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

Document version: 1.6

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**Revision History:**

<b>Effective Date</b>	<b>Version Number</b>	<b>Revision Description</b>
16 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update definitions
4 November 2022	1.2	Updates to definitions, descriptions, and explanations
31 May 2023	1.3	Updates to definitions, descriptions, explanations and questions.
31 May 2024	1.4	Updates to definitions, descriptions, explanations and questions.
30 May 2025	1.5	Updates to section 1 and sections 4.3 through 4.6 along with updates to the definitions, descriptions and explanations.
1 June 2026	1.6	Updates to section 1 through section 4.4 along with updates to terms and definitions.

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## 1 INTRODUCTION

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

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

FSPs are required to provide this data by completing the AML Return Form and submit it through the Authority’s web-based e-mail Return software, to the Anti-Money Laundering Division (“AMLDD”). The AML Return Form is issued in accordance with Regulation 53A of the AMLRs, pursuant to which the Authority may require a FSP to provide any information that the Authority reasonably requires in connection with the exercise of its functions. Requiring FSPs to provide the information by completing this AML Return is necessary to ensure that the Authority has the requisite information necessary to perform its functions as outlined in Section 6 of the MAA, which includes the monitoring of compliance with the AMLRs.

Section 16(1) of the Companies Management Act (2025 Revision) (“CMA”) further sets out the duty of the Authority to maintain a general review of the business of company management in the Islands and empowers the Authority to examine the affairs of a licensee in any manner as it deems fit for the purposes of carrying out its functions. These functions include monitoring compliance with the AMLRs pursuant to Section 6(1)(b)(ii) of the MAA, as well as carrying out the duty of maintaining a general review of the business of company management in the Islands pursuant to Section 16(1)(a) of the CMA. Section 16(2)(c) of the CMA further authorizes the Authority to require a licensee to provide such information as the Authority may reasonably require for the performance of its functions under the Act. The examination of the affairs of a licensee by way of the AML Return is therefore necessary for purposes of discharging these functions.

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

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

The Authority also has powers to take enforcement action pursuant to the relevant provisions of Section 18 of the CMA for failure to comply with a requirement to provide information, which may include revocation of a licence or imposition of an administrative fine in accordance with Section 42A of the MAA. Section 16(5) of the CMA further provides that failure to comply with any requirement of the Authority for information is a criminal offence and may result in a fine of ten thousand dollars on summary conviction, one hundred thousand dollars on indictment, and ten thousand dollars per day for continuing offences.

Providing false or misleading information to the Authority may also result in a fine of ten thousand dollars on summary conviction, one hundred thousand dollars on indictment and to imprisonment for five years pursuant to Section 16(6) of the CMA.

## 2 FORM INFORMATION

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

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

## 3 ACCESSING AND SUBMITTING THE AML RETURN

### 3.1 ACCESS TO THE AML RETURN

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

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

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

To access the AML Return:

1. When the AML Return is distributed from Strix, the recipients will receive an invitation email from “Cayman Islands Monetary Authority” with the address [AMLDoNotReply@cima.ky](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=YJa0JBLI86VZVCRbBxnm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYSop%2Bk8rPURRSvrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhATaTNSa3IE3aiA%3D>

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

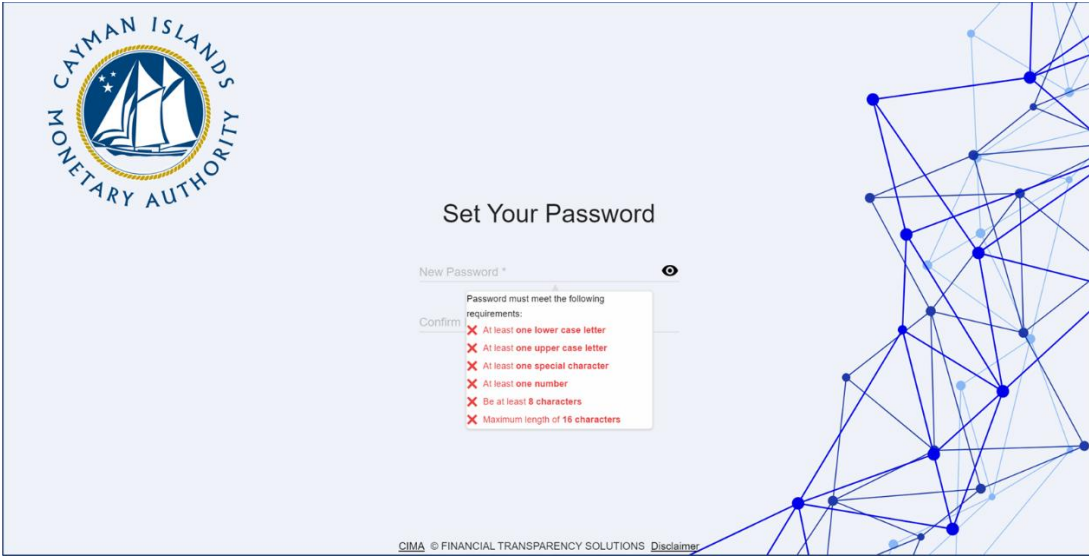
Please do not reply to this email, it is automatically generated.

**Disclaimer:**

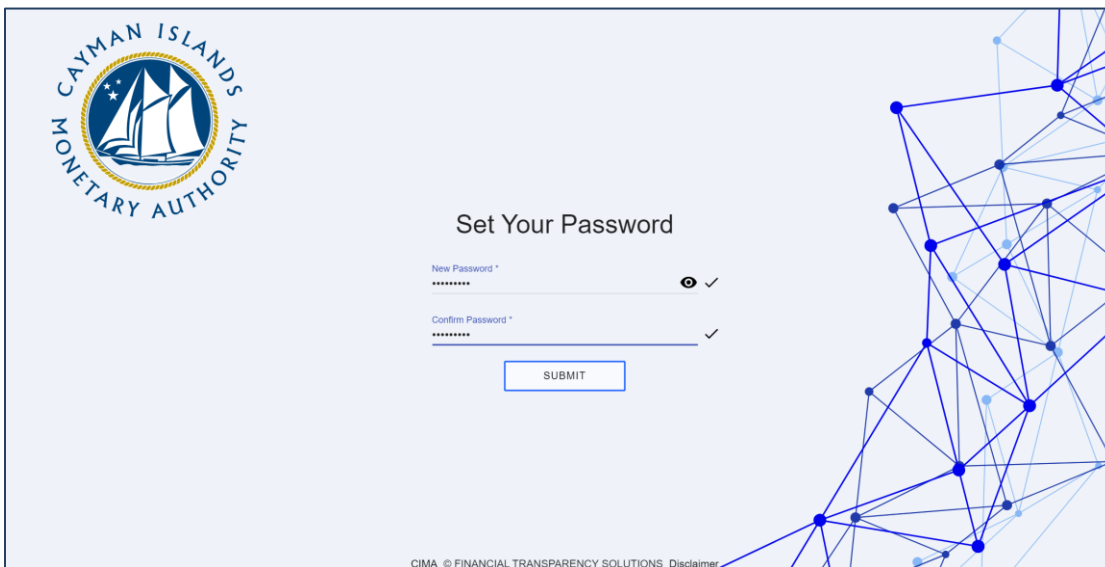
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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



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 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)

