



AML Survey – Completion Guide: Securities & Registered Persons

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3 October 2022	1.1	Update to definitions
31 May 2023	1.2	Updates to definitions, descriptions, and explanations.

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1 INTRODUCTION

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

FSPs are required to provide this data by completing the AML Survey Form and submit it through the Authority’s web-based e-mail survey software, to the Anti-Money Laundering Division (the “AML/D”). The AML Survey Form is issued in accordance with section 16(1)(c) of the Securities Investment Business Act (2020 Revision).

This Guide provides support to FSPs which carry out securities investment business for accessing, completion and submission of the AML Survey – Securities and Registered Persons Form.

2 FORM INFORMATION

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

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

3 ACCESSING AND SUBMITTING THE AML 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



Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

[Confirm Account](#)

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBUl86VZVCRbBxm3mm3fq3fSoAMoPYyQ6XKFqtX0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtlwMOBYSoP%2Bk8rPUrrSVrPSQt6JA5hgsaBaC6uvcZV4KB266HIFgh4FhATaTNSa3IE3aiA%3D>

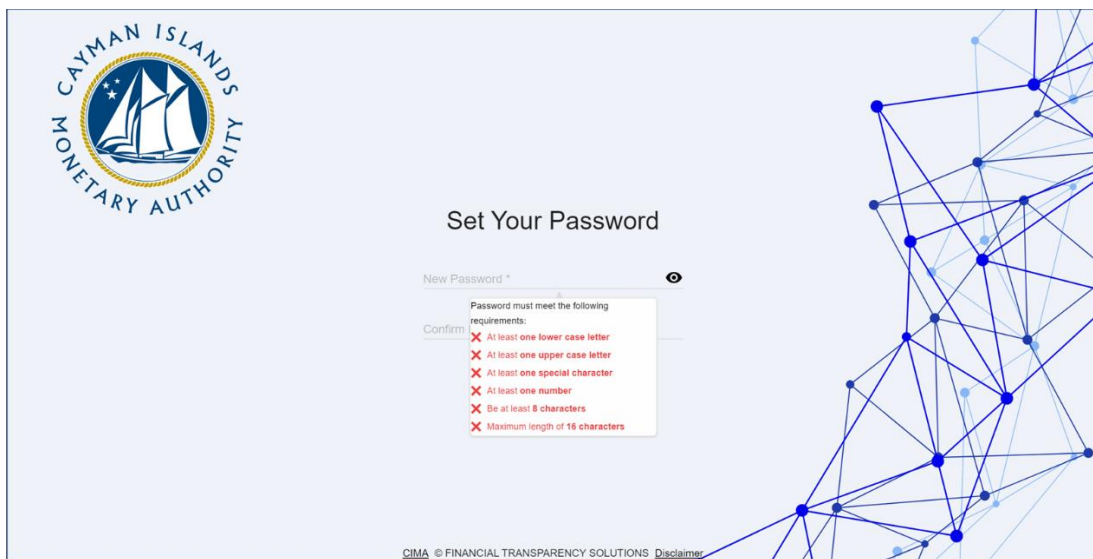
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

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

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

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**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password *

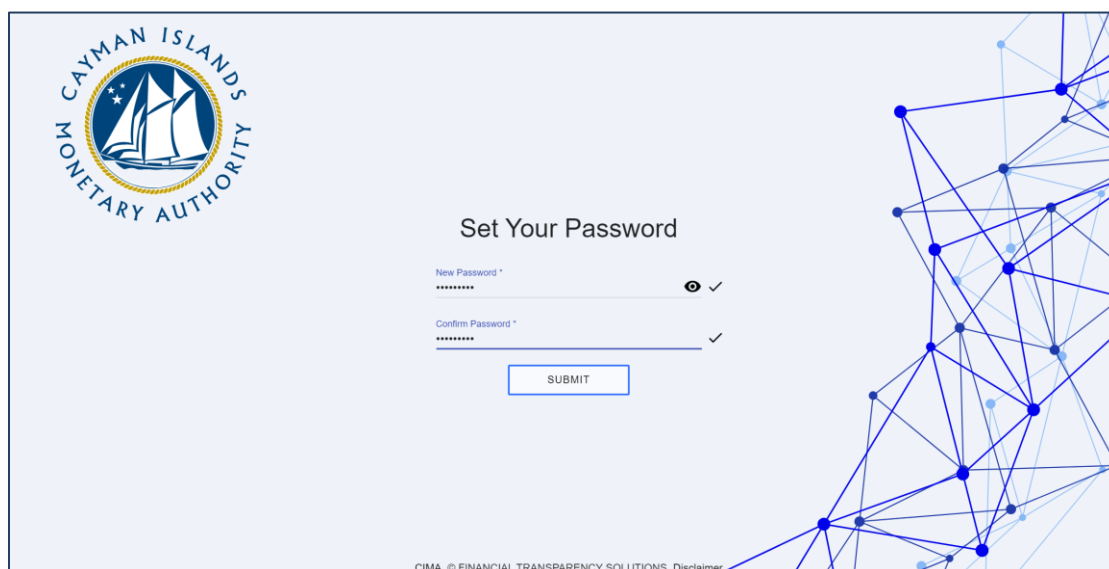
Confirm

Password must meet the following requirements:

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

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



**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password * ✓

Confirm Password * ✓

SUBMIT

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



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

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

Disclaimer:

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

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

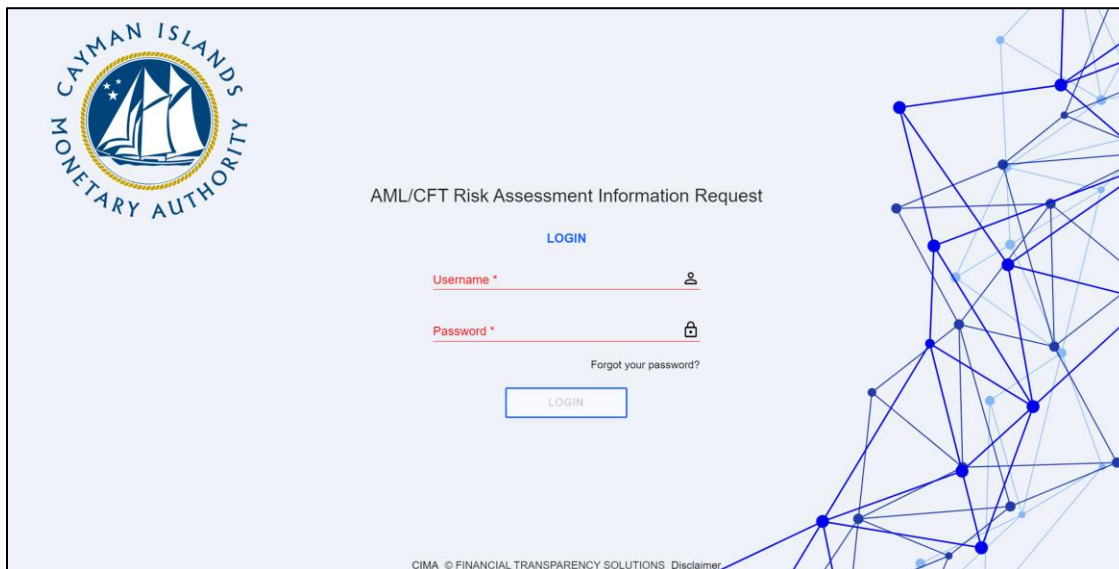


Your password was successfully changed.

[RETURN TO HOME](#)

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



AML/CFT Risk Assessment Information Request

LOGIN

Username *

Password *

Forgot your password?

