



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

Document version: 1.0

Revision History:

Effective Date	Version Number	Revision Description
13 September 2022	1.0	Initial release of document

Contents

1	Introduction	4
2	Form Information	4
3	Accessing and Submitting the AML Survey	4
3.1	Access to the AML Survey	4
3.2	Completing the AML Survey Form	10
4	Other Useful Information	10
4.1	User account lockouts	10
4.2	Internet Browser	11
4.3	Data and Security	11
4.4	Applicable Fees	11
5	<i>AML Survey Guidance</i>	12

1 INTRODUCTION

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

FSPs are required to provide this data by completing the AML Survey Form and submit it through the Authority’s web-based e-mail survey software, to the Anti-Money Laundering Division (“AML/D”). The AML Survey Form is issued in accordance with the Authority’s responsibilities under section 6(b)(ii) of the Monetary Authority Act.

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

2 FORM INFORMATION

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

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

3 ACCESSING AND SUBMITTING THE AML SURVEY

3.1 ACCESS TO THE AML SURVEY

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

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

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

To access the AML Survey:

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



Cayman Islands Monetary Authority

In accordance with our duties under section 6(3)(j) 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://amfidentity.cimacconnect.com/UserActivation/SetPassword?SecurityCode=Y&08U86VZVCB66m3m3p3DSoAMpPyQ60Xfqtz0M6rY6d3pT5b3t0c32R2cgg0PQ8r328Uv5b3zHQ43E2F4d2cb3Yasz%2B3bc0E3GtLwMQbY5oP%2Bk8rPURSSVtPSQ6IAshesBaC6cvcZV4KB266HF6r4ThAtaTNSa3IC3aIA53D>

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

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

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

STRIX™ AML is part of the Financial Transparency Solutions product suite. www.ftr.solutions.com

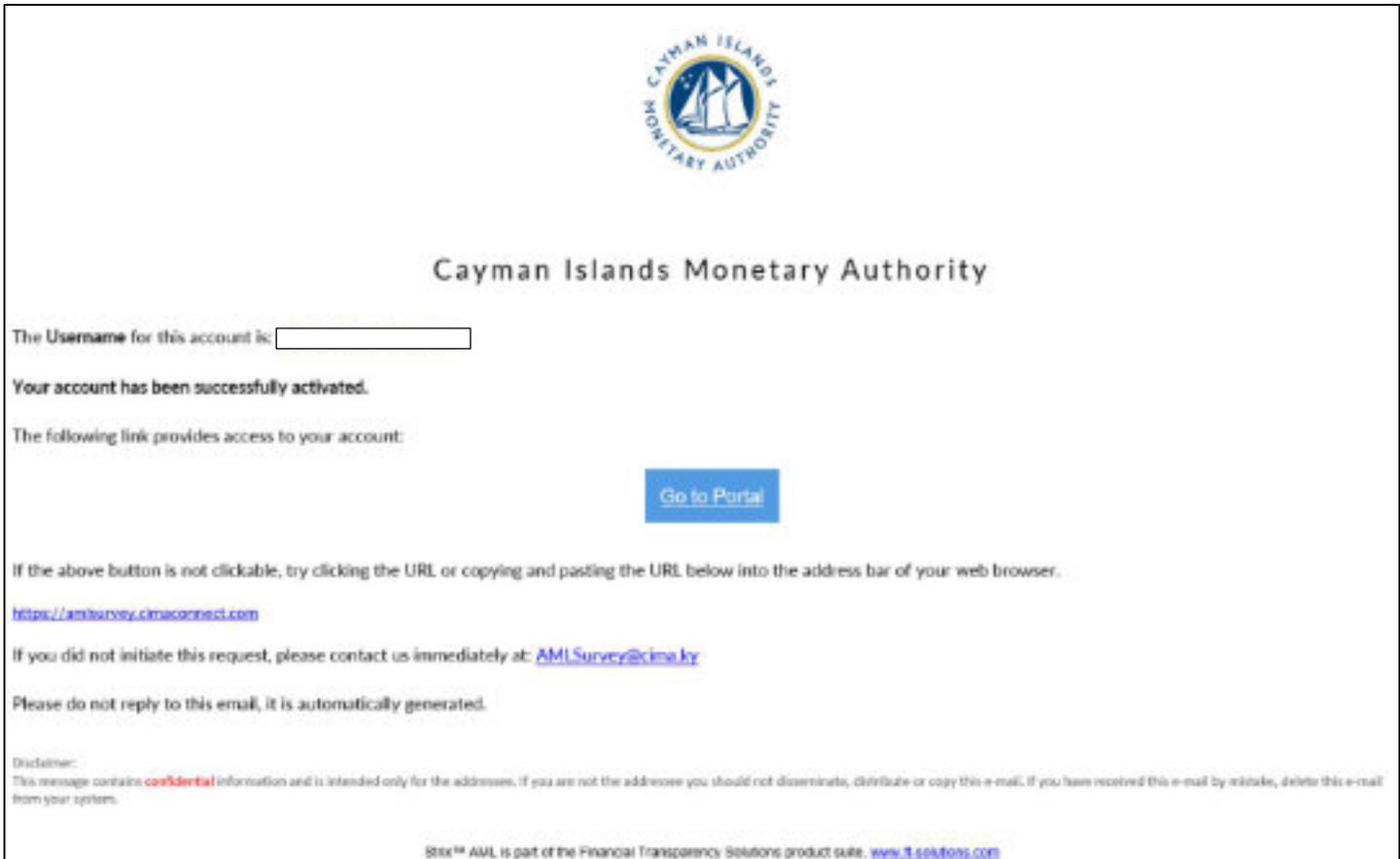
2. The recipient will then be asked to create a password using uppercase, lowercase, number, and a special character. The password is required to be between 8 and 16 characters long.



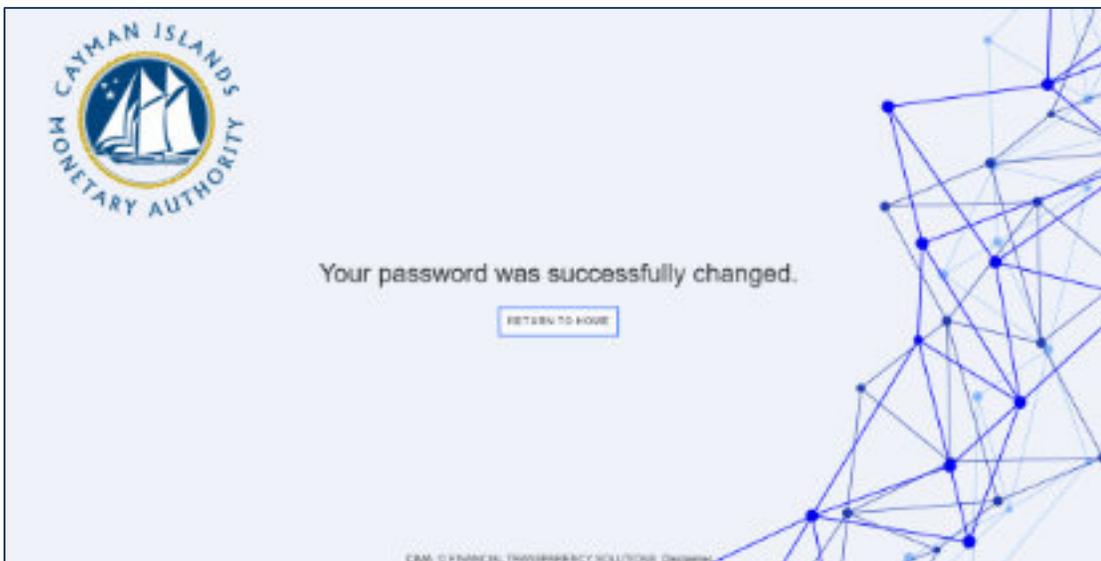
3. The recipient will be asked to re-enter their password.



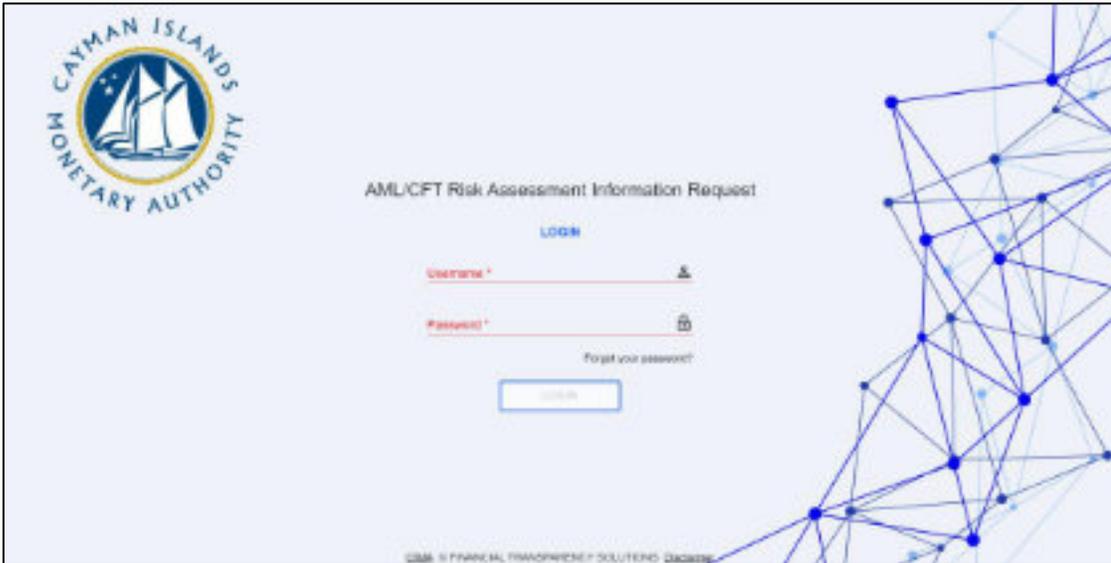
4. Once the recipient’s password has been re-entered, and matches, they can submit and finish the activation process. An email “Notification of Successful Activation” will be sent providing a ‘Go to Portal’ link which can be used for all future access.



