



AML Survey – Completion Guide: Virtual Assets Service Providers (VASPs)

Document version: 1.2

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13 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update to definitions
1 March 2023	1.2	Updates to definitions, descriptions, and explanations

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1 INTRODUCTION

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

FSPs are required to provide this data by completing the AML Survey Form and submit it through the Authority’s web-based e-mail survey software, to the Anti-Money Laundering Division (“AML/D”). The AML Survey Form is issued in accordance with section 9(5)(a) and (b) of the Virtual Asset (Service Providers) Act (2022 Revision) and section 34(8) of the Monetary Authority Act.

This Guide gives support to FSPs which carry out Virtual Assets Service Provider (“VASP”) business for accessing, completion and submission of the AML Survey – VASPs Form.

2 FORM INFORMATION

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

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

3 ACCESSING AND SUBMITTING THE AML SURVEY

3.1 ACCESS TO THE AML SURVEY


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

Logging into the STRIX portal is then accomplished by clicking on the ‘Return Home’ button available immediately after 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 survey.

The Authority is using the following entity contacts to distribute the AML Survey: Registered Office, AMLCO, MLROs and any other additional contacts, upon request from the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at AMLSurveys@cima.ky.

To access the AML Survey:

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



Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

[Confirm Account](#)

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLI86VZVCRbBxm3f3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2B2BUVVhbZktQht%2F4d2cbioYp%2B2Bjke0tE3GtLwMObYSOP%2B2Bk8rPURRSVrPSQt6JA5hgsaBaC6uvcZV4KB266HfFgh4FhATaTNSa3IE3aiA%3D>

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

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

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

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

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password *

Confirm

Password must meet the following requirements:

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

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

**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password *

Confirm Password *

SUBMIT

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



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

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

Disclaimer:

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

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

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

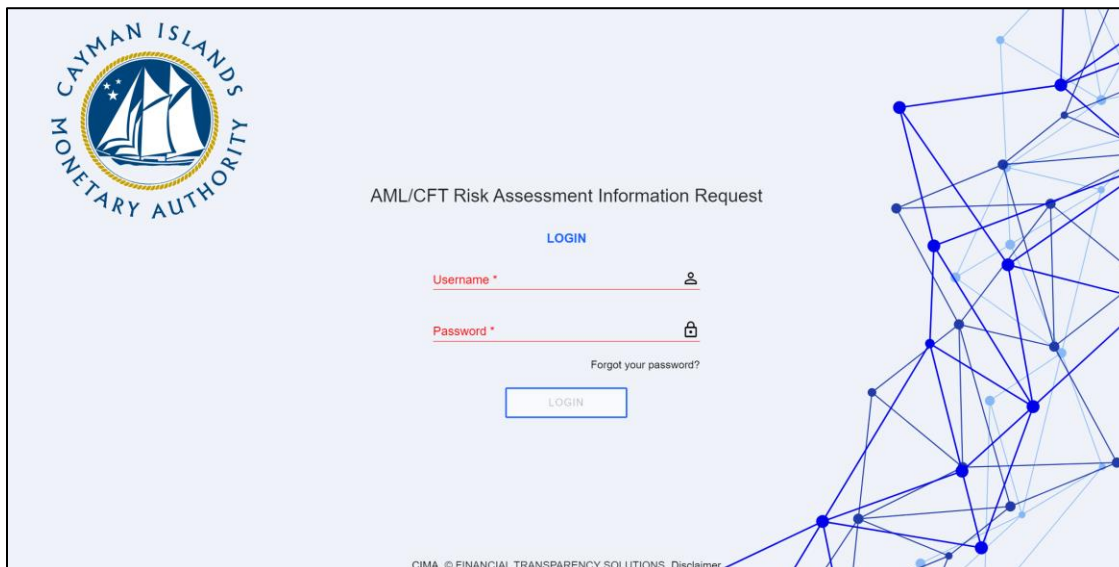


Your password was successfully changed.

[RETURN TO HOME](#)

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



AML/CFT Risk Assessment Information Request

LOGIN

Username *

Password *

Forgot your password?

LOGIN

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





Cayman Islands Monetary Authority

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

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

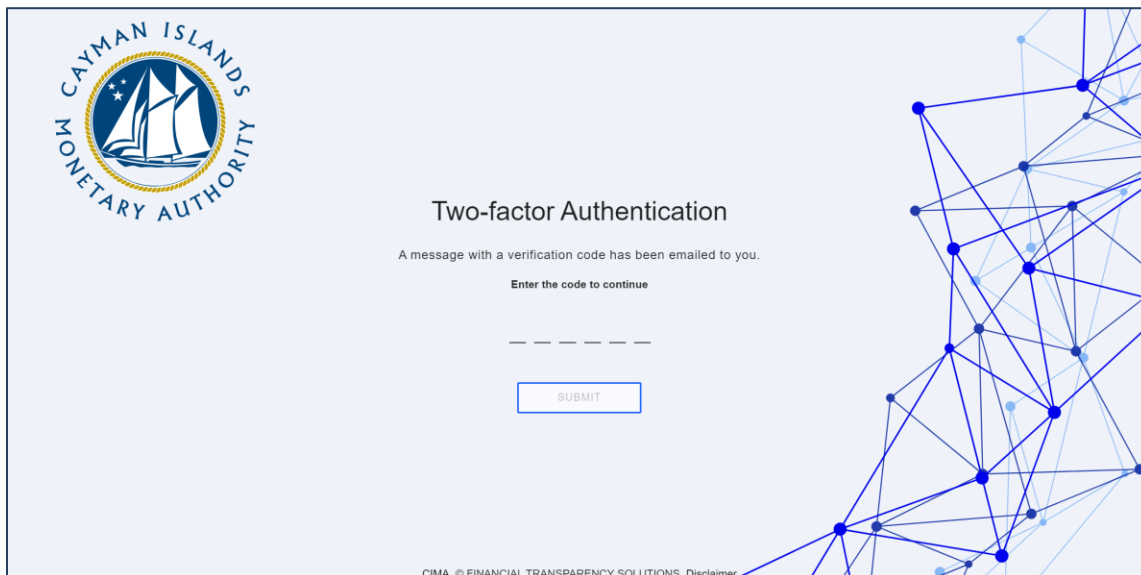
951247

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

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

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

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



**CAYMAN ISLANDS
MONETARY AUTHORITY**

Two-factor Authentication

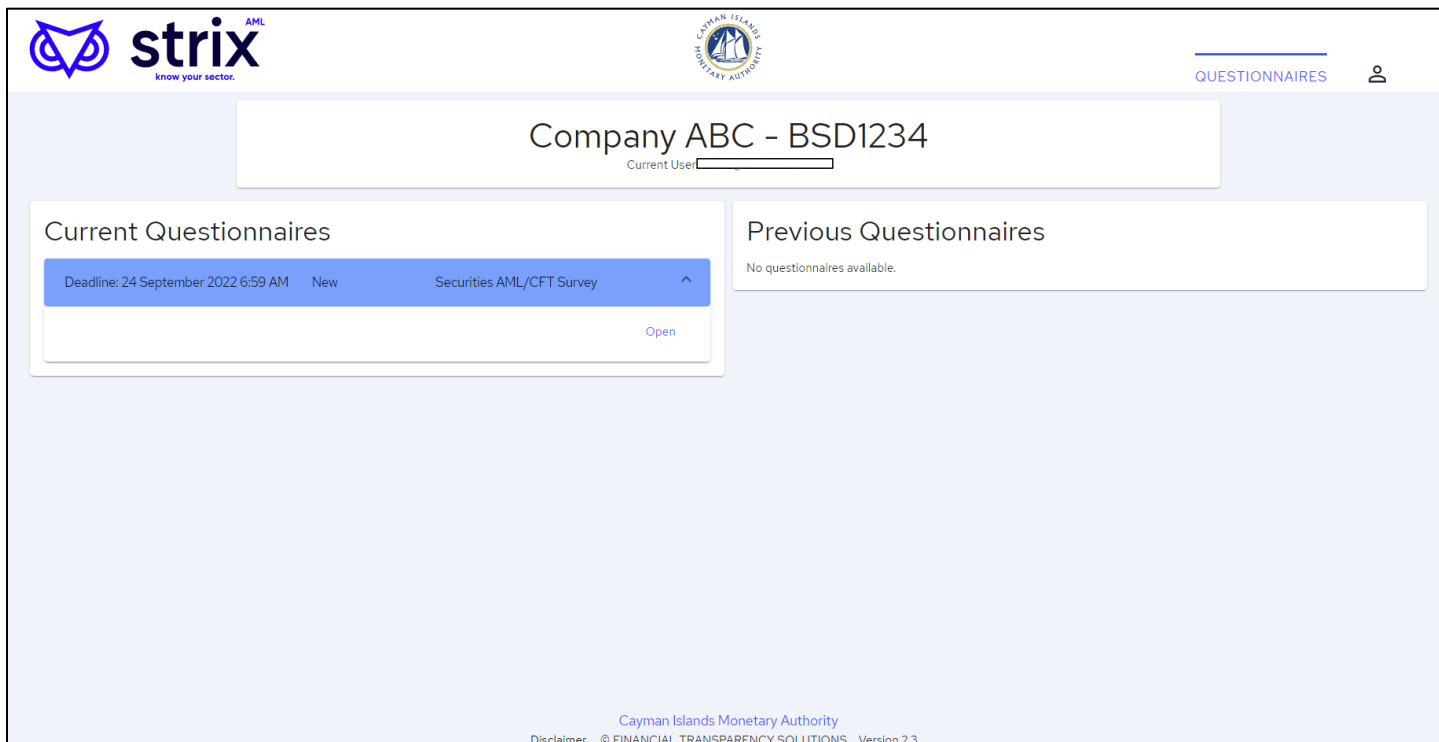
A message with a verification code has been emailed to you.

Enter the code to continue

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



strix AML
know your sector.