LOGIN

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





Cayman Islands Monetary Authority

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

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

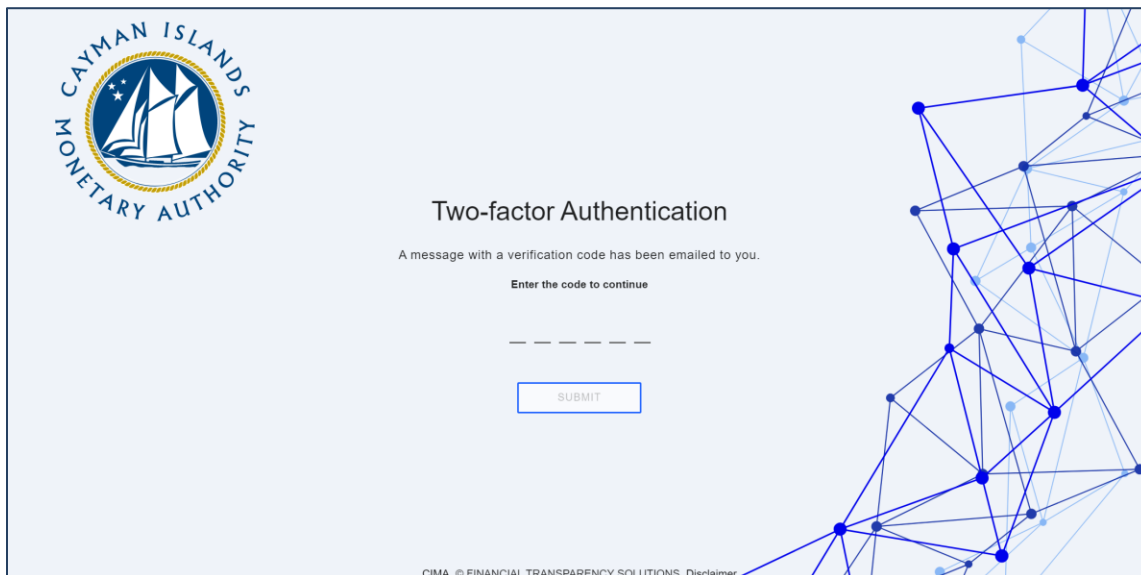
951247

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

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

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

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



**CAYMAN ISLANDS
MONETARY AUTHORITY**

Two-factor Authentication

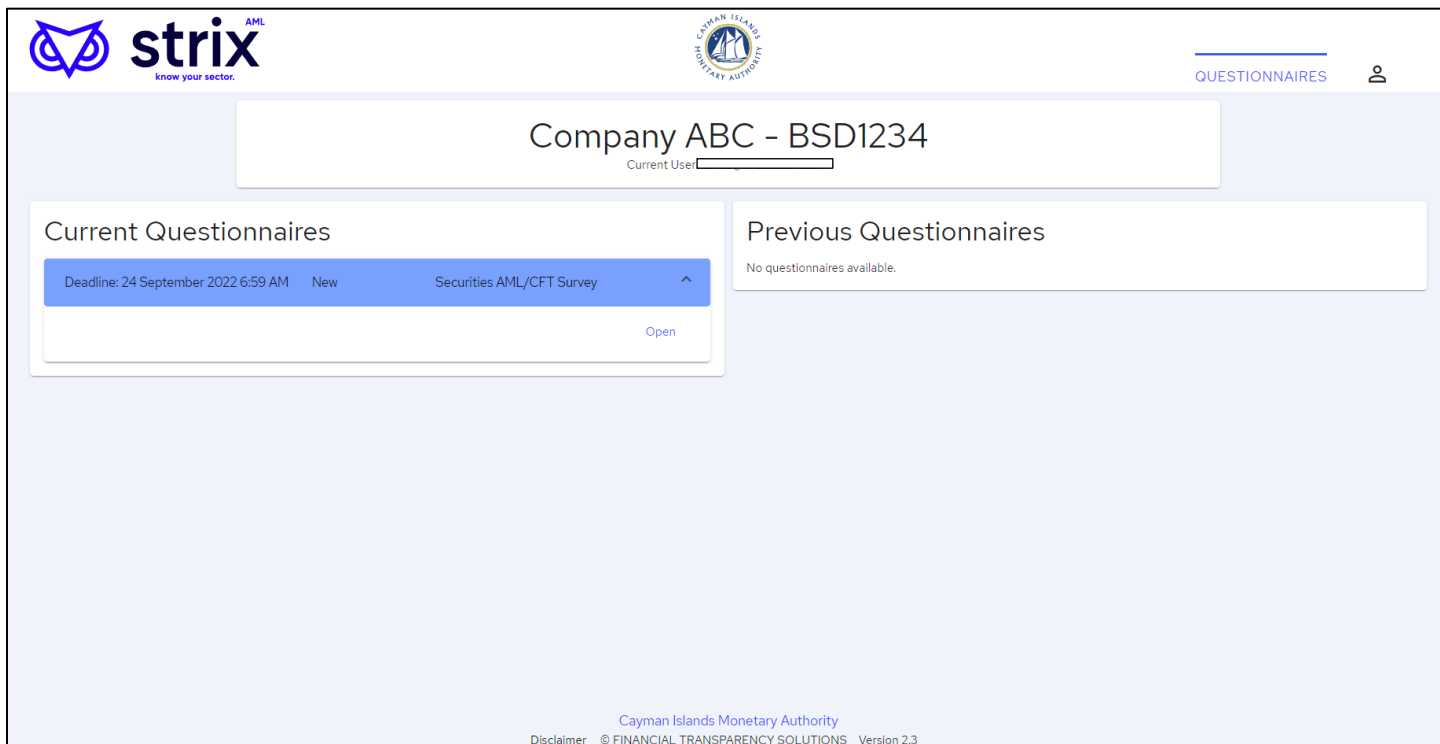
A message with a verification code has been emailed to you.

Enter the code to continue

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



strix AML
know your sector.

**CAYMAN ISLANDS
MONETARY AUTHORITY**

QUESTIONNAIRES

Company ABC - BSD1234

Current User: _____

Current Questionnaires

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

Previous Questionnaires

No questionnaires available.

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3.2 COMPLETING THE AML SURVEY FORM

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

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

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

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

Terms/Abbreviations	Definition/Meaning
AMLRs	Anti-Money Laundering Regulations, (2023 Revision), as amended.
Client / Customer	<p>A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands.</p> <p>This includes both Natural Persons and Legal Persons and Arrangement Clients.</p>
Controller	A person appointed to assume control of the affairs of a licensee or registrant.
Corporate Entity	A corporate body constituted under the Laws of the Islands, or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Survey	<p>United States Dollars (US\$).</p> <p>All other currencies must be converted to US\$ unless otherwise stated.</p>
Dealers in Precious Metals and Stones	Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
Direct - F2F	The engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Eligible Introducers	A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the

	ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the ALMRs.
Fintech Service	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>A high net worth individuals (HNWI) is:</p> <ul style="list-style-type: none"> (i) an individual whose net worth is at least CI\$800,000 (approx. US\$1,000,000) or its equivalent in any other currency; or (ii) any person that has total assets of not less than CI\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency. <p>HNWIS are <u>NOT</u> Ultra HNWI and should not be double counted.</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 such as a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Individual	A Natural Person and not a Legal Person and Arrangement.
Legal Person or Arrangement	“Legal person” means a company or other entity created by operation of law with separate legal personality.

	“Legal arrangement” means a trust or partnership, foundation or other entity created between parties which lacks separate legal personality.
ML/TF/PF	Money Laundering / Terrorism Financing / Proliferation Financing.
Money Service Business (MSB)	<p>Money services business means the business of providing, in or from within the Islands, any of the following services:</p> <p>(a) money transmission;</p> <p>(b) cheque cashing.</p> <p>(c) currency exchange.</p> <p>(d) the issuance, sale or redemption of money orders or traveller’s cheques.</p>
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Director	A natural or legal person who takes on the role of company director on the behalf of another.
Nominee Shareholder	A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.
Non-face-to-face	Where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP.
NPO	A legal person or arrangement that primarily engages in raising or disbursing funds for purposes such as charitable religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”.
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	“Politically Exposed Person” includes —

	<p>(a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official.</p> <p>(b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and</p> <p>(c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p> <p>Politically exposed persons also include:</p> <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 December 31, 2022.
Source of Funds	<p>The origin of the assets that will be used to form and maintain the business relationship.</p> <p>A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together.</p> <p>Take this into account when answering questions relating to the 'Nature of Business – Source of Funding.</p>
Special Economic Zone Business	Any type of business authorised to be carried on in a special economic zone pursuant to any legislation enforced in the Islands.
SIBA	Securities Investment Business Act (2020 Revision), as amended.

Signatories	Signatories are those persons authorised to act on behalf of a client, for example, UBOs, Directors, or other Third Parties.
Targeted Financial Sanctions (TSF)	Includes asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").
Transaction	<p>Events where services were engaged with or on behalf of a client or where payments are made to, from, or on behalf of clients. Services include but are not limited to those listed in Q170 through Q224.</p> <p>Transactions <u>should not include</u> those payments for taxes to a government body relating to trades of securities.</p>
Trust	A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.
UBO	<p>Ultimate Beneficial Owner - The natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to —</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person.</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person.</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement</p>
Ultra HNWIs	Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.
Value of Assets Under Management	The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under

		management (AUM) or the entire investment portfolio.
	Virtual Assets Service Providers (VASPs)	An entity that provides a virtual asset service as defined in the Virtual Asset (Service Providers) Act (2020 Revision).
Timeframe	Assets Under Management	Value of AUM as at the end of the reporting period.
Timeframe	Number of Clients	Number of clients as at the end of the reporting period.
Timeframe	Number of Transactions	Number of Transactions conducted for the client during the reporting period. This is to be an aggregate of all transactions conducted for clients/customers in this category for the reporting period. (I.E. If 1 order to trade a security at a specific price is filled over several lots, it is to be counted as a single transaction.)

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers.	Enter the total number of clients the entity has at the end of the reporting period. Total clients consist of natural persons and legal persons and arrangements.
1.1.2	2	Total Transactions.	Enter the total number of all transactions conducted for clients during the reporting period.
1.1.3	3	Total Value of Client Assets Held Management.	Enter the total Value of Assets Under Management (AUM) for clients, as at the end of the reporting period. If an entity does not have client AUM, a '0' value should be used.
1.1.4	4	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 broken down by their country of incorporation, or formation, at the end of the reporting period. Examples of legal persons and arrangements include, but are not limited to: Corporate entities, Foundations and Trusts.