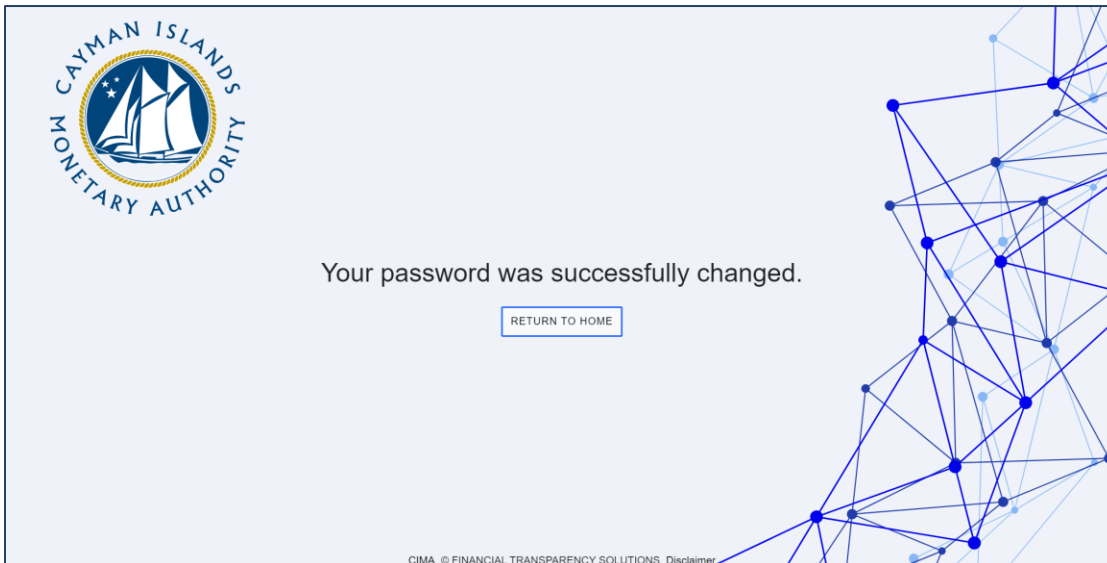
Please do not reply to this email, it is automatically generated.

**Disclaimer:**

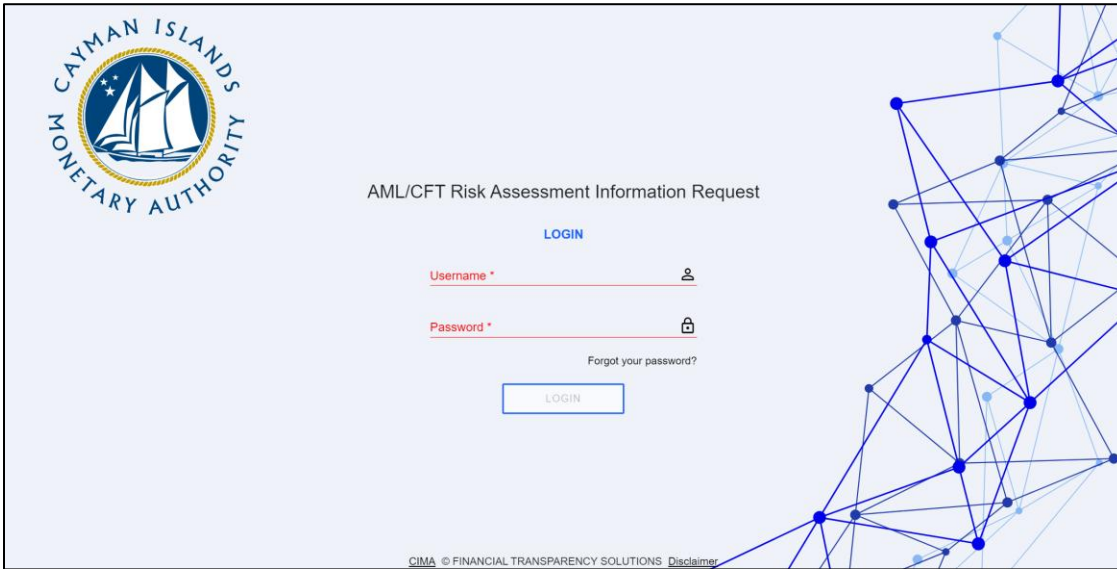
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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.



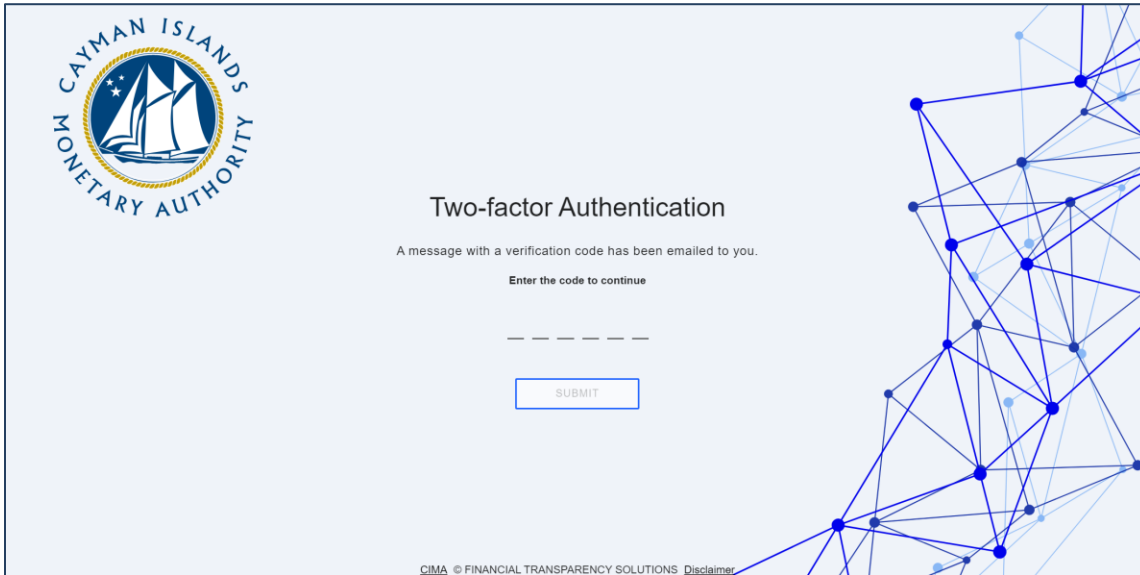
- 6. The recipient should then enter their username, which is the email address where they received the AML Return invite, and the password they just created.



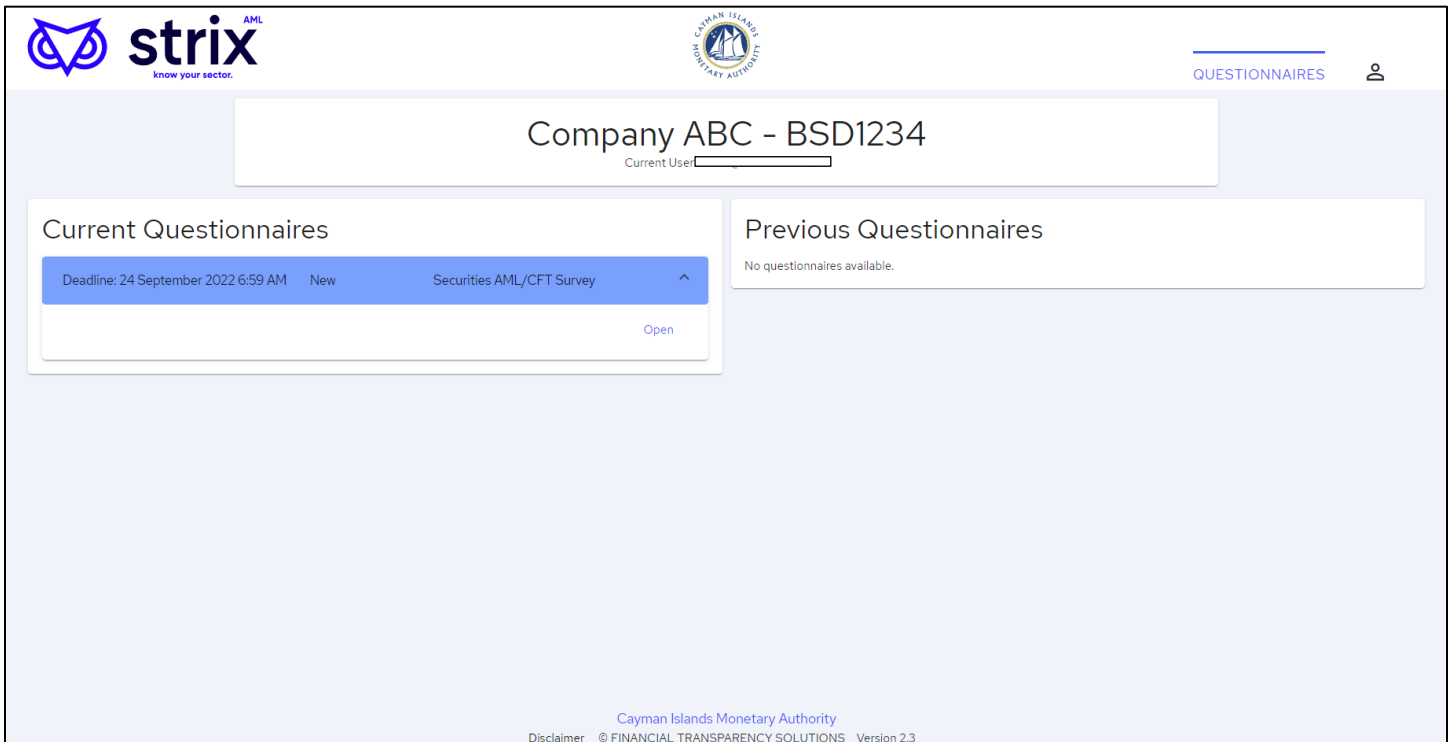
- 7. A six digit two-factor authentication code will be sent to the Return recipient’s email address.