**CAYMAN ISLANDS
MONETARY AUTHORITY**

QUESTIONNAIRES

Company ABC - BSD1234

Current User: _____

Current Questionnaires

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

Previous Questionnaires

No questionnaires available.

Cayman Islands Monetary Authority
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3.2 COMPLETING THE AML SURVEY FORM

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

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

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

If the user is permanently locked out, they should contact AMLSurveys@cima.ky to request having their account re-activated.

4.2 INTERNET BROWSER

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

4.3 DATA AND SECURITY

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

4.4 APPLICABLE FEES

There are no fees associated with this Form.

5 AML SURVEY GUIDANCE

Below are descriptions and explanations to the risk factors and controls factors you are required to provide information. The risk factors are used to assess Inherent ML/TF Risk. Control factors are used to assess the AML/CFT/CPF, and Sanctions controls the entity has in place.

AML Inherent Risk Factor Descriptions

Term/Abbreviation	Definition/Meaning
AMLRs	Anti-Money Laundering Regulations (2023 Revision), as amended.
Beneficiary	In relation to a transfer of virtual assets, means:

	<p>a) the client (natural person, legal person, or legal arrangement) that receives virtual assets that were transferred to a virtual asset service provider or directly to the client; or</p> <p>b) where the transfer is received by a virtual asset service provider on behalf of a client or other third party, the natural person, legal person, or legal arrangement that ultimately receives the transfer.</p>
Client / Customer	A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands.
Controller	A person appointed to assume control of the affairs of a licensee or registrant.
Corporate Entity	Means a body corporate constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Survey	<p>United States Dollars (US\$).</p> <p>All other currencies must be converted to US\$ unless otherwise stated.</p>
Dealers in Precious Metals and Stones	Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
Direct - F2F	The engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Eligible Introducers	A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for

	business, or beneficial owner, in accordance with Part IV of the AMLRs.
Fiat currency	Means currency that is issued by the relevant body in a country or by a government that is designated as legal tender in its country of issuance through, among other things, government decree or law.
Fintech service	Means a service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2023 Revision), except to the extent that it is modified by the Foundation Companies Act, 2017 or those foundation companies established in other jurisdictions.
FRA	Financial Reporting Authority.
Gov / Pub Sector	Business conducted in or with Government or Public Sector.
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods.
HNWI	<p>A High net worth individual (HNWI) is:</p> <ul style="list-style-type: none"> (i) an individual whose net worth is at least CI\$800,000 or its equivalent in any other currency; or (ii) any person that has total assets of not less than CI\$4,000,000 or its equivalent in any other currency. <p>HNWIs are NOT Ultra HNWI and should not be double counted.</p>
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it's a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Issuance of virtual assets or virtual asset issuance	Means the sale of newly created virtual assets to the public in or from within the Islands in exchange for fiat currency, other virtual assets or other consideration but does not include the sale of virtual service token

Legal Person or Arrangement	<p>“Legal person” means a company or other entity created by operation of law with separate legal personality.</p> <p>“Legal arrangement” means a trust or partnership or other entity created between parties which lacks separate legal personality.</p>
Money Service Businesses (MSB)	<p>Money services business means the business of providing, in or from within the Islands, any of the following services:</p> <p>(a) money transmission;</p> <p>(b) cheque cashing.</p> <p>(c) currency exchange.</p> <p>(d) the issuance, sale or redemption of money orders or traveller’s cheques.</p>
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Director	A natural or legal person who takes on the role of company director on behalf of another.
Nominee Shareholder	A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-face-to-face	Where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP.
Operator	In relation to a virtual asset trading platform, means a person or group of persons that exerts effective control over the activities of a virtual asset trading platform however, in the absence of a single entity or group that exerts effective control over the platform, the operator shall be considered to be the owner of the entity under which the platform operates
Originator	<p>In relation to a transfer of virtual asset, means :</p> <p>a) the natural person, legal person or legal arrangement that places an order with the virtual asset service provider for the virtual asset transfer; or</p>

	where the transfer is carried out by a virtual asset service provider on behalf of a client or other third party, the client or third party who owned the virtual asset immediately before the transfer.
OSP	<p>Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>
PEP	<p>“Politically Exposed Person” includes —</p> <p>(a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official.</p> <p>(b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and</p> <p>(c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p> <p>Politically exposed persons also include:</p> <p>(i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership.</p> <p>Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.</p>
Reporting Period	January 1 to 31 December 2022.
Source of Funds	<p>Source of funds is the origin of the assets that will be used to form and maintain the business relationship.</p> <p>A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used</p>

	<p>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 and Value of Assets Under Management.</p>
Special Economic Zone Business	Means any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands.
Targeted Financial Sanctions (TSF)	Means both asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").
Transaction	Events where services were engaged with or on behalf of a client. Services include but are not limited to those listed in Q143 through Q170.
Transfer of virtual asset	Means any transaction carried out on behalf of an originator with a view to making the virtual asset available to a beneficiary
Trust	A trust is a legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
UBO	<p>Ultimate Beneficial Owner - The natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to —</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person.</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement</p>

Ultra HNWIs		Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.
Value of Assets Under Management		The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio.
Virtual asset		Means 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		Means a licensee who provides virtual asset custody services in or from within the Islands.
Virtual asset custody service		Means the business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets.
Virtual Assets Service Providers (VASPs)		An entity that provides virtual asset service as a business or in the course of business. Virtual service tokens are not virtual assets and a person or legal arrangement that provides services that involve virtual service tokens.
Timeframe	Value of Transactions	Value of transactions processed during the end of the reporting period.
Timeframe	Number of Transactions	Number of transactions conducted for the client during the reporting period.

AML Inherent Risk Questions:			
Ref No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients/customers at the end of the reporting period.	Enter the total number of clients the entity has at the end of the reporting period. Where applicable, the number of clients /customers should only include those of the Cayman Islands legal entity.

			Total clients consist of natural persons and legal persons and arrangements.
1.1.2	2	Total Clients /customers throughout the reporting period.	<p>Enter how many different clients, in total, the entity conducted business with, during the reporting period.</p> <p>This category is specific to all clients that the entity dealt with throughout the reporting period. Therefore, the combined total should include both current and past relationships/clients falling within the January to December timeframe.</p>
1.1.3	3	Total Transactions for the reporting period.	<p>Enter the total number of all transactions conducted for clients during the reporting period.</p> <p>Where applicable, the total transactions should only include those of the Cayman Islands legal entity.</p>
1.1.4	4	Total Value of Transactions processed in the reporting period.	Enter the total value of transactions processed for clients during the reporting period.
1.1.5	5	Clients/customers that are Natural Persons, broken down by nationality of the client.	<p>Enter the number of clients that are Natural Persons, subdivided by nationality.</p> <p>This category is specific to clients who are Natural Persons and have a direct business relationship with the Entity.</p> <p>If an Entity does not have such clients, a '0' value should be used.</p>
1.1.6	6	Clients/customers that are Natural Persons, broken down by Residency of the client.	<p>Enter the number of clients that are natural persons, subdivided by residency.</p> <p>This category is specific to clients who are Natural Persons and have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.7	7	Total Transactions for the reporting period for all Natural Persons.	Enter the total number of transactions conducted for clients, who are natural persons, during the reporting period.

			<p>This category is specific to clients who are Natural Persons and have a direct business relationship with the entity.</p> <p>If an entity did not conduct such transactions, a '0' value should be used.</p>
1.1.8	8	Value of Transactions processed, in the reporting period, for all Natural Persons.	<p>Enter the total value of transactions processed for clients that are natural persons, during the reporting period.</p> <p>This category is specific to clients who are Natural Persons and have a direct business relationship with the entity.</p> <p>If an entity does not manage assets for its clients, a '0' value should be used.</p>
1.1.9	9	Clients/customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client.	<p>Enter the total number of clients that are Legal Persons and Arrangements, subdivided by country of incorporation, during the reporting period.</p> <p>Examples include, but are not limited to, Corporate entities, Foundations and Trusts.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.1.10	10	Number of Transactions - Legal Persons and Arrangements.	<p>Enter the total number of transactions that were conducted by customers who are legal person and arrangements, during the reporting period.</p> <p>Examples include, but are not limited to, Corporate entities, Foundations and Trusts.</p> <p>If an entity did not conduct such transactions, a '0' value should be used.</p>
1.1.11	11	Value of Transactions processed, for the reporting period, for all Legal Persons and Arrangements.	<p>Enter the total value of transactions processed for clients who are Legal Persons or Arrangements, during the reporting period.</p> <p>Examples include, but are not limited to, Corporate entities, Foundations and Trusts.</p> <p>If an entity does not manage assets for these clients, a '0' value should be used.</p>

1.1.12	12	Total number of High Risk clients/customers at the end of the reporting period.	Enter the total number of High Risk clients the entity has at the end of the reporting period.
1.1.13	13	Total number of PEP clients/customers at the end of the reporting period.	<p>Enter the total number of PEPs the entity conducts business with at the end of the reporting period.</p> <p>This category is specific to all PEPs. Therefore, the combined total should include, but not limited to, natural persons/individual clients who are PEPs, legal persons that have related UBOs, Directors or other controlling persons of Corporate entities that are PEPs, and legal arrangements where settlors of Trusts are PEPs.</p> <p>A PEP should not be counted more than once regardless of the number of business or personal relationships they have with the entity.</p>
1.2.1	14	Total number of UBOs by country of nationality of the UBO.	<p>Enter the total number of UBOs of all clients who are legal persons or arrangements, broken down by nationality of the UBO, during the reporting period.</p> <p>This category is specific to Legal Persons and Arrangements. Examples include, but are not limited to, the total number of UBOs of Corporate entities and Settlers of Trusts.</p> <p>A UBO should not be counted more than once regardless of the number of business relationships they have with the entity.</p> <p>If the entity does not have any clients that fit this category, record a '0'.</p>
1.2.2	15	Does the entity have any clients that have UBOs that are directors of the client?	Answer 'Yes' or 'No'
1.2.3	16	Number of clients which have UBOs that are directors of the client.	Enter the total number of clients which have UBOs that are also directors of the client, during the reporting period.
1.2.4	17	Does the entity have any clients that have UBOs that are Controllers of the client?	Answer 'Yes' or 'No'
1.2.5	18	Number of clients which have UBOs that are Controllers of the client.	Enter the total number of clients whose UBOs are also controllers of the client.

