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

Document version: 1.3

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**Revision History:**

Effective Date	Version Number	Revision Description
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
1 March 2024	1.3	Updates to inherent risk and controls questions.

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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](mailto:AMLSurveys@cima.ky).

To access the AML Survey:

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

  
**Cayman Islands Monetary Authority**

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

[Confirm Account](#)

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLI86VZVCRbBxmmm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYsoP%2Bk8rPURRSvrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhAtaTNSa3IE3aiA%3D>

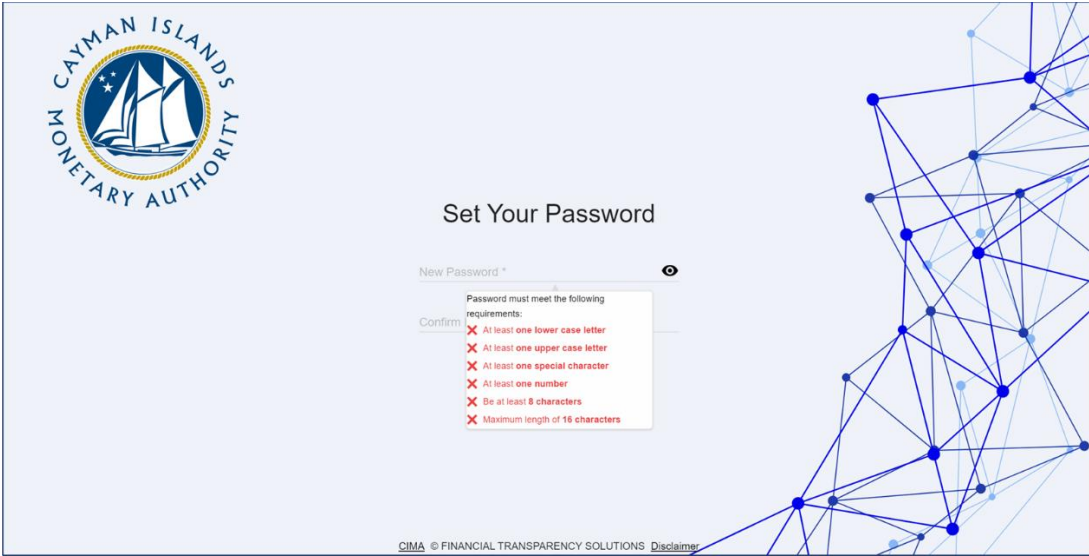
For any questions concerning the survey or the current reporting cycle, please contact: [AMLSurvey@cima.ky](mailto:AMLSurvey@cima.ky)

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

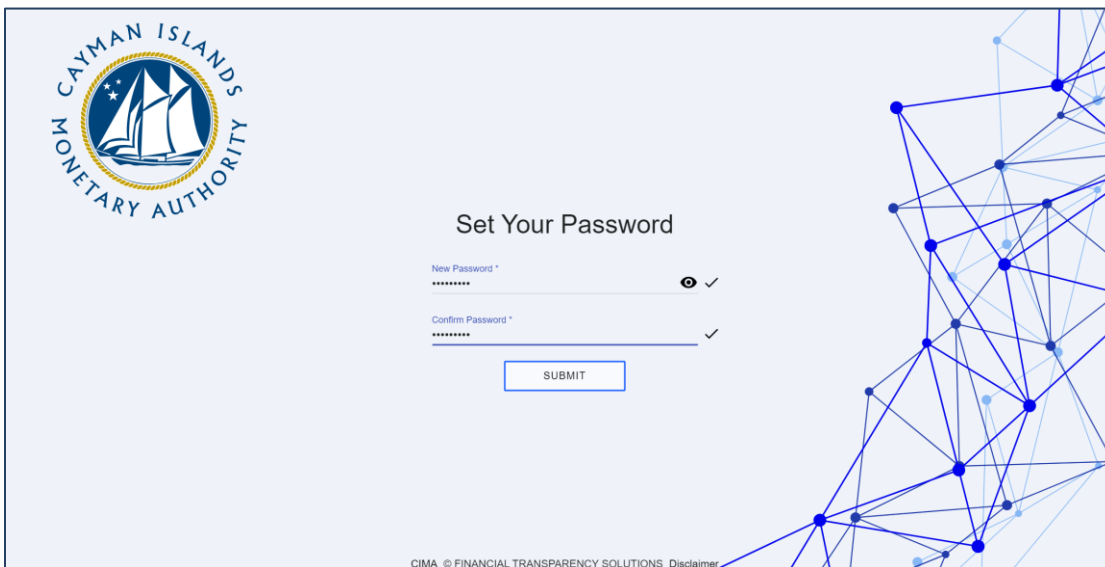
Disclaimer:  
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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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.



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



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



## Cayman Islands Monetary Authority

The **Username** for this account is:

