clients.	referrals within Group - F2F, broken down by nationality or country of incorporation of the client.
3.1.4	177	Number of Clients through Referrals within Group - Non F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, using referrals within Group Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.5	178	Number of Clients through Eligible Introducers - F2F, broken down by country of the client.	Enter the number of clients which were onboarded during the reporting period, through Eligible Introducers - F2F, broken down by nationality or country of incorporation of the client, during the reporting period.  Eligible Introducers – F2F is for instances when the entity would have face-to-face introduction or interaction with the client during the business relationship.
3.1.6	179	Number of Clients through Eligible Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, through Eligible Introducers Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.7	180	Number of Clients through Other Introducers - F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, through Other Introducers - F2F, broken down by nationality or country of incorporation of the client.
3.1.8	181	Number of Clients through Other Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded through Other Introducers Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.9	182	Number of Clients via Online Platforms, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, via Online Platforms, broken down by nationality or country of incorporation of the client.
3.2.1	183	Has your entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	184	To whom has the AML Compliance Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer: <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3rd Party and Member within Group</li> </ul>

			<ul style="list-style-type: none"> <li>3rd Party</li> </ul> <p>Select "3rd Party and Member within Group", in a case of the Compliance Officer turnover that includes one of each within the reporting period.</p>
3.2.3	185	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer at the end of the reporting period.
3.2.4	186	How many AML Compliance Officers have you had in the reporting period and the previous 2 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".
3.2.5	187	Has your entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	188	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"> <li>Member within Group</li> <li>3<sup>rd</sup> Party and Member within Group</li> <li>3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in a case of the Money Laundering Reporting Officer turnover that includes one of each within the reporting period.</p>
3.2.7	189	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	190	How many Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years?	If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	191	Has your entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	192	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:

			<ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in a case of the Deputy Money Laundering Reporting Officer turnover that includes one of each within the reporting period.</p>
3.2.11	193	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	194	How many Deputy Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	195	Has your entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	196	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"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in a case of the screening of targeted financial sanctions turnover that includes one of each within the reporting period.</p>
3.2.15	197	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	198	How many TFS Screening platforms have you had in the reporting period and the previous 2 years?	If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	199	Has your entity outsourced the function of transaction	Please answer 'Yes' or 'No'.

		monitoring within the reporting period?	
3.2.18	200	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship transaction monitoring:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in a case of transaction monitoring services turnover that includes one of each within the reporting period.</p>
3.2.19	201	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	202	How many Transaction monitoring platforms have you had in the reporting period and the previous 2 years?	If no turnover of the transaction monitoring platform in the three-year period, answer "1".
3.3.1	203	Physical presence - Place of Business.	Please answer 'Yes' or 'No'.
3.3.2	204	In which countries by percentage of equity ownership are all shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Insert countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.3	205	Number of branches by location, broken down by country of operation.	Enter the number of branches the entity has, broken down by country of operation.
3.3.4	206	Number of Subsidiaries by location, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.
3.3.5	207	In which country is the parent or holding company incorporated?	Enter the country the parent or holding company incorporated.
3.4.1	208	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.



3.4.2	209	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.
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### AML Controls Questions:

No.	Question No.	Question	Description/Explanation
1.1.1	210	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	211	Indicate the number that are 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	212	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.4	213	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.5	214	Does the approved Charter include the roles and responsibilities of the Directors/General Partners/Managers?	Please answer 'Yes' or 'No'.
1.1.6	215	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	216	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues?	Please answer 'Yes' or 'No'.

1.1.8	217	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.9	218	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	219	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, was held.
1.1.11	220	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	221	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	222	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.2.1	223	Is there regular reporting of AML/CFT/PF matters by Senior Management to the board?	Please answer 'Yes' or 'No'.
1.2.2	224	When was the last report of AML/CFT/PF matters to Senior Management to the board made?	Enter the date when the last report relating to AML/CFT/PF matters was made by Senior Management to the board.
1.2.3	225	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.2.4	226	When was the last review of the AML/CFT/PF policy and procedures?	Enter the date of the last review of the AML/CFT/PF policy and procedures.

1.2.5	227	Does Senior Management ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.2.6	228	Does Senior Management ensure that relevant, adequate, and timely information regarding AML/CFT/CPF matters is provided to the Board?	Please answer 'Yes' or 'No'.
1.2.7	229	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	230	How many risk assessments relating to new products/services/delivery channels/technologies did you 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	231	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.10	232	How many trainings did the AMLCO/MLRO attend for the reporting period?	Enter the total number of trainings the AMLCO/MLRO attended during the reporting period.
1.3.1	233	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.3.3	234	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.3.5	235	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.3.7	236	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.3.8	237	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.