			If an entity does not have such clients, a '0' value should be used.
1.1.5	5	Number of Transactions - Legal Persons and Arrangements.	<p>Enter the total number of transactions that were conducted by customers who are legal person and arrangements, during the reporting period.</p> <p>Examples of legal persons and arrangements include, but are not limited to, Corporate entities, Foundation and Trusts.</p> <p>If an entity did not conduct such transactions, a '0' value should be used.</p>
1.1.6	6	Value of Assets Held Under Management for client that are Legal Persons and Arrangements.	<p>Enter the total Value of Assets Under Management (AUM) for clients who are legal persons or arrangements, as at the end of the reporting period.</p> <p>Examples of legal persons and arrangements include, but are not limited to, Corporate entities, Foundations and Trusts.</p> <p>If an entity does not manage assets for these clients, a '0' value should be used.</p>
1.1.7	7	Total Number of PEPs.	<p>Enter the total number of PEPs, by nationality of the PEP, as at the end of the reporting period.</p> <p>Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, UBOs, Directors, or hold any other form of control, including signatories.</p>
1.1.8	8	Total Number of High Risk Clients.	Enter the total number of clients / customers that are 'high' risk, at the end of the reporting period.
1.2.1	9	Total number of UBOs of clients who are Legal Persons and Arrangements.	<p>Enter the total number of UBOs of all clients who are legal persons or arrangements, broken down by nationality of the UBO, as at the end of the review period.</p> <p><i>This category is specific to legal persons and arrangements. Examples include, but are not limited to, the total number of UBOs of Corporate entities and Settlers of Trusts.</i></p> <p><i>A UBO should not be counted more than once regardless of the number of business relationships they have with the entity.</i></p>
1.2.2	10	Does the entity have any clients who are Legal Arrangements?	Answer 'Yes' or 'No'

1.2.3	11	Number of settlors of clients who are Legal Arrangements.	<p>Enter the number of settlors of legal arrangement clients, broken down by the nationality of the settlor.</p> <p><i>This category is specific to clients who are legal arrangements and are Trusts.</i></p>
1.2.4	12	Number of Partners of clients who are Legal Arrangements.	<p>Enter the number of partners of legal arrangement clients, broken down by the nationality of the partner.</p>
1.2.5	13	Does the entity have any clients which have UBOs who are HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p><i>This category is specific to clients who are Legal Persons and Arrangements.</i></p> <p><i>Examples include, but not limited to, instances where a UBO of a Company or Settlor of a Trust is a HNWI.</i></p>
1.2.6	14	Number of Clients which have UBOs who are HNWIIs.	<p>Enter the total number of clients that have UBOs who are HNWIIs.</p> <p><i>HNWIIs is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least CI\$4,000,000 (approx. US\$5,000,000)</i></p> <p><i><u>Do Not include</u> clients/customers with net worth equal to or greater than US\$30,000,000.</i></p>
1.2.7	15	Does the entity have any clients which have UBOs who are Ultra HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p><i>UHNWIIs is specific to those persons whose net worth is equal to or greater than \$30,000,000.</i></p>
1.2.8	16	Number of Clients which have UBOs who are Ultra HNWIIs.	<p>Enter the total number of clients who have UBOs who are Ultra HNWIIs.</p>
1.2.9	17	Does the entity have any clients who are Legal Persons or Arrangements that have UBOs who are PEPs?	<p>Please answer 'Yes' or 'No'.</p>
1.2.10	18	Number of UBOs of clients who are Legal Persons or Arrangements which are also PEPs.	<p>Enter the total number of clients who are Legal Person and Arrangements that have UBOs who are PEPs, as at the end of the reporting period.</p>
1.2.11	19	Does the entity have any clients which have Nominees acting on behalf of a UBO (inc. any	<p>Please answer 'Yes' or 'No'.</p>

		Nominees within the ownership structure)?	
1.2.12	20	Number of clients which have Nominees appointed acting on behalf of a UBO, or a Nominee within the ownership structure, broken down by nationality of the UBO.	Enter the total number of clients which have nominees acting on behalf of UBOs, or within its ownership structure, categorised by nationality of the UBO. This category is specific to clients who are legal persons and arrangements.
1.3.1	21	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 a nominee director as at the end of the review period, broken down by country of nationality of the director.
1.3.2	22	Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the nominee.	Enter the total number of clients which have a nominee director as at the end of the review period, broken down by country of nationality of the nominee.
1.3.3	23	Number of directors and/or senior management of clients who are PEPs.	Enter the total number of clients who have directors and/or senior management who are PEPs as at the end of the reporting period.
1.3.4	24	Number of directors and/or senior management of clients who are High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are HNWI's, as at the end of the reporting period. <u>Do not include</u> count or include senior management who are Ultra HNWI's.
1.3.5	25	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are Ultra HNWI's as at the end of the reporting period.
1.3.6	26	Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI's, as at the end of the reporting period.
1.4.1	27	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	28	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are a government or public

			sector, broken down by government jurisdiction.
1.4.3	29	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions conducted by clients that are government or public sector during the reporting period.
1.4.4	30	Gov / Pub Sector - Value of Transactions.	Enter the value of transactions processed on behalf of clients that are Government or Public sector, during the reporting period.
1.4.5	31	Gov / Pub Sector - Value of Assets Under Management.	Enter the Value of Assets Under Management of the clients that are Government or Public sector, as at the end of the reporting period.
1.4.6	32	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.7	33	NPO - Number of Clients, broken down by country of incorporation of the client.	Enter the number of clients who are NPOs, broken down by country of incorporation of the client, as at the end of the reporting period.
1.4.8	34	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period.
1.4.9	35	NPO – Value of Transactions.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.
1.4.10	36	NPOs - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are NPOs, as at the end of the reporting period.
1.4.11	37	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.12	38	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of Foundation clients the entity has, broken down by the country of establishment of the client, as at the end of the reporting period.
1.4.13	39	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.
1.4.14	40	Foundations – Value of Transactions.	Enter the value of transactions processed for clients that are

			Foundations, during the reporting period.
1.4.15	41	Foundations - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are a Foundation, as at the end of the reporting period.
1.4.16	42	Does the entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.17	43	Trusts - Number of Clients, broken down by country of registration of the Trust.	Enter the number of Trust clients the entity has, broken down by country of registration of the trust, as at the end of the reporting period.
1.4.18	44	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are Trusts, during the reporting period.
1.4.19	45	Trusts – Value of Transactions.	Enter the Value of transactions conducted by clients that are Trust, during the reporting period.
1.4.20	46	Trusts - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are Trusts, as at the end of the reporting period.
1.4.21	47	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'. Note that one client can fall under multiple categories of structure.
1.4.22	48	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients the entity has that are a Segregated Portfolio Company, as at the end of the reporting period.
1.4.23	49	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients that are a Segregated Portfolio Company, during the reporting period.
1.4.24	50	Segregated Portfolio Companies - Value of Transactions	Enter the number of transactions conducted by clients that are a Segregated Portfolio Company, during the reporting period.
1.4.25	51	Segregated Portfolio Companies - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are a Segregated Portfolio Company, as at the end of the reporting period.

1.4.26	52	Does the entity have any clients that operate from Special Economic Zone?	Please answer 'Yes' or 'No'. Note that one client can fall under multiple categories of structure.
1.4.27	53	Special Economic Zone - Number of Clients.	Enter the number of clients the entity has, that are registered / operate in a Special Economic Zone, as at the end of reporting period.
1.4.28	54	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients, that are registered / operate in a Special Economic Zone, during the reporting period.
1.4.29	55	Special Economic Zone - Value of Transactions.	Enter the value of transactions conducted by clients, that are registered / operate in a Special Economic Zone, during the reporting period.
1.4.30	56	Special Economic Zone - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are registered / operate in a Special Economic Zone, as at the end of the reporting period.
1.4.31	57	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'. Note that one client can fall under multiple categories of structure.
1.4.32	58	Funds / Collective Investment Vehicles - Number of Clients.	Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles as at the end of reporting period.
1.4.33	59	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.34	60	Funds/Collective Investment Vehicles – Value of Transactions.	Enter the value of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.35	61	Funds / Collective Investment Vehicles - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are Funds / Collective Investment Vehicles, as at the end of the reporting period.
1.5.1	62	Does the entity have any Natural Person clients?	Please answer 'Yes' or 'No'. This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.

1.5.2	63	Clients / customers that are Natural Persons, broken down by nationality of the client.	<p>Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i></p>
1.5.3	64	Clients/customers that are Natural Persons, broken down by Residency of the client.	<p>Enter the number of clients that are natural persons, broken down by their residency.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients/ customers that are Legal Persons and Arrangements.</i></p>
1.5.4	65	Natural Person Clients – Total Transactions.	<p>Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients / customers that are Legal Persons and Arrangements.</i></p>
1.5.5	66	Value of Assets Held Under Management for clients who are Natural Persons.	Enter the value of assets under management for clients that are natural persons, at the end of the reporting period.
1.5.6	67	Does the entity have any Natural Person clients that are PEPs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.7	68	Number of Natural Person Clients who are PEPs, broken down by nationality of the client.	Enter the total number of Natural Person clients that are PEPs, broken down by the nationality of the client, as at the end of the reporting period.