1.2.6	19	Does the entity have any clients that have UBOs that are also senior managing officials of the client?	Please answer 'Yes' or 'No'.
1.2.7	20	Number of clients which have UBOs that are also senior managing officials of the client.	<p>Enter the total number of clients whose UBOs are also senior managing officials of the client.</p> <p>Senior managers are individuals at the highest level of organizational management who have the day-to-day responsibilities of managing a company or corporation. They hold specific executive powers conferred onto them by board of directors and/or the shareholders.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.8	21	Does the entity have any clients which have UBOs - HNWIIs?	Please answer 'Yes' or 'No'.
1.2.9	22	Number of Clients which have UBOs - HNWIIs.	<p>Enter the total number of clients who have UBOs that are also HNWIIs.</p> <p>HNWIIs is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000), or those that have assets valued at least CI\$4,000,000 (approx. US\$5,000,000).</p> <p><u>Do Not</u> include those clients / customers with net worth that is equal to or greater than US\$30,000,000.</p>
1.2.10	23	Does the entity have any clients which have UBOs - Ultra HNWIIs?	Please answer 'Yes' or 'No'.
1.2.11	24	Number of Clients which have UBOs - Ultra HNWIIs.	<p>Enter the total number of clients who have UBOs that are also Ultra HNWIIs.</p> <p>UHNWIIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p>
1.2.12	25	Does the entity have any clients which have UBOs which are PEPs?	Please answer 'Yes' or 'No'.
1.2.13	26	Number of UBOs of clients which are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who have UBOs that are also PEPs, categorized by the nationality of the PEP.

1.2.14	27	Does the entity have any clients which have Nominees acting on behalf of a UBO?	Please answer 'Yes' or 'No'.
1.2.15	28	Number of clients which have Nominees acting on behalf of a UBO, broken down by nationality of the client.	Enter the total number of clients which have nominees acting on behalf of UBOs, categorized by the nationality of the client.
1.3.1	29	Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director.	Enter the total number of clients with nominee directors during the reporting period.
1.3.2	30	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are also PEPs during the reporting period.
1.3.3	31	Number of directors and/or senior management of clients who are High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are also HNWIIs during the reporting period.
1.3.4	32	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are also Ultra HNWIIs during the reporting period.
1.3.5	33	Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIIs during the reporting period.
1.4.1	34	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	35	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients the entity has, during the reporting period, that are a Government or Public Sector, broken down by government jurisdiction.
1.4.3	36	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed by clients that are Government or Public Sector,

			during the reporting period, broken down by government jurisdiction.
1.4.4	37	Gov / Pub Sector - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Government or Public Sector, during the reporting period.
1.4.5	38	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.6	39	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, during reporting period.
1.4.7	40	NPO - Number of Transactions.	Enter the number of transactions processed for clients that are NPOs, during the reporting period
1.4.8	41	NPOs - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.
1.4.9	42	Does the entity have any clients that are Other corporate entities - Non-Financial Institutions?	Please answer 'Yes' or 'No'.
1.4.10	43	Other corporate entities - Non-Financial Institutions - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, that are Non-Financial Institutions, during the reporting period.
1.4.11	44	Other corporate entities - Non-Financial Institutions - Number of Transactions.	Enter the number of transactions conducted by clients that are Non-Financial Institutions, during the reporting period.
1.4.12	45	Other corporate entities - Non-Financial Institutions - Value of Transactions for the reporting period.	Enter the value of transactions processed for other corporate clients that are Non-Financial Institutions, during the reporting period.
1.4.13	46	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.14	47	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are a Foundation.
1.4.15	48	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a

			Foundation, during the reporting period.
1.4.16	49	Foundations - Value of Transactions for the reporting period.	Enter the Value of Transactions processed for clients that are Foundations, during the reporting period.
1.4.17	50	Does the entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.18	51	Trusts - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, during the reporting period, that are Trusts.
1.4.19	52	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are a Trusts, during the reporting period.
1.4.20	53	Trusts - Value of Transactions for the reporting period.	Enter the Value of Transactions processed for clients that are Trusts, during the reporting period.
1.4.21	54	Does the entity have any clients that are Special Purpose Vehicles?	Please answer 'Yes' or 'No'.
1.4.22	55	Special Purpose Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Special Purpose Vehicles, during the reporting period.
1.4.23	56	Special Purpose Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are Special Purpose Vehicles, during the reporting period.
1.4.24	57	Special Purpose Vehicles - Value of Transactions for the reporting period.	Enter the Value of Transactions processed for clients that are Special Purpose Vehicles, during the reporting period.
1.4.25	58	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.26	59	Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Segregated Portfolio Companies, during the reporting period.
1.4.27	60	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients that are Segregated Portfolio Companies, during the reporting period.

1.4.28	61	Segregated Portfolio Companies - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Segregated Portfolio Companies, during the reporting period.
1.4.29	62	Does the entity have any Special Economic Zone clients?	Please answer 'Yes' or 'No'.
1.4.30	63	Special Economic Zone - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Special Economic Zone companies, during the reporting period.
1.4.31	64	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are Special Economic Zone companies, during the reporting period.
1.4.32	65	Special Economic Zone - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Special Economic Zone companies, during the reporting period.
1.4.33	66	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.
1.4.34	67	Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.35	68	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.36	69	Funds / Collective Investment Vehicles - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, by clients that hold Funds / Collective Investment Vehicles
1.5.1	70	Natural Persons - Does the entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.
1.5.2	71	Number of Natural Persons who are PEPs, broken down by nationality of the client.	Enter the number of clients the entity has that are Natural Persons and also PEPs, during the reporting period.
1.5.3	72	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by clients that are

			Natural Persons and also PEPs, during the reporting period.
1.5.4	73	Natural Persons - PEPs - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Natural Persons and also PEPs, during the reporting period.
1.5.5	74	Does the entity have any Natural Person clients that are HNWIs?	Please answer 'Yes' or 'No'.
1.5.6	75	Number of Natural Persons who are HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has that are Natural Persons and also HNWIs, during the reporting period.
1.5.7	76	Natural Persons - HNWIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons and also HNWIs, during the reporting period.
1.5.8	77	Natural Persons - HNWIs - Value of Transactions for the reporting period.	Enter the value of transactions processed for clients that are Natural Persons and also HNWIs, during the reporting period.
1.5.9	78	Does the entity have any Natural Person clients that are PEPs and HNWIs?	Please answer 'Yes' or 'No'.
1.5.10	79	Number of Natural Persons who are PEPs & HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and HNWIs, during the reporting period.
1.5.11	80	Natural Persons - PEPs & HNWIs - Number of Transactions.	Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWIs, during the reporting period.
1.5.12	81	Natural Persons - PEPs & HNWIs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWIs, during the reporting period.
1.5.13	82	Does the entity have any Natural Person clients that are Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.5.14	83	Number of Natural Persons who are Ultra HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has that are Natural Persons

			and also Ultra HNWIs, during the reporting period.
1.5.15	84	Natural Persons – Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons and also Ultra HNWIs, during the reporting period.
1.5.16	85	Natural Persons – Ultra HNWIs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are Natural Persons and also Ultra HNWIs, during the reporting period.
1.5.17	86	Does the entity have any Natural Person clients that are PEPs and Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.5.18	87	Number of Natural Persons who are PEPs & Ultra HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and Ultra HNWIs, during the reporting period.
1.5.19	88	Natural Persons - PEPs & UHNWIs - Number of Transactions.	Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and Ultra HNWIs, during the reporting period.
1.5.20	89	Natural Persons - PEPs & UHNWIs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients who are a combination of Natural Persons, PEPs, and Ultra HNWIs, during the reporting period.
1.6.1	90	<p>Source of Funds</p> <p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> • Banking Institutions (excluding MSBs) • Other Financial Regulated Business* • Financial Leasing • Money Lending • Legal Practitioners • Accountants • Fintech 	Enter the total number of clients that fall within the list of the sectors.

		*excluding MSBs, VASPs, and Trusts, Company Managers, or Corporate Service Providers.	
1.6.2	91	Does the entity have any clients that are legal persons operating as Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.6.3	92	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed by Banking Institutions (excluding MSBs), broken down by country of incorporation and nationality, respectively.
1.6.4	93	Does the entity have any clients that are legal persons operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses?	Please answer 'Yes' or 'No'.
1.6.5	94	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has that are legal persons operating as Other Financial Regulated Business, and natural persons that are employed by Other Financial Regulated Businesses, broken down by country of incorporation and nationality, respectively.
1.6.6	95	Does the entity have any clients that are legal persons operating in Financial Leasing, or natural persons employed in Financial Leasing?	Please answer 'Yes' or 'No'.
1.6.7	96	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Financial Leasing companies, and natural persons that are employed by Financial Leasing companies, broken down by country of incorporation and nationality, respectively.

1.6.8	97	Does the entity have any clients that are legal persons operating in Money Lending, and natural persons employed in Money Lending?	Please answer 'Yes' or 'No'.
1.6.9	98	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Money Lending institutions, and natural persons that are employed by Money Lending institutions, broken down by country of incorporation and nationality, respectively.
1.6.10	99	Does the entity have any clients that are legal persons operating as Legal Practitioners, or natural persons employed by Legal Practitioners?	Please answer 'Yes' or 'No'.
1.6.11	100	Legal Practitioner - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners, broken down by country of incorporation and nationality, respectively.
1.6.12	101	Does the entity have any clients that are legal persons operating as Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), or natural persons employed by Accountants?	Please answer 'Yes' or 'No'.
1.6.13	102	Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), and natural persons that are employed by Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), broken down by country of incorporation and nationality, respectively.
1.6.14	103	Does the entity have any legal person clients that are in the Fintech industry, or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.