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.



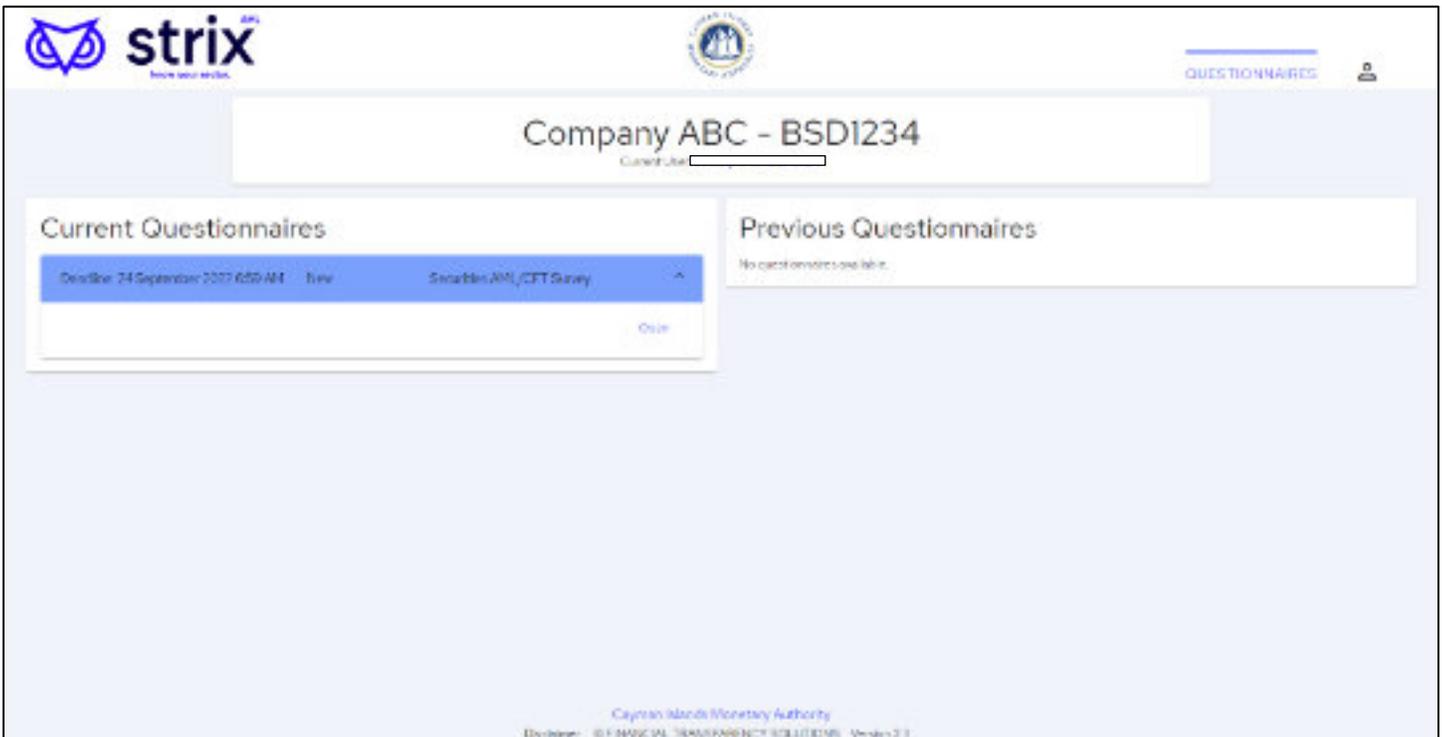
- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email



- 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.
 - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
 - e. Once the AML Survey is 'Submitted' an Excel and PDF copy of the completed survey will be available under 'Current Questionnaire'.
 - f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Survey through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an 'Incomplete' AML Survey, they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLSurveys@cima.ky detailing the following:
 - i. Licence or Registration Name
 - ii. Licenced or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current directors
 - v. Number of Clients
 - vi. Reason for requesting to make an Incomplete Submission.

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

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

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

4.2 INTERNET BROWSER

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

4.3 DATA AND SECURITY

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

4.4 APPLICABLE FEES

There are no fees associated with this Form.

5 AML SURVEY GUIDANCE

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

AML Inherent Risk Factor Descriptions

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

	a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
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 (Revised), except to the extent that it is modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions.
FRA	Financial Reporting Authority.
Gov / Pub Sector	Business conducted in or with Government or Public Sector.
HNWIs	<p>High net worth individuals (HNWI) is:</p> <ul style="list-style-type: none"> (i) an individual whose net worth is at least \$800,000 or its equivalent in any other currency; or (ii) any person that has total assets of not less than \$4,000,000 or its equivalent in any other currency. <p>Under this AML Survey the number of HNWIs will also include those individuals who are also Ultra HNWIs.</p>
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15, 000 or more (or equivalent in any currency) in exchange for goods.
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it's a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
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, foundation 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	Is someone who takes the role of company director, and they act in place of the company in that jurisdiction. The Nominee Director does not have any executive say or authority to run the company or make decisions on behalf of the company.
Nominee Shareholder	A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-face-to-face	Where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP.
Operator	In relation to a virtual asset trading platform, means a person or group of persons that exerts effective control over the activities of a virtual asset trading platform however, in the absence of a single entity or group that exerts effective control over the platform, the operator shall be considered to be the owner of the entity under which the platform operates
Originator	In relation to a transfer of virtual asset, means :

	<ul style="list-style-type: none"> 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 b) where the transfer is carried out by a virtual asset service provider on behalf of a client or other third party, the client or third party who owned the virtual asset immediately before the transfer.
OSP	<p>Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>
PEP	<p>“Politically Exposed Person” includes —</p> <ul style="list-style-type: none"> (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. (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 (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>Politically exposed persons also include:</p> <ul style="list-style-type: none"> (i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership. (ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.
Reporting Period	January 1 to 31 December 2021, and future calendar years thereafter.

Special Economic Zone Business	Means any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands.
SIBA	Securities Investment Business Act (2020 Revision), as amended.
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").
Transfer of virtual asset	Means any transaction carried out on behalf of an originator with a view to making the virtual asset available to a beneficiary
Trust	A trust is a legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
UBO	<p>Ultimate Beneficial Owner - The natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to –</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person.</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement</p>
Ultra 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)		An entity that provides virtual asset service as a business or in the course of business. Virtual service tokens are not virtual assets and a person or legal arrangement that provides services that involve virtual service tokens.
Timeframe	Value of transactions	Value of transactions processed during the reporting period.
Timeframe	Number of Clients	Number of clients during the reporting period.
Timeframe	Number of Transactions	Number of Transactions conducted for the client during the reporting period.
Source of Funds		A client can have multiple sources of funds. As such, a client with multiple sources of funds should be recorded as such and counted on all the sources of funds that was used when forming the business relationship and the ongoing activity with the business relationship. Take this into account when answering questions relating to the 'Nature of Business (Source of Funding)'.

AML Inherent Risk Questions:

Ref No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers.	Enter the total number of clients. This will include all customers on the entity's client list at the end of the reporting period. This number should include all clients the entity provides financial products and services to

			as opposed to accounts e.g., If the same client, individual or legal entity, has two accounts in the same name, then only 1 client should be counted. Do not double count. Total clients consist of natural persons and legal persons and arrangements.
1.1.2	2	Total Transactions for the reporting period.	Enter the total number of all transactions conducted for clients during the reporting period.
1.1.3	3	Total Value of Transactions processed in the reporting period.	Enter the total Value of Transactions processed in the reporting period, for clients reported in question. If an entity does not manage assets for its clients, a '0' value should be used.
1.1.4	4	Clients/customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients the entity have, that are natural persons, broken down by their nationality. If an entity does not have such clients, a '0' value should be used.
1.1.5	5	Clients/customers that are Natural Persons, broken down by Residency of the client.	Enter the number of clients that are natural persons did the entity have, broken down by the clients' residency. If an entity does not have such clients, a '0' value should be used.
1.1.6	6	Total Transactions for the reporting period for all Natural Persons.	Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period.
1.1.7	7	Value of Transactions processed, in the reporting period, for all Natural Persons.	Enter the total Value of Transactions processed for clients that are Natural Persons reported in question as at the end of the reporting period. If an entity does not manage assets for its clients, a '0' value should be used.
1.1.8	8	Clients/customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client.	Enter the total number of clients that are Legal Persons and Arrangements reported in question as at the end of the reporting period. If an entity does not have such clients, a '0' value should be used.
1.1.9	9	Number of Transactions - Legal Persons and Arrangements.	Enter the total number of transactions that were conducted by customers who are legal person and arrangements.

1.1.10	10	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, as at the end of the reporting period.</p> <p>If an entity does not manage assets for these clients, a '0' value should be used.</p>
1.2.1	11	Total number of UBOs by country of nationality of the UBO.	Enter the total number of UBOs of all clients who are legal persons or arrangements, broken down by nationality of the UBO.
1.2.2	12	Does your entity have any clients that have UBOs that are directors of the client?	Answer 'Yes' or 'No'
1.2.3	13	Number of clients which have UBOs that are directors of the client.	Enter the total number of clients which have UBOs that are directors of the client.
1.2.4	14	Does your entity have any clients that have UBOs that are Controllers of the client?	Answer Yes OR No
1.2.5	15	Number of clients which have UBOs that are Controllers of the client.	Enter the total number of clients whose UBOs are controllers of the client.
1.2.6	16	Does your entity have any clients that have UBOs that are also senior managing officials of the client?	Please answer 'Yes' or 'No'.
1.2.7	17	Number of clients which have UBOs that are also senior managing officials of the client.	<p>Enter the total number of clients whose UBOs are also senior managing officials of the client.</p> <p>Senior managers are individuals at the highest level of organizational management who have the day-to-day responsibilities of managing a company or corporation. They hold specific executive powers conferred onto them by board of directors and/or the shareholders.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.8	18	Does your entity have any clients which have UBOs - HNWI's?	Please answer 'Yes' or 'No'.
1.2.9	19	Number of Clients which have UBOs - HNWI's.	Enter the total number of clients who have UBOs that are HNWI's.