			This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.
1.5.8	69	Natural Person Clients - PEPs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.
1.5.9	70	Natural Person Clients - PEPs - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients who are PEPs, during the reporting period.
1.5.10	71	Natural Person Clients - PEPs - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients who are PEPs, at the end of the reporting period.
1.5.11	72	Does the entity have any Natural Person Clients that are HNWI's?	Please answer 'Yes' or 'No'. This category <u>does NOT include</u> those individuals who are Ultra HNWI.
1.5.12	73	Number of Natural Person Clients who are HNWI's.	Enter the number of Natural Person clients the entity has that are HNWI's. This category <u>does NOT include</u> those individuals who are Ultra HNWI's.
1.5.13	74	Natural Person Clients - HNWI's - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are HNWI's, during the reporting period.
1.5.14	75	Natural Person Clients - HNWI's - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients that are HNWI's, during the reporting period.
1.5.15	76	Natural Person Clients - HNWI's - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients that are HNWI's, as at the end of the reporting period.
1.5.16	77	Does the entity have any Natural Person clients that are Ultra HNWI's?	Please answer 'Yes' or 'No'.
1.5.17	78	Number of Natural Person Clients who are Ultra HNWI's.	Enter the number of Natural Person clients that are Ultra HNWI's, at the end of the reporting period.
1.5.18	79	Natural Person Clients – Ultra HNWI's - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are Ultra HNWI's, during the reporting period.

1.5.19	80	Natural Person Clients – Ultra HNWIs - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients that are Ultra HNWIs, during the reporting period.
1.5.20	81	Natural Person Clients – Ultra HNWIs - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients that are Ultra HNWIs, at the end of the reporting period.
1.5.21	82	Does the entity have any Natural Person clients that are PEPs and HNWIs?	Please answer 'Yes' or 'No'. Include all PEPs, both HNWI and Ultra HNWIs.
1.5.22	83	Number of Natural Person Clients who are PEPs and HNWIs.	Enter the number of Natural Person clients that are both PEPs and HNWIs. Include all PEPs, both HNWI and Ultra HNWIs.
1.5.23	84	Natural Person Clients - PEPs and HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are both PEPs and HNWIs, during the reporting period. Include all PEPs, both HNWI and Ultra HNWIs.
1.5.24	85	Natural Persons - PEPs & UHNWIs - Value of Transactions.	Enter the value of transactions conducted by Natural Person clients that are both PEPs and Ultra HNWIs, during the reporting period. Include all PEPs, both HNWI and Ultra HNWIs.
1.5.25	86	Natural Persons - PEPs & UHNWIs - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients that are both PEPs and HNWIs, at the end of the reporting period. Include all PEPs, both HNWI and Ultra HNWIs.
1.6.1	87	<p>Nature of Business / Source of Funding:</p> <p>Provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation / formation of the clients:</p> <ul style="list-style-type: none"> Banking Institutions exc. MSBs 	Provide the total number of clients which fall within the list of the sectors, broken down by nationality or country of incorporation / formation of the client, as at the end of the reporting period.

		<ul style="list-style-type: none"> • Other Financial regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech <p><i>*excluding MSBs, Virtual Asset Products and Services, and TCSPs.</i></p>	
1.6.2	88	Does the entity have any clients that are legal persons or arrangements operating as Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.6.3	89	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are banking institutions, or natural persons that are employed by banking institutions. This section excludes MSBs
1.6.4	90	Does the entity have any clients that are legal persons or arrangements operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses not listed in this section?	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 or arrangements operating as Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above.
1.6.6	92	Does the entity have any clients that are legal persons and arrangements operating in 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 or arrangements operating as Financial Leasing companies or natural persons that are employed by Financial Leasing companies.
1.6.8	94	Does the entity have any clients that are legal persons and arrangements that are Money Lending, or natural persons employed by Money Lending?	Please answer 'Yes' or 'No'.
1.6.9	95	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are Money Lending institutions, and / or natural persons that are employed by Money Lending institutions.
1.6.10	96	Does the entity have any clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or natural persons employed as Accountants?	Please answer 'Yes' or 'No'.
1.6.11	97	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.6.12	98	Does the entity have any clients that are legal persons or arrangements operating in the Fintech industry, or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.13	99	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry.

1.6.14	100	<p>Nature of Business / Source of Funding:</p> <p>Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in the following sectors, broken down by nationality or incorporation / formation of the client:</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Service Business (MSBs) ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ TCSPs ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	Enter the total number of clients which fall within the list of the sectors, broken down by nationality or country of incorporation / formation of the client, at the end of the reporting period.
1.6.15	101	Does the entity have any clients that are legal persons or arrangements operating as Legal Practitioners, or natural persons employed as Legal Practitioners?	Please answer 'Yes' or 'No'.
1.6.16	102	Legal Practitioner - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.6.17	103	Does the entity have any clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, or natural persons employed by Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'.

1.6.18	104	Dealers in Precious Metals and Stones - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.6.19	105	Does the entity have any clients that are legal persons or arrangements operating as a Money Services Business, or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.6.20	106	Money Services Business - Number of Clients.	Enter the number of clients the entity has that are legal persons or arrangements operating in the Money Services Business, and / or are natural persons that are employed in the Money Services Business.
1.6.21	107	Does the entity have any clients that are legal persons or arrangements operating as a Virtual Asset products or services, or natural persons employed by a virtual asset products or services?	Please answer 'Yes' or 'No'.
1.6.22	108	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has that are legal persons or arrangements operating as a virtual asset products and services, and natural persons that are employed by institutions which offer virtual asset products and services.
1.6.23	109	Does the entity have any clients that are legal persons or arrangements that are High Value Dealers or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.
1.6.24	110	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as High Value

			Dealers, and natural persons that are employed by High Value Dealers.
1.6.25	111	Does your entity have any clients that are legal persons or arrangements that are TCSPs (Trusts and Corporate Service Providers), or natural persons employed by TCSPs?	Please answer 'Yes' or 'No'.
1.6.26	112	TCSPs - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as a TCSP, and natural persons that are employed by a TCSP.
1.6.27	113	Does the entity have any clients that are legal persons or arrangements operating in the Import / Export Industry, or natural persons employed by the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.28	114	Import / Export - Number of Clients.	Enter the number of clients the entity has that are legal persons or arrangements operating in the Import / Export business, and natural persons that are employed within the Import / Export industry.
1.6.29	115	Does the entity have any clients that are legal persons or arrangements 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'.
1.6.30	116	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Shipping and Transport of Goods business, or natural persons that are employed within the Shipping and Transport of Goods industry.
1.6.31	117	Nature of Business / Source of Funding:	Provide the total number of clients which fall within the list of the sectors, broken down by nationality or country of

		<p>Provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation / formation of the clients:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry ▪ Unknown Sector / Industry (not recorded) 	incorporation / formation of the clients, at the end of the reporting period.
1.6.32	118	Does the entity have any clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, or natural persons employed as Real Estate Agents / Brokers?	Please answer 'Yes' or 'No'.
1.6.33	119	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.6.34	120	Does the entity have any clients that are legal persons operating 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 or arrangements operating in the gambling

			business (including online gambling), and natural persons that are employed in the gambling business (including online gambling).
1.6.36	122	Does the entity have any clients that are legal persons or arrangements operating 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 or arrangements operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry.
1.6.38	124	Does the entity have any clients that are legal persons or arrangements operating in the Defence Industry, or natural persons employed by the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.39	125	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.6.40	126	Does the entity have any clients that are legal persons or arrangements operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.41	127	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.6.42	128	Does the entity have any clients that are legal persons or arrangements in the Mining Industry, or	Please answer 'Yes' or 'No'.

		natural persons employed by the Mining Industry?	
1.6.43	129	Mining Industry - Number of Clients.	Enter the number of clients the entity has that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.6.44	130	Does the entity have any clients that are legal persons or arrangements operating 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 or arrangements operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry.
1.6.46	132	Does the entity have any clients that are legal persons or arrangements operating 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 or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.6.48	134	Does the entity have any clients that are legal persons or arrangements operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry?	Please answer 'Yes' or 'No'.