**Your account has been successfully activated.**

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

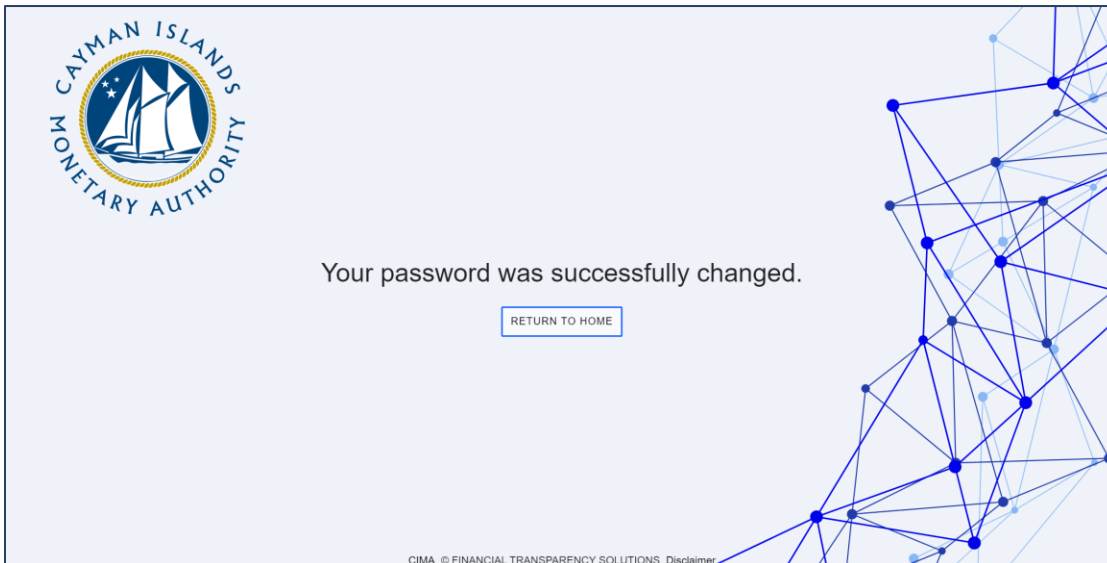
Please do not reply to this email, it is automatically generated.

**Disclaimer:**

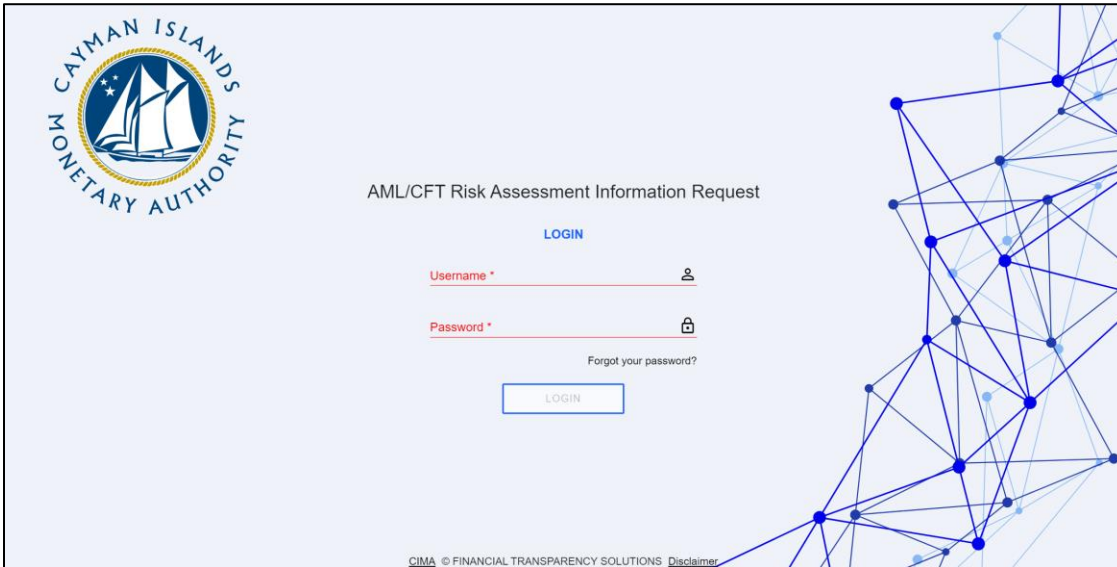
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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