1.2.10	20	Does your entity have any clients which have UBOs - Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.2.11	21	Number of Clients which have UBOs - Ultra HNWIs.	Enter the total number of clients who have UBOs that are Ultra HNWIs.
1.2.12	22	Does your entity have any clients which have UBOs which are PEPs?	Please answer 'Yes' or 'No'.
1.2.13	23	Number of UBOs of clients which are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who have UBOs that are PEPs.
1.2.14	24	Does your entity have any clients which have Nominees acting on behalf of a UBO?	Please answer 'Yes' or 'No'.
1.2.15	25	Number of clients which have Nominees acting on behalf of a UBO, broken down by nationality of the client.	Enter the total number of clients which have nominees acting on behalf of UBOs.
1.3.1	26	Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director.	Enter the total number of clients which have nominees appointed on behalf of a director.
1.3.2	27	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are PEPs.
1.3.3	28	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 HNWIs, broken down by nationality of the director / senior management.
1.3.4	29	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals, broken down by nationality of the director / senior management.	Enter the number of directors and/or senior management of the clients who are Ultra HNWIs, broken down by nationality of the director / senior management.
1.3.5	30	Number of directors and/or senior management of clients who are PEPs & High Net Worth	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs, broken down by

		Individuals, broken down by nationality of the director / senior management.	nationality of the director / senior management.
1.4.1	31	Does your entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	32	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients the entity has, as at last date of reporting period, that are a government or public sector, broken down by government jurisdiction.
1.4.3	33	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions conducted by clients that are government or public sector, during the reporting period, broken down by government jurisdiction.
1.4.4	34	Gov / Pub Sector - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are government or public sector.
1.4.5	35	Does your entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.6	36	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are NPOs.
1.4.7	37	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs, during the reporting period
1.4.8	38	NPOs - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are NPOs.
1.4.9	39	Does your entity have any clients that are Other corporate entities - Non-Financial Institutions?	Please answer 'Yes' or 'No'.
1.4.10	40	Other corporate entities - Non-Financial Institutions - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are Non-Financial Institutions.
1.4.11	41	Other corporate entities - Non-Financial Institutions - Number of Transactions.	Enter the number of transactions conducted by clients that are Non-Financial Institutions, during the reporting period.

1.4.12	42	Other corporate entities - Non-Financial Institutions - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of other corporate clients that are Non-Financial Institutions.
1.4.13	43	Does your entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.14	44	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are a Foundation.
1.4.15	45	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.
1.4.16	46	Foundations - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are a Foundation.
1.4.17	47	Does your entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.18	48	Trusts - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are Trusts.
1.4.19	49	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are a Trusts, during the reporting period.
1.4.20	50	Trusts - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are Trusts.
1.4.21	51	Does your entity have any clients that are Special Purpose Vehicles?	Please answer 'Yes' or 'No'.
1.4.22	52	Special Purpose Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are a Special Purpose Vehicle.
1.4.23	53	Special Purpose Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are a Special Purpose Vehicle conduct, during the reporting period.
1.4.24	54	Special Purpose Vehicles - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are a Special Purpose Vehicle.

1.4.25	55	Does your entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.26	56	Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are a Segregated Portfolio Company.
1.4.27	57	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients that are a Segregated Portfolio Company conduct, during the reporting period.
1.4.28	58	Segregated Portfolio Companies - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are a Segregated Portfolio Company.
1.4.29	59	Does your entity have any clients that are from Special Economic Zone?	Please answer 'Yes' or 'No'.
1.4.30	60	Special Economic Zone - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are a Special Economic Zone.
1.4.31	61	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are a Special Economic Zone conduct, during the reporting period.
1.4.32	62	Special Economic Zone - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are a Special Economic Zone.
1.4.33	63	Does your entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.
1.4.34	64	Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients the entity has, as at last date of reporting period, that are Funds / Collective Investment Vehicles.
1.4.35	65	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.36	66	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	67	Does your entity have any clients that are PEPs?	Please answer 'Yes' or 'No'.
1.5.2	68	Number of Natural Persons who are PEPs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are PEPs, broken down by nationality of the client?
1.5.3	69	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are PEPs, during the reporting period?
1.5.4	70	Natural Persons - PEPs - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are Natural Persons, and are PEPs.
1.5.5	71	Does your entity have any Natural Person clients that are HNWI's?	Please answer 'Yes' or 'No'.
1.5.6	72	Number of Natural Persons who are HNWI's, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are HNWI's, broken down by nationality of the client.
1.5.7	73	Natural Persons - HNWI's - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are HNWI's conduct, during the reporting period.
1.5.8	74	Natural Persons - HNWI's - Value of Transactions for the reporting period.	Enter the Value of Transactions processed during the reporting period, of clients that are Natural Persons, and are HNWI's.
1.5.9	75	Does your entity have any Natural Person clients that are PEPs and HNWI's?	Please answer 'Yes' or 'No'.
1.5.10	76	Number of Natural Persons who are PEPs & HNWI's, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are PEPs and HNWI's, broken down by nationality of the client.
1.5.11	77	Natural Persons - PEPs & HNWI's - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are PEPs and HNWI's conduct, during the reporting period.
1.5.12	78	Natural Persons - PEPs & HNWI's - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are Natural Persons, and are PEPs and HNWI's, for the reporting period.

1.5.13	79	Does your entity have any Natural Person clients that are Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.5.14	80	Number of Natural Persons who are Ultra HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are Ultra HNWIs, broken down by nationality of the client.
1.5.15	81	Natural Persons – Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are Ultra HNWIs conduct, during the reporting period.
1.5.16	82	Natural Persons – Ultra HNWIs - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are Natural Persons, and are Ultra HNWIs, for the reporting period.
1.5.17	83	Does your entity have any Natural Person clients that are PEPs and Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.5.18	84	Number of Natural Persons who are PEPs & Ultra HNWIs, broken down by nationality of the client.	Enter the number of clients the entity has, that are Natural Persons, and are PEPs and Ultra HNWIs, broken down by nationality of the client.
1.5.19	85	Natural Persons - PEPs & UHNWIs - Number of Transactions.	Enter the number of transactions conducted by clients that are Natural Persons, and are PEPs and Ultra HNWIs conduct, during the reporting period.
1.5.20	86	Natural Persons - PEPs & UHNWIs - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are Natural Persons, and are PEPs and Ultra HNWIs, for the reporting period.
1.6.1	87	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> • Banking Institutions exc. MSBs • Other Financial regulated Business* • Financial Leasing • Money Lending • Legal Practitioners • Accountants 	Provide the total number of clients which fall within the list of the sectors.

		<ul style="list-style-type: none"> Fintech <p><i>*excluding MSBs, VASP Products and Services Providers, and Trusts, Company Managers, or Corporate Service Providers.</i></p>	
1.6.2	88	Does the entity have any clients that are legal persons that are Banking Institutions exc. MSBs or natural persons that are employed by Banking Institutions exc. MSBs?	Please answer 'Yes' or 'No'.
1.6.3	89	Banking Institutions exc. MSBs - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are banking institutions excluding MSBs, and natural persons that are employed by banking institutions, excluding MSBs, broken down by country of incorporation and nationality, respectively.
1.6.4	90	Does the entity have any clients that are legal persons that are Other Financial Regulated Businesses or natural persons employed by Other Financial Regulated Businesses?	Please answer 'Yes' or 'No'.
1.6.5	91	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Other Financial Regulated Business, and natural persons that are employed by Other Financial Regulated Businesses, broken down by country of incorporation and nationality, respectively.
1.6.6	92	Does the entity have any clients that are legal persons that are Financial Leasing or natural persons employed by Financial Leasing?	Please answer 'Yes' or 'No'.
1.6.7	93	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Financial Leasing companies, and natural persons that are employed by Financial Leasing companies, broken down by country of incorporation and nationality, respectively.
1.6.8	94	Does the entity have any clients that are legal persons that are	Please answer 'Yes' or 'No'.

		Money Lending or natural persons employed by Money Lending?	
1.6.9	95	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Money Lending institutions, and natural persons that are employed by Money Lending institutions, broken down by country of incorporation and nationality, respectively.
1.6.10	96	Does the entity have any clients that are legal persons that are Legal Practitioners or natural persons employed as Legal Practitioners?	Please answer 'Yes' or 'No'.
1.6.11	97	Legal Practitioner - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Legal Practitioners, and natural persons that are employed by Legal Practitioners, broken down by country of incorporation and nationality, respectively.
1.6.12	98	Does the entity have any clients that are legal persons that are Accountants (Audit / Assurance / Bookkeeping / Insolvency) or natural persons employed as Accountants?	Please answer 'Yes' or 'No'.
1.6.13	99	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency), broken down by country of incorporation and nationality, respectively.
1.6.14	100	Does the entity have any legal person clients that are in the Fintech industry or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.15	101	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry, broken down by country of incorporation and nationality, respectively.