1.6.49	135	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Cannabis Production & Distribution Business, and natural persons that are employed in the Cannabis Production & Distribution industry.
1.6.50	136	Does the entity have any clients that are legal persons or arrangements 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 or arrangements or natural person clients whose source of funds, business or profession is unknown.
1.6.52	138	Does the entity have any clients where their nature of 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 or arrangements operating in known businesses, not mentioned above, and natural persons who are employed in known business sectors which are not mentioned above.
1.7.1	140	<p>Source of Funds – Value of Client Assets.</p> <p>Please provide the total Value of Assets Under Management from clients that are legal persons or arrangements of, or are natural persons employed in, the following sector:</p> <ul style="list-style-type: none"> ▪ Banking Institutions excluding MSBs ▪ Other Financial regulated Business* ▪ Financial Leasing 	Enter the total Value of Assets Under Management of the clients that are legal persons or arrangements of, and are natural persons employed in, the following sectors:

		<ul style="list-style-type: none"> ▪ Money Lending ▪ 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 (excluding MSBs) - Value of Assets Under Management.	Enter the Value of Assets Under Management of the clients that are legal persons or arrangements operating as 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 Assets Under Management.	Enter the Value of Assets Under Management of the clients that are legal persons or arrangements operating as 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 Assets Under Management.	Enter the Value of Assets Under Management of the clients that are legal persons or arrangements operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business.
1.7.5	144	Money Lending- Value of Assets Under Management.	Enter the Value of Assets Under Management of the clients that are legal persons or arrangements operating in the Money Lending business, and natural persons that are employed by Money Lending businesses.
1.7.6	145	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Assets Under Management.	Enter the Value of Assets Under Management of the clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.7.7	146	Fintech - Value of Assets Under Management.	Enter the Value of Assets Under Management of the clients that are legal persons or arrangements and are in the Fintech industry, and natural persons

			that are employed in the Fintech industry.
1.7.8	147	Source of Funds – Value of Client Assets. Please provide the total Value of Assets Under Management from clients that are legal persons of, or are natural persons employed in, the following sector: <ul style="list-style-type: none"> ▪ Legal practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Services Businesses ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ Trusts and Corporate Service Providers (“TCSPs”) ▪ Import/Export Industry ▪ Shipping and transport of goods 	Enter the total Value of Assets Under Management of the clients that are legal persons or arrangements of, and are natural persons employed in, the sectors listed.
1.7.9	148	Legal Practitioner - Value of Assets Under Management.	Enter the Value of Assets Under Management of the clients that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.7.10	149	Dealers in Precious Metals and Stones - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.7.11	150	Money Services Business - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in the Money Services Business, and natural persons that are employed in the Money Services Business.
1.7.12	151	Virtual Asset Service Providers - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements offering virtual asset products and services, and natural

			persons that are employed by providers of virtual asset products and services.
1.7.13	152	High Value Dealers - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.7.14	153	Trusts, Company Managers and Corporate Service Providers - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating as a TCSP (Trusts, Company Managers and Corporate Service Providers), and natural persons that are employed by TCSP.
1.7.15	154	Import / Export - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements and are in the Import / Export Industry, and natural persons that are employed in the Import / Export Industry.
1.7.16	155	Shipping and Transport of Goods - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in the Shipping and Transport of Goods Industry, and natural persons that are employed in the Shipping and Transport of Goods Industry.
1.7.17	156	<p>Source of Funds – Value of Client Assets.</p> <p>Please provide the total Value of Assets Under Management from clients that are legal persons or arrangements of, or are natural persons employed in, the following sector:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents and Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining 	Enter the total Value of Assets Under Management of clients that are legal persons or arrangements of, and are natural persons employed in, the listed sectors.

		<ul style="list-style-type: none"> Construction & Development Retail & Restaurant Cannabis Industry Unknown Sector / Industry (not recorded) 	
1.7.18	157	Real Estate Agents / Brokers - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.7.19	158	Gambling business (including online gambling) - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating 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 Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business.
1.7.21	160	Defence Industry - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.7.22	161	Oil and Gas Industry - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.7.23	162	Mining Industry - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.7.24	163	Construction / Development - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating 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 Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating 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 Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating 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 Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in unknown / unrecorded Industries/ professions, and natural persons that are employed in unknown / unrecorded industries/ professions.
1.7.28	167	Other - Not listed above - Value of Assets Under Management.	Enter the Value of Assets Under Management of clients that are legal persons or arrangements operating in known businesses/ industries/ professions not listed above, and natural persons that are employed in known businesses / industries/professions, not listed above.
1.8.1	168	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
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. Enter 'N/A' if no comments.
2.1.1	170	Does the entity provide products or services for shares trading (listed or unlisted)?	Please answer 'Yes' or 'No'.
2.1.2	171	Shares Trading - Number of Clients.	Enter the number of clients the entity provides shares trading services and

			holds shares, during the reporting period.
2.1.3	172	Shares Trading - Value of Transactions.	Enter the Value of Transactions of clients that the entity provides shares trading services and holds shares, during the reporting period.
2.1.4	173	Does the entity provide any products related to Instruments of indebtedness?	Please answer 'Yes' or 'No'.
2.1.5	174	Instruments of indebtedness - Number of Clients.	Enter the number of clients the entity provides products related to instruments of indebtedness, during the reporting period.
2.1.6	175	Instruments of Indebtedness - Value of Transactions.	Enter the Value of Transactions for clients that the entity provides products related to instruments of indebtedness, during the reporting period.
2.1.7	176	Does the entity provide any products related to Securities Traded - Securities Entitlements?	Please answer 'Yes' or 'No'.
2.1.8	177	Securities Traded - Securities Entitlements- Number of Clients.	Enter the number of clients to whom the entity provides securities trading services related to securities entitlements, during the reporting period.
2.1.9	178	Securities Traded - Securities Entitlements - Value of Transactions	Enter the Value of Transactions of clients that the entity provides securities trading products related to securities entitlements, for the reporting period.
2.1.10	179	Does the entity provide any products related to Certificates?	Please answer 'Yes' or 'No'.
2.1.11	180	Securities Traded – Certificates - Number of Clients.	Enter the number of clients the entity provides securities trading services related to certificates, during the reporting period.
2.1.12	181	Securities Traded - Certificates - Value of Transactions.	Enter the Value of Transactions of clients the entity provides securities trading products related to certificates for the reporting period.

2.1.13	182	Does the entity provide any products related to Options?	Please answer 'Yes' or 'No'.
2.1.14	183	Securities Traded - Options - Number of Clients.	Enter the number of clients the entity provides securities trading services related to options to, for the reporting period.
2.1.15	184	Securities Traded - Options Value of Transactions.	Enter the Value of Transactions for clients the entity provides securities trading products related to options, for the reporting period.
2.1.16	185	Does the entity provide any products related to Futures?	Please answer 'Yes' or 'No'.
2.1.17	186	Securities Traded - Futures - Number of Clients.	Enter the number of clients the entity provides securities trading services related to futures to, during the reporting period.
2.1.18	187	Securities Traded - Futures - Value of Transactions.	Enter the Value of Transactions for clients the entity provides securities trading products related to futures, during the reporting period.
2.1.19	188	Does the entity provide any products related to Forward Contracts?	Please answer 'Yes' or 'No'.
2.1.20	189	Securities Traded - Forward Contracts - Number of Clients.	Enter the number of clients the entity provides securities trading services related to forward contracts, during the reporting period.
2.1.21	190	Securities Traded - Forward Contracts - Value of Transactions.	Enter the Value of Transactions of clients the entity provides securities trading products related to forward contracts, during the reporting period.
2.1.22	191	Does the entity provide any products related to Contracts for Differences?	Please answer 'Yes' or 'No'.
2.1.23	192	Securities Traded - Contracts for Differences- Number of Clients.	Enter the number of clients the entity provides securities trading services related to contracts for differences, during the reporting period.

2.1.24	193	Securities Traded - Contracts for Differences - Value of Transactions.	Enter the Value of Transactions for clients the entity provides securities trading products related to contracts for differences, during the reporting period.
2.1.25	194	Does the entity provide any products related to Securities Traded - Virtual Assets?	Please answer 'Yes' or 'No'.
2.1.26	195	Securities Traded - Virtual Assets - Number of Clients.	Enter the number of clients the entity provides securities trading services related to virtual assets to, during the reporting period.
2.1.27	196	Securities Traded - Virtual Assets - Value of Transactions.	Enter the Value of Transactions for clients the entity provides securities trading products related to virtual assets, during the reporting period.
2.1.28	197	Does the entity provide any Products related to Securities Traded - Penny / Micro Stocks?	Please answer 'Yes' or 'No'.
2.1.29	198	Securities Traded - Penny / micro stocks - Number of Clients.	Enter the number of clients the entity provides securities trading services related to penny / micro stocks, during the reporting period.
2.1.30	199	Securities Traded - Penny / Micro Stocks - Value of Transactions.	Enter the Value of Transactions for clients that the entity provides securities trading products related to penny / micro stocks, during the reporting period.
2.1.31	200	Does the entity provide any other products related to securities not mentioned above?	Please answer 'Yes' or 'No'.
2.1.32	201	Securities Traded - Other Securities - Number of Clients.	Enter the number of clients the entity provides securities trading services not mentioned above, during the reporting period.
2.1.33	202	Please indicate the other Securities Products not captured above.	List the other Securities Products not mentioned above.
2.2.1	203	Does the entity provide custodial or depository services?	Please answer 'Yes' or 'No'.