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



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



## 3.2 COMPLETING THE AML RETURN FORM

1. Click the Current Questionnaire to access the AML Return Form and start populating the form with the required data.
  - a. Completion guidance for the AML Return is available at Section 5 of this Guide below.
  - b. The recipient(s) can open, update, and close the AML Return as many times as needed prior to the Return due date so long as the recipient selects 'Save'.
  - c. Once the AML Return has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority. Users should note that the Return does not have Excel import functionality.
  - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the Return name will be listed for verification, which is useful for instances where users are submitting for more than one entity.
  - e. Once the AML Return is 'Submitted' an Excel and PDF copy of the completed Return will be available under 'Current Questionnaire'.
  - f. Upon submission to the Authority a review of the AML Return will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Return through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
2. If a User receives or has access to more than one Return, they will not see the additional Return(s) in the 'Current Returns' section of the web page. At the top of the page, where it shows the Entity's name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.

## 4 OTHER USEFUL INFORMATION

### 4.1 USER ACCOUNT LOCKOUTS

In the event the AML Return recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An email will be sent to the user identifying that they won't be able to log in. There are three (3) stages of lockout: 1) locked out for five (5) minutes; 2) locked out for ten (10) minutes; and, 3) if the user persists, locked out permanently.

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

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

## 4.2 INTERNET BROWSER

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

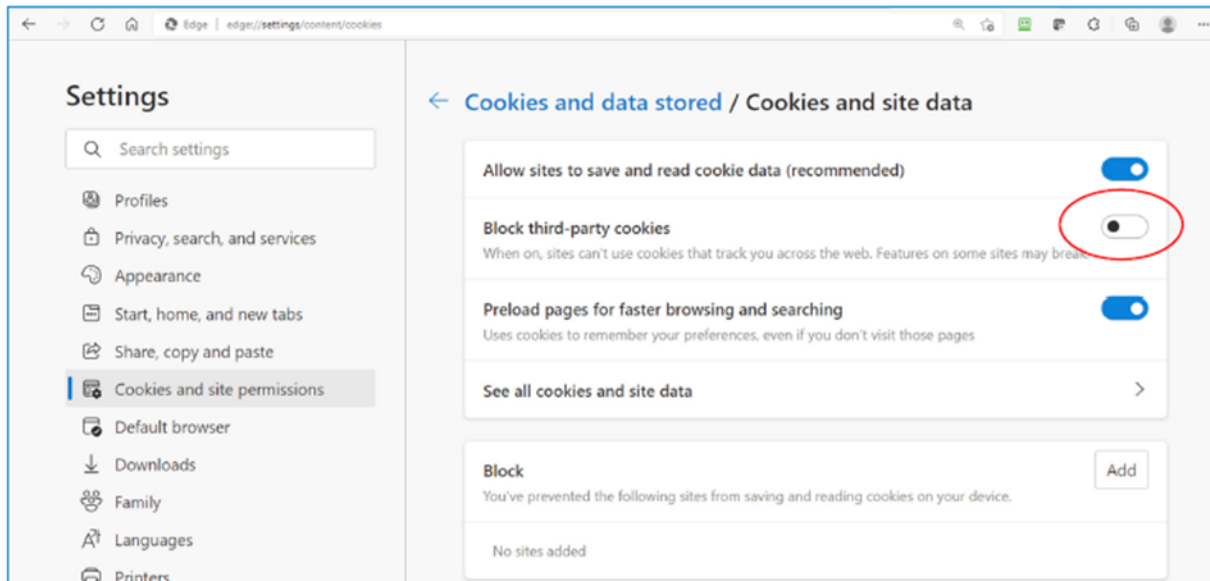
## 4.3 TWO-FACTOR AUTHENTICATION

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

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

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

Example of Microsoft Edge Cookie Setting:



## 4.4 USING EXCEL

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

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

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

## 4.5 PARTIAL OR INCOMPLETE RETURN SUBMISSIONS

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

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

## 4.6 DATA AND SECURITY

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

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

## 4.7 APPLICABLE FEES

There are no fees associated with this Form.

## 5 AML RETURN GUIDANCE

Below are descriptions and explanations regarding the risk factors and controls factors which you are required to provide information on. The risk factors are used to assess Inherent ML/TF/PF Risks. 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
AMLCO	Anti-Money Laundering Compliance Officer means the person designated in accordance with Regulation 3(1) of the Anti-Money Laundering Regulations (2025 Revision), as amended.
AMLRs	Anti-Money Laundering Regulations (2025 Revision), as amended.
Beneficial Owner	<p>Or (“BO”) means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to–</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person or</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement.</p> <p><i>As guidance, in instances where a BO has multiple nationalities, where applicable, the entity is to disclose the nationality which could present the higher risks as referenced in Regulation 8A of the AMLRs.</i></p>
Client / Customer	<p>A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands.</p> <p>Generally, clients/customers are made up of Natural Persons, Legal Persons, and/or Legal Arrangements.</p>
Corporate Entity	A corporate body constituted under the Laws of the Islands or any other jurisdiction, which is formed

	specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Return	<b>United States Dollars (US\$).</b> All other currencies must be converted to US\$ unless otherwise stated, using the prevailing rate of exchange as at the last day of the reporting period.
Dealers in Precious Metals and Stones	Legal and Natural Persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer means the “nominated officer” as defined in Regulation 33(2) of the AMLRs.
Eligible Introducers	A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs.  The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under Regulation 22(1)(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Entity	For the purposes of this form/Return, an ‘Entity’ is the holder of the Corporate Service Provider licence that is responding to this Return.
F2F	Face-to-Face means the engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Fintech Services	Services that use innovative technology to improve, change or enhance how a financial services business is conducted but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2025 Revision), except to the extent that it is modified by the Foundation Companies Act (2025

	Revision) or those foundation companies established in other jurisdictions.
FRA	The Financial Reporting Authority (“FRA”) is the Cayman Islands Financial Intelligence Unit responsible for deterring, preventing and detecting Money Laundering, Terrorist Financing and the Financing of Proliferation.
Gov / Pub Sector	Business conducted with companies who are Government or in the Public Sector. Companies in which a government has a controlling interest; and in respect of such company, includes all subsidiary entities of the company.
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods.
HNWIs	<p>For the purpose of the AML Return, a high net worth individual (HNWI) is:</p> <ul style="list-style-type: none"> <li>(i) an individual whose net worth is approx. US\$1,000,000 or its equivalent in any other currency; or</li> <li>(ii) any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.</li> </ul> <p>HNWIs also include those clients who are Ultra HNWIs.</p>
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it’s a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Individual	A client who is a Natural Person and not a Legal Person or Legal Arrangement.
Legal Arrangement	A Trust, Partnership, or other entity created between parties which lacks separate legal personality.
Legal Person	A company or other entity created by operation of law with separate legal personality.
MLRO	Money Laundering Reporting Officer “MLRO” means the “nominated officer” as defined in regulation 33(1) of the AMLRs.
ML/TF/PF	Money Laundering/Terrorism Financing/Proliferation Financing.