1.6.16	102	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> ▪ Money Service Business (MSBs) ▪ VASP products and services providers ▪ High value dealers ▪ Trusts, Company managers or corporate service providers ▪ Import/Export industry <p>Shipping and transport"</p>	Provide the total number of clients
1.6.17	103	Does the entity have any clients that are legal persons that are Money Services Businesses or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.6.18	104	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Money Services Business, and natural persons that are employed in the Money Services Business, broken down by country of incorporation and nationality, respectively.
1.6.19	105	Does the entity have any clients that are legal persons that are VASP Products and Services providers, or natural persons employed by VASP Products and Services providers?	Please answer 'Yes' or 'No'.
1.6.20	106	VASP Products and Services - Number of Clients.	Enter the number of clients the entity has, that are legal persons and offer VASP Products and Services, and natural persons that are employed by institutions which offer VASP Products and Services, broken down by country of incorporation and nationality, respectively.
1.6.21	107	Does the entity have any clients that are legal persons that are High Value Dealers or natural	Please answer 'Yes' or 'No'.

		persons employed by High Value Dealers?	
1.6.22	108	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are High Value Dealers, and natural persons that are employed by High Value Dealers, broken down by country of incorporation and nationality, respectively.
1.6.23	109	Does the entity have any clients that are legal persons that are Trusts, Company Managers, or Corporate Service Providers or natural persons employed by Trusts, Company Managers, or Corporate Service Providers?	Please answer 'Yes' or 'No'.
1.6.24	110	Trusts, Company Managers, or Corporate Service Providers - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Trusts, Company Managers, or Corporate Service Providers, and natural persons that are employed by Trusts, Company Managers, or Corporate Service Providers, broken down by country of incorporation and nationality, respectively.
1.6.25	111	Does the entity have any clients that are legal persons that are in the Import / Export Industry or natural persons employed by the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.26	112	Import / Export - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Import / Export business, or Corporate Service Providers, and natural persons that are employed the Import / Export industry, broken down by country of incorporation and nationality, respectively.
1.6.27	113	Does the entity have any clients that are legal persons that are in the Shipping and Transport of Goods industry, or natural persons employed by the Shipping and Transport of Goods industry?	Please answer 'Yes' or 'No'.
1.6.28	114	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Shipping and Transport of Goods business, or Corporate Service Providers, and natural persons that are employed the

			Shipping and Transport of Goods industry, broken down by country of incorporation and nationality, respectively.
1.6.29	115	<p>Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Dealers in Precious Metals and Stones ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defense Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry <p>Unknown Sector / Industry (not recorded)"</p>	Provide the total number of clients
1.6.30	116	Does the entity have any clients that are legal persons that are Real Estate Agents / Brokers or natural persons employed as Real Estate Agents / Brokers?	Please answer 'Yes' or 'No'.
1.6.31	117	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers, broken down by country of incorporation and nationality, respectively.
1.6.32	118	Does the entity have any clients that are legal persons that are Dealers in Precious Metals and Stones, or natural persons employed as Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'.
1.6.33	119	Dealers in Precious Metals and Stones - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones, broken down by country of incorporation and nationality, respectively.

1.6.34	120	Does the entity have any clients that are legal persons that are in the Gambling business (including online gambling) or natural persons employed by Gambling business?	Please answer 'Yes' or 'No'.
1.6.35	121	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling), broken down by country of incorporation and nationality, respectively.
1.6.36	122	Does the entity have any clients that are legal persons that are in the Adult Entertainment industry or natural persons employed in the Adult Entertainment industry?	Please answer 'Yes' or 'No'.
1.6.37	123	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry, broken down by country of incorporation and nationality, respectively.
1.6.38	124	Does the entity have any clients that are legal persons that are in the Defense Industry or natural persons employed by the Defense Industry?	Please answer 'Yes' or 'No'.
1.6.39	125	Defense Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Defense Industry, and natural persons that are employed in the Defense Industry, broken down by country of incorporation and nationality, respectively.
1.6.40	126	Does the entity have any clients that are legal persons that are in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.41	127	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Oil and Gas Industry, and natural persons that

			are employed in the Oil and Gas Industry, broken down by country of incorporation and nationality, respectively.
1.6.42	128	Does the entity have any clients that are legal persons that are in the Mining Industry or natural persons employed by the Mining Industry?	Please answer 'Yes' or 'No'.
1.6.43	129	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Mining Industry, and natural persons that are employed in the Mining Industry, broken down by country of incorporation and nationality, respectively.
1.6.44	130	Does the entity have any clients that are legal persons that are in the Construction / Development industry or natural persons employed in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.6.45	131	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry, broken down by country of incorporation and nationality, respectively.
1.6.46	132	Does the entity have any clients that are legal persons that are in the Retail & Restaurant Business or natural persons employed in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.47	133	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business, broken down by country of incorporation and nationality, respectively.
1.6.48	134	Does the entity have any clients that are legal persons that are in the Cannabis Production & Distribution industry or natural persons employed in the	Please answer 'Yes' or 'No'.

		Cannabis Production & Distribution industry?	
1.6.49	135	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons and are in Cannabis Production & Distribution Business, and natural persons that are employed in the Cannabis Production & Distribution industry, broken down by country of incorporation and nationality, respectively.
1.6.50	136	Does the entity have any clients that are legal persons of unknown business, or natural persons employed in unknown professions or industries?	Please answer 'Yes' or 'No'.
1.6.51	137	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons of Unknown Business and Profession, and natural persons that are employed in Unknown Businesses and Professions, broken down by country of incorporation and nationality, respectively. Unknown business and profession are where the entity does not know, and was not provided with, and verified, the line of business or profession of the client.
1.6.52	138	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	139	Other - Not mentioned above - Number of Clients, broken down by nationality or country of incorporation of the client.	Enter the number of clients the entity has, that are legal persons and have known business which are however, not mentioned above, and natural persons that are employed in known business which are not mentioned above, broken down by country of incorporation and nationality, respectively.
1.7.1	140	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: ▪ Banking Institutions exc. MSBs	Enter the total Value of Transactions conducted by clients that are legal persons of, and are natural persons employed in, the following sectors: Banking Institutions excluding MSBs; other Financial regulated Business; Financial Leasing; Money Lending; Legal Practitioners; Accountants; and Fintech.

		<ul style="list-style-type: none"> ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Legal Practitioners ▪ Accountants ▪ Fintech <p><i>*excluding MSBs, VASP Products and Services Providers, and Trusts, Company Managers, or Corporate Service Providers."</i></p>	
1.7.2	141	Banking Institutions exc. MSBs -Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are Banking Institutions excluding MSBs, and natural persons that are employed in Banking Institutions excluding MSBs.
1.7.3	142	Other Financial Regulated Business - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are Other Financial Regulated Business not mentioned in this section, and natural persons that are employed in these Other Financial Regulated Business.
1.7.4	143	Financial Leasing - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business.
1.7.5	144	Money Lending- Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Money Lending business, and natural persons that are employed by Money Lending businesses.
1.7.6	145	Legal Practitioner - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.7.7	146	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.7.8	147	Fintech - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in

			the Fintech industry, and natural persons that are employed in the Fintech industry
1.7.9	148	<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"> ▪ MSBs ▪ VASP products and services providers ▪ High value dealers ▪ Trusts, Company managers or corporate service providers ▪ Import/Export industry ▪ Shipping and transport 	Enter the total Value of Transactions conducted by clients that are legal persons of, and are natural persons employed in, the following sectors: MSBs; VASP products and services providers; High value dealers; Trusts, Company managers or corporate service providers; Import/Export industry; Shipping and transport.
1.7.10	149	Money Services Business - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and in the Money Services Business, and natural persons that are employed in the Money Services Business.
1.7.11	150	VASP Products and Services - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are providers of VASP Products and Services, and natural persons that are employed by providers of VASP Products and Services.
1.7.12	151	High Value Dealers - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are High Value Dealers, and natural persons that are employed by High Value Dealers.
1.7.13	152	Trusts, Company Managers and Corporate Service Providers - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and Trusts, Company Managers and Corporate Service Providers, and natural persons that are employed in by Trusts, Company Managers and Corporate Service Providers.
1.7.14	153	Mining Industry - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Import / Export Industry, and natural persons that are employed in the Import / Export Industry.
1.7.15	154	Import / Export - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Shipping and Transport of Goods

			Industry, and natural persons that are employed in the Shipping and Transport of Goods Industry.
1.7.16	155	<p>Please provide the total Value of Transactions for the reporting period, with clients that are legal persons of, or are natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Dealers in Precious Metals and Stones ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Shipping and Transport of Goods ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry ▪ Unknown Sector / Industry (not recorded) 	Enter the total Value of Transactions conducted by clients that are legal persons of, and are natural persons employed in, the following sectors: Real Estate Agents/Brokers; Dealers in Precious Metals and Stones; Gambling Business; Adult Entertainment Industry; Defense Industry; Oil and Gas Industry; Shipping and Transport of Goods; Construction / Development; Retail / Restaurant; Cannabis Industry; Unknown Sector / Industry (not recorded).
1.7.17	156	Real Estate Agents / Brokers - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.7.18	157	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 and are Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.7.19	158	Gambling business (including online gambling) - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.7.20	159	Adult Entertainment - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business.

1.7.21	160	Defense Industry - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Defense Industry, and natural persons that are employed in the Defense Industry.
1.7.22	161	Oil and Gas Industry - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.7.23	162	Shipping and Transport of Goods - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Shipping and Transport of Goods Industry, and natural persons that are employed in the Shipping and Transport of Goods Industry.
1.7.24	163	Construction / Development - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Construction / Development business, and natural persons that are employed in the Construction / Development industry.
1.7.25	164	Retail & Restaurant Business - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.7.26	165	Cannabis Production & Distribution - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and are in the Cannabis Production & Distribution business, and natural persons that are employed in the Cannabis Production & Distribution business.
1.7.27	166	Industry / profession is not known or not recorded - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons and their Industry / profession is not known or not recorded, and natural persons that are employed in an Industry / profession not known or not recorded.
1.7.28	167	Other - Not listed above - Value of Transactions for the reporting period.	Enter the Value of Transactions conducted by clients that are legal persons, and their business/industry/profession is known, but is not listed above, and natural persons that are employed in known business/industry/profession, which are, however, not listed above.