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



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

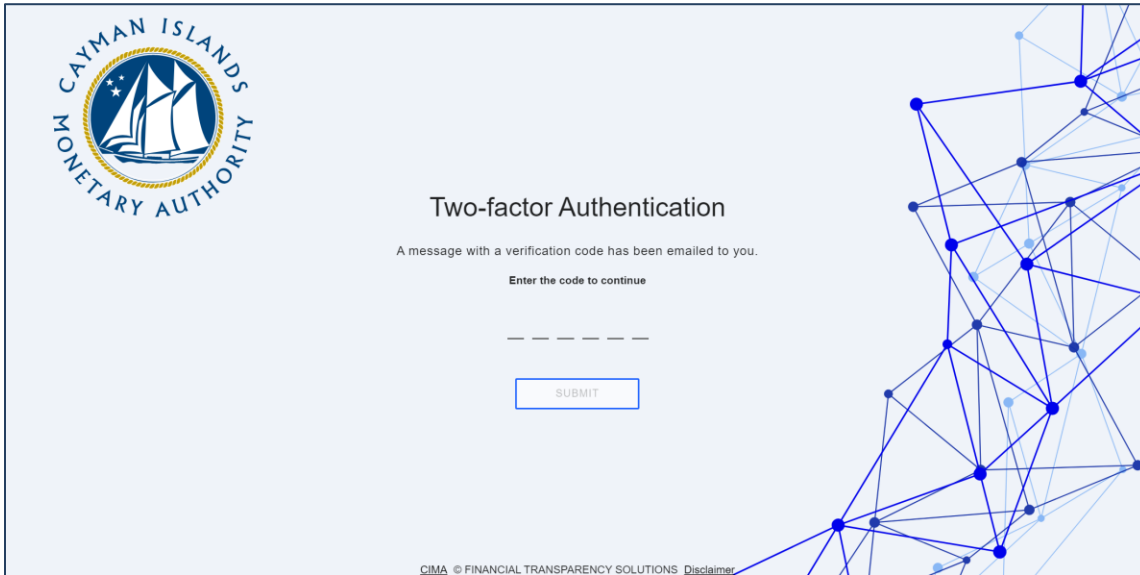


- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email

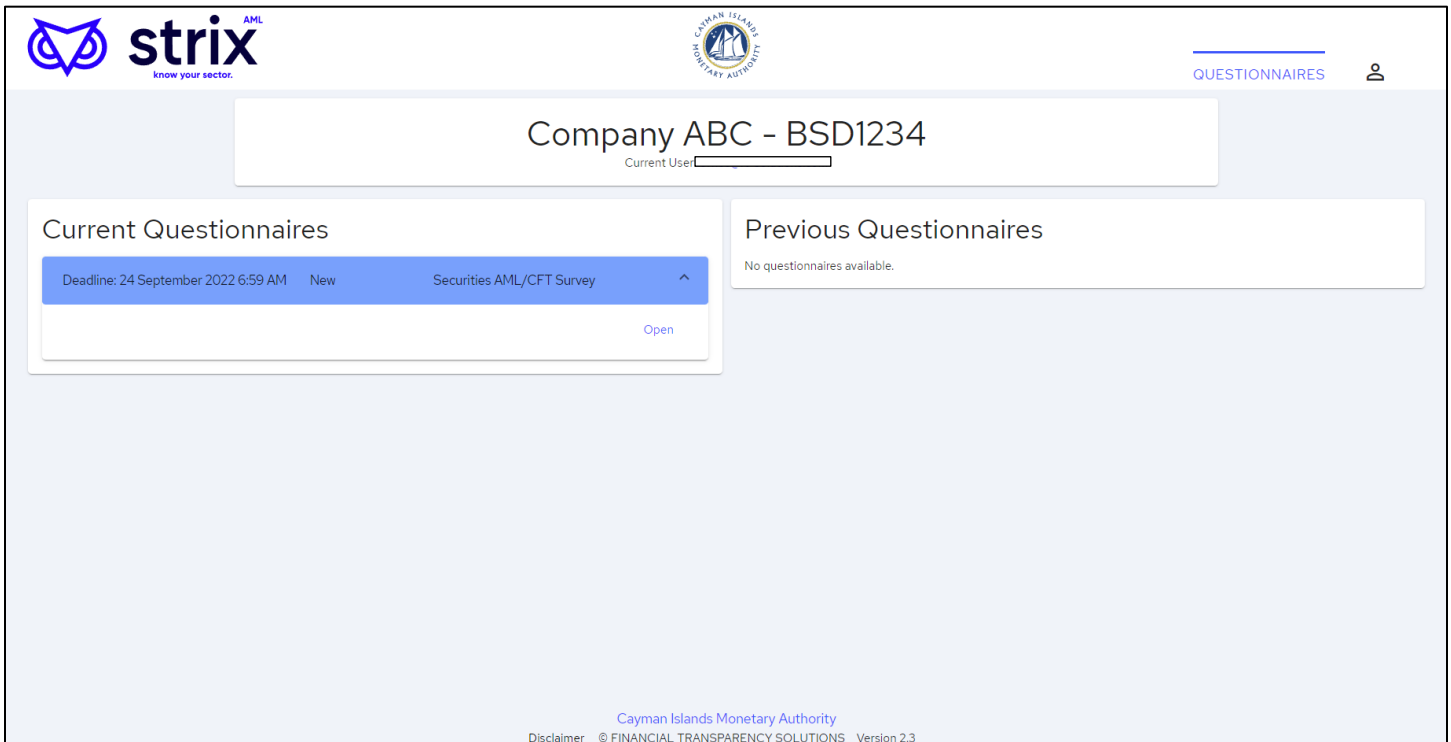




- 8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted.



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



## 3.2 COMPLETING THE AML SURVEY FORM

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

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

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

## 4 OTHER USEFUL INFORMATION

### 4.1 USER ACCOUNT LOCKOUTS

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

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

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

### 4.2 INTERNET BROWSER

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

### 4.3 DATA AND SECURITY

The AML Survey, the auto-generated communication from STRIX, and the data collected from FSPs in the AML Survey are all maintained on-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	<p>In relation to a transfer of virtual assets, means:</p> <ul style="list-style-type: none"> <li>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</li> <li>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.</li> </ul>
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><b>United States Dollars (US\$).</b></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 Introdurers	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	A High net worth individual (HNWI) is:  (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.

	HNWIs are NOT Ultra HNWI and should not be double counted.
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	<p>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</p>
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> <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.</p>
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 2023.
Source of Funds	<p>Source of funds is the origin of the assets that will be used to form and maintain the business relationship.</p> <p>A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together.</p> <p>Take this into account when answering questions relating to the 'Nature of Business - Source of 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 Q165 through Q211.
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	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>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person.</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement</p>
Ultra HNWI		Ultra-High Net Worth Individuals, also referred to as UHNWI, are all 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)		<p>An entity that provides virtual asset service as a business or in the course of business.</p> <p>Virtual service tokens are not virtual assets and a person or legal arrangement that provides services that involve virtual service tokens.</p>
Timeframe	Value of Transactions	Value of transactions processed <b>during the end of the reporting period.</b>
Timeframe	Number of Transactions	Number of transactions conducted for the client <b>during the reporting period.</b>

<b>AML Inherent Risk Questions:</b>			
<b>Ref No.</b>	<b>Question No.</b>	<b>Question</b>	<b>Description/Explanation</b>
1.1.1	1	Total Clients/customers at the end of the reporting period.	<p>Enter the total number of clients the entity has at the end of the reporting period.</p> <p>Where applicable, the number of clients /customers should only include those of the Cayman Islands legal entity.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p>
1.1.2	2	Total 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>

			If an Entity does not have such clients, a '0' value should be used.
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.	<p>Enter the total number of transactions conducted for clients, who are natural persons, during the reporting period.</p> <p>This category is specific to clients who are Natural Persons 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.	Enter the total number of transactions that were conducted by customers who are legal person and arrangements, during the reporting period.