2.2.2	204	Custodian / Depository - Number of Clients.	Enter the number of clients the entity provides Custodial Services to, during the reporting year.
2.2.3	205	Custodian / Depository - Value of Client Assets.	Enter the value of client assets at end of the reporting year.
2.2.4	206	Custodian / Depository - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides Custodial / depository services to during the reporting period.
2.2.5	207	Does the entity service Clients as Broker Dealer?	Please answer 'Yes' or 'No'.
2.2.6	208	Broker Dealer - Number of Clients.	Enter the number of clients the entity provides Broker Dealer services, during the reporting period.
2.2.7	209	Broker Dealer - Value of Transactions for the reporting period.	Enter the Value of Transactions for the reporting period, for clients the entity provides Broker Dealer services to.
2.2.8	210	Does the entity service Clients as Market Maker?	Please answer 'Yes' or 'No'.
2.2.9	211	Market Maker - Number of Clients.	Enter the number of clients the entity provided market maker services to during the reporting period.
2.2.10	212	Market Maker - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides market maker services, during the reporting period.
2.2.11	213	Does the entity service Clients as Securities Advisor?	Please answer 'Yes' or 'No'.
2.2.12	214	Securities Advisor - Number of Clients.	Enter the number of clients to whom the entity provides securities advisor services, during the reporting period.
2.2.13	215	Securities Advisor - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides securities advisor services, during the reporting period.
2.2.14	216	Does the entity service Clients as Securities Arranger?	Please answer 'Yes' or 'No'.
2.2.15	217	Securities Arranger - Number of Clients.	Enter the number of clients the entity provides securities arranger services to, during the reporting period.

2.2.16	218	Securities Arranger - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides securities arranger services to, during the reporting period.
2.2.17	219	Does the entity service Clients as Securities Manager?	Please answer 'Yes' or 'No'.
2.2.18	220	Securities Manager - Number of Clients.	Enter the number of clients the entity provides Securities Manager services to, during the reporting period.
2.2.19	221	Securities Manager - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients the entity provides Securities Manager services to, during the reporting period.
2.2.20	222	Does the entity have any clients that are Administered Funds?	Please answer 'Yes' or 'No'.
2.2.21	223	Administered Fund Clients - Number of Clients.	Enter the number of clients the entity has who are administered funds, during the reporting period.
2.2.22	224	Administered Fund Clients - Value of Transactions for the reporting period.	Enter the Value of Transactions for clients who are administered funds during the reporting period.
2.3.1	225	Does the entity facilitate payments to / from Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	226	Physical Cash - Number of Clients.	Enter the number of clients where payments were made by, for or on behalf of clients, in the form of Physical Cash, during the reporting period.
2.3.3	227	Physical Cash - Number of Transactions.	Enter the number of Physical Cash transactions conducted by, for or on behalf of clients, during the reporting period.
2.3.4	228	Physical Cash - Value of Funds Transacted.	Enter the value of the Physical Cash transactions conducted by, for or on behalf of clients, during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity.

2.3.5	229	Does the entity facilitate payments to / from Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.6	230	Virtual Currency - Number of Clients.	Enter the number of clients where payments were made by, for or on behalf of clients, in the form of Virtual Currency, during the reporting period.
2.3.7	231	Virtual Currencies - Number of Transactions.	Enter the number of virtual currency transactions clients conducted by, for or on behalf of clients, during the reporting period.
2.3.8	232	Virtual Currencies - Value of Funds Transferred.	Enter the value of the virtual currency transactions conducted by, for or on behalf of clients, during the reporting period.
2.3.9	233	Does the entity facilitate payments to / from Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.3.10	234	Third Parties - Number of Clients.	Enter the number of clients which conducted payments via Third Parties during the reporting period, which were conducted by, for or on behalf of clients. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction.
2.3.11	235	Third Parties - Number of Transactions.	Enter the number of Third Party transactions conducted by, for or on behalf of, clients during the reporting period.
2.3.12	236	Third Parties - Value of Funds Transferred.	Enter the value of the Third-Party transactions conducted by, for or on behalf of, clients during the reporting period.
2.3.13	237	Does the entity facilitate payments to / from Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.3.14	238	Credit Card Payments - Number of Clients	Enter the number of clients which had payments via credit card, conducted by, for or on behalf of the client, during the reporting period.
2.3.15	239	Credit Card Payments - Number of Transactions.	Enter the number of credit card transactions conducted by, for or on

			behalf of the client, during the reporting period.
2.3.16	240	Credit Card Payments - Value of Funds Transferred.	Enter the value of credit card transactions, conducted by, for or on behalf of, clients, during the reporting period.
2.3.17	241	Does the entity facilitate payments to / from Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'. This excludes internal bank transfers.
2.3.18	242	Wire Transfers - Number of Clients.	Enter the number of clients which had payments via wire transfers conducted by, for or on behalf of clients, during the reporting period.
2.3.19	243	Wire Transfers - Number of Transactions.	Enter the number of wire transfer transactions that were conducted by, for or on behalf of clients, during the reporting period.
2.3.20	244	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.3.21	245	Does the entity facilitate payments of Clients in the form of Transfer of securities to / from another provider?	Please answer 'Yes' or 'No'.
2.3.22	246	Transfer of securities to / from another provider - Number of Clients.	Enter the number of clients which transferred securities to / from another provider, during the reporting period.
2.3.23	247	Transfer of securities to / from another provider - Number of Transactions.	Enter the number of transfers of securities to / from another provider conducted by clients during the reporting period.
2.3.24	248	Transfer of securities to / from another provider - Value of Funds Transferred.	Enter the value of all transactions relating to transfer of securities to / from another provider, conducted by clients during the reporting period.
2.3.25	249	Does the entity facilitate payments to / from Clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.3.26	250	Other Forms of Payment - Number of Clients.	Enter the number of clients which made payments using other forms of payment

			not listed above during the reporting period.
2.3.27	251	Other Forms of Payment - Number of Transactions.	Enter the number of transactions conducted by, for or on behalf of clients, during the reporting period, using other forms of payment other than the ones listed above.
2.3.28	252	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were conducted by, for or on behalf of clients, using other forms of payment, during the reporting period.
2.3.29	253	Please indicate the types of other forms of payments.	List the other forms of payment conducted by, for or on behalf of clients, during the reporting period, which are not listed above.
2.4.1	254	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated.
2.4.2	255	Total number of transactions received, broken down by origin country of the transaction.	Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, during the reporting period, broken down by country of origin of the funds.
2.4.3	256	Total value of funds transferred out, broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients, broken down by the country of payment destination.
2.4.4	257	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of transactions relating to outward transfers by the clients, or on behalf of clients, broken down by country of destination of the transaction, for the reporting period.
2.5.1	258	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	259	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	260	Number of Clients - Direct - F2F.	Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period.

			F2F channels include: Direct-F2F, Referrals within Group – F2F, Eligible Introducers – F2F, and Other Introducers-F2F.
3.1.2	261	Number of Clients - Direct - Non-F2F.	<p>Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and <u>not only</u> those onboarded during the reporting period.</p> <p>Examples of Direct Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have Direct F2F contact with the clients.</p>
3.1.3	262	Total number of clients via Online Platforms.	Provide the total number of clients, in the <u>entity's entire portfolio</u> , that were onboarded via Online platforms, and not only those onboarded during the reporting period.
3.1.4	263	Number of Clients through Referrals within Group - F2F.	<p>Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the UBOs nationality.</p> <p>An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients.</p>
3.1.5	264	Number of Clients through Referrals within Group - Non F2F, broken down by nationality or country of incorporation of the client.	<p>Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the UBOs.</p> <p>Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.</p>
3.1.6	265	Total number of Clients onboarded through Eligible Introducers.	<p>Total clients in the entity's <u>entire portfolio</u> that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients' identity.</p> <p>An Eligible Introducer is 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.</p>

3.1.7	266	Number of Clients through Eligible Introducers.	Enter the number of clients which were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the UBO.
3.1.8	267	Number of Clients through Other Introducers - Non-F2F.	Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the UBOs.
3.1.9	268	Clients via Online Platforms.	Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the UBO.
3.2.1	269	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	270	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	271	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	272	How many AML Compliance Officers did the entity have in the reporting period and the previous 2 years?	If no turnover of the AML Compliance Officer role in the <u>three-year period</u> , answer "1".
3.2.5	273	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	274	To whom has the Money Laundering Reporting	If outsourced, 'select' the status that best describes the outsource relationship

		Officer role been outsourced?	<p>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	275	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	276	How many Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years?	If no turnover of the Money Laundering Reporting Officers role in the <u>three-year period</u> , answer "1".
3.2.9	277	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	278	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	279	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	280	How many Deputy Money Laundering Reporting Officers did the entity have	If no turnover of the Deputy Money Laundering Reporting Officers role in the <u>three-year period</u> , answer "1".

		in the reporting period and the previous 2 years?	
3.2.13	281	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	282	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 sanctions turnover that includes one of each within the reporting period.</p>
3.2.15	283	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	284	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 <u>three-year period</u> , answer "1".
3.2.17	285	Has the entity outsourced the function of transaction monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	286	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	287	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	288	How many Transaction monitoring platforms has the entity had in the reporting period and the previous 2 years?	If no turnover of the transaction monitoring platform in the <u>three-year period</u> , answer "1".
3.2.21	289	Has the entity outsourced the function of trading platform within the reporting period?	Please answer 'Yes' or 'No'.
3.2.22	290	To whom has the trading platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the trading platform:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in a case of the trading platform turnover that includes one of each within the reporting period.</p>
3.2.23	291	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	292	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 <u>three-year period</u> , answer "1".
3.2.25	293	Has the entity outsourced the function of liquidity platforms within the reporting period?	Please answer 'Yes' or 'No'.
3.2.26	294	To whom has the liquidity platform function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Liquidity Platform:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party

			Select "3rd Party and Member within Group", in a case of the Liquidity Platform turnover that includes one of each within the reporting period.
3.2.27	295	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	296	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 <u>three-year period</u> , answer "1".
3.3.1	297	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.3.2	298	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	299	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	300	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	301	Is the entity a Single Family Office?	Please answer 'Yes' or 'No'.
3.3.6	302	In which country is the parent or holding company incorporated?	Enter the country the parent or holding company is incorporated.
3.4.1	303	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	304	Please use this area to provide any comments or feedback for this tab.	Use this area to provide any comments or feedback for this tab. Please enter 'NA' if no comment.