1.3.9	238	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.10	239	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.3.11	240	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.3.12	241	Has the AML Compliance Officer received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.13	242	Has the MLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.14	243	Has the DMLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.15	244	Does the AMLCO report to the Board and Senior Management on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.16	245	Does the MLRO report to the Board and Senior Management on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.17	246	Does the DMLRO report to the Board and Senior Management on AML/CFT/CPF related issues?	Please answer 'Yes' or 'No'.

1.3.18	247	Does the AMLCO provide oversight of risk assessment procedures?	Please answer 'Yes' or 'No'.
1.3.19	248	Does the AMLCO conduct AML/CFT/CPF training for all Directors and relevant staff of the entity?	Please answer 'Yes' or 'No'.
1.3.20	249	How many internal trainings did the AMLCO conduct during the period under review?	Enter the number of internal trainings that were conducted by the AMLCO during the reporting period.
1.3.21	250	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.22	251	Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF compliance breaches?	Please answer 'Yes' or 'No'.
1.3.23	252	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.
1.3.24	253	Does the AMLCO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.25	254	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.
1.3.26	255	Does the MLRO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.27	256	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.
1.3.28	257	Does the DMLRO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.29	258	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	259	Does the entity have an internal audit department /	Please answer 'Yes' or 'No'.

		unit with oversight over AML functions?	
1.4.2	260	Is there an Internal AML Audit Charter/Plan?	Please answer 'Yes' or 'No'.
1.4.3	261	Is the AML compliance plan or charter reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.4	262	Is the internal AML audit function outsourced?	Please answer 'Yes' or 'No'.
1.4.5	263	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	264	Does the internal AML auditor perform regular reviews of the AML/CFT/CPF-related policies, procedures and processes?	Please answer 'Yes' or 'No'.
1.4.7	265	Has the internal AML auditor performed a AML/CFT/CPF audit?	Please answer 'Yes' or 'No'.
1.4.8	266	Enter the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?	Enter the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme.
1.4.9	267	When was the last AML/CFT audit conducted by Internal Audit?	Enter the date of last Internal AML Audit.
1.4.10	268	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.11	269	Enter 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	270	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.5.2	271	Is AML/CFT/CPF training provided to Directors and all relevant staff?	Please answer 'Yes' or 'No'.
1.5.3	272	How many AML/CFT/CPF training sessions in total were conducted for the Directors	Enter the total number of AML/CFT/CPF training sessions conducted for the Directors and relevant staff during the reporting period.

		and relevant staff within the reporting period?	
1.5.4	273	Who facilitates the training? Please name the trainer and their role.	Enter the name of who facilitated the training, such as the name of the company and name of individual who provided the training.
1.5.5	274	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.5.6	275	Does the entity assess AML knowledge of its employees?	Please answer 'Yes' or 'No'.
1.5.7	276	Please indicate percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the company during the reporting period.	Enter the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the entity during the reporting period.
1.6.1	277	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.
1.6.2	278	Are any records NOT retained or accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.3	279	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	280	How accessible and swiftly available are records for competent authorities/law enforcement - in hours?	Enter the time, in hours, of how long it takes for the entity to provide records upon request from competent authorities/law enforcement agencies.
1.7.1	281	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.7.2	282	How many clients were rated high risk?	Enter the number of clients that were rated 'high' risk.
1.7.3	283	How many clients were rated between low and high risk?	Enter the number of clients that were rated between 'low' and 'high' risk, i.e., medium risk.
1.7.4	284	How many clients were rated low risk?	Enter the number of clients that were rated 'low' risk.

1.7.5	285	How frequent is the Risk Assessment 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.
1.7.6	286	What was the date of the last review?	Enter the date of the last review of the Risk Assessment.
1.7.7	287	Does the entity consider the ML/TF/PF risks of the clients (including UBOs) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.8	288	Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.9	289	Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.10	290	Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.11	291	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.12	292	How often, in months, do you review High-Risk relationships/accounts?	Enter how often, in months, does the entity review 'high' risk relationships/accounts.
1.7.13	293	How many high-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'high' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.14	294	How often, in months, do you review medium-Risk relationships/accounts?	Enter the number of months between reviews, the entity takes to review medium-risk relationships/accounts.
1.7.15	295	How many medium-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'medium' risk business relationships or client accounts the entity reviewed during the reporting period.