			<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>
1.1.14	14	Total number of Non-Compliant Accounts at the end of the reporting period.	Enter the number of customers where sufficient CDD has not been collected, at the end of the reporting period.
1.2.1	15	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	16	Does the entity have any clients that have UBOs that are directors of the client?	Answer 'Yes' or 'No'
1.2.3	17	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	18	Does the entity have any clients that have UBOs that are Controllers of the client?	Answer 'Yes' or 'No'
1.2.5	19	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	20	Does the entity have any clients which have UBOs - HNWI's?	Please answer 'Yes' or 'No'.
1.2.7	21	Number of Clients which have UBOs - HNWI's.	<p>Enter the total number of clients who have UBOs that are also HNWI's.</p> <p>HNWI's 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>
1.2.8	22	Does the entity have any clients which have UBOs - Ultra HNWI's?	Please answer 'Yes' or 'No'.
1.2.9	23	Number of Clients which have UBOs - Ultra HNWI's.	<p>Enter the total number of clients who have UBOs that are also Ultra HNWI's.</p> <p>UHNWI's is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p>
1.2.10	24	Does the entity have any clients which have UBOs which are PEPs?	Please answer 'Yes' or 'No'.

1.2.11	25	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.
1.2.12	26	Does the entity have any clients which have Nominees acting on behalf of a UBO?	Please answer 'Yes' or 'No'.
1.2.13	27	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	28	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	29	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are also PEPs during the reporting period.
1.3.3	30	Number of directors and/or senior management of clients who are High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are also HNWIs during the reporting period.
1.3.4	31	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs during the reporting period.
1.3.5	32	Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs during the reporting period.
1.4.1	33	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	34	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients the entity has, during the reporting period, that are a government or

			Public Sector, broken down by government jurisdiction.
1.4.3	35	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed by clients that are Government or Public Sector, during the reporting period, broken down by government jurisdiction.
1.4.4	36	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	37	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.6	38	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	39	NPO - Number of Transactions.	Enter the number of transactions processed for clients that are NPOs, during the reporting period
1.4.8	40	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	41	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.10	42	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.
1.4.11	43	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.
1.4.12	44	Foundations - Value of Transactions for the reporting period.	Enter the Value of Transactions processed for clients that are Foundations, during the reporting period.
1.4.13	45	Does the entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.14	46	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.

1.4.15	47	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are a Trusts, during the reporting period.
1.4.16	48	Trusts - Value of Transactions for the reporting period.	Enter the Value of Transactions processed for clients that are Trusts, during the reporting period.
1.4.17	49	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.18	50	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.
1.4.19	51	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients that are Segregated Portfolio Companies, during the reporting period.
1.4.20	52	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.
1.4.21	53	Does the entity have any Special Economic Zone clients?	Please answer 'Yes' or 'No'.
1.4.22	54	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.
1.4.23	55	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are Special Economic Zone companies, during the reporting period.
1.4.24	56	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.
1.4.25	57	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.
1.4.26	58	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.



1.4.27	59	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.
1.4.28	60	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	61	Does the entity have any clients that are Natural Persons?	Please answer 'Yes' or 'No'.
1.5.2	62	Natural Persons - Does the entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.
1.5.3	63	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.
1.5.4	64	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.
1.5.5	65	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.
1.5.6	66	Does the entity have any Natural Person clients that are HNWIs?	Please answer 'Yes' or 'No'.
1.5.7	67	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.
1.5.8	68	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.
1.5.9	69	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.
1.5.10	70	Does the entity have any Natural Person clients that are PEPs and HNWIs?	Please answer 'Yes' or 'No'.

1.5.11	71	Number of Natural Persons who are PEPs & HNWIIs, broken down by nationality of the client.	Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and HNWIIs, during the reporting period.
1.5.12	72	Natural Persons - PEPs & HNWIIs - Number of Transactions.	Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWIIs, during the reporting period.
1.5.13	73	Natural Persons - PEPs & HNWIIs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWIIs, during the reporting period.
1.5.14	74	Does the entity have any Natural Person clients that are Ultra HNWIIs?	Please answer 'Yes' or 'No'.
1.5.15	75	Number of Natural Persons who are Ultra HNWIIs, broken down by nationality of the client.	Enter the number of clients the entity has that are Natural Persons and also Ultra HNWIIs, during the reporting period.
1.5.16	76	Natural Persons – Ultra HNWIIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons and also Ultra HNWIIs, during the reporting period.
1.5.17	77	Natural Persons – Ultra HNWIIs - Value of Transactions for the reporting period.	Enter the value of transactions conducted by clients that are Natural Persons and also Ultra HNWIIs, during the reporting period.
1.5.18	78	Does the entity have any Natural Person clients that are PEPs and Ultra HNWIIs?	Please answer 'Yes' or 'No'.
1.5.19	79	Number of Natural Persons who are PEPs & Ultra HNWIIs, 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 HNWIIs, during the reporting period.
1.5.20	80	Natural Persons - PEPs & UHNWIIs - Number of Transactions.	Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and Ultra HNWIIs, during the reporting period.