1.6.15	104	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Fintech industry, and natural persons that are employed in the Fintech industry, broken down by country of incorporation and nationality, respectively.
1.6.16	105	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> ▪ Money Service Business (MSBs) ▪ Virtual Asset Service Providers (VASPs) ▪ High Value Dealers ▪ Trusts, Company Managers or Corporate Service Providers ▪ Import/Export Industry <p>Shipping and Transport of Goods</p>	Provide the total number of clients that fall within the list of the sectors.
1.6.17	106	<ul style="list-style-type: none"> ▪ Does the entity have any clients that are legal persons operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses? 	Please answer 'Yes' or 'No'.
1.6.18	107	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Money Services Business, and natural persons that are employed in the Money Services Business, broken down by country of incorporation and nationality, respectively.
1.6.19	108	Does the entity have any clients that are legal persons operating as VASPs, or natural persons employed by VASPs?	Please answer 'Yes' or 'No'.
1.6.20	109	Virtual Asset Service Providers (VASPs) - Number of Clients.	Enter the number of clients the entity has, that are legal persons offering virtual asset products and services, and natural persons that are employed by institutions which offer virtual asset products and

			services, broken down by country of incorporation and nationality, respectively.
1.6.21	110	Does the entity have any clients that are legal persons operating as High Value Dealers, or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.
1.6.22	111	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers, broken down by country of incorporation and nationality, respectively.
1.6.23	112	Does the entity have any clients that are legal persons or arrangements operating as Trusts, Company Managers, or Corporate Service Providers, or natural persons employed by Trusts, Company Managers, or Corporate Service Providers?	Please answer 'Yes' or 'No'.
1.6.24	113	Trusts, Company Managers, or Corporate Service Providers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Trusts, Company Managers, or Corporate Service Providers, and natural persons that are employed by Trusts, Company Managers, or Corporate Service Providers, broken down by country of incorporation and nationality, respectively.
1.6.25	114	Does the entity have any clients that are legal persons operating in the Import/ Export Industry, or natural persons employed by the Import/ Export Industry?	Please answer 'Yes' or 'No'.
1.6.26	115	Import/ Export - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Import/ Export business, and natural persons that are employed the Import/ Export industry, broken down by country of incorporation and nationality, respectively.

1.6.27	116	Does the entity have any clients that are legal persons operating in the Shipping and Transport of Goods industry, or natural persons employed by the Shipping and Transport of Goods industry?	Please answer 'Yes' or 'No'.
1.6.28	117	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Shipping and Transport of Goods business, and natural persons that are employed in the Shipping and Transport of Goods industry, broken down by country of incorporation and nationality, respectively.
1.6.29	118	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Dealers in Precious Metals and Stones ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry <p>Unknown Sector / Industry (not recorded)</p>	Provide the total number of clients that fall within the list of the sectors.
1.6.30	119	Does the entity have any clients that are legal persons operating as Real Estate Agent/ Brokers, or natural persons employed as Real Estate Agents/ Brokers?	Please answer 'Yes' or 'No'.
1.6.31	120	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers, broken down by country of incorporation and nationality, respectively.

1.6.32	121	Does the entity have any clients that are legal persons operating as Dealers in Precious Metals and Stones, or natural persons employed as Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'.
1.6.33	122	Dealers in Precious Metals and Stones - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones, broken down by country of incorporation and nationality, respectively.
1.6.34	123	Does the entity have any clients that are legal persons operating in the Gambling business (including online gambling), or natural persons employed in the Gambling business?	Please answer 'Yes' or 'No'.
1.6.35	124	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling), broken down by country of incorporation and nationality, respectively.
1.6.36	125	Does the entity have any clients that are legal persons operating in the Adult Entertainment industry, or natural persons employed in the Adult Entertainment industry?	Please answer 'Yes' or 'No'.
1.6.37	126	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry, broken down by country of incorporation and nationality, respectively.
1.6.38	127	Does the entity have any clients that are legal persons operating in the Defence Industry, or natural	Please answer 'Yes' or 'No'.

		persons employed by the Defence Industry?	
1.6.39	128	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry, broken down by country of incorporation and nationality, respectively.
1.6.40	129	Does the entity have any clients that are legal persons operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.41	130	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry, broken down by country of incorporation and nationality, respectively.
1.6.42	131	Does the entity have any clients that are legal persons operating in the Mining Industry, or natural persons employed by the Mining Industry?	Please answer 'Yes' or 'No'.
1.6.43	132	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry, broken down by country of incorporation and nationality, respectively.
1.6.44	133	Does the entity have any clients that are legal persons operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.6.45	134	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Construction / Development industry, and natural persons that are employed in the

			Construction / Development industry, broken down by country of incorporation and nationality, respectively.
1.6.46	135	Does the entity have any clients that are legal persons operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.47	136	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business, broken down by country of incorporation and nationality, respectively.
1.6.48	137	Does the entity have any clients that are legal persons operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry?	Please answer 'Yes' or 'No'.
1.6.49	138	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Cannabis Production & Distribution industry, and natural persons that are employed in the Cannabis Production & Distribution industry, broken down by country of incorporation and nationality, respectively.
1.6.50	139	Does the entity have any clients that are legal persons of Unknown Business, or natural persons employed in Unknown Professions or Industries?	Please answer 'Yes' or 'No'.
1.6.51	140	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions, broken down by country of incorporation and nationality, respectively.

			Unknown businesses and professions are where the entity does not know, and was not provided with, and verified, the line of business or profession of the client.
1.6.52	141	Does the entity have any clients where their business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.53	142	Other - Not mentioned above - Number of Clients, broken down by nationality or country of incorporation of the client.	Enter the number of clients the entity has, that are legal persons operating in known businesses/industries, not mentioned above, and natural persons that are employed in known businesses/industries, not mentioned above, broken down by country of incorporation and nationality, respectively.
1.7.1	143	<p>Source of Funds – Value of Transactions</p> <p>Please provide the total Value of Transactions for the reporting period, with clients that are legal persons of, or are natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> ▪ Banking Institutions (excluding MSBs) ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Legal Practitioners ▪ Accountants ▪ Fintech <p>*excluding MSBs, VASPs, and Trusts, Company Managers, and or Corporate Service Providers.</p>	Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.
1.7.2	144	Banking Institutions (excluding MSBs) - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs).

1.7.3	145	Other Financial Regulated Business - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating as Other Financial Regulated Business not mentioned in this section, and natural persons that are employed in any Other Financial Regulated Business.
1.7.4	146	Financial Leasing - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business.
1.7.5	147	Money Lending- Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Money Lending business, and natural persons that are employed by Money Lending businesses.
1.7.6	148	Legal Practitioner - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.7.7	149	Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency) - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating as Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.7.8	150	Fintech - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons and are in the Fintech industry, and natural persons that are employed in the Fintech industry
1.7.9	151	Please provide the total Value of Transactions for the reporting period, with clients that are legal persons of, or are natural persons employed in, the following sectors:	Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.

		<ul style="list-style-type: none"> ▪ MSBs ▪ VASPs ▪ High Value Dealers ▪ Trusts, Company Managers, or Corporate Service Providers ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	
1.7.10	152	<ul style="list-style-type: none"> ▪ Money Services Business - Value of Transactions for the reporting period. 	Enter the value of transactions conducted by clients that are legal persons operating in the Money Services Business, and natural persons that are employed in the Money Services Business.
1.7.11	153	VASPs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons offering virtual asset products and services, and natural persons that are employed by providers of virtual asset products and services.
1.7.12	154	High Value Dealers - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.7.13	155	Trusts, Company Managers, or Corporate Service Providers - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons or arrangements operating as Trusts, Company Managers, or Corporate Service Providers, and natural persons that are employed by Trusts, Company Managers, or Corporate Service Providers.
1.7.14	156	Import/Export Industry - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Import/Export Industry, and natural persons that are employed in the Import/Export Industry.
1.7.15	157	Shipping and Transport of Goods - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Shipping and Transport of Goods Industry, and natural persons that are employed in the Shipping and Transport of Goods Industry.

1.7.16	158	<p>Please provide the total Value of Transactions for the reporting period, with clients that are legal persons of, or are natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Dealers in Precious Metals and Stones ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry ▪ Unknown Sector / Industry (not recorded) 	Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.
1.7.17	159	<ul style="list-style-type: none"> ▪ Real Estate Agents / Brokers - Value of Transactions for the reporting period. 	Enter the value of transactions conducted by clients that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.7.18	160	Dealers in Precious Metals and Stones - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.7.19	161	Gambling business (including online gambling) - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.7.20	162	Adult Entertainment - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business.

1.7.21	163	Defence Industry - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.7.22	164	Oil and Gas Industry - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.7.23	165	Mining - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.7.24	166	Construction / Development - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Construction / Development business, and natural persons that are employed in the Construction / Development industry.
1.7.25	167	Retail & Restaurant Business - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.7.26	168	Cannabis Production & Distribution - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in the Cannabis Production & Distribution business, and natural persons that are employed in the Cannabis Production & Distribution business.
1.7.27	169	Industry / profession not known or not recorded - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in unknown or unrecorded Industries/ Professions, and natural persons that are employed in unknown or unrecorded Industries/ Professions.