MSB	<p>Money Services Business (“MSB”) 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-Compliant Accounts	Where a person carrying out relevant financial business is unable to obtain information required under Part IV of the AMLRs to satisfy relevant customer due diligence measures.
Non-F2F	Non-Face-to-Face (“Non-F2F”) is where a customer can open an account and transact with a regulated Financial Service Provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP.
NPO	<p>A company or body of persons, whether incorporated or unincorporated, or a Trust –</p> <p>(a) established or which identifies itself as established primarily for the promotion of charitable, philanthropic, religious, cultural, educational, social or fraternal purposes, or other activities or programmes for the public benefit or a section of the public within the Islands or elsewhere; and</p> <p>(b) which solicits contributions or raises funds from the public or a section of the public within the Islands or elsewhere.</p>
OSP	Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to the corporate group, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.

	Outsourcing does not include purchasing contracts.
PEP	<p>“Politically Exposed Person” includes —</p> <p>(a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official.</p> <p>(b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and</p> <p>(c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p>
Reporting Period	January 1 to December 31 of the applicable year.
Signatories	Signatories are those persons authorised to act on behalf of a client, for example, BOs, Directors, or other Third Parties.
Source of Funds	<p>The origin of the assets that will be used to form and maintain the business relationship.</p> <p>A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together.</p> <p>Take this into account when answering questions relating to the 'Nature of Business - Source of Funding.</p>
Special Economic Zone Business	Any type of business authorised to operate in a Special Economic Zone pursuant to any legislation enforced in the Islands.
Targeted Financial Sanctions (TFS)	Includes asset freezing, restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury (“OFSI”).

TCSP		Includes those entities conducting Trust, Company Manager, and Corporate Service Provider business.
Transaction		For the purposes of this AML Return, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client.  Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction.
Trust		A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
Ultra HNWI		For the purpose of the AML Return, Ultra-High Net Worth Individuals, also referred to as UHNWIs, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.
Virtual Asset		A digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies.
Virtual Asset Custodian		A VASP who provides virtual asset custody services in or from within the Islands.
Virtual Asset Custody Service		The business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets.
Virtual Assets Products and Services		Includes those services identified within the Virtual Asset (Service Providers) Act (2024 Revision) ("VASP Act"), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.
Virtual Asset Service Provider (VASP)		An entity that is registered pursuant to Section 6(3) of the VASP Act or licensed as a virtual asset custodian or trading platform pursuant to Section 8(2)(a) of the VASP Act, 2024 Revision or as amended.
Timeframe	Number of Clients	Number of clients <b>as at the end of the reporting period.</b>
Timeframe	Value of Transactions	Value of transactions conducted for clients <b>during the reporting period.</b>
Timeframe	Number of Transactions	Number of Transactions conducted for clients <b>during the reporting period.</b>

<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 at <i>the end</i> of the reporting period.	<p>Enter the total number of clients the entity had at <i>the end</i> of the reporting period.</p> <p><b>Where applicable, the number of clients/customers should only include those of the Cayman Islands legal entity.</b></p> <p>Total clients consist of Natural Persons, Legal Persons and Legal Arrangements.</p>
1.1.2	2	Total Number of Transactions for the reporting period.	<p>Enter the total number of all transactions conducted for clients <i>during</i> the reporting period.</p> <p>This is a numeric value and not monetary value.</p> <p><b>Where applicable, the total transactions should only include those of the Cayman Islands legal entity.</b></p>
1.1.3	3	Total Value of Client Assets Under Management - Monetary Value (\$\$)	<p>Enter the total value of client assets for clients reported in Question 1, at the end of the reporting period.</p>
1.1.4	4	Clients/Customers that are Legal Persons, broken down by country of incorporation of the client.	<p>Enter the total number of clients that are Legal Persons, broken down by country of incorporation, as at <i>the end of</i> the reporting period.</p> <p>Examples of legal persons include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation Companies.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.5	5	Clients / Customers that are Legal Arrangements, broken down by the country of establishment of the client.	<p>Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as at <i>the end of</i> the reporting period.</p> <p>Examples of Legal Arrangements include but are not limited to Trusts and Partnerships.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>

1.1.6	6	Total number of PEPs.	<p>Enter the total number of PEPs, broken down by the nationality of the PEP, as at <i>the end of</i> the reporting period.</p> <p>Total PEPs should include, but may not be limited to, those clients that are Natural Persons, BOs, Directors, or hold any other form of control, including signatories.</p>
1.1.7	7	Total number of High-Risk Clients/ Customers at the end of the reporting period.	Enter the total number of high-risk clients/customers the entity has, at <i>the end of</i> the reporting period.
1.1.8	8	Total number of Non-Compliant Accounts at <i>the end of</i> the reporting period.	Enter the number of customers where sufficient CDD has not been collected, at <i>the end of</i> the reporting period.
1.2.1	9	Total number of BOs of clients who are Legal Persons and Arrangements.	<p>Enter the total number of BOs of all clients who are Legal Persons and Arrangements, broken down by nationality of the BO, as at <i>the end of</i> the reporting period.</p> <p>This category is specific to Legal Persons and Legal Arrangements. Examples include, but are not limited to, the total number of BOs of Corporate entities, Settlers of Trusts and General Partners of Limited Partnerships.</p> <p>A BO should not be counted more than once regardless of the number of business relationships they have with the entity.</p>
1.2.2	10	Does the entity have any clients who are Legal Persons?	Answer 'Yes' or 'No'
1.2.3	11	Number of BOs of clients who are Legal Persons.	Enter the number of BOS of clients who are Legal Persons, broken down by the nationality of the BO, at the end of the reporting period.
1.2.4	12	Does the entity have any clients that are Legal Arrangements?	Answer 'Yes' or 'No'
1.2.5	13	Number of Settlers of clients who are Legal Arrangements.	<p>Enter the number of settlers of clients who are Legal Arrangements, broken down by the nationality of the settlor, at the end of the reporting period.</p> <p>This category is specific to clients who are Legal Arrangements and are Trusts.</p>
1.2.6	14	Number of Partners of clients who are Legal Arrangements.	Enter the number of partners of clients who are Legal Arrangements, broken down

			<p>by the nationality of the partner, at the end of the reporting period.</p> <p>This category is specific to clients who are Legal Arrangements and are Partnerships.</p>
1.2.7	15	Number of Clients that have BOs who are HNWIIs.	<p>Enter the total number of clients that have BOs who are also HNWIIs.</p> <p>This category is specific to clients who are Legal Persons and Legal Arrangements. Examples include, but not limited to, instances where a BO of a Company or Settlor of a Trust is a HNWI.</p> <p>HNWIIs is specific to those persons whose net worth is approx. US\$1,000,000 or its equivalent in any other currency, or any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.</p> <p>HNWIIs also include those clients who are Ultra HNWIIs</p>
1.2.8	16	Number of Clients that have BOs who are Ultra HNWIIs.	<p>Enter the total number of clients who have BOs who are also Ultra HNWIIs.</p> <p>This category is specific to clients who are Legal Persons and Legal Arrangements. Examples include, but not limited to, instances where a BO of a Company or Settlor of a Trust is a UHNWI.</p> <p>UHNWIIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p>
1.2.9	17	Number of BOs of clients who are Legal Persons or Arrangements who are also PEPs.	Enter the total number of clients who are Legal Persons and Arrangements that have BOs who are PEPs, as at <i>the end of</i> the reporting period.
1.2.10	18	Number of clients that have Nominees acting on behalf of a Beneficial Owner, or a Nominee within the ownership structure, broken down by nationality of the BO.	<p>Enter the total number of clients that have nominees acting on behalf of Beneficial Owners, or within its ownership structure, broken down by the nationality of the beneficial owner.</p> <p>This category is specific to clients who are Legal Persons and Arrangements.</p>
1.2.11	19	Number of total Directors appointed to clients.	Enter the total number of Directors appointed to clients, as at <i>the end of</i> the reporting period.
1.2.12	20	Number of Directors and/or Senior Management of clients who are PEPs.	Enter the total number of clients who have Directors and/or Senior Management who are also PEPs, as at <i>the end of</i> the reporting period.
1.2.13	21	Number of Directors and/or Senior Management of clients	Enter the number of Directors and/or Senior Management of the clients who are