1.5.21	81	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	82	<p><b>Source of Funds</b></p> <p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> <li>• Banking Institutions (excluding MSBs)</li> <li>• Other Financial Regulated Business*</li> <li>• Financial Leasing</li> <li>• Money Lending</li> <li>• Accountants</li> <li>• Fintech</li> </ul> <p>*excluding MSBs, VASPs, and Trusts, Company Managers, or Corporate Service Providers.</p>	Enter the total number of clients that fall within the list of the sectors.
1.6.2	83	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	84	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).
1.6.4	85	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	86	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.
1.6.6	87	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	88	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.
1.6.8	89	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	90	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.
1.6.10	91	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'.
1.6.11	92	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).
1.6.12	93	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'.
1.6.13	94	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.
1.6.14	95	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> <li>▪ Legal Practitioners</li> <li>▪ Dealers in Precious Metals and Stones</li> <li>▪ Money Service Business (MSBs)</li> <li>▪ Virtual Asset Service Providers (VASPs)</li> <li>▪ High Value Dealers</li> <li>▪ Trusts, Company Managers or Corporate Service Providers</li> <li>▪ Import/Export Industry</li> <li>▪ Shipping and Transport of Goods</li> </ul>	Provide the total number of clients that fall within the list of the sectors.
1.6.15	96	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'.
1.6.16	97	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.
1.6.17	98	Dealers in Precious Metals and Stones - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.6.18	99	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'.
1.6.19	100	Does the entity have any clients that are legal persons operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.6.20	101	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.
1.6.21	102	Does the entity have any clients that are legal persons operating as VASPs, or natural persons employed by VASPs?	Please answer 'Yes' or 'No'.
1.6.22	103	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.
1.6.23	104	Does the entity have any clients that are legal persons operating as High Value Dealers, or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.
1.6.24	105	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.6.25	106	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'.
1.6.26	107	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.
1.6.27	108	Does the entity have any clients that are legal persons operating in the Import/ Export Industry, or natural persons employed by the Import/ Export Industry?	Please answer 'Yes' or 'No'.
1.6.28	109	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.
1.6.29	110	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'.
1.6.30	111	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.
1.6.31	112	Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors: <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Gambling Business</li> <li>▪ Adult Entertainment Industry</li> <li>▪ Defence Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> </ul>	Provide the total number of clients that fall within the list of the sectors.
1.6.32	113	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'.
1.6.33	112	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.
1.6.34	113	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'.

1.6.35	116	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.6.36	117	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	118	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry.
1.6.38	119	Does the entity have any clients that are legal persons operating in the Defence Industry, or natural persons employed by the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.39	120	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.6.40	121	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	122	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.6.42	123	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	124	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.6.44	125	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	126	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry.
1.6.46	127	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	128	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.6.48	129	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	130	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.
1.6.50	131	Does the entity have any clients that are legal persons of Unknown Business, or natural persons	Please answer 'Yes' or 'No'.

		employed in Unknown Professions or Industries?	
1.6.51	132	Unknown Businesses and Professions - Number of Clients.	<p>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.</p> <p>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.</p>
1.6.52	133	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	134	Other - Not mentioned above - Number of Clients.	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.
1.7.1	135	<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"> <li>▪ Banking Institutions (excluding MSBs)</li> <li>▪ Other Financial regulated Business*</li> <li>▪ Financial Leasing</li> <li>▪ Money Lending</li> <li>▪ Legal Practitioners</li> <li>▪ Accountants</li> <li>▪ Fintech</li> </ul> <p>*excluding MSBs, 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	136	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	137	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	138	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	139	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	140	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).
1.7.7	141	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
1.7.8	142	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: ▪ Legal Practitioners	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"> <li>▪ Dealers in Precious Metals and Stone</li> <li>▪ MSBs</li> <li>▪ VASPs</li> <li>▪ High Value Dealers</li> <li>▪ Trusts, Company Managers, or Corporate Service Providers</li> <li>▪ Import/Export Industry</li> <li>▪ Shipping and Transport of Goods</li> </ul>	
1.7.9	143	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.
1.7.10	144	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.
1.7.11	145	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.
1.7.12	146	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.
1.7.13	147	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.
1.7.14	148	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.
1.7.15	149	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.
1.7.16	150	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.
1.7.17	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: <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Gambling Business</li> <li>▪ Adult Entertainment Industry</li> <li>▪ Defence Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> </ul>	Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.
1.7.18	152	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.
1.7.19	153	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	154	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	155	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	156	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	157	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	158	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	159	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	160	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	161	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	162	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	163	Do you have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
1.8.2	164	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	165	Does the entity offer Custodian Services?	Please answer 'Yes' or 'No'.
2.1.2	166	Custodian Services - Number of Clients.	Enter the number of clients that have been offered custodian services by the entity, during the reporting period.
2.1.3	167	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	168	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	169	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	170	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	171	Is the entity an issuer of Private VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.8	172	Issuer Private VA Coins and Tokens - Number of Clients.	Enter the number of clients that were issued Private VA Coins and Tokens by the entity, during the reporting period.

2.1.9	173	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	174	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	175	Is the entity an issuer of Public VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.12	176	Issuer of Public VA Coins and Tokens - Number of Clients.	Enter the number of clients that were issued with Public VA Coins and Tokens by the entity, during the reporting period.
2.1.13	177	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	178	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	179	Is the entity a Dealer of VA Coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.16	180	Dealer of VA - Number of Clients.	Enter the number of clients the entity provided the Dealer of VA Coins and Tokens services to, during the reporting period.
2.1.17	181	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	182	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	183	Is the entity an Operator of a Virtual Asset Platform / Exchange?	Please answer 'Yes' or 'No'.