1.7.28	170	Other - Not listed above - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are legal persons operating in known Businesses/ Industries/ Professions not listed above, and natural persons that are employed in known Businesses/ Industries/ Professions not listed above.
1.8.1	171	Do you have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
1.8.2	172	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback that may be relevant, which you could not provide on the tabs above.
2.1.1	173	Does the entity offer Custodian Services?	Please answer 'Yes' or 'No'.
2.1.2	174	Custodian Services - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients that have been offered custodian services by the entity, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.3	175	Custodian Services - Number of Transactions	Enter the number of transactions that the entity processed for clients that it offered custodian services to, during the reporting period.
2.1.4	176	Custodian - Value of Fiat Assets Under Management.	Enter the value of Fiat Assets Under Management for clients that the entity offered custodian services to, during the reporting period.
2.1.5	177	Custodian - Value of Securities Under Management.	Enter the value of Securities Under Management for clients that the entity offered custodian services to, during the reporting period.
2.1.6	178	Custodian - Value of Virtual Assets Under Management.	Enter the value of Virtual Assets Under Management for clients that the entity offered custodian services to, during the reporting period.
2.1.7	179	Is the entity an issuer of Private VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.8	180	Issuer Private VA Coins and Tokens - Number of Clients, broken down	Enter the number of clients that were issued Private VA Coins and

		by country of incorporation or nationality of the client.	Tokens by the entity, during the reporting period.
2.1.9	181	Issuer of Private VA Coins and Tokens - Number of Transactions.	Enter the number of transactions the entity conducted, relating to issuance of Private VA Coins and Tokens, during the reporting period.
2.1.10	182	Issuers of Private VA Coins and Tokens - Gross Value of AUM.	Enter the gross value of Assets Under Management of Private VA Coins and Tokens issued during the reporting period.
2.1.11	183	Is the entity an issuer of Public VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.12	184	Issuer of Public VA Coins and Tokens - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients that were issued with Public VA Coins and Tokens by the entity, during the reporting period.
2.1.13	185	Issuer of Public VA Coins and Tokens - Number of Transactions.	Enter the number of transactions the entity conducted, relating to issuance of Public VA Coins and Tokens, during the reporting period.
2.1.14	186	Issuers of Public VA Coins and Tokens - Gross Value of AUM.	Enter the gross value of Assets Under Management, of Public VA Coins and Tokens issued by the entity, during the reporting period.
2.1.15	187	Is the entity a Dealer of VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.16	188	Dealer of VA - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity provided the Dealer of VA Coins and Tokens services to, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.17	189	Dealer of VA - Number of Transactions.	Enter the number of transactions the entity processed as a Dealer of VA Coins and Tokens, during the reporting period.
2.1.18	190	Dealer of VA - Value of Transactions.	Enter the value of transactions relating to the services rendered by the entity as a Dealer of VA Coins and Tokens, during the reporting period.

2.1.19	191	Is the entity an Operator of a Virtual Asset Platform / Exchange?	Please answer 'Yes' or 'No'.
2.1.20	192	VA Platform / Exchange - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity provided with the services of an operator of a Virtual Asset Platform / Exchange, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.21	193	VA Platform / Exchange - Number of Transactions.	Enter the number of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period.
2.1.22	194	VA Platform / Exchange - Total Value of Transactions.	Enter the total value of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period.
2.1.23	195	Does the entity service Clients as an Agency Broker for Virtual Assets?	Please answer 'Yes' or 'No'.
2.1.24	196	Agency Broker for VA - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity provided the services of an Agency Broker for VA, during the reporting period.
2.1.25	197	Agency Brokers for VA - Number of Transactions.	Enter the number of transactions that the entity processed as an Agency Broker for VA, during the reporting period.
2.1.26	198	Agency Broker for VA - Value of Transactions.	Enter the total value of transactions that the entity processed relating to the service rendered as an Agency Broker for VA, during the reporting period.
2.1.27	199	Does the entity provide other investment activities not listed above?	Please answer 'Yes' or 'No'.
2.1.28	200	Other Investment Activities - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients to which the entity provided other investment activities not listed above, during the reporting period.

2.1.29	201	Other Investment Activities VA - Number of Transactions.	Enter the number of transactions that the entity processed, during the reporting period, relating to other VA investment activities, which are not listed above.
2.1.30	202	Other Investment Activities - VA - Value of Transactions.	Enter the total value of transactions relating to other VA investment activities, not listed above, which the entity provided during the reporting period.
2.1.31	203	Indicate the types of 'Other Investment Activities'. Name all that apply.	List all other VA investment activities not listed above, which the entity offers.
2.1.32	204	Does the entity conduct batch processing for client transactions?	Please answer 'Yes' or 'No'.
2.1.33	205	Batch Processing - Average Number of Clients processed within a week	Enter the average number of clients processed by the entity each week, through Batch Processing of transactions.
2.1.34	206	Batch Processing - Average Value of Transactions processed within a week.	Enter the average value of transactions processed within a week, using the Batch Processing of transactions method.
2.1.35	207	Does the entity engage in Crypto Lending?	Please answer 'Yes' or 'No'.
2.1.36	208	Crypto Lending - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity lent Crypto to, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.37	209	Crypto Lending - Number of Transactions.	Enter the number of transactions conducted, during the reporting period, involving the entity lending Crypto to clients.
2.1.38	210	Crypto Lending - Value of Transactions.	Enter the value of transactions conducted, during the reporting period, relating to the entity lending Crypto to clients.
2.1.39	211	Does the entity operate VA ATMs?	Please answer 'Yes' or 'No'.
2.1.40	212	Number of VA ATMs, broken down by country of ATM location.	Enter the number of VA Automated Teller Machines (ATMs) the entity

			has, broken down by country of location of the ATM.
2.1.41	213	VA ATM Operator - Number of Transactions, broken down by the country of the ATM.	Enter the number of transactions conducted at the VA Automated Teller Machines (ATMs), during the reporting period, broken down by country of location of the ATM.
2.1.42	214	VA ATM Operator - Value of Transactions, broken down by country of VA ATM.	Enter the value of transactions conducted on the VA Automated Teller Machines (ATMs) during the reporting period, broken down by country of location of the ATM.
2.1.43	215	Does the entity provide Mixers, Tumbler, Blenders, Foggers, or similar products and services to clients?	Please answer 'Yes' or 'No'.
2.1.44	216	Mixer Products and Services - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients to whom the entity provides Mixer Products and Services, broken down by country of incorporation or nationality of the client.
2.1.45	217	Mixer Products and Services - Number of Transactions.	Enter the number of transactions conducted, during the reporting period, relating to Mixer Products and Services.
2.1.46	218	Mixer Products and Services - Value of Transactions.	Enter the total value of the transactions conducted, during the reporting period, relating to Mixer Products and Services.
2.2.1	219	Number of outgoing Transactions from a client, above the reporting threshold, for the reporting period, broken down by the transaction destination country.	Enter the total number of outgoing transactions, processed by or on behalf of clients, during the reporting period. The reporting threshold is US\$1,000
2.2.2	220	Total value of outgoing Transactions from a client, above the reporting threshold, for the reporting period, broken down by the transaction destination country.	Enter the total value of outgoing transactions, processed by or on behalf of clients, during the reporting period. The reporting threshold is US\$1,000
2.2.3	221	Number of incoming transfers to a Beneficiary client, above the	Enter the total number incoming of transfers received by Beneficiary

		reporting threshold, for the reporting period, broken down by Country of origin.	clients, broken down by country where the transaction originated. The reporting threshold is US\$1,000
2.2.4	222	Total value of incoming Transfers as a Beneficiary client, above the reporting threshold, for the reporting period, broken down by the Country of origin.	Enter the total value of incoming transfers received by Beneficiary clients during the reporting period, broken down by country where the transaction originated. The reporting threshold is US\$1,000
2.2.5	223	Number of transactions not executed due to incomplete CDD.	Enter the total number of incoming and outgoing transactions not executed due to incomplete client due diligence "CDD" on either the Originator or Beneficiary, for the reporting period.
2.3.1	224	Does the entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	225	Physical Cash - Number of Clients.	Enter the number of clients that processed Physical Cash transactions, during the reporting period.
2.3.3	226	Physical Cash - Number of Transactions.	Enter the number of Physical Cash transactions conducted during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity.
2.3.4	227	Physical Cash - Value of Funds Transferred.	Enter the total value of funds transferred in form of Physical Cash during the reporting period.
2.3.5	228	Does the entity facilitate payments of Clients in the form of Travellers Cheques?	Please answer 'Yes' or 'No'.
2.3.6	229	Travellers Cheques - Number of Clients.	Enter the number of clients that made payments in the form of Travellers Cheques, during the reporting period.
2.3.7	230	Travellers Cheques - Number of Transactions.	Enter the number of transactions conducted by clients, using

			Travellers Cheques, during the reporting period.
2.3.8	231	Travellers Cheques - Value of Transactions.	Enter the value of transactions processed by clients during the reporting period, using Travellers Cheques.
2.3.9	232	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.10	233	Virtual Currency - Number of Clients.	Enter the number of clients that processed payments in the form of Virtual Currency during the reporting period.
2.3.11	234	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions the clients conducted, during the reporting period.
2.3.12	235	Virtual Currencies - Value of Funds Transferred.	Enter the value of funds transferred by clients using Virtual Currencies during the reporting period.
2.3.13	236	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.3.14	237	Third Parties - Number of Clients.	Enter the number of clients which conducted payments via Third Parties during the reporting period. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction.
2.3.15	238	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions conducted by clients during the reporting period.
2.3.16	239	Third Parties - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, using payments via Third Parties.
2.3.17	240	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.3.18	241	Credit Card Payments - Number of Clients	Enter the number of clients made payments via Credit Card during the reporting period.