		who are High Net Worth Individuals.	also HNWI, as at <i>the end of</i> the reporting period.  HNWIs is specific to those persons whose net worth is approx. US\$1,000,000 or its equivalent in any other currency or any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.  HNWIs also include those clients who are Ultra HNWIs.
1.2.14	22	Number of Directors and/or Senior Management of clients who are Ultra HNWIs.	Enter the number of Directors and/or Senior Management of the clients who are also Ultra HNWIs, as at the end of the reporting period.  UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.
1.2.15	23	Number of Directors and/or Senior Management of clients who are PEPs & HNWIs/ Ultra-HNWIs.	Enter the number of Directors and/or Senior Management of the clients who are both PEPs and HNWIs/ Ultra- HNWIs, as at <i>the end of</i> the reporting period.
<b>Client Structures – Note that clients may fall under multiple categories below</b>			
1.3.1	24	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are Government or Public Sector, broken down by government jurisdiction.
1.3.2	25	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, as at the end of the reporting period, broken down by country of incorporation of the client.
1.3.3	26	Foundations - Number of Clients.	Enter the number of clients the entity has that are Foundations, broken down by country of establishment of the client, at the end of the reporting period.
1.3.4	27	Trusts - Number of Clients.	Enter the number of clients the entity has, that are Trusts, broken down by country of establishment, as at the end of the reporting period.
1.3.5	28	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients which are Segregated Portfolio Companies, as at the end of reporting period.
1.3.6	29	Special Economic Zone - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, that are registered/operate in a Special Economic Zone, broken down by country of incorporation of the client.

1.3.7	30	Funds / Collective Investment Vehicles - Number of Clients.	Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles, as at <i>the end of</i> reporting period.
1.3.8	31	Partnerships – Number of Clients.	Enter the number of clients the entity has that are Partnerships, as at the end of the reporting period.
<b>The following questions are specific to Natural Person clients ONLY – this section should only be completed if you have clients who are Natural Persons and <i>Not</i> Legal Persons or Arrangements</b>			
1.4.1	32	Does the entity have any clients that are Natural Persons?	Please answer 'Yes' or 'No'.  This question <u>does not</u> apply to clients who are Legal Persons or Legal Arrangements.
1.4.2	33	Clients / customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients that are Natural Persons, broken down by their nationality, at the end of the reporting period.  If an entity does not have such clients, a '0' value should be used.  <i>Note: This category does not include clients/ customers that are Legal Persons or Legal Arrangements.</i>
1.4.3	34	Clients/customers that are Natural Persons, broken down by Residency of the client.	Enter the number of clients that are Natural Persons, broken down by their residency.  This category is specific to Natural Person clients who have a direct business relationship with the entity.  If an entity does not have such clients, a '0' value should be used.  <i>Note: This category <u>does not</u> include clients/ customers that are Legal Persons or Legal Arrangements.</i>
1.4.4	35	Natural Persons - Total Transactions for the reporting period.	Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period.  This category is specific to Natural Person clients who have a direct business relationship with the entity.  If an entity does not have such clients, a '0' value should be used.  <i>Note: This category <u>does not</u> include clients / customers that are Legal Persons or Legal Arrangements.</i>

1.4.5	36	Natural Person Clients – Does the entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.  This question <u>does not</u> apply to clients who are Legal Persons or Legal Arrangements.
1.4.6	37	Number of Natural Person clients who are PEPs.	Enter the total number of Natural Person clients that are PEPs, as at the end of the reporting period.  This question <u>does not</u> apply to clients that are Legal Persons or Legal Arrangements.
1.4.7	38	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, that are PEPs, during the reporting period.
1.4.8	39	Does the entity have any Natural Person clients that are HNWIIs?	Please answer 'Yes' or 'No'.  This question <u>does not</u> apply to clients who are Legal Persons or Legal Arrangements.
1.4.9	40	Number of Natural Person clients who are HNWIIs.	Enter the number of Natural Person clients the entity has that are HNWIIs.
1.4.10	41	Natural Person Clients - HNWIIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are HNWIIs, <i>during</i> the reporting period.
1.4.11	42	Does the entity have any Natural Person clients that are Ultra HNWIIs?	Please answer 'Yes' or 'No'.  For this category, Ultra HNWIIs are those natural persons with net worth equal to or greater than US\$30,000,000.  This question <u>does not</u> apply to clients that are Legal Persons or Arrangements.
1.4.12	43	Number of Natural Person clients who are Ultra HNWIIs.	Enter the number of Natural Person clients the entity has that are Ultra-HNWIIs at the end of the reporting period.
1.4.13	44	Natural Person Clients - Ultra HNWIIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients who are Ultra HNWIIs, during the reporting period.
1.4.14	45	Does the entity have any Natural Person clients that are PEPs and HNWIIs / Ultra HNWIIs?	Please answer 'Yes' or 'No'.
1.4.15	46	Number of Natural Person Clients who are PEPs and HNWIIs / Ultra HNWIIs.	Enter the number of Natural Person clients the entity has that are both PEPs and HNWIIs / Ultra HNWIIs, at the end of the reporting period.

1.4.16	47	Natural Person Clients – PEPs and HNWI/ UHNWIs - Number of Transactions.	Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWI/ Ultra HNWI, during the reporting period.
1.5.1	48	<p><b>Nature of Business/Source of Funding:</b> Does the entity have clients whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> <li>▪ Banking Institutions</li> <li>▪ Other Financial Regulated Business*</li> <li>▪ Financial Leasing</li> <li>▪ Money Lending</li> <li>▪ Accountants</li> <li>▪ Fintech</li> <li>▪ Civil Service / Government Employment</li> </ul> <p>*excluding MSBs, VASP, and TCSPs.</p>	Please answer 'Yes' or 'No'.
1.5.2	49	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Banking sector.
1.5.3	50	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from the Financial Sector (excluding Banking, VASPs, MSBs and TCSPs).
1.5.4	51	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from Financial Leasing operations.
1.5.5	52	Money Lending - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from Money Lending operations.
1.5.6	53	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived through being an Accountant, (including but not limited to the areas of: Audit, Assurance, Bookkeeping, and Insolvency).
1.5.7	54	Fintech - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Fintech Industry.
1.5.8	55	Civil Service / Gov Employees – Number of Clients	Enter the number of clients the Entity has whose source of funding is from the government employment / civil service employment.