2.1.20	184	Does the entity allow/use privacy coins/anonymity-enhancing cryptocurrencies on the platform/exchange?	Please answer 'Yes' or 'No'.
2.1.21	185	VA Platform / Exchange - Number of Clients.	Enter the number of clients the entity provided with the services of an operator of a Virtual Asset Platform / Exchange, during the reporting period.
2.1.22	186	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.
2.1.23	187	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.
2.1.24	188	Does the entity service Clients as an Agency Broker for Virtual Assets?	Please answer 'Yes' or 'No'.
2.1.25	189	Agency Broker for VA - Number of Clients.	Enter the number of clients the entity provided the services of an Agency Broker for VA, during the reporting period.
2.1.26	190	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.
2.1.27	191	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.
2.1.28	192	Does the entity provide other investment activities not listed above?	Please answer 'Yes' or 'No'.
2.1.29	193	Other Investment Activities - Number of Clients.	Enter the number of clients to which the entity provided other investment activities not listed above, during the reporting period.

2.1.30	194	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.
2.1.31	195	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.
2.1.32	196	Indicate the types of 'Other Investment Activities'. Name all that apply.	List all other VA investment activities not listed above, which the entity offers.
2.2.1	197	Does the entity conduct batch processing for client transactions?	Please answer 'Yes' or 'No'.
2.2.2	198	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.
2.2.3	199	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.
2.2.4	200	Does the entity engage in Crypto Lending?	Please answer 'Yes' or 'No'.
2.2.5	201	Crypto Lending - Number of Clients.	Enter the number of clients the entity lent Crypto to, during the reporting period.
2.2.6	202	Crypto Lending - Number of Transactions.	Enter the number of transactions conducted, during the reporting period, involving the entity lending Crypto to clients.
2.2.7	203	Crypto Lending - Value of Transactions.	Enter the value of transactions conducted, during the reporting period, relating to the entity lending Crypto to clients.
2.2.8	204	Does the entity operate VA ATMs?	Please answer 'Yes' or 'No'.
2.2.9	205	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.

2.2.10	206	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.
2.2.11	207	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.
2.2.12	208	Does the entity provide Mixers, Tumbler, Blenders, Foggers, or similar products and services to clients?	Please answer 'Yes' or 'No'.
2.2.13	209	Mixer Products and Services - Number of Clients.	Enter the number of clients where mixer products and services are applied.
2.2.14	210	Mixer Products and Services - Number of Transactions.	Enter the number of transactions conducted, during the reporting period, relating to Mixer Products and Services.
2.2.15	211	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.
2.3.1	212	Does the entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	213	Physical Cash - Number of Clients.	Enter the number of clients that processed Physical Cash transactions, during the reporting period.
2.3.3	214	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	215	Physical Cash - Value of Funds Transferred.	Enter the total value of funds transferred in form of Physical Cash during the reporting period.

2.3.9	216	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.10	217	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	218	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions the clients conducted, during the reporting period.
2.3.12	219	Virtual Currencies - Value of Transactions.	Enter the value of funds transferred by clients using Virtual Currencies during the reporting period.
2.3.13	220	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.3.14	221	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	222	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions conducted by clients during the reporting period.
2.3.16	223	Third Parties - Value of Transactions.	Enter the value of funds transferred by clients during the reporting period, using payments via Third Parties.
2.3.17	224	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.3.18	225	Credit Card Payments - Number of Clients	Enter the number of clients made payments via Credit Card during the reporting period.
2.3.19	226	Credit Card Payments - Number of Transactions.	Enter the number of transactions conducted by clients, during the reporting period, using Credit Cards.
2.3.20	227	Credit Card Payments – Value of Transactions.	Enter the value of transactions processed by clients, during the

			reporting period, using Credit Cards.
2.3.21	228	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.3.22	229	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	230	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions conducted by clients, during the reporting period.
2.3.24	231	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.3.29	232	Does the entity facilitate payments with Clients in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.3.30	233	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	234	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	235	Transfer of Securities - Value Transactions.	Enter the value of funds transferred by clients during the reporting period, by way of Transfer of Securities.
2.3.33	236	Does the entity facilitate payments of Clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.3.34	237	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	238	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	239	Other Forms of Payment - Value of Transactions.	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	240	Please indicate the types of Other Forms of Payment.	List the Other Forms of Payment processed by clients during the reporting period, which are not listed above.
2.4.1	241	Total value of all funds received, not only those relating to client funds, broken down by originating country of payment.	Enter the total value of funds received by clients, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country where the funds originated.
2.4.2	242	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds.
2.4.3	243	Total value of all funds transferred out not only those relating to client funds, broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country of payment destination.
2.4.4	244	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of outgoing transactions during the reporting period relating, broken down by destination country of the transaction.
2.5.1	245	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	246	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	247	Total number of Clients - Direct - F2F.	Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period.
3.1.2	248	Total number of Clients - Direct - Non-F2F.	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