2.3.19	242	Credit Card Payments - Number of Transactions.	Enter the number of transactions conducted by clients, during the reporting period, using Credit Cards.
2.3.20	243	Credit Card Payments – Value of Transactions.	Enter the value of transactions processed by clients, during the reporting period, using Credit Cards.
2.3.21	244	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.3.22	245	Wire Transfers - Number of Clients.	Enter the number of clients which made payments in the form of Wire Transfers during the reporting period.
2.3.23	246	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions conducted by clients, during the reporting period.
2.3.24	247	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.3.25	248	Does the entity facilitate payments of Clients in the form of Internal Bank Transfers?	Please answer 'Yes' or 'No'.
2.3.26	249	Internal Bank Transfers - Number of Clients.	Enter the number of clients which conducted Internal Bank Transfers, during the reporting period.
2.3.27	250	Internal Bank Transfers - Number of Transactions.	Enter the number of Internal Bank Transfer transactions conducted by clients, during the reporting period.
2.3.28	251	Internal Bank Transfers - Value of Funds Transferred.	Enter the value of transactions conducted via Internal Bank Transfer by clients during the reporting period.
2.3.29	252	Does the entity facilitate payments with Clients in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.30	253	Transfer of Securities - Number of Clients.	Enter the number of clients which made payments in the form of Transfer of Securities, during the reporting period.

2.3.31	254	Transfer of Securities - Number of Transactions.	Enter the number of transactions made by clients, during the reporting period, in the form of Transfer of Securities.
2.3.32	255	Transfer of Securities - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, by way of Transfer of Securities.
2.3.33	256	Does the entity facilitate payments of Clients in other forms not noted listed above?	Please answer 'Yes' or 'No'.
2.3.34	257	Other Forms of Payment - Number of Clients.	Enter the number of clients which made payments using other forms of payment not listed above, during the reporting period.
2.3.35	259	Other Forms of Payment - Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, using other forms of payment other than the ones listed above.
2.3.36	261	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were transferred by clients during the reporting period, using other forms of payments not listed above.
2.3.37	262	Please indicate the types of Other Forms of Payment.	List the Other Forms of Payment processed by clients during the reporting period, which are not listed above.
2.4.3	263	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of transactions received by clients, or on behalf of clients, during the reporting period, broken down by country of origin of the funds. These are funds transferred into the jurisdiction either directly to the regulated entity or through the jurisdiction's banking system, or both.
2.4.6	264	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of outgoing transactions, during the reporting period, relating to funds transferred out by or on behalf of clients, broken down by destination country of the transaction.

2.5.1	265	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	266	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Please include 'N/A' if no comment.
3.1.1	267	Total number of Clients - F2F, broken down by nationality or country of incorporation.	<p>Enter the total number of clients which were onboarded using Face-to-Face (F2F) channels, broken down by nationality or country of incorporation of the client.</p> <p>F2F channels include: Direct – F2F; Referrals within Group – F2F; Eligible Introducers - F2F; Other Introducers - F2F</p> <p>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.</p>
3.1.2	268	Total number of Clients – Non-F2F, broken down by nationality or country of incorporation of the clients.	<p>Enter the total number of clients which were onboarded using Non Face-to-Face (Non-F2F) channels, broken down by nationality or country of incorporation of the client.</p> <p>Non-F2F channels include: Direct Non-F2F; referrals within Group Non-F2F; Eligible Introducers Non-F2F; Other Introducers Non-F2F</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and <u>not only</u> those onboarded during the reporting period.</p>
3.1.3	269	Total number of Clients – Online platforms, broken down by nationality or country of incorporation of the clients.	<p>Enter the total number of clients which were onboarded using Online platforms, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and <u>not only</u> those onboarded during the reporting period.</p>

3.1.4	270	Number of Clients - Direct - F2F, broken down by nationality or country of incorporation of the clients.	<p>Enter the total number of clients which were onboarded using Direct - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded using Direct-F2F, for the reporting period.</p>
3.1.5	271	Number of Clients - Direct - Non-F2F, broken down by nationality or country of incorporation of the clients.	<p>Enter the number of clients which were onboarded using Direct Non - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded using Direct Non-F2F, for the reporting period.</p>
3.1.6	272	Number of Clients through Referrals within Group - F2F, broken down by nationality or country of incorporation of the clients.	<p>Enter the number of clients which were onboarded using referrals within Group - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded using referrals within Group-F2F, for the reporting period.</p>
3.1.7	273	Number of Clients through Referrals within Group - Non F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded using referrals within Group Non - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded using referrals within Group Non-F2F, for the reporting period.</p>
3.1.8	274	Total number of Clients through Eligible Introducers - F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded through Eligible Introducers - F2F, broken down by nationality or country of incorporation of the client.

			<p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Eligible Introducers-F2F, for the reporting period.</p> <p>Eligible Introducers – F2F are instances where the entity would have face-to-face introduction or interaction with the client during the business relationship.</p>
3.1.9	275	Number of Clients through Eligible Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded through Eligible Introducers Non - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Eligible Introducers Non-F2F, for the reporting period.</p>
3.1.10	276	Number of Clients through Other Introducers - F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded through Other Introducers - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Other Introducers-F2F, for the reporting period.</p>
3.1.11	277	Number of Clients through Other Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded through Other Introducers Non - F2F, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Other Introducers Non-F2F, for the reporting period.</p>
3.1.12	278	Number of Clients via Hot Wallets, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded via Hot Wallets, broken down by nationality or country of incorporation of the client.

			Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Hot Wallets, for the reporting period.
3.1.13	279	Number of Clients via Cold Wallets, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded via Cold Wallets, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, for the reporting period.</p>
3.1.14	280	Clients via Online Platforms, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded via Online Platforms, broken down by nationality or country of incorporation of the client.</p> <p>Provide the total number of clients, in the entity's entire portfolio, for the reporting period.</p>
3.2.2	283	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	284	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer at the end of the reporting period.
3.2.4	285	How many AML Compliance Officers have you had in the reporting period and the previous 2 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".
3.2.5	286	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.

3.2.6	287	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	288	What was the country of residency of the Money Laundering Reporting Officer at the end of the reporting period?	Enter the country of residency of the Money Laundering Reporting Officer at the end of the reporting period.
3.2.8	289	How many Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years?	If no turnover of the Money Laundering Reporting Officer role in the three-year period, answer "1".
3.2.9	290	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	291	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.11	292	What was the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period?	Enter the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period.

3.2.12	293	How many Deputy Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years?	If no turnover of the Deputy Money Laundering Reporting Officer role in the three-year period, answer "1".
3.2.13	294	Has the entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	295	To whom has the Targeted Financial Sanction screening function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the screening of Targeted Financial Sanctions:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.</p>
3.2.15	296	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, during the reporting period.
3.2.16	297	How many TFS screening platforms have you had in the reporting period and the previous 2 years?	If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	298	Has the entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	299	To whom has the Transaction Monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource Transaction Monitoring relationship:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Transaction</p>

			Monitoring services turnover includes one of each within the reporting period.
3.2.19	300	What was the outsourcing country of the Transaction Monitoring function at the end of the reporting period?	Enter the country the entity outsourced the Transaction Monitoring function to, at the end of the reporting period.
3.2.20	301	How many Transaction Monitoring platforms have you had in the reporting period and the previous 2 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.2.21	302	Has the entity outsourced the function of Trading platform within the reporting period?	Please answer 'Yes' or 'No'.
3.2.22	303	To whom has the Trading platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Trading platform:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Trading platform turnover includes one of each within the reporting period.</p>
3.2.23	304	What was the outsourcing country of the Trading platform function at the end of the reporting period?	Enter the country the entity outsourced the Trading platform function to, at the end of the reporting period.
3.2.24	305	How many Trading platforms have you had in the reporting period and the previous 2 years?	If no turnover of the Trading platform function in the three-year period, answer "1".
3.2.25	306	Has the entity outsourced the function of Liquidity platforms within the reporting period?	Please answer 'Yes' or 'No'.
3.2.26	307	To whom has the Liquidity platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Liquidity platform:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party

			Select "3rd Party and Member within Group", in cases where of the Liquidity platform turnover that includes one of each within the reporting period.
3.2.27	308	What was the outsourcing country of the Liquidity platform function at the end of the reporting period?	Enter the country the entity outsourced the Liquidity platform function to, at the end of the reporting period.
3.2.28	309	How many Liquidity platforms have you had in the reporting period and the previous 2 years?	If no turnover of the Liquidity platform function in the three-year period, answer "1".
3.2.29	310	Has the entity outsourced the function of Mixer, Blender, Fogger, or other similar services within the reporting period?	Please answer 'Yes' or 'No'.
3.2.30	311	To whom has Mixer, or similar services, been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Mixer, Blender, Fogger, or other similar services:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Mixer services that includes one of each within the reporting period.</p>
3.2.31	312	What was the outsourcing country of the Mixer Services function at the end of the reporting period?	Enter the country the entity outsourced the Mixer, Blender, Fogger, or other similar services to, at the end of the reporting period.
3.2.32	313	How many Mixer Service Providers have you transacted with in the reporting period and the previous 2 years?	If no turnover of the Mixer, Blender, Fogger, or other similar services in the three-year period, answer "1".
3.2.33	314	Did the entity engage in Margin Trading during the reporting period?	Please answer 'Yes' or 'No'.
3.2.34	315	Number of Margin Trading Transactions	Enter the number of Margin Trading transactions the entity conducted, during the reporting period.