AML Control Questions:

No.	Question No.	Question	Description/Explanation
1.1.1	305	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	306	Indicate the number of 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	307	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.4	308	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.5	309	Does the approved Charter include the roles and responsibilities of the Directors/General Partners/Managers?	Please answer 'Yes' or 'No'.
1.1.6	310	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	311	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF and Sanctions risks and issues?	Please answer 'Yes' or 'No'.
1.1.8	312	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.9	313	Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?	Please answer 'Yes' or 'No'.
1.1.10	314	When was the last Board/Principal and/or Board committee meeting held	Enter the Date of the last Board/Principal and/or Board committee meeting, which discussed

		which discussed AML/CFT/CPF, including regulatory audit findings?	AML/CFT/CPF, including regulatory audit findings.
1.1.11	315	Has the entity, or its directors, shareholders, beneficial owners or senior officers been denied an application by any regulatory body?	Please answer 'Yes' or 'No'.
1.1.12	316	Provide the country of jurisdiction.	Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body.
1.1.13	317	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors or Senior Management a PEP?	Please answer 'Yes' or 'No'.
1.2.1	318	Is there regular reporting of AML/CFT/CPF and Sanctions matters by Senior Management to the board?	Please answer 'Yes' or 'No'.
1.2.2	319	What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?	Enter how often, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board by Senior Management.
1.2.3	320	Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.2.4	321	When was the last review of the AML/CFT/CPF and Sanctions policies and procedures?	Enter the date of the last review of the AML/CFT/CPF and Sanctions policies and procedures.
1.2.5	322	Does Senior Management ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.2.6	323	Does Senior Management ensure that relevant, adequate, and timely information regarding AML/CFT/CPF and Sanctions matters is provided to the Board?	Please answer 'Yes' or 'No'.
1.2.7	324	Does Senior Management ensure that ML/TF/PF business risk assessments	Please answer 'Yes' or 'No'.

		are done prior to the launch of any new products/services/delivery channels/technologies?	
1.2.8	325	How many risk assessments relating to new products/services/delivery channels/technologies did the entity 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	326	Does Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.10	327	How many trainings did the AMLCO/MLRO/DMLRO attend for the reporting period?	Enter the total number of trainings the AMLCO/MLRO/DMLRO attended during the reporting period.
1.3.1	328	Has an AMLCO been appointed?	Please answer 'Yes' or 'No'.
1.3.2	329	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.3.3	330	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.3.4	331	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.3.5	332	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.6	333	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.3.7	334	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.3.8	335	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.3.9	336	Has the AMLCO received specialised AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.10	337	Has the MLRO received specialised AML/CFT/CPF and Sanctions training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.11	338	Has the DMLRO received specialised AML/CFT/CPF and sanctions training	Please answer 'Yes' or 'No'.

		over the last year relevant to the current position?	
1.3.12	339	Does the AMLCO report to the Board and Senior Management on AML/CFT/CPF and Sanctions related issues and on the adequacy of the AML/CFT/CPF and Sanctions framework?	Please answer 'Yes' or 'No'.
1.3.13	340	Does the MLRO report to the Board and Senior Management on AML/CFT/CPF and Sanctions related issues on the adequacy of the AML/CFT/CPF and Sanctions framework?	Please answer 'Yes' or 'No'.
1.3.14	341	Does the DMLRO report to the Board and Senior Management on AML/CFT/CPF and Sanctions related issues?	Please answer 'Yes' or 'No'.
1.3.15	342	Does the AMLCO provide oversight of risk assessment procedures?	Please answer 'Yes' or 'No'.
1.3.16	343	Does the AMLCO conduct AML/CFT/CPF and Sanctions training for all Directors and relevant staff of the entity?	Please answer 'Yes' or 'No'.
1.3.17	344	How many internal trainings did the AMLCO conduct or organize for staff and directors during the reporting period?	Enter the number of internal trainings that were conducted by the AMLCO during the reporting period.
1.3.18	345	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.19	346	Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF and Sanctions compliance breaches?	<p>Please answer 'Yes' or 'No'.</p> <p>Exception report – a report that states those instances in which actual performance deviated significantly from expectations, usually in a negative direction. The intent of the report is to focus management's attention on just those areas requiring immediate action. Examples of what an exception report may identify include 1) inadequate settings in screening software, 2) failures in staff training, and 3) data breach.</p>

1.3.20	347	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.
1.3.21	348	Does the AMLCO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.22	349	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.
1.3.23	350	Does the MLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.24	351	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.
1.3.25	352	Does the DMLRO fulfil any other role or job function?	Please answer 'Yes' or 'No'.
1.3.26	353	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	354	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	355	Is there an Internal Audit Charter/Plan?	Please answer 'Yes' or 'No'.
1.4.3	356	Is the AML Audit plan or charter reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.4	357	Is the internal AML audit function outsourced?	Please answer 'Yes' or 'No'.
1.4.5	358	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	359	Does the internal AML auditor perform regular reviews of the AML/CFT/CPF and Sanctions-related policies, procedures, and processes?	Please answer 'Yes' or 'No'.

1.4.7	360	Has the internal AML auditor performed an AML/CFT/CPF and Sanctions audit and issued a report of findings and conclusions?	Please answer 'Yes' or 'No'.
1.4.8	361	What is the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?	Enter the frequency, in months, of the how often an internal AML audit for the AML/CFT/CPF and Sanctions Programme is conducted.
1.4.9	362	When was the last AML/CFT audit conducted by Internal Audit?	Enter the date of last Internal AML Audit.
1.4.10	363	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.11	364	What is 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	365	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.5.2	366	Is AML/CFT/CPF and Sanctions training provided to Directors and all relevant staff?	Please answer 'Yes' or 'No'.
1.5.3	367	How many AML/CFT/CPF and Sanctions training sessions in total were conducted for the Directors and relevant staff within the reporting period?	Enter the total number of AML/CFT/CPF and Sanctions training sessions conducted for the Directors and relevant staff during the reporting period.
1.5.4	368	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.5.5	369	Does the entity assess AML knowledge of its employees?	Please answer 'Yes' or 'No'.
1.5.6	370	Please indicate percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company during the reporting period.	Enter the percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period.
1.6.1	371	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.

			Enter '20' if 20 or more years.
1.6.2	372	Are any records NOT retained or accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.3	373	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	374	How accessible and swiftly available are records for competent authorities/law enforcement - in hours?	Enter the number of hours it takes for the entity to provide records upon request from competent authorities/law enforcement agencies.
1.7.1	375	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.7.2	376	How frequent is the Risk Assessment methodology 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.
1.7.3	377	What was the date of the last review?	Enter the date of the last review of the Risk Assessment.
1.7.4	378	Does the entity consider ML/TF/PF risks of the clients, including those risks relating to UBOs, in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.5	379	Does the entity consider the ML/TF/PF risks relating to geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.6	380	Does the entity consider the ML/TF/PF risks associated with products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.7	381	Does the entity consider the ML/TF/PF risks associated with delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.7.8	382	Does the entity consider the ML/TF/PF risks associated with technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.