1.8.1	168	Do you have any comments or feedback for this tab?	Please save the work.
1.8.2	169	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	170	Does the entity offer custodian services?	Please answer 'Yes' or 'No'.
2.1.2	171	Custodian Services - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients that have been offered custodian services by the entity, as at the end of the reporting period, broken down by country of incorporation or nationality of the client.
2.1.3	172	Custodian Services - Number of Transactions	Enter the number of transactions, the entity conducted for clients it offers custodian services, during the reporting period.
2.1.4	173	Custodian - Value of Fiat Assets Under Management.	Enter the Value of Fiat Assets Under Management of clients offered custodian services, as at the end of the reporting period.
2.1.5	174	Custodian - Value of securities Under Management.	Enter the Value of Securities Under Management, of clients offered custodian services, as at the end of the reporting period.
2.1.6	175	Custodian - Value of Virtual Assets Under Management.	Enter the Value of Virtual Assets Under Management, of clients offered custodian services, as at the end of the reporting period.
2.1.7	176	Is the entity an issuer of Private VA coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.8	177	Issuer Private VA Coins and Tokens - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients that were issued with Private VA coins and Tokens by the entity, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.9	178	Issuer of Private VA and Tokens - Number of Transactions?	Enter the number of transactions the entity conducted, relating to issuance of Private VA and Tokens, during the reporting period.
2.1.10	179	Issuers of Private VA and Tokens - Gross Value of AUM.	Enter the Gross Value of Assets Under Management, of Private VA and Tokens issued during the reporting period.

2.1.11	180	Is the entity an issuer of Public VA coins and Tokens?	Please answer 'Yes' or 'No'.
2.1.12	181	Issuer of VA and Tokens - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients that were issued with Public VA coins and Tokens by the entity, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.13	182	Issuer of Public VA and Tokens - Number of Transactions?	Enter the number of transactions the entity conducted, relating to issuance of Public VA and Tokens, during the reporting period.
2.1.14	183	Issuers of Public VA and Tokens - Gross Value of AUM?	Enter the Gross Value of Assets Under Management, of Public VA and Tokens issued by the entity during the reporting period.
2.1.15	184	Is the entity a Dealer of VA and Tokens?	Please answer 'Yes' or 'No'.
2.1.16	185	Dealer of VA - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity provided the Dealer of VA and Tokens services during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.17	186	Dealer of VA - Number of Transactions.	Enter the number of transactions in which the entity provided the Dealer of VA and Tokens services, during the reporting period.
2.1.18	187	Dealer of VA - Value of Transactions.	Enter the Value of Transactions relating to the service rendered by the entity as a Dealer of VA and Tokens, during the reporting period.
2.1.19	188	Is the entity an Operator of a Virtual Asset Platform / Exchange?	Please answer 'Yes' or 'No'.
2.1.20	189	VA Platform / Exchange - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity provided the service of an Operator of a Virtual Asset Platform / Exchange, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.21	190	VA Platform / Exchange - Number of Transactions.	Enter the number of transactions in which the entity provided the service of an Operator of a Virtual Asset Platform / Exchange, during the reporting period.

2.1.22	191	VA Platform / Exchange - Total Value of Transactions.	Enter the Total Value of Transactions relating to the service rendered by the entity as an Operator of a Virtual Asset Platform / Exchange, during the reporting period.
2.1.23	192	Does the entity service Clients as an Agency Broker for Virtual Assets?	Please answer 'Yes' or 'No'.
2.1.24	193	Agency Broker for VA - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity provided the service of an Agency Broker for VA, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.25	194	Agency Brokers for VA - Number of Transactions.	Enter the number of transactions in which the entity provided the service of an Agency Broker for VA, during the reporting period.
2.1.26	195	Agency Broker for VA - Value of Transactions.	Enter the Total Value of Transactions relating to the service rendered by the entity as an Agency Broker for VA, during the reporting period.
2.1.27	196	Does the entity provide other investment activities not listed above?	Please answer 'Yes' or 'No'.
2.1.28	197	Other Investment Activities - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity provided other investment activities not listed above, during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.29	198	Other Investment Activity VA - Number of Transactions.	Enter the number of transactions conducted during the reporting period, relating to other investment activities the entity provided, which are not listed above.
2.1.30	199	Other Investment Activity- VA - Value of Transactions.	Enter the Total Value of Transactions relating to other VA investment activities not listed above, which the entity provided during the reporting period.
2.1.31	200	Indicate the types of 'Other' Investment Activity, name all that apply.	List all other VA investment activities not listed above, which the entity offers

2.1.32	201	Does the entity conduct batch processing for client transactions?	Please answer 'Yes' or 'No'.
2.1.33	202	Batch Processing - Average Number of Clients processed within a week	Enter the average number of clients processed by the entity each week, in the batch processing of their transactions.
2.1.34	203	Batch Processing - Average Value of Transactions processed within a week.	Enter the Average Value of Transactions processed within a week, using the batch processing of transactions method.
2.1.35	204	Does the entity engage in Crypto Lending?	Please answer 'Yes' or 'No'.
2.1.36	205	Crypto Lending - Number of Clients, broken down by country of incorporation or nationality of the client.	Enter the number of clients the entity lent Crypto during the reporting period, broken down by country of incorporation or nationality of the client.
2.1.37	206	Crypto Lending - Number of Transactions.	Enter the number of transactions conducted during the reporting period, involving the entity lending Crypto to the client.
2.1.38	207	Crypto Lending - Value of Transactions.	Enter the Value of Transactions conducted during the reporting period, relating to the entity lending Crypto to clients.
2.1.39	208	Does the entity operate VA ATMs?	Please answer 'Yes' or 'No'.
2.1.40	209	Number of VA ATMs, broken down by country of ATM location.	Enter the number of VA Automated Teller Machines (ATMs) the entity has, broken down by country of location of the ATM.
2.1.41	210	VA ATM Operator - Number of Transactions, broken down by the country of the ATM.	Enter the number of transactions conducted at the VA Automated Teller Machines (ATMs) during the reporting period, broken down by country of location of the ATM.
2.1.42	211	VA ATM Operator - Value of Transactions, broken down by country of VA ATM.	Enter the Value of Transactions conducted on the VA Automated Teller Machines (ATMs) during the reporting period, broken down by country of location of the ATM.
2.1.43	212	Does the entity provide Mixers, Tumbler, Blenders, Foggers, or similar products and services to clients?	Please answer 'Yes' or 'No'.
2.1.44	213	Mixer Products and Services - Number of Clients, broken	Enter the number of clients provided the Mixer Products and Services by the entity,

		down by country of incorporation or nationality of the client.	broken down by country of incorporation or nationality of the client.
2.1.45	214	Mixer Products and Services - Number of Transactions.	Enter the number of transactions conducted during the reporting period, relating to Mixer Products and Services.
2.1.46	215	Mixer Products and Services - Value of Transactions.	Enter the total value of the transactions conducted during the reporting period, relating to Mixer Products and Services.
2.2.1	216	Number of Transactions by the Originator for the reporting period, broken down by the transaction destination country.	Enter the Number of Transactions conducted during the reporting period, where the Originator of the transaction was the entity's client.
2.2.2	217	Total value of transactions by the Originator, above the reporting threshold, for the reporting period, broken down by the transaction destination country.	Enter the total value of transactions conducted during the reporting period, where the originator of the transaction was the entity's client and amount transferred was above the reporting threshold of US\$1,000
2.2.3	218	Number of transfers above threshold as a VASP Beneficiary, broken down by Country of origin.	Number of transfers above the threshold (US\$1,000) received by the entity, where it was the Beneficiary, broken down by Country of origin.
2.2.4	219	Total value of transfers as a VASP Beneficiary, above the reporting threshold, for the reporting period, broken down by the transaction destination country.	Enter the total value of transfers received by the entity, where the client was the Beneficiary above the threshold and amount transferred was above the reporting threshold of US\$1000, 00.
2.2.5	220	Number of transactions not executed due to incomplete CDD.	Enter the number of transactions the entity did not execute during the reporting period, due to incomplete CDD.
2.3.1	221	Does the entity facilitate payments of Clients in the form of Physical Cash?	Enter the number of clients which made payments in the form of Physical Cash during the reporting period.
2.3.2	222	Physical Cash - Number of Clients.	Enter the number of Physical Cash transactions conducted by clients during the reporting period.
2.3.3	223	Physical Cash - Number of Transactions.	Enter the value of the 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	224	Physical Cash - Value of Funds Transferred.	Enter the total value of funds transferred in form of physical cash during the reporting period.
2.3.5	225	Does the entity facilitate payments of Clients in the form of Travellers Cheques?	Please answer 'Yes' or 'No'.
2.3.6	226	Travellers Cheques - Number of Clients.	Enter the number of clients which made payments in the form of Travellers Cheques, during the reporting period.
2.3.7	227	Travellers Cheques - Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, using Travellers Cheques.
2.3.8	228	Travellers Cheques - Value of Funds Transferred.	Enter the value of the funds transferred by clients during the reporting period, using Travellers Cheques.
2.3.9	229	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.10	230	Virtual Currency - Number of Clients.	Enter the number of clients which had payments in the form of Virtual Currency during the reporting period.
2.3.11	231	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions the clients conducted, during the reporting period.
2.3.12	232	Virtual Currencies - Value of Funds Transferred.	Enter the value of funds transferred by clients using Virtual Currencies during the reporting period.
2.3.13	233	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.3.14	234	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	235	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions conducted by clients during the reporting period.