3.2.35	316	Value of funds borrowed by the entity for Margin Trading, broken down by borrowing country.	Enter the Value of funds borrowed by the entity during the reporting period, for Margin Trading transactions, broken down by borrowing country
3.3.1	317	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.3.2	318	In which countries by percentage of equity ownership are all Shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Insert countries where all Shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.3	319	Number of Branches by location, broken down by country of operation.	Enter the number of Branches the entity has, broken down by country of operation.
3.3.4	320	Number of Subsidiaries by location, broken down by country of operation.	Enter the number of Subsidiaries the entity has, broken down by country of operation.
3.3.5	321	In which country is the Parent or Holding Company incorporated?	Enter the country of incorporation for the Parent or Holding Company.
3.3.6	322	Percentage of Controlling Interests in the entity, broken down by country of location of the Controlling Interests.	Insert countries where persons or beneficial owners who control the entity are located, and their percentage of Controlling Interest in the entity. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.7	323	Does the entity have any licence or registration in another jurisdiction?	Please answer 'Yes' or 'No'.
3.3.8	324	Did the entity receive any penalty or other enforcement action in another jurisdiction(s)?	Please answer 'Yes' or 'No'.
3.3.9	325	List the jurisdiction(s) which enforcement action was taken. If none, use '0' to indicate none.	Enter the name(s) of the jurisdiction(s) which enforcement action was taken, if any. If none, use '0' to indicate none.
3.3.10	326	Does the entity hold a Controlling Interest in another legal person or	Please answer 'Yes' or 'No'.

		legal arrangement engaged in Virtual Asset products or services?	
3.3.11	327	List the jurisdiction(s) where the entity holds a Controlling Interest in another legal person or arrangement engaged in Virtual Asset products or services.	Enter the name(s) of the jurisdiction(s) which the entity holds a Controlling Interest in another legal person or arrangement engaged in Virtual Asset products or services. If none, use '0' to indicate none.
3.4.1	328	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	329	Please use this area to provide any comments or feedback for this tab.	Use this area to provide any comments or feedback for this tab. Please enter 'N/A' if no comment.

AML Controls Questions:

No.	Question No.	Question	Description/Explanation
1.1.1	330	The total number of Directors / Members of the Governing Body.	Enter the total number of Directors / Members of the Governing Body of the institution.
1.1.2	331	Indicate the number that are Independent Directors / Non-Executive Directors.	Enter the number of Directors/Members of the Governing Body that are Independent Directors/Non-Executive Directors. An Independent Directors/Non-Executive Directors is an individual who is a director (member) of the board of directors who does not have a material or pecuniary relationship with the company or related persons and provides independent oversight and constructive challenge to the executive directors.
1.1.3	332	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.4	333	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.

1.1.5	334	Does the approved Charter include the roles and responsibilities of the Directors/General Partners/Managers?	Please answer 'Yes' or 'No'.
1.1.6	335	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	336	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues?	Please answer 'Yes' or 'No'.
1.1.8	337	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.9	338	Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?	Please answer 'Yes' or 'No'.
1.1.10	339	When was the last Board/Principal and/or Board committee meeting held which discussed AML/CFT/CPF, including regulatory audit findings?	Enter the date of the last Board/Principal and/or Board committee meeting, which discussed AML/CFT/CPF, including regulatory audit findings, was held.
1.1.11	340	Has the entity, or its directors, shareholders, beneficial owners, or senior officers been denied an application by any regulatory body?	Please answer 'Yes' or 'No'.
1.1.12	341	Provide the country of jurisdiction.	Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body.
1.1.13	342	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.2.1	343	Is there regular reporting of AML/CFT/PF matters by Senior Management to the board?	Please answer 'Yes' or 'No'.

1.2.2	344	When was the last report of AML/CFT/PF matters to Senior Management to the board made?	Enter the date when the last report relating to AML/CFT/PF matters was made by Senior Management to the board.
1.2.3	345	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.2.4	346	When was the last review of the AML/CFT/PF policy and procedures?	Enter the date of the last review of the AML/CFT/PF policy and procedures.
1.2.5	347	Does Senior Management ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.2.6	348	Does Senior Management ensure that relevant, adequate, and timely information regarding AML/CFT/CPF matters is provided to the Board?	Please answer 'Yes' or 'No'.
1.2.7	349	Does Senior Management ensure that ML/TF/PF business risk assessments are done prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.2.8	350	How many risk assessments relating to new products/services/delivery channels/technologies did you carry out during the period under review?	Enter the total number of risk assessments relating to new products/services/delivery channels/technologies that were carried out during the period under review.
1.2.9	351	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.10	352	How many trainings did the AMLCO/MLRO attend for the reporting period?	Enter the total number of trainings the AMLCO/MLRO attended during the reporting period.
1.3.1	353	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.3.3	354	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.

1.3.5	355	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.3.7	356	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.3.8	357	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.9	358	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.10	359	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.3.11	360	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.3.12	361	Has the AML Compliance Officer received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.13	362	Has the MLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.14	363	Has the DMLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.15	364	Does the AMLCO report to the Board and Senior Management on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.16	365	Does the MLRO report to the Board and Senior Management on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.17	366	Does the DMLRO report to the Board and Senior Management on AML/CFT/CPF related issues?	Please answer 'Yes' or 'No'.

1.3.18	367	Does the AMLCO provide oversight of risk assessment procedures?	Please answer 'Yes' or 'No'.
1.3.19	368	Does the AMLCO conduct AML/CFT/CPF training for all Directors and relevant staff of the entity?	Please answer 'Yes' or 'No'.
1.3.20	369	How many internal trainings did the AMLCO conduct during the period under review?	Enter the number of internal trainings that were conducted by the AMLCO during the reporting period.
1.3.21	370	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.22	371	Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF compliance breaches?	Please answer 'Yes' or 'No'.
1.3.23	372	How many sample testing and reviews of exception reports did the AMLCO do during the period under review?	Enter the number of sample testing and reviews of exception reports that were conducted by the AMLCO, during the period under review.
1.3.24	373	Does the AMLCO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.25	374	What percentage of time does the AMLCO spend on additional functions?	Enter the percentage of time the AMLCO spends on additional functions outside of the compliance function.
1.3.26	375	Does the MLRO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.27	376	What percentage of time does the MLRO spend on additional functions?	Enter the percentage of time the MLRO spends on additional functions outside of reviewing internal SARs, investigating SARs and filing SARs to the FRA.
1.3.28	377	Does the DMLRO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.29	378	What percentage of time does the DMLRO spend on additional functions?	Enter the percentage of time the DMLRO spends on additional functions outside of reviewing

			internal SARs, investigating SARs and filing SARs to the FRA.
1.4.1	379	Does the entity have an internal audit department / unit with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	380	Is there an Internal AML Audit Charter/Plan?	Please answer 'Yes' or 'No'.
1.4.3	381	Is the AML compliance plan or charter reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.4	382	Is the internal AML audit function outsourced?	Please answer 'Yes' or 'No'.
1.4.5	383	Who is the internal AML audit function outsourced to?	Enter the name of the OSP which the entity outsourced internal AML audit function to.
1.4.6	384	Does the internal AML auditor perform regular reviews of the AML/CFT/CPF-related policies, procedures and processes?	Please answer 'Yes' or 'No'.
1.4.7	385	Has the internal AML auditor performed a AML/CFT/CPF audit?	Please answer 'Yes' or 'No'.
1.4.8	386	Enter the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?	Enter the frequency, in months, of how often an internal AML audit for the AML/CFT/CPF and Sanctions programme is conducted.
1.4.9	387	When was the last AML/CFT audit conducted by Internal Audit?	Enter the date of last Internal AML Audit.
1.4.10	388	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.11	389	Enter the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, in months, of the Board review of the AML audit program.
1.5.1	390	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.5.2	391	Is AML/CFT/CPF training provided to Directors and all relevant staff?	Please answer 'Yes' or 'No'.

1.5.3	392	How many AML/CFT/CPF training sessions in total were conducted for the Directors and relevant staff within the reporting period?	Enter the total number of AML/CFT/CPF training sessions conducted for the Directors and relevant staff during the reporting period.
1.5.4	393	Who facilitates the training? Please name the trainer and their role.	Enter the name of who facilitated the training, such as the name of the company and name of individual who provided the training.
1.5.5	394	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.5.6	395	Does the entity assess AML knowledge of its employees?	Please answer 'Yes' or 'No'.
1.5.7	396	Please indicate percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the company during the reporting period.	Enter the percentage of employees/ agents/ directors that have NOT been exposed to AML/CFT/CPF training by the entity during the reporting period.
1.6.1	397	How many years after the end of the business relationship are records retained?	Enter the number of years records are retained after the end of the business relationship.
1.6.2	398	Are any records NOT retained or accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.3	399	In which countries does the entity retain its records?	Enter the name of jurisdiction(s) where the entity's records are retained.
1.6.4	400	How accessible and swiftly available are records for competent authorities/law enforcement - in hours?	Enter the time, in hours, of how long it takes for the entity to provide records upon request from competent authorities/law enforcement agencies.
1.7.1	401	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.7.2	402	How many clients were rated high risk?	Enter the number of clients that were rated 'high' risk.

1.7.3	403	How many clients were rated between low and high risk?	Enter the number of clients that were rated between 'low' and 'high' risk, i.e., medium risk.
1.7.4	404	How many clients were rated low risk?	Enter the number of clients that were rated 'low' risk.
1.7.5	405	How frequent is the Risk Assessment reviewed, and / or revised or updated by the entity during the year?	Enter the number of times the entity reviewed, and / or revised or updated the Risk Assessment during the year.
1.7.6	406	What was the date of the last review?	Enter the date of the last review of the Risk Assessment.
1.7.7	407	Does the entity consider the ML/TF/PF risks of the clients (including UBOs) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.8	408	Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.9	409	Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.10	410	Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.11	411	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.12	412	How often, in months, do you review High-Risk relationships/accounts?	Enter how often, in months, does the entity review 'high' risk relationships/accounts.
1.7.13	413	How many high-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'high' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.14	414	How often, in months, do you review medium-risk relationships/accounts?	Enter the number of months between reviews, the entity takes to review medium-risk relationships/accounts.