1.5.9	56	<p><b>Nature of Business / Source of Funding:</b></p> <p>Does the entity have clients whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> <li>▪ Legal Practitioners</li> <li>▪ Dealers in Precious Metals and Stones</li> <li>▪ Money Services Business (MSBs)</li> <li>▪ Virtual Asset Products and Services</li> <li>▪ High Value Dealers</li> <li>▪ TCSPs</li> <li>▪ Import/Export Industry</li> <li>▪ Shipping and Transport of Goods</li> </ul>	Please answer 'Yes' or 'No'.
1.5.10	57	Legal Practitioners – Number of clients.	Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner.
1.5.11	58	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.5.12	59	Money Services Business - Number of Clients.	Enter the number of clients whose source of funds is derived from Money Services Business operations.
1.5.13	60	Virtual Asset Products and Services- Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from Virtual Asset Products and Services (products, services, or investments).
1.5.14	61	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funds is derived from High Value Dealer operations.
1.5.15	62	TCSPs - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from TCSP operations.
1.5.16	63	Import / Export - Number of Clients.	Enter the number of clients the entity has, which are Legal Persons or Legal Arrangements operating in the Import / Export business, and Natural Persons employed in the Import / Export industry.
1.5.17	64	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from

			the Shipping and Transport of Goods industry.
1.5.18	65	<p><b>Nature of Business/Source of Funding:</b> Does the entity have clients whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Gambling Business</li> <li>▪ Adult Entertainment Industry</li> <li>▪ Defence Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> </ul>	Please answer 'Yes' or 'No'.
1.5.19	66	Real Estate Agents / Brokers / Sellers - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Real Estate Industry (Agents / Brokers / Sellers).
1.5.20	67	Gambling Business (including online gambling) - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Gambling Industry (including online gambling).
1.5.21	68	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Adult Entertainment Industry.
1.5.22	69	Defence Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Defence Industry.
1.5.23	70	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from operating in the Oil and Gas Industry.
1.5.24	71	Mining Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from the Mining Industry.
1.5.25	72	Construction / Development Industry - Number of Clients.	Enter the number of clients the entity has, whose source of funds is derived from operating in the Construction / Development Industry.

1.5.26	73	Retail / Restaurant Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is derived from the Retail / Restaurant Business.
1.5.27	74	Cannabis Production & Distribution Industry - Number of Clients.	Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.
1.5.28	75	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, whose source of funds is Unknown to the entity, broken down by the country of formation of the client.  Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.
1.5.29	76	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has whose source of funds is from known businesses, however not mentioned above.
1.6.1	77	Does the Entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.6.2	78	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback for this tab.  Enter 'N/A' if no comments.
2.1.1	79	Number of clients that the Entity provides the service of Registered Office.	Enter the number of clients the entity provides the service of Registered Office as at the end of the reporting period.
2.1.2	80	Number of clients the Entity provides the service of Formation Agent.	Enter the number of clients the entity provides the service of Formation Agent.
2.1.3	81	Number of Clients the Entity provides the service of Registered Agent / Statutory Filings.	Enter the number of clients, the entity provides Registered Agent/ Statutory Filing services as at the end of the reporting period.
2.1.4	82	Number of clients the Entity provides the service of BO Filings.	Enter the number of clients, the entity provides the service of BO Filings, as at the end of the reporting period.
2.1.5	83	Number of clients the Entity provides MLRO services.	Enter the number of clients, the entity provides MLRO services.
2.1.6	84	Number of Clients the Entity provides AML Compliance Officer services.	Enter the number of clients, the entity provides AML Compliance Officer services.

2.1.7	85	Number of Clients the Entity provides Nominee Shareholder services.	Enter the number of clients, the entity provides Nominee Shareholders services.
2.1.8	86	Does the entity provide other services to clients that are not listed above?	Please answer 'Yes' or 'No'.
2.1.9	87	Number of Clients the Entity provides Other Services not mentioned above.	Enter the number of clients the entity provides Other Services that are not mentioned above.
2.1.10	88	Please describe the other types of services provided to clients, that are not listed above.	Enter all other types of services, provided to clients, that are not listed above.
2.2.1	89	Number of clients with assets that are marine vessels within their client structure, by the nationality of the BO.	Enter the number of clients with assets that are marine vessels within their client structure, broken down by nationality of the BO.
2.2.2	90	Number of clients with assets that are marine vessels within the client structure, by jurisdiction of registration of the marine vessels.	Enter the number of clients with assets that are marine vessels within their client structure, broken down by jurisdiction of registration of the marine vessels.
2.2.3	91	Number of clients with assets that are aircraft within their client structure, by the nationality of the BO.	Enter the number of clients with assets that are aircraft within their client structure, broken down by nationality of the BO.
2.2.4	92	Number of clients with assets that are aircraft within the client structure, by jurisdiction of registration of the aircraft.	Enter the number of clients with assets that are aircraft within their client structure, broken down by jurisdiction of registration of the aircraft.
2.2.5	93	Number of clients with assets that are real estate assets within their client structure, by the nationality of the BO.	Enter the number of clients with real estate assets within their client structure, broken down by nationality of the BO.
2.2.6	94	Country location of the assets that are real estate.	Enter the number of clients with real estate assets within their client structure, broken down by country location of the real estate.
2.2.7	95	Number of clients with 'Other Assets', that are not listed above, within their client structure, by the nationality of the BO.	Enter the number of clients with 'Other Assets', not listed above, within their client structure, broken down by nationality of the BO.

2.2.8	96	Country location of the 'Other Assets'.	Enter the number of clients with 'Other Assets' within their client structure, broken down by country location of the assets.
2.3.1	97	Does the Entity facilitate transactions in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	98	Physical Cash Transactions - Number of Clients.	Enter the number of clients where transactions were conducted, by or on behalf of clients, via physical cash, <i>during</i> the reporting period.
2.3.3	99	Physical Cash - Value of Transactions.	Enter the total value of cash transactions processed by or on behalf of clients, <i>during</i> the reporting period.  Transactions include those between the entity and the client, the client account and a third party or the entity on behalf of the client.
2.3.4	100	Does the Entity facilitate transactions, in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.5	101	Virtual Currency Transactions - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, in the form of Virtual Currency, <i>during</i> the reporting period.
2.3.6	102	Virtual Currency - Value of Transactions.	Enter the total value of Virtual Currency transactions processed by or on behalf of clients <i>during</i> the reporting period.
2.3.7	103	Does the Entity facilitate client transactions via Third Parties?	Please answer 'Yes' or 'No'.
2.3.8	104	Third Party Transactions - Number of Clients.	Enter the number of clients where transactions to and from the client were conducted via Third Parties, <i>during</i> the reporting period.  Third Party means an individual or entity not

			associated with the business relationship or transaction.
2.3.9	105	Third Party – Value of Transactions.	Enter the total value of transactions where payments to / from the client were conducted via Third Parties, during the reporting period.
2.3.10	106	Does the Entity facilitate transactions via Credit Card?	Please answer 'Yes' or 'No'.
2.3.11	107	Credit Card Transactions - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients via Credit Card, during the reporting period.
2.3.12	108	Credit Card - Value of Transactions.	Enter the total value of Credit Card transactions processed by or on behalf of clients, <i>during</i> the reporting period.
2.3.13	109	Does the Entity facilitate transactions in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.3.14	110	Wire Transfers - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, in the form of Wire Transfers, <i>during</i> the reporting period.
2.3.15	111	Wire Transfers - Value of Funds Transferred.	Enter the total value of Wire Transfer transactions conducted by or on behalf of clients <i>during</i> the reporting period.
2.3.16	112	Does the Entity facilitate transactions in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.17	113	Transfer of Securities - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, via Transfer of Securities, <i>during</i> the reporting period.
2.3.18	114	Transfer of Securities - Value of Funds Transferred.	Enter the total value of funds transferred by or on behalf of clients, <i>during</i> the reporting period, by way of Transfer of Securities.