2.3.16	236	Third Parties - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, using payments via Third Parties.
2.3.17	237	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.3.18	238	Credit Card Payments - Number of Clients	Enter the number of clients made payments via Credit Card during the reporting period.
2.3.19	239	Credit Card Payments - Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, using Credit Card transactions.
2.3.20	240	Credit Card Payments - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, using Credit Cards.
2.3.21	241	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.3.22	242	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	243	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions conducted by clients, during the reporting period.
2.3.24	244	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.3.25	245	Does the entity facilitate payments of Clients in the form of Internal Bank Transfer?	Please answer 'Yes' or 'No'.
2.3.26	246	Internal Bank Transfer - Number of Clients.	Enter the number of clients which conducted Internal Bank Transfers, during the reporting period.
2.3.27	247	Internal Bank Transfer - Number of Transactions.	Enter the number of Internal Bank Transfer transactions conducted by clients, during the reporting period.
2.3.28	248	Internal Bank Transfer - Value of Funds Transferred.	Enter the value of the Internal Bank Transfer transactions conducted by clients during the reporting period.
2.3.29	249	Does the entity facilitate payments with Clients in the form of Transfer of securities?	Please answer 'Yes' or 'No'.

2.3.30	250	Transfer of Securities - Number of Clients.	Enter the number of clients which made payments in the form of transfers of securities, during the reporting period.
2.3.31	251	Transfer of Securities - Number of Transactions.	Enter the number of transactions made by clients during the reporting period, in the form of transfers of securities.
2.3.32	252	Transfer of securities - Value of Funds Transferred.	Enter the value of funds transferred by clients during the reporting period, by way of transfers of securities.
2.3.33	253	Does the entity facilitate payments of Clients in other forms not noted listed above?	Please answer 'Yes' or 'No'.
2.3.34	254	Other Payment Forms - 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	255	Other Payment Forms - 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	256	Other Payment Forms - Value of Funds Transferred.	Enter the value of funds that were transferred by clients during the reporting period, using other forms of payments not listed above.
2.3.37	257	Please indicate the types of other forms of payments.	List the other types of forms of payment conducted by clients during the reporting period, which are not listed above.
2.4.1		Total value of funds received, broken down by nationality or country of incorporation of the client.	<p>Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by nationality or country of incorporation of the client.</p> <p>These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.</p>
2.4.2	258	Total value of funds received, broken down by originating country of payment.	<p>Enter the total value of funds received by clients, or on behalf of clients during the reporting period, broken down by originating country of payment.</p> <p>These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.</p>

2.4.3	259	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of transactions received during the reporting period, relating to funds received by clients, or on their behalf, broken down by country of origin of the funds. These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.
2.4.4		Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by nationality or country of incorporation of the client.	Enter the total value of funds transferred out (remitted to clients or on behalf of clients) of the jurisdiction by clients, broken down by nationality or country of incorporation of the client.
2.4.5	260	Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination.	Enter the total value of funds transferred out (remitted to clients or on behalf of clients) of the jurisdiction by clients, broken down by the country of payment destination.
2.4.6	261	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of transactions transferred out during the reporting period, relating to funds transferred out by clients, or on their behalf, broken down by destination country of the transaction.
2.5.1	262	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	263	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	264	Number of Clients - Direct - F2F, broken down by nationality or country of incorporation of the clients.	Enter the number of clients which were onboarded during the reporting period, using Direct - F2F, broken down by nationality or country of incorporation of the client.
3.1.2	265	Number of Clients - Direct - Non-F2F, broken down by nationality or country of incorporation of the clients.	Enter the number of clients which were onboarded during the reporting period, using Direct Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.3	266	Number of Clients through Referrals within Group - F2F, broken down by nationality or country of incorporation of the clients.	Enter the number of clients which were onboarded during the reporting period, using referrals within Group - F2F, broken down by nationality or country of incorporation of the client.

3.1.4	267	Number of Clients through Referrals within Group - Non F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, using referrals within Group Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.5	268	Number of Clients through Eligible Introducers - F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, through Eligible Introducers - F2F, broken down by nationality or country of incorporation of the client, during the reporting period. Eligible Introducers – F2F is for instances when the entity would have face-to-face introduction or interaction with the client during the business relationship.
3.1.6	269	Number of Clients through Eligible Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, through Eligible Introducers Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.7	270	Number of Clients through Other Introducers - F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, through Other Introducers - F2F, broken down by nationality or country of incorporation of the client.
3.1.8	271	Number of Clients through Other Introducers Non-F2F, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded through Other Introducers Non - F2F, broken down by nationality or country of incorporation of the client.
3.1.9	272	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.
3.1.10	273	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.
3.1.11	274	Clients via Online Platforms, broken down by nationality or country of incorporation of the client.	Enter the number of clients which were onboarded during the reporting period, via Online Platforms, broken down by nationality or country of incorporation of the client.
3.1.12		-	

3.2.1	275	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	276	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Compliance Officer turnover that includes one of each within the reporting period.</p>
3.2.3	277	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	278	How many AML Compliance Officers have you had in the reporting period and the previous 2 years?	If no turnover of the Compliance Officer role in the three-year period, answer "1".
3.2.5	279	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	280	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Money Laundering Reporting Officer turnover that includes one of each within the reporting period.</p>
3.2.7	281	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	282	How many Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years?	If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	283	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	284	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Deputy Money Laundering Reporting Officer turnover that includes one of each within the reporting period.</p>
3.2.11	285	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	286	How many Deputy Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	287	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	288	To whom has the Targeted Financial Sanction screening function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the screening of targeted financial sanctions:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the screening of targeted financial</p>

			sanctions turnover that includes one of each within the reporting period.
3.2.15	289	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.16	290	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	291	Has the entity outsourced the function of transaction monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	292	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship transaction monitoring:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of transaction monitoring services turnover that includes one of each within the reporting period.</p>
3.2.19	293	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	294	How many Transaction monitoring platforms have you had in the reporting period and the previous 2 years?	If no turnover of the transaction monitoring platform in the three-year period, answer "1".
3.2.21	295	Has the entity outsourced the function of trading platform within the reporting period?	Please answer 'Yes' or 'No'.
3.2.22	296	To whom has the trading platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the trading platform:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party

			Select "3rd Party and Member within Group", in a case of the trading platform turnover that includes one of each within the reporting period.
3.2.23	297	What was the outsourcing country of the trading platform function at the end of the reporting period?	Enter the country the entity outsourced the trading platform function to, at the end of the reporting period.
3.2.24	298	How many Trading platforms have you had in the reporting period and the previous 2 years?	If no turnover of the trading platform function in the three-year period, answer "1".
3.2.25	299	Has the entity outsourced the function of liquidity platforms within the reporting period?	Please answer 'Yes' or 'No'.
3.2.26	300	To whom has the liquidity platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Liquidity Platform:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Liquidity Platform turnover that includes one of each within the reporting period.</p>
3.2.27	301	What was the outsourcing country of the liquidity platform function at the end of the reporting period?	Enter the country the entity outsourced the liquidity platform function to, at the end of the reporting period.
3.2.28	302	How many Liquidity platforms have you had in the reporting period and the previous 2 years?	If no turnover of the liquidity platform function in the three-year period, answer "1".
3.2.29	303	Has the entity outsourced the function of Mixer, Blender, Fogger, or other similar services within the reporting period?	Please answer 'Yes' or 'No'.
3.2.30	304	To whom has Mixer, or similar services, been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the Mixer, Blender, Fogger, or other similar services:

			<ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the Liquidity Platform turnover that includes one of each within the reporting period.</p>
3.2.31	305	What was the outsourcing country of the Mixer Services function at the end of the reporting period?	Enter the country the entity outsourced the Mixer, Blender, Fogger, or other similar services to, at the end of the reporting period.
3.2.32	306	How many Mixer Service Providers have you transacted with in the reporting period and the previous 2 years?	If no turnover of the Mixer, Blender, Fogger, or other similar services in the three-year period, answer "1".
3.2.33	307	Did the entity engage in Margin Trading During the reporting period?	Please answer 'Yes' or 'No'.
3.2.34	308	Number of Margin Trading Transactions	Enter the number of Margin Trading Transactions the entity conducted during the reporting period.
3.2.35	309	Value of fund Borrowed by the entity for Margin Trading, broken down by borrowing country	Enter the Value of fund Borrowed by the entity during the reporting period, for Margin Trading transactions, broken down by borrowing country
3.3.1	310	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.3.2	311	In which countries by percentage of equity ownership are all shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Insert countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.3	312	Number of branches by location, broken down by country of operation.	Enter the number of branches the entity has, broken down by country of operation.
3.3.4	313	Number of Subsidiaries by location, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.

3.3.5	314	In which country is the parent or holding company incorporated?	Enter the country the parent or holding company is incorporated.
3.3.6	315	Percentage of controlling interest of the entity by country of the controlling interest.	Insert countries where persons or beneficial owners who control the entity are located, and their percentage of controlling interest of the entity. For publicly listed entities please list beneficial ownership of 10% or more.
3.3.7	316	Does the entity have any licence or registration in another jurisdiction?	Please answer 'Yes' or 'No'.
3.3.8	317	Did the entity receive penalties or other enforcement action in another jurisdiction?	Please answer 'Yes' or 'No'.
3.3.9	318	List the jurisdictions(s) which enforcement action was taken. If none, use '0' to indicate none.	Enter the name(s) of the jurisdictions(s) which enforcement action was taken. If none, use '0' to indicate none.
3.3.10	319	Does the entity hold a controlling interest in another legal arrangement engaged in Virtual Asset products or services?	Please answer 'Yes' or 'No'.
3.3.11	320	List the jurisdiction(s) where the entity holds a controlling interest in another legal entity or arrangement engaged in virtual asset services.	Enter the name(s) of the jurisdictions(s) which the entity holds a controlling interest in another legal entity or arrangement engaged in virtual asset services If none, use '0' to indicate none.
3.4.1	321	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	322	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	323	The total number of Directors / Members of the Governing Body.	Enter the total number of Directors / Members of the Governing Body of the institution.
1.1.2	324	Indicate the number that are Independent Directors / Non-Executive Directors.	<p>Enter the number of Directors/Members of the Governing Body that are Independent Directors/Non-Executive Directors.</p> <p>An Independent Directors/Non-Executive Directors is an individual who is a director (member) of the board of directors who does not have a material or pecuniary relationship with the company or related persons and provides independent oversight and constructive challenge to the executive directors.</p>
1.1.3	325	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.4	326	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.5	327	Does the approved Charter include the roles and responsibilities of the Directors/General Partners/Managers?	Please answer 'Yes' or 'No'.
1.1.6	328	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	329	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues?	Please answer 'Yes' or 'No'.
1.1.8	330	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.