1.7.9	383	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'
17.10	384	Does the entity consider other risk factors, other than those listed above in their risk assessment?	Please answer 'Yes' or 'No'
1.7.11	385	How often, in months, does the entity review High-Risk relationships/accounts?	Select the frequency range of reviewing 'high risk' accounts: 'Never Implemented', 'More than 18 months', '13 – 18 months', '7 – 12 months', and '1 – 6 months'.
1.7.12	386	How many high-risk business relationships or client accounts did the entity review during the reporting period?	Enter the number of 'high' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.13	387	How often, in months, does the entity review medium-Risk relationships/accounts?	Select the frequency range of reviewing 'medium risk' accounts: 'Never Implemented', 'More than 18 months', '13 – 18 months', '7 – 12 months', and '1 – 6 months'.
1.7.14	388	How many medium-risk business relationships or client accounts did the entity review during the reporting period?	Enter the number of 'medium' risk business relationships or client accounts the entity reviewed during the reporting period.
1.7.15	389	How often, in months, does the entity review low-risk relationships / accounts?	Select the frequency range of reviewing 'low risk' accounts: 'Never Implemented', 'More than 18 months', '13 – 18 months', '7 – 12 months', and '1 – 6 months'.
1.7.16	390	How many low-risk business relationships or client accounts did the entity 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	391	Where applicable, does the entity have a Group Wide AML/CFT programme?	Please answer 'Yes' or 'No'.
1.8.2	392	If yes, has the entity conducted a gap analysis to identify whether the AML/CFT programme of each	Please answer 'Yes' or 'No'.

		branch/majority owned subsidiary complies with Cayman's legislation and regulatory framework?	
1.8.3	393	Has 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	394	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	395	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	396	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	397	Does the entity have Governing Body approved policies and procedures for reporting to the Financial Reporting Authority?	Please answer 'Yes' or 'No'.
1.8.8	398	Does the entity have Governing Body approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.8.9	399	Does the entity have Governing Body approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.8.10	400	Does the entity have Governing Body approved policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.8.11	401	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	402	Does the entity have Governing Body approved policies and procedures for	Please answer 'Yes' or 'No'.

		the freezing of funds/assets of designated persons?	
1.8.13	403	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	404	When were the AML/CFT/CPF and Sanctions policies and procedures last updated?	Enter the date when the AML/CFT/CPF policies and procedures were last updated.
1.8.15	405	For the governing process, is information collected on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.8.16	406	Total Clients	<p>Enter the total number of clients the entity has as at end of the reporting period.</p> <p>Where applicable, the number of clients/ customers should only include those of the Cayman Islands legal entity.</p> <p>Total clients consist of natural persons and legal persons and arrangements.</p> <p>Answer to this question should be the same as Question 1 of this Survey, as information requested is the same.</p>
1.8.17	407	Did the company decline, de-risk/ terminate / restrict any business relationships due to AML/CFT/CPF and Sanctions related reasons for the current reporting period?	Please answer 'Yes' or 'No'.
1.8.18	408	Please provide the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period.	Enter the total number of business relationships or clients' accounts that were de-risked/ declined/ terminated / restricted due to AML/CFT/CPF and Sanctions concerns-as at the end of the reporting period.
1.8.20	409	How many customer accounts remain non-compliant with required	Enter the Number of customer accounts that remain non-compliant with required identification and

		identification and verification procedures?	verification procedures, as at the end of the reporting period
1.8.21	410	Does the entity have processes in place to verify client signatories?	Please answer 'Yes' or 'No'.
1.8.22	411	Does the entity conduct due diligence on client signatories?	Please answer 'Yes' or 'No'.
1.9.1	412	Is there a screening process?	Please answer 'Yes' or 'No'.
1.9.2	413	Is the screening process manual, automated or a combination?	Select: 'Manual', 'Automated', or 'Automated with Manual Checks'.
1.9.3	414	Is the screening process fully or partially outsourced?	Please select: 'Fully', 'Partially', or 'Not Applicable'.
1.9.4	415	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	416	Do screening parameters include risk indicators for TF and PF monitoring?	Please answer 'Yes' or 'No'.
1.9.6	417	Is the existing customer database screened periodically against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.9.7	418	Number of clients and related parties / counterparties screened against the H.M. Treasury List within the reporting period.	Enter the number of clients and related parties / counterparties screened against the H.M. Treasury List within the reporting period.
1.9.8	419	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	420	How many false positive hits did the entity encounter during the reporting period?	Number of false positive hits the entity encountered during the reporting period.

1.9.11	421	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.9.12	422	Are customers / counterparties screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.9.13	423	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	424	Does the entity maintain a report of results of positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.9.15	425	How many positive hits for TFS did the entity encounter during the reporting period?	Total number of positive hits related to TFS the entity encountered during the reporting period.
1.9.18	426	Is there an approved process, including policies and procedures, for sanctions monitoring?	Please answer 'Yes' or 'No'.
1.9.19	427	Is the sanctions monitoring process manual, automated or a combination?	Select which applies: 'No Process', 'Manual', 'Automated', or 'Automated with Manual Checks'.
1.9.20	428	Is sanctions monitoring done in real time or after the event?	Select what applies: 'No process', 'After the event', or 'Real time'.
1.9.21	429	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries, counterparties, directors or officers is the target of any economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.9.22	430	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'.
1.9.23	431	Does the entity have systems and procedures in place to determine	Please answer 'Yes' or 'No'.

		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?	
1.10.1	432	Does the Entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.10.2	433	What is 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	434	Has the automated system been adapted for use in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	435	How many instances of unusual or suspicious activity have been flagged by the screening tool during the reporting period?	Enter the number of instances where unusual or suspicious activity has been flagged by the screening tool during the reporting period.
1.10.5	436	Please provide the total number of Alerts generated by the automated system that related to Money Laundering during the reporting period.	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.
1.10.6	437	Please provide the total number of Alerts which resulted in the filing of Suspicious Activity Reports related to Money Laundering.	Enter 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-
1.10.7	438	Please provide the total number of Alerts by the automated system related to Terrorism Financing /Proliferation Financing and sanctions, during the reporting period.	Enter the Total number of alerts related to Terrorism Financing /Proliferation Financing, and Sanctions 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.
1.10.8	439	Please provide the total number of Alerts resulting in the filing of Suspicious Activity Reports related to Terrorism Financing/Proliferation Financing	Enter 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.
1.10.9	440	Please provide the total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information.	Enter the number of incoming transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.10	441	Please provide the total value of incoming funds rejected due to insufficient applicant for business or beneficiary information.	Enter the total value of incoming funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.11	442	Please provide the total number of outgoing transactions rejected due to insufficient applicant for business or beneficiary information.	Enter the number of outgoing transactions the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.12	443	Please provide the total value of outgoing funds rejected due to insufficient applicant for business or beneficiary information.	Enter the total value of outgoing funds the entity rejected during the reporting period, due to insufficient applicant for business or beneficiary information.
1.10.13	444	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering or Terrorism Financing or Sanctions considerations during the reporting period.	Enter the number of new client business relationships (potential clients) the entity rejected due to Money Laundering or Terrorism Financing concerns, during the reporting period.
1.10.14	445	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering, Terrorism	The number of transactions (both incoming and outgoing) the entity blocked/rejected due to Money Laundering, Terrorism Financing or

		Financing or Sanctions considerations during the reporting period.	Sanctions concerns during the reporting period.
1.10.15	446	Please provide the total number of client business relationships (clients) that have been terminated due to Money Laundering, Terrorism Financing or Sanctions considerations during the reporting period.	The number of client business relationships the entity terminated due to Money Laundering, Terrorism Financing or Sanctions concerns, during the reporting period.
1.11.1	447	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	448	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	449	How many clients did the entity conduct EDD on during the reporting period?	The number of clients where the entity applied enhance due diligence.
1.11.4	450	Where EDD was applied, did the entity conduct EDD measures for every transaction such customers carried out?	Please answer 'Yes' or 'No'.
1.11.5	451	How many Transactions did the entity apply EDD on during the reporting period?	The number of transactions the entity applied EDD on during the reporting period.
1.11.6	452	Does the entity have enhanced procedures for monitoring PEPs?	Please answer 'Yes' or 'No'.
1.12.1	453	Does the entity have a documented process for reporting Internal Suspicious Activity to the MLRO?	Please answer 'Yes' or 'No'.
1.12.2	454	How many internal Suspicious Activity Reports have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity Reports reported to the MLRO during the reporting period.
1.12.3	455	How many Suspicious Activity Reports have been reported to the FRA by the MLRO for the current reporting period?	Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period.
1.12.4	456	How many hours on average does it take the entity to file a SAR to the FRA?	Select the option which best applies:

			'More than one week', 'Between 72 hours and 1 week', 'Between 24 and 72 hours', and 'Less than 24 hours'.
1.12.5	457	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	458	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.12.7	459	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.13.1	460	If applicable, is there a board approved documented policy on outsourcing?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsources any activities / functions.
1.13.2	461	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.3	462	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.4	463	In total, how many services does the entity outsource from either third parties, within its group or subsidiaries?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries. Material functions such as AML/Compliance, Information Technology, Internal Audit and any other functions that fall within the definition of an outsourced function.
1.13.5	464	Does the outsourcing agreement clearly set out the obligations of both parties?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.

1.13.6	465	If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.7	466	if relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity?	Please answer 'Yes', 'No' or 'N/A'.
1.13.8	467	If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities.
1.13.9	468	If relevant, does the outsourced AMLCO/MLRO have access to the compliance committee and board of the entity?	Select which best applies: 'Yes', 'No' or 'N/A' The question is only applicable if entity outsource any activities.
1.13.10	469	If relevant, are there data protection restrictions which would delay access to data and documents?	Select which best applies: 'Yes', 'No' or 'N/A' The question is only applicable if entity outsource any activities.
1.13.11	470	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes' or Enter 'No' where not applicable The question is only applicable if entity outsource any activities.
1.13.12	471	Is the entity satisfied that the OSP(s) has measures in place to comply with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not applicable' The question is only applicable if entity outsource any activities
1.14.1	472	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.14.2	473	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.