2.3.19	115	Does the Entity facilitate transactions in the form of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.3.20	116	Internal Bank Transfers - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, via Internal Bank Transfer, <i>during</i> the reporting period.
2.3.21	117	Internal Bank Transfers - Value of Funds Transferred.	Enter the total value of Internal Bank Transfer transactions conducted by or on behalf of clients <i>during</i> the reporting period.
2.3.22	118	Does the Entity facilitate transactions to / from clients in other forms of payments not listed above?	Please answer 'Yes' or 'No'.
2.3.23	119	Other Forms of Payment - Number of Clients.	Enter the number of clients where transactions were conducted by or on behalf of clients, using other Forms of Payment not listed above, <i>during</i> the reporting period.
2.3.24	120	Other Forms of Payment - Value of Funds Transferred.	Enter the total value of funds transferred by or on behalf of clients, using Other Forms of Payments, <i>during</i> the reporting period.
2.3.25	121	Please indicate the types of Other Forms of Payments.	List the Other Forms of Payment processed by or on behalf of clients, during the reporting period, which are not listed above.
2.4.1	122	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, or on behalf of clients, <i>during</i> the reporting period, broken down by country of origin of the funds.
2.4.3	123	Total number of transactions received, broken down by origin of the funds.	Enter the total number of transactions, received <i>during</i> the reporting period, broken down by country of origin of the funds.
2.4.5	124	Total value of funds transferred out, broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients <i>during</i> the reporting period, broken down by the country of payment destination.
2.4.7	125	Total number of transactions transferred out, broken down by	Enter the total number of outgoing transactions <i>during</i> the reporting period,

		destination country of the transaction.	broken down by destination country of the transaction.
2.5.1	126	Does the Entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	127	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Enter 'N/A' if no comments.
3.1.1	128	Number of Clients – F2F.	Enter the total number of clients that were onboarded using Face-to-Face (F2F) channels, broken down by nationality or country of incorporation/ establishment of the client.  Provide the total number of clients, in the entity's entire portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period.
3.1.2	129	Number of Clients – Non-F2F.	Enter the total number of clients that were onboarded using Non-Face-to-Face (Non-F2F) channels, broken down by nationality or country of incorporation/ establishment of the client.  Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and <u>not only</u> those onboarded during the reporting period.  An example of Non-F2F would include where the entity is onboarding clients through phone or email; however, they do not have F2F contact with the clients.
3.1.3	130	Number of clients onboarded via Online Platforms or portal.	Enter the total number of clients that were onboarded via Online Platforms or portal, broken down by nationality or country of incorporation/ establishment of the client.  Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and <u>not only</u> those onboarded during the reporting period.
3.1.4	131	Number of Clients onboarded through Referrals within Group - F2F.	Enter the total number of clients that were onboarded using referrals within Group – F2F during the reporting period, broken down by the BOs nationality.  An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself had F2F interaction with the clients.

3.1.5	132	Number of Clients onboarded through Referrals within Group - Non F2F.	<p>Enter the total number of clients which were onboarded, using referrals within Group and via Non – Face to Face channels <i>during</i> the reporting period, broken down by nationality of the BOs.</p> <p>Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.</p>
3.1.6	133	Number of total active Clients onboarded through Eligible Introducers.	Enter the total number of clients in the entity's <u>entire portfolio</u> that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients' identity.
3.1.7	134	Number of Clients onboarded through Eligible Introducers during the reporting period.	Enter the total number of clients which were onboarded through Eligible Introducers, <i>during</i> the reporting period, broken down by the nationality of the BO.
3.1.8	135	Number of Clients onboarded via Online Platforms or portal.	Enter the total number of clients onboarded via Online Platforms or portal <i>during</i> the reporting period, broken down by the nationality of the BO.
3.2.1	136	Has the Entity outsourced the role of the AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	137	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer (AMLCO):</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3rd Party and Member within Group</li> <li>• 3rd Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	138	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer as at <i>the end of</i> the reporting period.
3.2.4	139	How many AML Compliance Officers has the entity had within the past 3 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".

3.2.5	140	Has the Entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	141	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 (MLRO):</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 cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	142	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 <i>the end of</i> the reporting period.
3.2.8	143	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover within the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	144	Has the Entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	145	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer (DMLRO):</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 cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.11	146	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 <i>the end of</i> the reporting period.

3.2.12	147	How many Deputy Money Laundering Reporting Officers did the Entity have in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	148	Has the Entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	149	To whom has the Targeted Financial Sanction screening function been outsourced?	Select one of the following options which best describes the outsourced relationship for the screening of Targeted Financial Sanctions (TFS): <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> Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.
3.2.15	150	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, as at <i>the end of</i> reporting period.
3.2.16	151	How many TFS Screening platforms/software did the entity have in the past 3 years?	If there was no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	152	Has the Entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	153	To whom has the Transaction Monitoring function been outsourced?	Select one of the following options which best describes the outsourced Transaction Monitoring relationship: <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> Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.
3.2.19	154	What was the outsourcing country of the Transaction	Enter the country the entity outsourced the Transaction Monitoring function to, at <i>the end of</i> the reporting period.

		Monitoring function at the end of the reporting period?	
3.2.20	155	How many Transaction Monitoring platforms/ software did the Entity have in the past 3 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	156	Where is the Entity's physical place of business?	Select the country where the entity's physical business operations are located.
3.3.2	157	Does the Entity form part of a group structure?	Please answer 'Yes' or 'No'.
3.3.3	158	In which country is the parent company incorporated?	Enter the country in which the parent company was incorporated.
3.3.4	159	In which country is the entity's Holding Company incorporated?	Select the country of incorporation of the Entity's Holding Company.  <i>If no separate Holding Company, select the country of incorporation of the Parent Company.</i>
3.3.5	160	Number of branches, by location, broken down by country of operation.	Enter the number of branches the entity has, broken down by country of operation.
3.3.6	161	Number of Subsidiaries, by location, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.
3.3.7	162	In which countries, by percentage of equity ownership, are all shareholders of the Entity located.	Enter the countries where all shareholders of the entity are located and their percentage of equity ownership.  For publicly listed entities, please list beneficial ownership of 10% or more.
3.3.8	163	How many Beneficial Owners does the Entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period?	Enter the number of Beneficial Owners the entity has, broken down by nationality of the Beneficial Owner, at <i>the end of</i> the reporting period.
3.3.9	164	How many Directors does the Entity have appointed, by country of nationality of the Directors, at the end of the reporting period?	Enter the number of Directors appointed to the entity at <i>the end of</i> the reporting period, broken down by the nationality of the Directors.
3.4.1	165	Does the Entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.

3.4.2	166	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback. Please enter 'NA' if no comment.
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<b>AML Controls Questions</b>			
<b>No.</b>	<b>Question No.</b>	<b>Question</b>	<b>Description/Explanation</b>
1.1.1	167	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF and Sanctions risks and issues?	Please answer 'Yes' or 'No'.
1.1.2	168	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	169	What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?	Enter the frequency in number of months.
1.1.4	170	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	171	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	172	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	173	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	174	Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?	Please answer 'Yes' or 'No'.
1.1.9	175	Does the Board / Governing Body ensure that recommendations made by the internal and external auditors	Please answer 'Yes' or 'No'.

		and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	
1.1.10	176	Has the entity, or its Directors, Shareholders, Beneficial Owners, or Senior Officers been denied an application by any Regulatory Body?	Please answer 'Yes' or 'No'.
1.1.11	177	Provide the country of jurisdiction.	Enter the names of the jurisdiction(s) in which the entity, or its Directors, Shareholders, Beneficial Owners or Senior Officers were denied an application by any regulatory body.
1.1.12	178	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	179	Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	180	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.2.2	181	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	182	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	183	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	184	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	185	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	186	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	187	Does the AMLCO report to the Board on AML/CFT/CPF and Sanctions related issues and on the adequacy of the	Please answer 'Yes' or 'No'.

		AML/CFT/CPF and Sanctions framework?	
1.2.9	188	Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF and Sanctions compliance breaches?	Please answer 'Yes' or 'No'.
1.2.10	189	Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures?	Please answer 'Yes' or 'No'.
1.2.11	190	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	191	Does the MLRO report to the Board on AML/CFT/CPF and Sanctions related issues and on the adequacy of the AML/CFT/CPF and Sanctions framework?	Please answer 'Yes' or 'No'.
1.3.1	192	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	193	Have the Directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	194	Has the AML Compliance Officer received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	195	Has the MLRO received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	196	Has the DMLRO received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.