1.1.9	331	Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?	Please answer 'Yes' or 'No'.
1.1.10	332	When was the last Board/Principal and/or Board committee meeting held which discussed AML/CFT/CPF, including regulatory audit findings?	Enter the date of the last Board/Principal and/or Board committee meeting, which discussed AML/CFT/CPF, including regulatory audit findings, was held.
1.1.11	333	Has the entity, or its directors, shareholders, beneficial owners, or senior officers been denied an application by any regulatory body?	Please answer 'Yes' or 'No'.
1.1.12	334	Provide the country of jurisdiction.	Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body.
1.1.13	335	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.2.1	336	Is there regular reporting of AML/CFT/PF matters by Senior Management to the board?	Please answer 'Yes' or 'No'.
1.2.2	337	When was the last report of AML/CFT/PF matters to Senior Management to the board made?	Enter the date when the last report relating to AML/CFT/PF matters was made by Senior Management to the board.
1.2.3	338	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.2.4	339	When was the last review of the AML/CFT/PF policy and procedures?	Enter the date of the last review of the AML/CFT/PF policy and procedures.
1.2.5	340	Does Senior Management ensure that recommendations made by the internal and external auditors and regulators to address	Please answer 'Yes' or 'No'.

		AML/CFT/CPF findings are acted upon in a timely manner?	
1.2.6	341	Does Senior Management ensure that relevant, adequate, and timely information regarding AML/CFT/CPF matters is provided to the Board?	Please answer 'Yes' or 'No'.
1.2.7	342	Does Senior Management ensure that ML/TF/PF business risk assessments are done prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.2.8	343	How many risk assessments relating to new products/services/delivery channels/technologies did you carry out during the period under review?	Enter the total number of risk assessments relating to new products/services/delivery channels/technologies that were carried out during the period under review.
1.2.9	344	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.10	345	How many trainings did the AMLCO/MLRO attend for the reporting period?	Enter the total number of trainings the AMLCO/MLRO attended during the reporting period.
1.3.1	346	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.3.3	347	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.3.5	348	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.3.7	349	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.3.8	350	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.9	351	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.

1.3.10	352	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.3.11	353	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.3.12	354	Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.13	355	Has the MLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.14	356	Has the DMLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.15	357	Does the AMLCO report to the Board and Senior Management on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.16	358	Does the MLRO report to the Board and Senior Management on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.17	359	Does the DMLRO report to the Board and Senior Management on AML/CFT/CPF related issues?	Please answer 'Yes' or 'No'.
1.3.18	360	Does the AMLCO provide oversight of risk assessment procedures?	Please answer 'Yes' or 'No'.
1.3.19	361	Does the AMLCO conduct AML/CFT/CPF training for all	Please answer 'Yes' or 'No'.

		Directors and relevant staff of the entity?	
1.3.20	362	How many internal trainings did the AMLCO conduct during the period under review?	Enter the number of internal trainings that were conducted by the AMLCO during the reporting period.
1.3.21	363	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.22	364	Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF compliance breaches?	Please answer 'Yes' or 'No'.
1.3.23	365	How many sample testing and reviews of exception reports did the AMLCO do during the period under review?	Enter the number of sample testing and reviews of exception reports that were conducted by the AMLCO, during the period under review.
1.3.24	366	Does the AMLCO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.25	367	What percentage of time does the AMLCO spend on additional functions?	Enter the percentage of time the AMLCO spends on additional functions outside of the compliance function.
1.3.26	368	Does the MLRO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.27	369	What percentage of time does the MLRO spend on additional functions?	Enter the percentage of time the MLRO spends on additional functions outside of reviewing internal SARs, investigating SARs and filing SARs to the FRA.
1.3.28	370	Does the DMLRO fulfill any other role or job function?	Please answer 'Yes' or 'No'.
1.3.29	371	What percentage of time does the DMLRO spend on additional functions?	Enter the percentage of time the DMLRO spends on additional functions outside of reviewing internal SARs, investigating SARs and filing SARs to the FRA.
1.4.1	372	Does the entity have an internal audit department / unit with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	373	Is there an Internal AML Audit Charter/Plan?	Please answer 'Yes' or 'No'.

1.4.3	374	Is the AML compliance plan or charter reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.4	375	Is the internal AML audit function outsourced?	Please answer 'Yes' or 'No'.
1.4.5	376	Who is the internal AML audit function outsourced to?	Enter the name of the OSP which the entity outsourced internal AML audit function to.
1.4.6	377	Does the internal AML auditor perform regular reviews of the AML/CFT/CPF-related policies, procedures and processes?	Please answer 'Yes' or 'No'.
1.4.7	378	Has the internal AML auditor performed a AML/CFT/CPF audit?	Please answer 'Yes' or 'No'.
1.4.8	379	Enter the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?	Enter the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme.
1.4.9	380	When was the last AML/CFT audit conducted by Internal Audit?	Enter the date of last Internal AML Audit.
1.4.10	381	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.11	382	Enter the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, in months, of the Board review of the AML audit program.
1.5.1	383	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.5.2	384	Is AML/CFT/CPF training provided to Directors and all relevant staff?	Please answer 'Yes' or 'No'.
1.5.3	385	How many AML/CFT/CPF training sessions in total were conducted for the Directors and relevant staff within the reporting period?	Enter the total number of AML/CFT/CPF training sessions conducted for the Directors and relevant staff during the reporting period.
1.5.4	386	Who facilitates the training? Please name the trainer and their role.	Enter the name of who facilitated the training, such as the name of the

			company and name of individual who provided the training.
1.5.5	387	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.5.6	388	Does the entity assess AML knowledge of its employees?	Please answer 'Yes' or 'No'.
1.5.7	389	Please indicate percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the company during the reporting period.	Enter the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the entity during the reporting period.
1.6.1	390	How many years after the end of the business relationship are records retained?	Enter the number of years records are retained after the end of the business relationship.
1.6.2	391	Are any records NOT retained or accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.3	392	In which countries does the entity retain its records?	Enter the name of jurisdiction(s) where the entity's records are retained.
1.6.4	393	How accessible and swiftly available are records for competent authorities/law enforcement - in hours?	Enter the time, in hours, of how long it takes for the entity to provide records upon request from competent authorities/law enforcement agencies.
1.7.1	394	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.7.2	395	How many clients were rated high risk?	Enter the number of clients that were rated 'high' risk.
1.7.3	396	How many clients were rated between low and high risk?	Enter the number of clients that were rated between 'low' and 'high' risk, i.e., medium risk.
1.7.4	397	How many clients were rated low risk?	Enter the number of clients that were rated 'low' risk.
1.7.5	398	How frequent is the Risk Assessment reviewed, and / or revised or updated by the entity during the year?	Enter the number of times the entity reviewed, and / or revised or updated the Risk Assessment during the year.

1.7.6	399	What was the date of the last review?	Enter the date of the last review of the Risk Assessment.
1.7.7	400	Does the entity consider the ML/TF/PF risks of the clients (including UBOs) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.8	401	Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.9	402	Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.10	403	Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.11	404	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.12	405	How often, in months, do you review High-Risk relationships/accounts?	Enter how often, in months, does the entity review 'high' risk relationships/accounts.
1.7.13	406	How many high-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'high' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.14	407	How often, in months, do you review medium-Risk relationships/accounts?	Enter the number of months between reviews, the entity takes to review medium-risk relationships/accounts.
1.7.15	408	How many medium-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'medium' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.16	409	How often, in months, do you review low-Risk relationships/accounts?	Enter the number of months between reviews, the entity takes to review 'low' risk relationships/accounts.

1.7.17	410	How many low-risk business relationships or client accounts did you review during the reporting period?	Enter the number of 'low' risk business relationships or client accounts the entity reviewed during the reporting period.
1.8.1	411	Where applicable, does the entity have a Group Wide AML/CFT programme?	Please answer 'Yes' or 'No'.
1.8.2	412	If yes, has the entity conducted a gap analysis to identify whether the AML/CFT programme of each branch/majority owned subsidiary complies with Cayman's legislation and regulatory framework?	Please answer 'Yes' or 'No'.
1.8.3	413	Have the board ensured that necessary amendments are made to ensure entities apply AML/CFT measures consistent with Cayman's requirements?	Please answer 'Yes' or 'No'.
1.8.4	414	Does the entity have Governing Body approved policies and procedures for Customer due diligence measures i.e. customer identification and verification as well as monitoring of customers and updating customer information?	Please answer 'Yes' or 'No'.
1.8.5	415	Does the entity have Governing Body approved policies and procedures for identification of high risk customers and PEPs?	Please answer 'Yes' or 'No'.
1.8.6	416	Does the entity have Governing Body approved policies and procedures for Internal Reporting i.e. Identification and Reporting of Suspicious Activities and Transactions including for TF and PF?	Please answer 'Yes' or 'No'.
1.8.7	417	Does the entity have Governing Body approved policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.