1.7.16	296	How often, in months, do you review low-Risk relationships/accounts?	Enter the number of months between reviews, the entity takes to review 'low' risk relationships/accounts.
1.7.17	297	How many low-risk business relationships or client accounts did you 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	298	Where applicable, does the entity have a Group Wide AML/CFT programme?	Please answer 'Yes' or 'No'.
1.8.2	299	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	300	Have 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	301	Does the entity have Governing Body approved policies and procedures for Customer due diligence measures i.e. customer identification and verification as well as monitoring of customers and updating customer information?	Please answer 'Yes' or 'No'.
1.8.5	302	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	303	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	304	Does the entity have Governing Body approved policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.8.8	305	Does the entity have Governing Body approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.8.9	306	Does the entity have Governing Body approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.8.10	307	Does the entity have Governing Body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.8.11	308	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	309	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	310	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	311	When were the AML/CFT/CPF policies and procedures last updated?	Enter the date when the AML/CFT/CPF policies and procedures were last updated.
1.8.15	312	For the governing process, is information collected on	Please answer 'Yes' or 'No'.

		counterparties and business associates?	
1.8.16	313	Total Clients	Total number of clients (legal arrangements and natural persons) the entity has as at the last date of the reporting period.  Answer to this question should be the same as Question 1 of this Survey, as information requested is the same.
1.8.17	314	Did the company decline, de-risk/ terminate / restrict business relationships with any customers or any business for AML/CFT/CPF related reasons for the current reporting period?	Please answer 'Yes' or 'No'.
1.8.18	315	Please provide the total number of business relationships or clients accounts that were de-risked through termination of business relationship within the reporting period.	Enter the total number of business relationships or clients' accounts that were de-risked through termination of business relationship, during the reporting period.
1.8.20	316	How many customer accounts remain non-compliant with required identification and verification procedures?	Number of non-compliant customers
1.9.1	317	Is there a screening process?	Please answer 'Yes' or 'No'.
1.9.2	318	Is the screening process manual, automated or a combination?	Select Manual, Automated, or Automated with Manual Checks.
1.9.3	319	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.9.4	320	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	321	Do screening parameters include risk indicators for TF and PF monitoring?	Please answer 'Yes' or 'No'.
1.9.6	322	Is the existing customer database screened periodically	Please answer 'Yes' or 'No'.

		against the designated H.M. Treasury list?	
1.9.7	323	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	324	Number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.	<p>Enter the number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.</p> <p>An alert is generated during screening process, indicating a match of some or all, of the customer or business partner's identification details, against those of designated persons and entities on the HM Treasury Sanctions list. A match needs to be verified, to confirm or discount whether it is a true or false positive.</p>
1.9.9	325	How many false positive hits did you encounter during the reporting period?	Number of false positive hits the entity encountered during the reporting period.
1.9.11	326	When designated list are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.9.12	327	Are customers / counterparties screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.9.13	328	Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen?	Please answer 'Yes' or 'No'.
1.9.14	329	Does the entity maintain a report of results of positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.9.15	330	How many positive hits for TFS did you encounter during the reporting period?	Total number of positive hits related to TFS the entity encountered during the reporting period.

1.9.18	331	Is there an approved process for sanctions monitoring?	Please answer 'Yes' or 'No'.
1.9.19	332	How many instances of unusual or suspicious activity have been flagged by the sanctions monitoring tool during the reporting period?	Enter the number of instances where unusual or suspicious activity has been flagged by the sanctions monitoring tool during the reporting period.
1.9.20	333	Is the sanctions monitoring process manual, automated or a combination?	Select what applies:  Manual, Automated, or Automated with Manual Checks.
1.9.21	334	Is sanctions monitoring done in real time or after the event?	Select what applies:  No process, After the event, or Real time.
1.10.1	335	Does your 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	336	Enter 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	337	Has the automated system been adapted for use in Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	338	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.
1.10.5	339	Please provide the total number of Alerts in Reporting Period by the automated system related to Money Laundering.	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.
1.10.7	340	Please provide the total number of Alerts resulting in	The total number of alerts produced by the monitoring system (automated or