1.7.15	415	How many medium-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'medium' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.16	416	How often, in months, do you review low-Risk relationships/accounts?	Enter the number of months between reviews, the entity takes to review 'low' risk relationships/accounts.
1.7.17	417	How many low-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'low' risk business relationships or client accounts the entity reviewed during the reporting period.
1.8.1	418	Where applicable, does the entity have a Group Wide AML/CFT programme?	Please answer 'Yes' or 'No'.
1.8.2	419	If yes, has the entity conducted a gap analysis to identify whether the AML/CFT programme of each branch/majority owned subsidiary complies with Cayman's legislation and regulatory framework?	Please answer 'Yes' or 'No'.
1.8.3	420	Have the board ensured that necessary amendments are made to ensure entities apply AML/CFT measures consistent with Cayman's requirements?	Please answer 'Yes' or 'No'.
1.8.4	421	Does the entity have Governing Body approved policies and procedures for Customer due diligence measures i.e. customer identification and verification as well as monitoring of customers and updating customer information?	Please answer 'Yes' or 'No'.
1.8.5	422	Does the entity have Governing Body approved policies and procedures for identification of high risk customers and PEPs?	Please answer 'Yes' or 'No'.
1.8.6	423	Does the entity have Governing Body approved policies and procedures for Internal Reporting i.e. Identification and Reporting of Suspicious Activities and Transactions including for TF and PF?	Please answer 'Yes' or 'No'.

1.8.7	424	Does the entity have Governing Body approved policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.8.8	425	Does the entity have Governing Body approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.8.9	426	Does the entity have Governing Body approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.8.10	427	Does the entity have Governing Body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.8.11	428	Does the entity have Governing Body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?	Please answer 'Yes' or 'No'.
1.8.12	429	Does the entity have Governing Body approved policies and procedures for the freezing of funds/assets of designated persons?	Please answer 'Yes' or 'No'.
1.8.13	430	Does the entity have Governing Body approved policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.14	431	When were the AML/CFT/CPF policies and procedures last updated?	Enter the date when the AML/CFT/CPF policies and procedures were last updated.
1.8.15	432	For the governing process, is information collected on counterparties and business associates?	Please answer 'Yes' or 'No'.

1.8.16	433	Total Clients	<p>Enter the total number of clients the entity had during the reporting period.</p> <p>Where applicable, the number of clients /customers should only include those of the Cayman Islands legal entity.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p>
1.8.17	434	Did the company decline, de-risk/ terminate / restrict business relationships with any customers or any business for AML/CFT/CPF related reasons for the current reporting period?	Please answer 'Yes' or 'No'.
1.8.18	435	Please provide the total number of business relationships or clients accounts that were de-risked through termination of business relationship within the reporting period.	Enter the total number of business relationships or clients' accounts that were de-risked through termination of business relationship, during the reporting period.
1.8.20	436	How many customer accounts remain non-compliant with required identification and verification procedures?	Number of non-compliant customers
1.9.1	437	Is there a screening process?	Please answer 'Yes' or 'No'.
1.9.2	438	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.9.3	439	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.9.4	440	If outsourced, please identify the vendor and the measures in place to ensure that the vendor is screening against the most recent lists.	Enter the name of the vendor along with the measures in place to ensure that the vendor is screening against the most recent lists.
1.9.5	441	Do screening parameters include risk indicators for TF and PF monitoring?	Please answer 'Yes' or 'No'.

1.9.6	442	Is the existing customer database screened periodically against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.9.7	443	Number of clients and related parties / counterparties screened against the H.M. Treasury List within the reporting period.	Enter the number of clients and related parties / counterparties screened against the H.M. Treasury List within the reporting period.
1.9.8	444	Number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.	<p>Enter the number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.</p> <p>An alert is generated during screening process, indicating a match of some or all, of the customer or business partner's identification details, against those of designated persons and entities on the HM Treasury Sanctions list. A match needs to be verified, to confirm or discount whether it is a true or false positive.</p>
1.9.9	445	How many false positive hits did you encounter during the reporting period?	Number of false positive hits the entity encountered during the reporting period.
1.9.11	446	When designated list are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.9.12	447	Are customers / counterparties screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.9.13	448	Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen?	Please answer 'Yes' or 'No'.
1.9.14	449	Does the entity maintain a report of results of positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.9.15	450	How many positive hits for TFS did you encounter during the reporting period?	Total number of positive hits related to TFS the entity encountered during the reporting period.

1.9.18	451	Is there an approved process for sanctions monitoring?	Please answer 'Yes' or 'No'.
1.9.19	452	How many instances of unusual or suspicious activity have been flagged by the sanctions monitoring tool during the reporting period?	Enter the number of instances where unusual or suspicious activity has been flagged by the sanctions monitoring tool during the reporting period.
1.9.20	453	Is the sanctions monitoring process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.9.21	455	Is sanctions monitoring done in real time or after the event?	Select what applies: No process, After the event, or Real time.
1.10.1	456	Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.10.2	458	Enter the name of the Transaction Monitoring System or name of the provider of the Transaction Monitoring System if bought or outsourced?	Enter the name of the Transaction Monitoring System or name of the provider of the Transaction Monitoring System if bought or outsourced.
1.10.3	459	Has the automated system been adapted for use in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	460	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	Enter the total number of all transactions conducted for clients during the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity. Answer to this question should be the same as Question 3 of this Survey, as information requested is the same.
1.10.5	461	Please provide the total number of Alerts in Reporting Period by the automated system related to Money Laundering.	Enter the total number of Alerts relating to money laundering, that were generated by the automated system during the reporting period.

			Alerts are notifications flagged by a screening monitoring system identifying that a FSP should conduct further review to verify if the alert is a true match or a false positive.
1.10.7	462	Please provide the total number of Alerts resulting in Suspicious Activity Reports related to Money Laundering.	The total number of alerts produced by the monitoring system (automated or manual) which resulted in generation of suspicious activity reports (SAR) internally, relating to money laundering. This number includes false positive alerts.
1.10.11	463	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing/Proliferation Financing.	Total number of Alerts related to Terrorism Financing/Proliferation Financing, that were generated by the automated system during the reporting period. Alerts are transactions or activities that fall outside the norm or expected conduct of business by a client, which are flagged out by the automated system whenever they occur.
1.10.13	464	Please provide the total number of Alerts resulting in internal suspicious activity reports related to Terrorism Financing/Proliferation Financing.	The total number of alerts produced by the monitoring system (automated or manual) which resulted in the generation of internal suspicious activity reports (SAR), relating to Terrorism Financing/Proliferation Financing. This number includes all alerts including false positives.
1.10.17	465	Please provide the total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information.	The number of incoming transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.18	466	Please provide the total value of incoming funds rejected due to insufficient applicant for business or beneficiary information.	The total value of incoming funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.19	467	Please provide the total number of outgoing transactions rejected due	The number of outgoing transactions the entity rejected

		to insufficient applicant for business or beneficiary information.	during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.20	468	Please provide the total value of outgoing funds rejected due to insufficient applicant for business or beneficiary information.	The total value of outgoing funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.21	469	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of new client business relationships (potential clients) the entity rejected due to Money Laundering or Terrorism Financing concerns, during the reporting period.
1.10.22	470	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of transactions (both incoming and outgoing) the entity blocked/rejected due to Money Laundering or Terrorism Financing concerns during the reporting period.
1.10.23	471	Please provide the total number of client business relationships (clients) that have been terminated due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of client business relationships the entity terminated due to Money Laundering or Terrorism Financing concerns, during the reporting period.
1.11.1	472	Is there a requirement for senior management approval before establishing high risk business relationships for example with PEPs?	Please answer 'Yes' or 'No'.
1.11.2	473	Does the entity exercise additional caution and conduct EDD on individuals and/or entities based in high-risk countries?	Please answer 'Yes' or 'No'.
1.11.3	474	How many clients did the entity conduct EDD on during the reporting period?	The number of clients, legal persons and arrangements, and natural persons, where the entity applied enhance due diligence.
1.11.4	475	Where EDD was applied, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.

1.11.5	476	How many Transactions did the entity apply EDD on during the reporting period?	The number of transactions (of legal persons and arrangements, and natural persons) where the entity applied enhanced due diligence.
1.11.6	477	How many Client's KYC/CDD files were reviewed by the entity as part of applying EDD measures on during the reporting period?	The number of clients' CDD files, both legal persons and arrangements, and natural persons, that the entity reviewed as part of applying enhanced due diligence.
1.11.7	478	Does the entity have enhanced procedures for monitoring PEPs?	Please answer 'Yes' or 'No'.
1.12.1	479	Does the entity have a documented process for internal Suspicious Activity SAR to the MLRO?	Please answer 'Yes' or 'No'.
1.12.2	480	How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period.
1.12.3	481	How many Suspicious Activity Reports have been reported, to the FRA, by the MLRO for the current reporting period?	Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period.
1.12.4	482	How many hours on average does it take to file a SAR to the FRA?	Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.
1.12.5	483	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.
1.12.6	484	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.12.7	485	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.13.1	486	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries,	Please answer 'Yes' or 'No'.

		counterparties, directors, or officers is the target of any economic or financial sanctions?	
1.13.2	487	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.13.3	488	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.15.1	489	If applicable, is there a board approved documented policy on outsourcing?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.15.2	490	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.
1.15.3	491	Is there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.15.4	492	In total, how many services does the entity outsource from either third parties, or within its group or subsidiaries?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.15.5	493	Does the outsourcing agreement clearly set out the obligations of both parties?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.

1.15.6	494	If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.15.7	495	If relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.15.8	496	If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.15.9	496	If relevant, does the outsourced AMLCO/MLRO have access to the compliance committee and board of the entity?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.15.10	498	If relevant, are there data protection restrictions which would delay access to data and documents?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.15.11	499	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' This question is only applicable if the entity outsources any activities.
1.15.12	500	How do you ensure the OSP follows the outsourcing standards equivalent to the licensee's?	Provide a narrative explaining how the entity ensures the OSP follows the outsourcing standards equivalent to that of the entity.
1.15.13	501	Is the entity satisfied that the OSP has measures in place to comply with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.

1.16.1	502	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.16.2	503	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback for this tab. Enter 'N/A' if no comment.