			<p>onboarded during the reporting period.</p> <p>Examples of Direct Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have Direct F2F contact with the clients.</p>
3.1.3	249	Total number of clients via Online Platforms.	Provide the total number of clients, in the <u>entity's entire portfolio</u> , that were onboarded via Online platforms, and not only those onboarded during the reporting period.
3.1.4	250	Number of Clients through Referrals within Group - F2F during the reporting period, broken down by the UBOs nationality.	<p>Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the UBOs nationality.</p> <p>An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients.</p>
3.1.5	251	Number of Clients - Direct - Non-F2F, broken down by nationality of the UBO.	<p>Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the UBOs.</p> <p>Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.</p>
3.1.6	252	Total number of Clients onboarded through Eligible Introducers.	<p>Total clients in the entity's entire portfolio that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients' identity.</p> <p>An Eligible Introducer is a person who falls within one of the</p>

			categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
3.1.7	253	Number of Clients onboarding through Eligible Introducers during the reporting period, broken down by nationality of the UBO.	Enter the number of clients which were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the UBO.
3.1.8	254	Number of Clients onboarded through other introducers, and not Eligible Introducers, (Non-F2F), broken down by nationality or country of incorporation of the client.	Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the UBOs.
3.1.9	255	Clients onboarding via Online Platforms during the reporting period, broken down by nationality of the UBO.	Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the UBO.
3.1.11	256	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.
3.1.12	257	Number of Clients via Cold Wallets, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded via Cold Wallets, broken down by nationality or country of incorporation of the client.  Provide the total number of clients, in the entity's entire portfolio, for the reporting period.
3.1.1	258	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	259	To whom has the AML Compliance Officer role been outsourced?	Select one of the following options which best describes the outsource



			<p>relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	260	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	261	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	262	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	263	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>Select one of the following options which best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	264	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	265	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	266	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	267	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	<p>Select one of the following options which best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.11	268	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	269	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	270	Has the entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	271	To whom has the Targeted Financial Sanction screening function been outsourced?	<p>Select one of the following options which best describes the outsource relationship for the screening of Targeted Financial Sanctions:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.</p>
3.2.15	272	What was the outsourcing country of the Targeted Financial Sanction	Enter the country that the entity outsourced the Targeted Financial

		screening function at the end of the reporting period?	Sanction screening function to, during the reporting period.
3.2.16	273	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	274	Has the entity outsourced the function of Transaction Monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	275	To whom has the Transaction Monitoring function been outsourced?	<p>Select one of the following options which best describes the outsource Transaction Monitoring relationship:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.</p>
3.2.19	276	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	277	How many Transaction Monitoring platforms have you had in the reporting period and the previous 2 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	278	Has the entity outsourced the function of Trading platform within the reporting period?	Please answer 'Yes' or 'No'.
3.3.2	279	To whom has the Trading platform function been outsourced?	<p>Select one of the following options which best describes the outsource relationship for the Trading platform:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Trading platform turnover includes one of each within the reporting period.</p>

3.3.3	280	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.
3.3.4	281	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".
3.3.5	282	Has the entity outsourced the function of Liquidity platforms within the reporting period?	Please answer 'Yes' or 'No'.
3.3.6	283	To whom has the Liquidity platform function been outsourced?	Select one of the following options which best describes the outsource relationship for the Liquidity platform: <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> Select "3rd Party and Member within Group", in cases where of the Liquidity platform turnover that includes one of each within the reporting period.
3.3.7	284	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.
3.3.8	285	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".
3.3.9	286	Has the entity outsourced the function of Mixer, Blender, Fogger, or other similar services within the reporting period?	Please answer 'Yes' or 'No'.
3.3.10	287	To whom has Mixer, or similar services, been outsourced?	Select one of the following options which best describes one of the following options which best describes the outsource relationship for the Mixer, Blender, Fogger, or other similar services: <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul>

			Select "3rd Party and Member within Group", in cases where the Mixer services that includes one of each within the reporting period.
3.3.11	288	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.
3.3.12	289	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".
3.3.13	290	Did the entity engage in Margin Trading during the reporting period?	Please answer 'Yes' or 'No'.
3.3.14	291	Number of Margin Trading Transactions	Enter the number of Margin Trading transactions the entity conducted, during the reporting period.
3.3.15	292	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
3.4.1	293	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.4.2	294	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.
3.4.3	295	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.
3.4.4	296	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.
3.4.5	297	In which country is the Parent or Holding Company incorporated?	Enter the country of incorporation for the Parent or Holding Company.
3.4.6	298	Percentage of Controlling Interests in the entity, broken down by	Insert countries where persons or beneficial owners who control the

		country of location of the Controlling Interests.	entity are located, and their percentage of Controlling Interest in the entity.  For publicly listed entities please list beneficial ownership of 10% or more.
3.4.7	299	Does the entity have any licence or registration in another jurisdiction?	Please answer 'Yes' or 'No'.
3.4.8	300	Did the entity receive any penalty or other enforcement action in another jurisdiction(s)?	Please answer 'Yes' or 'No'.
3.4.9	301	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.
3.4.10	302	Does the entity hold a Controlling Interest in another legal person or legal arrangement engaged in Virtual Asset products or services?	Please answer 'Yes' or 'No'.
3.4.11	303	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.
3.5.1	304	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.5.2	305	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	306	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues?	Please answer 'Yes' or 'No'.

1.1.2	307	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	308	What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?	Enter the frequency in number of months.
1.1.4	309	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	310	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	311	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	312	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	313	Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?	Please answer 'Yes' or 'No'.
1.1.9	314	Does the Board / Governing Body ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.1.10	315	Has the entity, or its directors, shareholders, beneficial owners, or senior officers been denied an application by any regulatory body?	Please answer 'Yes' or 'No'.
1.1.11	316	Provide the country of jurisdiction.	Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body.
1.1.12	317	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.

1.1.13	318	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	319	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.2.2	320	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	321	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	322	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	323	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	324	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	325	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	326	Does the AMLCO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.2.9	327	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'.
1.2.10	328	Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures?	Please answer 'Yes' or 'No'.
1.2.11	329	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	330	Does the MLRO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.1	331	Has the entity developed and implemented AML/CFT/CPF and	Please answer 'Yes' or 'No'.