1.3.6	197	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	198	Are changes to policy and procedures communicated to all Staff/Directors and Senior Management?	Please answer 'Yes' or 'No'.
1.3.8	199	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	200	What is the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company during the reporting period?	Enter the percentage of employees/agents/ directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period.
1.3.10	201	Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually?	Please answer 'Yes' or 'No'.
1.4.1	202	Does the entity have an Internal Audit Department, Unit, or function (including outsourced) with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	203	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?	Please answer 'Yes' or 'No'.
1.4.3	204	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	205	Does the Internal AML audit include reviews of the AML/CFT/CPF and Sanctions related policies, procedures and processes?	Please answer 'Yes' or 'No'.
1.4.5	206	Has the AML audit function performed an AML/CFT/CPF and Sanctions audit and issued a report for conclusions and recommendations?	Please answer 'Yes' or 'No'.
1.4.6	207	What is the frequency, in months, of the internal AML	Enter the frequency, in months, of how often an internal AML audit for the

		audit for the AML/CFT/CPF and Sanctions Programme?	AML/CFT/CPF and Sanctions programme is conducted.
1.4.7	208	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	209	What is the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, <u>in months</u> , of the Board review of the AML audit program.
1.4.9	210	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	211	Where applicable, does the internal audit include testing of EI relationships?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.11	212	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	213	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	214	Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors?	Please answer 'Yes' or 'No'.
1.5.2	215	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	216	Does the entity consider the ML/TF/PF and Sanctions risks of clients (including BOs), in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.4	217	Does the entity consider the ML/TF/PF and Sanctions risks relating to geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.5	218	Does the entity consider the ML/TF/PF and Sanctions risks associated with products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.

1.5.6	219	Does the entity consider the ML/TF/PF and Sanctions risks associated with delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.7	220	Does the entity ensure ML/TF/PF and Sanctions business risk assessments are done / updated prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.5.8	221	Does the entity consider the ML/TF/PF and Sanctions risks associated with technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	222	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	223	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	224	Where applicable, does the entity consider outsourcing risk factors in its risk assessment?	Please select 'Yes', 'No', or 'Not Applicable'.
1.5.12	225	Does the entity take their nature, size and complexity into consideration and consider the need for other risk factors, other than those listed above, when developing their business risk assessment?	Please answer 'Yes' or 'No'.
1.5.13	226	How often, in months, does the entity review High-Risk relationships/accounts?	Please select the most appropriate response: 'Not Applicable – no high risk clients', 'More than 18 months', '7 – 12 months', '1 – 6 months'.
1.5.14	227	How often, in months, does the entity review Medium-Risk relationships/accounts?	Please select the most appropriate response:  'Not Applicable – no 'Medium' risk clients', More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.15	228	How often, in months, does the entity review Low-Risk relationships/accounts?	Please select the most appropriate response:

			'Not Applicable – no low risk clients', More than 18 months, 7 – 12 months, 1 – 6 months.
1.6.1	229	Does the entity rely on Group AML/CFT policies and procedures?	Please select the most appropriate response:  'Not Applicable – No group structure', 'Yes', or 'No'.
1.6.2	230	If yes to use of group policies and procedures, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?	Please select the most appropriate response:  'Yes', 'No', or 'Not Applicable'
1.6.3	231	Has the Board, or Governing Body, ensured that necessary amendments are made to the entity's policies and procedures for alignment with the requirements in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.4	232	Does the entity have Board, or Governing Body, approved policies and procedures for Customer Due Diligence measures i.e. customer identification and verification?	Please answer 'Yes' or 'No'.
1.6.5	233	Does the entity have Board, or Governing Body, approved policies and procedures for identification of high-risk customers inc. PEPs?	Please answer 'Yes' or 'No'.
1.6.6	234	Does the entity have Board, or Governing Body, approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.6.7	235	Does the entity have Board, or Governing Body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	236	Does the entity have Board or Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.

1.6.9	237	Does the entity have Board or Governing Body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?	Please answer 'Yes' or 'No'.
1.6.10	238	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	239	Does the entity have procedures for declining, de-risking, terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons?	Please answer 'Yes' or 'No'.
1.6.12	240	Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period.	Enter the total number of client accounts that were declined, terminated, or restricted due to AML/CFT/CPF and Sanctions concerns.
1.7.1	241	Does the entity have a Sanctions screening process including policies and procedures?	Please answer 'Yes' or 'No'.
1.7.2	242	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	243	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	244	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	245	Is sanctions monitoring done in real time or after the event?	Select what applies: 'No process', 'After the event', or 'Real time'.
1.7.6	246	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.

1.7.7	247	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	248	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	249	Have assets of any customers been identified as persons or entities designated by the OFSI or OFAC?	Please answer 'Yes' or 'No'.
1.7.10	250	Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting from sanction screening?	Please answer 'Yes' or 'No'.
1.7.11	251	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.7.12	252	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.7.13	253	Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries surrounding sanctioned jurisdictions are scrutinized to ensure the unlisted countries are not being used as conduits to evade	Please answer 'Yes' or 'No'.

		targeted financial sanctions and proliferation alerts / risks?	
1.8.1	254	Does the entity have transaction monitoring policies and procedures developed commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	255	Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.3	256	Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.8.4	257	Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs?	Please answer 'Yes' or 'No'.
1.8.5	258	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	259	Where applicable, does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	260	Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.
1.8.8	261	Enter the total number of Alerts resulting in internal Suspicious Activity Reports to the MLRO related to ML/TF/PF and Sanctions matters identified during transaction monitoring only.	The total number of alerts produced through <u>transaction monitoring</u> systems and processes which resulted in the escalation of an internal SAR to the MLRO.
1.9.1	262	Does the entity have Internal Reporting policies and	Please answer 'Yes' or 'No'.

		procedures i.e. Identification and Reporting of Suspicious Activities and Transactions to the MLRO?	
1.9.2	263	Does the entity's policies and procedures identify the MLRO and how to make a filing to them?	Please answer 'Yes' or 'No'.
1.9.3	264	Does the entity have policies and procedures for reporting to the Cayman Islands Financial Reporting Authority?	Please answer 'Yes' or 'No'.
1.9.4	265	How many internal Suspicious Activity Reports have been reported to the MLRO in total for the current reporting period?	Enter the number of internal Suspicious Activity Reports reported to the MLRO in total during the reporting period.
1.9.5	266	How many Suspicious Activity Reports have been reported, to the Financial Reporting Authority, by the MLRO for the current reporting period?	Enter the total number of Suspicious Activity Reports filed by the entity's MLRO, to the FRA, during the reporting period.
1.9.6	267	How many hours on average does it take to file a Suspicious Activity Report 'SAR' to the FRA?	Enter the number of hours (average) the entity, through the MLRO, takes to file a Suspicious Activity Report to the FRA.
1.9.7	268	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.
1.9.8	269	Has the entity been penalized or received a warning for non-compliance, relating to reporting requirements or failure to comply with a direction, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	270	Does the have procedures to maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	271	Does the entity have procedures to maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.

1.9.11	272	If the MLRO decides not to file a SAR to the FRA, are there procedures to ensure the MLRO's reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	273	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	274	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	275	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	276	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	277	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	278	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	279	Does the entity have outsourced arrangements for its functions and services?	Please answer 'Yes' or 'No'.
1.11.2	280	In total, how many services does the entity outsource to either third parties, or within its group or subsidiaries, during the reporting period?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.11.3	281	Is there a Board approved documented policy on outsourcing?	Please answer 'Yes' or 'No'.
1.11.4	282	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', or 'No'
1.11.5	283	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', or 'No'
1.11.6	284	Does the outsourcing agreement(s) clearly set out the obligations of both parties?	Select which best applies: 'Yes', or 'No'

1.11.7	285	Does the outsourcing agreement(s) require the Outsourced Service Provider to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', or 'No'
1.11.8	286	Is there a contingency plan in the event the Outsourced Service Provider fails to perform the outsourced activity?	Select which best applies: 'Yes', or 'No'
1.11.9	287	Does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced Service Provider?	Select which best applies: 'Yes', or 'No'
1.11.10	288	If applicable, does the outsourced AMLCO/MLRO have access to the entity's Board?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.11	289	Are there policies and procedures for outsource arrangements to ensure data protection restrictions would NOT delay access to data and documents?	Select which best applies: 'Yes', or 'No'
1.11.12	290	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.13	291	Does the entity conduct testing to ensure the Outsourced Service Provider complies with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.12.1	292	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	293	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback for this tab. Enter 'N/A' if no comments.