		Suspicious Activity Reports related to Money Laundering.	manual) which resulted in generation of suspicious activity reports (SAR) internally, relating to money laundering. This number includes false positive alerts.
1.10.9	341	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	Total number of alerts which led to the internal filing of suspicious transactions reports (STR) relating to money laundering, during the reporting period.
1.10.11	342	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing/Proliferation Financing.	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.
1.10.13	343	Please provide the total number of Alerts resulting in suspicious activity reports related to Terrorism Financing/Proliferation Financing.	The total number of alerts produced by the monitoring system (automated or manual) which resulted in generation of suspicious activity reports (SAR) internally, relating to Terrorism Financing/Proliferation Financing. This number includes all alerts including false positives.
1.10.15	344	Please provide the total number of Alerts leading to the filing of a Suspicious Transaction Report related to Terrorism Financing/Proliferation Financing.	The total number of alerts which led to the internal filing of suspicious transactions reports (STR) relating to Terrorism Financing/Proliferation Financing, during the reporting period.
1.10.17	345	Please provide the total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information.	The number of incoming transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.18	346	Please provide the total value of incoming funds rejected due to insufficient applicant for business or beneficiary information.	The total value of incoming funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.19	347	Please provide the total number of outgoing	The number of outgoing transactions the entity rejected during the reporting

		transactions rejected due to insufficient applicant for business or beneficiary information.	period, due to insufficient applicant for business or beneficiary information.
1.10.20	348	Please provide the total value of outgoing funds rejected due to insufficient applicant for business or beneficiary information.	The total value of outgoing funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.21	349	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of new client business relationships (potential clients) the entity rejected due to Money Laundering or Terrorism Financing considerations, during the reporting period.
1.10.22	350	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of transactions (both incoming and outgoing) the entity blocked/rejected due to Money Laundering or Terrorism Financing considerations during the reporting period.
1.10.23	351	Please provide the total number of client business relationships (clients) that have been terminated due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of client business relationships the entity terminated due to Money Laundering or Terrorism Financing considerations, during the reporting period.
1.11.1	352	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	353	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	354	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 enhanced due diligence.

1.11.4	355	Where EDD was applied, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.
1.11.5	356	How many Transactions did the entity apply EDD on during the reporting period?	The number of transactions (of legal persons and arrangements and natural persons) where the entity applied enhanced due diligence.
1.11.6	357	How many Client's KYC/CDD files were reviewed by the entity as part of applying EDD measures on during the reporting period?	The number of clients' CDD files, both legal persons and arrangements and natural persons, that the entity reviewed as part applying enhance due diligence.
1.11.7	358	Does the entity have enhanced procedures for monitoring PEPs?	Please answer 'Yes' or 'No'.
1.12.1	359	Is there an internal process to report a Suspicious Activity/Transaction (STR/SAR) to the MLRO?	Please answer 'Yes' or 'No'.
1.12.2	360	How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period.
1.12.3	361	How many Suspicious Activity/Transaction Reports have been reported to the FRA by the MLRO for the current reporting period?	Enter the number of Suspicious Activity/Transaction Reports reported by the MLRO, to the FRA, during the reporting period.
1.12.4	362	How many hours on average does it take you to file a SAR to the FRA?	Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.
1.12.5	363	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.
1.12.6	364	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.



1.12.7	365	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.13.1	366	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'.
1.13.2	367	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'.
1.13.3	368	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'.
1.15.1	369	Is there a board approved documented policy on outsourcing?	Please answer 'Yes' or 'No'.
1.15.2	370	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Please answer 'Yes' or 'No'.
1.15.3	371	Is there regular ongoing reviews of the outsourcing arrangement?	Please answer 'Yes' or 'No'.
1.15.4	372	In total, how many services do you outsource from either third parties, the entities group or subsidiaries?	Enter the total number of services the entity outsources from either third parties, the entities group or subsidiaries.

1.15.5	373	Does the outsourcing agreement clearly set out the obligations of both parties?	Please answer 'Yes' or 'No'.
1.15.6	374	If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity?	Please answer 'Yes' or 'No'.
1.15.7	375	If relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity?	Please answer 'Yes' or 'No'.
1.15.8	376	If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider?	Please answer 'Yes' or 'No'.
1.15.9	377	If relevant, does the outsourced AMLCO/MLRO have access to the compliance committee and board of the entity?	Please answer 'Yes' or 'No'.
1.15.10	378	If relevant, are there data protection restrictions which would delay access to data and documents?	Please answer 'Yes' or 'No'.
1.15.11	379	Is sub-contracting of any of the outsourced activities permitted?	Please answer 'Yes' or 'No'.
1.15.12	380	How do you ensure the OSP follows the outsourcing standards equivalent to the licensee's?	Provide a narrative explaining how the entity ensures the OSP follows the outsourcing standards equivalent to that of the entity.
1.15.13	381	Is the entity satisfied that the OSP has measures in place to comply with record keeping requirements?	Please answer 'Yes' or 'No'.
1.16.1	382	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.

1.16.2	383	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.
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