		Sanctions training and awareness programme?	
1.3.2	332	Have the directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	333	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'.
1.3.4	334	Has the MLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	335	Has the DMLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.6	336	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	337	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.3.8	338	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	339	What 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.
1.3.10	340	Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually?	Please answer 'Yes' or 'No'.
1.4.1	341	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.

1.4.2	342	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.3	343	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	344	Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes?	Please answer 'Yes' or 'No'.
1.4.5	345	Has the AML audit function performed an AML/CFT/CPF and Sanctions audit and issued a report for conclusions and recommendations?	Please answer 'Yes' or 'No'.
1.4.6	346	What is the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?	Enter the frequency, in months, of how often an internal AML audit for the AML/CFT/CPF and Sanctions programme is conducted.
1.4.7	347	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	348	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.
1.4.9	349	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	350	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	351	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	352	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	353	Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors?	Please answer 'Yes' or 'No'.
1.5.2	354	Does the entity employ a Risk Based Methodology when assessing	Please answer 'Yes' or 'No'.

		and allocating oversight of its clients?	
1.5.3	355	Does the entity consider the ML/TF/PF risks of the clients, (including UBOs, in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.4	356	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'.
1.5.5	357	Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.6	358	Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.7	359	Does the entity ensure ML/TF/PF business risk assessments are done / updated prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.5.8	360	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	361	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	362	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	363	Does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.
1.5.12	364	Does the entity take their nature, size and complexity into consideration and consider the need for other risk factors, other than those listed above, when developing their business risk assessment?	Please answer 'Yes' or 'No'.

1.5.13	365	How often, in months, do you review High-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.14	366	How often, in months, do you review medium-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.15	367	How often, in months, do you review low-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.6.1	368	Does the entity rely on Group AML/CFT policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	369	If yes, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?	Please answer 'Yes' or 'No'.
1.6.3	370	Has the Board, or governing body, ensured that necessary amendments are made to the entity's policies and procedures for alignment with the requirements in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.4	371	Does the entity have Board, or governing body, approved policies and procedures for Customer Due Diligence measures i.e. customer identification and verification?	Please answer 'Yes' or 'No'.
1.6.5	372	Does the entity have Board, or governing body, approved policies and procedures for identification of high risk customers inc. PEPs?	Please answer 'Yes' or 'No'.
1.6.6	373	Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.6.7	374	Does the entity have Board, or governing body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.

1.6.8	375	Does the entity have Board or governing body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	376	Does the entity have Board or governing body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?	Please answer 'Yes' or 'No'.
1.6.10	377	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	378	Does the entity have procedures for declining, de-risking terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons?	Please answer 'Yes' or 'No'.
1.6.12	379	Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period.	
1.7.1	380	Does the entity have a screening process?	Please answer 'Yes' or 'No'.
1.7.2	381	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	382	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	383	When designated list are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	384	Is sanctions monitoring done in real time or after the event?	Select what applies: 'No process', 'After the event', or 'Real time'.
1.7.6	385	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	386	Are procedures in place to ensure customers / counterparties are	Please answer 'Yes' or 'No'.

		screened prior to payouts (remittance of funds)?	
1.7.8	387	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	388	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'.
1.7.10	389	Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.7.11	390	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.7.12	391	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.7.12	392	Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries surrounding sanctioned jurisdictions are scrutinized to ensure those the unlisted countries are not being used as conduits to evade targeted financial sanctions and proliferation alerts / risks?	Please answer 'Yes' or 'No'.
1.8.1	393	Does the entity have transaction monitoring policies and procedures developed commensurate to its operations?	Please answer 'Yes' or 'No'.

1.8.2	394	Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.3	395	Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.8.4	396	Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs?	Please answer 'Yes' or 'No'.
1.8.5	397	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	398	Does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	399	Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.
1.8.8	400	Enter the total number of Alerts resulting in Suspicious Activity Reports related to ML/TF/PF and Sanctions matters identified during transaction monitoring.	The total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR.
1.9.1	401	Does the entity have Internal Reporting policies and procedures i.e. Identification and Reporting of Suspicious Activities and Transactions to the MLRO?	Please answer 'Yes' or 'No'.
1.9.2	402	Does the entity's policies and procedures identify the MLRO and how to make a filing to them?	Please answer 'Yes' or 'No'.
1.9.3	403	Does the entity have policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.

1.9.4	404	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.
1.9.5	405	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.
1.9.6	406	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.
1.9.7	407	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.
1.9.8	408	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	409	Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	410	Does the entity maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.
1.9.11	411	If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	412	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	413	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	414	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	415	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	416	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.



1.10.6	417	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	418	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.
1.11.2	419	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.
1.11.3	420	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.
1.11.4	421	In total, how many services does the entity outsource from either third parties, or within its group or subsidiaries, during the reporting period?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.11.5	422	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.
1.11.6	423	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.
1.11.7	424	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.
1.11.8	425	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.
1.11.9	426	If relevant, does the outsourced AMLCO/MLRO have access to the entity's board?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.

			This question is only applicable if the entity outsources any activities.
1.11.10	427	If relevant, are there policies and procedures to ensure data protection restrictions would NOT 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.
1.11.11	428	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.  This question is only applicable if the entity outsources any activities.
1.11.12	429	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.
1.11.13	430	Does the entity conduct testing to ensure the outsourced service provider complies with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.  This question is only applicable if the entity outsources any activities.
1.12.1	431	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	432	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.