1.8.8	418	Does the entity have Governing Body approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.8.9	419	Does the entity have Governing Body approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.8.10	420	Does the entity have Governing Body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.8.11	421	Does the entity have Governing Body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?	Please answer 'Yes' or 'No'.
1.8.12	422	Does the entity have Governing Body approved policies and procedures for the freezing of funds/assets of designated persons?	Please answer 'Yes' or 'No'.
1.8.13	423	Does the entity have Governing Body approved policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.14	424	When were the AML/CFT/CPF policies and procedures last updated?	Enter the date when the AML/CFT/CPF policies and procedures were last updated.
1.8.15	425	For the governing process, is information collected on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.8.16	426	Total Clients	Total number of clients (legal arrangements and natural persons) the

			entity has as at the last date of the reporting period. Answer to this question should be the same as Question 1 of this Survey, as information requested is the same.
1.8.17	427	Did the company decline, de-risk/ terminate / restrict business relationships with any customers or any business for AML/CFT/CPF related reasons for the current reporting period?	Please answer 'Yes' or 'No'.
1.8.18	428	Please provide the total number of business relationships or clients accounts that were de-risked through termination of business relationship within the reporting period.	Enter the total number of business relationships or clients' accounts that were de-risked through termination of business relationship, during the reporting period.
1.8.20	429	How many customer accounts remain non-compliant with required identification and verification procedures?	Number of non-compliant customers
1.9.1	430	Is there a screening process?	Please answer 'Yes' or 'No'.
1.9.2	431	Is the screening process manual, automated or a combination?	Select Manual, Automated, or Automated with Manual Checks.
1.9.3	432	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.9.4	433	If outsourced, please identify the vendor and the measures in place to ensure that the vendor is screening against the most recent lists.	Enter the name of the vendor along with the measures in place to ensure that the vendor is screening against the most recent lists.
1.9.5	434	Do screening parameters include risk indicators for TF and PF monitoring?	Please answer 'Yes' or 'No'.
1.9.6	435	Is the existing customer database screened periodically against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.9.7	436	Number of clients and related parties / counterparties screened against the H.M.	Enter the number of clients and related parties / counterparties screened against

		Treasury List within the reporting period.	the H.M. Treasury List within the reporting period.
1.9.8	437	Number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period.	Enter the number of alerts resulting from clients and related parties / counterparties being screened against the H.M. Treasury List within the reporting period. An alert is generated during screening process, indicating a match of some or all, of the customer or business partner's identification details, against those of designated persons and entities on the HM Treasury Sanctions list. A match needs to be verified, to confirm or discount whether it is a true or false positive.
1.9.9	438	How many false positive hits did you encounter during the reporting period?	Number of false positive hits the entity encountered during the reporting period.
1.9.11	439	When designated list are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.9.12	440	Are customers / counterparties screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.9.13	441	Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen?	Please answer 'Yes' or 'No'.
1.9.14	442	Does the entity maintain a report of results of positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.9.15	443	How may positive hits for TFS did you encounter during the reporting period?	Total number of positive hits related to TFS the entity encountered during the reporting period.
1.9.18	444	Is there an approved process for sanctions monitoring?	Please answer 'Yes' or 'No'.
1.9.19	445	How many instances of unusual or suspicious activity have been flagged by the	Enter the number of instances where unusual or suspicious activity has been

		sanctions monitoring tool during the reporting period?	flagged by the sanctions monitoring tool during the reporting period.
1.9.20	446	Is the sanctions monitoring process manual, automated or a combination?	Select what applies: Manual, Automated, or Automated with Manual Checks.
1.9.21	447	Is sanctions monitoring done in real time or after the event?	Select what applies: No process, After the event, or Real time.
1.10.1	448	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.10.2	449	Enter the name of the Transaction Monitoring System or name of the provider of the Transaction Monitoring System if bought or outsourced?	Enter the name of the Transaction Monitoring System or name of the provider of the Transaction Monitoring System if bought or outsourced.
1.10.3	450	Has the automated system been adapted for use in Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	451	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.
1.10.5	452	Please provide the total number of Alerts in Reporting Period by the automated system related to Money Laundering.	Enter the total number of Alerts relating to money laundering, that were generated by the automated system during the reporting period. Alerts are notifications flagged by a screening monitoring system identifying that a FSP should conduct further review to verify if the alert is a true match or a false positive.
1.10.7	453	Please provide the total number of Alerts resulting in Suspicious Activity Reports related to Money Laundering.	The total number of alerts produced by the monitoring system (automated or manual) which resulted in generation of suspicious activity reports (SAR) internally, relating to money laundering. This number includes false positive alerts.
1.10.9	454	Please provide the total number of Alerts leading to	Total number of alerts which led to the internal filing of suspicious transactions

		filing of a Suspicious Transaction Report related to Money Laundering.	reports (STR) relating to money laundering, during the reporting period.
1.10.11	455	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing/Proliferation Financing.	Total number of Alerts related to Terrorism Financing/Proliferation Financing, that were generated by the automated system during the reporting period. Alerts are transactions or activities that fall outside the norm or expected conduct of business by a client, which are flagged out by the automated system whenever they occur.
1.10.13	456	Please provide the total number of Alerts resulting in suspicious activity reports related to Terrorism Financing/Proliferation Financing.	The total number of alerts produced by the monitoring system (automated or manual) which resulted in generation of suspicious activity reports (SAR) internally, relating to Terrorism Financing/Proliferation Financing. This number includes all alerts including false positives.
1.10.15	457	Please provide the total number of Alerts leading to the filing of a Suspicious Transaction Report related to Terrorism Financing/Proliferation Financing.	The total number of alerts which led to the internal filing of suspicious transactions reports (STR) relating to Terrorism Financing/Proliferation Financing, during the reporting period.
1.10.17	458	Please provide the total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information.	The number of incoming transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.18	459	Please provide the total value of incoming funds rejected due to insufficient applicant for business or beneficiary information.	The total value of incoming funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.19	460	Please provide the total number of outgoing transactions rejected due to insufficient applicant for business or beneficiary information.	The number of outgoing transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.20	461	Please provide the total value of outgoing funds rejected due	The total value of outgoing funds the entity rejected during the reporting

		to insufficient applicant for business or beneficiary information.	period, due to insufficient applicant for business or beneficiary information.
1.10.21	462	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of new client business relationships (potential clients) the entity rejected due to Money Laundering or Terrorism Financing considerations, during the reporting period.
1.10.22	463	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of transactions (both incoming and outgoing) the entity blocked/rejected due to Money Laundering or Terrorism Financing considerations during the reporting period.
1.10.23	464	Please provide the total number of client business relationships (clients) that have been terminated due to Money Laundering or Terrorism Financing considerations during the reporting period.	The number of client business relationships the entity terminated due to Money Laundering or Terrorism Financing considerations, during the reporting period.
1.11.1	465	Is there a requirement for senior management approval before establishing high risk business relationships for example with PEPs?	Please answer 'Yes' or 'No'.
1.11.2	466	Does the entity exercise additional caution and conduct EDD on individuals and/or entities based in high-risk countries?	Please answer 'Yes' or 'No'.
1.11.3	467	How many clients did the entity conduct EDD on during the reporting period?	The number of clients, legal persons and arrangements and natural persons, where the entity applied enhance due diligence.
1.11.4	468	Where EDD was applied, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.

1.11.5	469	How many Transactions did the entity apply EDD on during the reporting period?	The number of transactions (of legal persons and arrangements and natural persons) where the entity applied enhanced due diligence.
1.11.6	470	How many Client's KYC/CDD files were reviewed by the entity as part of applying EDD measures on during the reporting period?	The number of clients' CDD files, both legal persons and arrangements and natural persons, that the entity reviewed as part applying enhance due diligence.
1.11.7	471	Does the entity have enhanced procedures for monitoring PEPs?	Please answer 'Yes' or 'No'.
1.12.1	472	Is there an internal process to report a Suspicious Activity/Transaction (STR/SAR) to the MLRO?	Please answer 'Yes' or 'No'.
1.12.2	473	How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period.
1.12.3	474	How many Suspicious Activity/Transaction Reports have been reported to the FRA by the MLRO for the current reporting period?	Enter the number of Suspicious Activity/Transaction Reports reported by the MLRO, to the FRA, during the reporting period.
1.12.4	475	How many hours on average does it take you to file a SAR to the FRA?	Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.
1.12.5	476	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.
1.12.6	477	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.12.7	478	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.13.1	479	Does the entity have systems and procedures in place to	Please answer 'Yes' or 'No'.

		determine whether the entity or any of its affiliates, subsidiaries, counterparties, directors, or officers is the target of any economic or financial sanctions?	
1.13.2	480	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.13.3	481	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.15.1	482	Is there a board approved documented policy on outsourcing?	Please answer 'Yes' or 'No'.
1.15.2	483	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Please answer 'Yes' or 'No'.
1.15.3	484	Is there regular ongoing reviews of the outsourcing arrangement?	Please answer 'Yes' or 'No'.
1.15.4	485	In total, how many services do you outsource from either third parties, the entities group or subsidiaries?	Enter the total number of services the entity outsources from either third parties, the entities group or subsidiaries.
1.15.5	486	Does the outsourcing agreement clearly set out the obligations of both parties?	Please answer 'Yes' or 'No'.
1.15.6	487	If relevant, does the outsourcing agreement	Please answer 'Yes' or 'No'.

		require OSP to file a SAR with the FRA in cases of identified suspicious activity?	
1.15.7	488	If relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity?	Please answer 'Yes' or 'No'.
1.15.8	489	If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider?	Please answer 'Yes' or 'No'.
1.15.9	490	If relevant, does the outsourced AMLCO/MLRO have access to the compliance committee and board of the entity?	Please answer 'Yes' or 'No'.
1.15.10	491	If relevant, are there data protection restrictions which would delay access to data and documents?	Please answer 'Yes' or 'No'.
1.15.11	492	Is sub-contracting of any of the outsourced activities permitted?	Please answer 'Yes' or 'No'.
1.15.12	493	How do you ensure the OSP follows the outsourcing standards equivalent to the licensee's?	Provide a narrative explaining how the entity ensures the OSP follows the outsourcing standards equivalent to that of the entity.
1.15.13	494	Is the entity satisfied that the OSP has measures in place to comply with record keeping requirements?	Please answer 'Yes' or 'No'.
1.16.1	495	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.16.2	496	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.