



Completion Guide: VASP Travel Rule Return

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Revision History:

Effective Date	Version Number	Revision Description
27 January 2023	1.0	Initial release of document
30 October 2023	1.1	Updates to user guidance for excel functionality and user access and removing the threshold reporting value
01 August 2025	1.2	Updates to Sections 1 through 3.3, Section 4.5 and updates to definitions, descriptions, and explanations

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1 INTRODUCTION

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

In order to obtain the information necessary to discharge its principal functions, particularly that of monitoring compliance with the AMLRs, the Authority periodically undertakes sectoral money laundering/terrorist financing/proliferation financing (ML/TF/PF) risk assessments as part of its risk-based approach to Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) supervision of regulated financial service providers (“**FSPs**”). For the purposes of the risk assessment of the virtual asset service providers (**VASP**) sector, the Authority distributes the **Travel Rule Return** to VASP on a quarterly basis. The VASP Travel Rule Return collects data relating to the originator and beneficiary details of transfers allowing the Authority to analyse the ML/TF/PF and sanctions risk exposures and increase transparency within the crypto asset sector.

Originating VASP and beneficiary VASP who engage in virtual asset transfers, with both retail and institutional customers, are required to collect, verify and share information about virtual asset transfers for transactions as set out in Part 10A of the AMLRs. VASP are therefore required to provide the necessary data by completing the VASP Travel Rule Return and submit it through the Authority’s web-based data collection software, STRIX, to the Anti-Money Laundering Division (the “**AML**D”), within ten (10) days after distribution by the Authority. Please note that manual submissions will not be accepted.

The Travel Rule Return is issued in accordance with Regulation 53A of the AMLRs, pursuant to which the Authority may require a FSP to provide any information that the Authority reasonably requires in connection with the exercise of its functions. Requiring VASP to complete the Travel Rule Return is necessary to ensure that the Authority has the requisite information to perform its statutory functions as outlined in Section 6 of the MAA, which includes the monitoring of compliance with the AMLRs.

In addition, Section 9(5) of the Virtual Asset (Service Providers) Act (2024 Revision) (“**VASP Act**”) requires a virtual asset service provider to collect and maintain information on the beneficiary and originator of the transfer of virtual assets in accordance with AMLRs together with any additional information specified by the Authority, and to make the records available at the request of the Authority within forty-eight hours of receipt of the request. Section 24(1) of the VASP Act further sets out the duty of the Authority to maintain a general review of virtual asset services in the Islands and empowers the Authority to examine the affairs of a licensee in any manner as it deems fit for the purposes of confirming that the AMLRs are being complied with and carrying out any other functions. The examination of the affairs of a virtual asset service provider using information obtained through the Travel Rule Return is therefore necessary for purposes of discharging the Authority’s functions, including monitoring compliance with the AMLRs pursuant to Section 6(1)(b)(ii) of the MAA and Section 24(1)(c)(ii) of the VASP Act, as well as carrying out the duty of maintaining a general review of virtual asset services in the Islands pursuant to Section 24(1)(a) of the VASP Act.

This Guide provides instructions and support to VASP for accessing, completing, and submitting the Travel Rule Return to AMLD.

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

The Authority also has powers to take enforcement action pursuant to the relevant provisions of Section 25 of the VASP Act for failure to comply with a requirement to provide information, which may include revocation of a licence. Providing false or misleading information to the Authority may also amount to a criminal offence and result in a fine of ten thousand dollars on summary conviction and to imprisonment for six months pursuant to Section 24(3) of the VASP Act.

2 FORM INFORMATION

The VASP Travel Rule Return is comprised of one (1) schedule and is intended for reporting relevant transfers of assets (crypto currency, fiat, or other form^[TM1] of digital currency) involving entities within the scope of application.

3 ACCESSING AND SUBMITTING THE VASP TRAVEL RULE RETURN

3.1 ACCESS TO THE VASP TRAVEL RULE RETURN

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 contact of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient's email address and cannot be shared or forwarded. Clicking on the link provided in the invitation email will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation email.

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

The Authority is using the following entity contacts to distribute the VASP Travel Rule Return: Anti-Money Laundering Compliance Officer ("AMLCO"), Deputy Money Laundering Reporting Officer ("DMLRO"), Money Laundering Reporting Officer ("MLRO"), Registered Office contact and any other additional contacts, upon request from the Entity. If an entity is unsure of the current contact details the Authority has on record, they can contact the Authority at AMLSurveys@cima.ky.

To access the VASP Travel Rule Return:

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



Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

[Confirm Account](#)

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLI86VZVCRbBxmnm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYSop%2Bk8rPURRSVrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhATaTNSa3IE3aIA%3D>

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

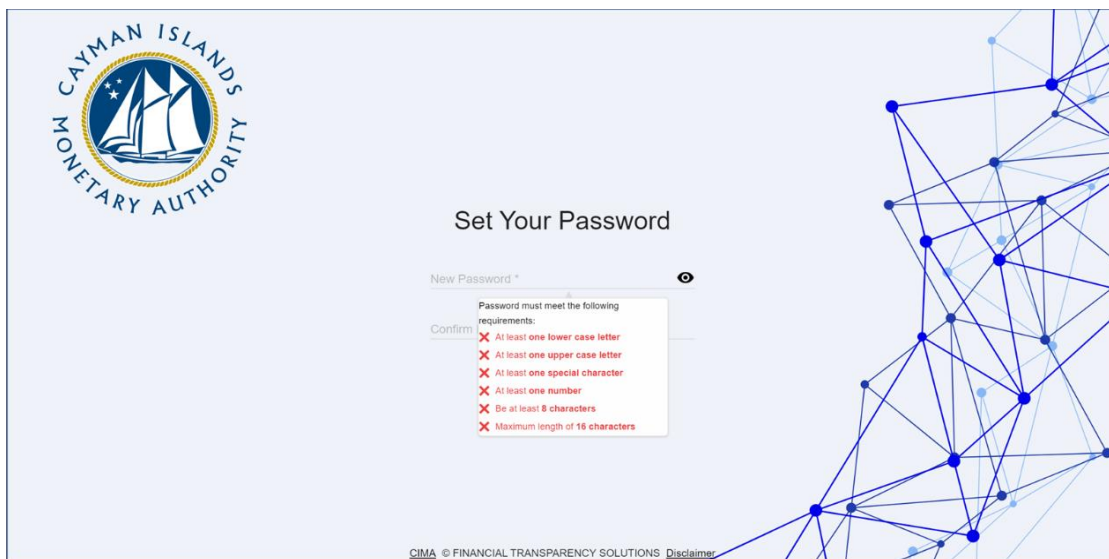
Please do not reply to this email, it is automatically generated.

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



**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password *

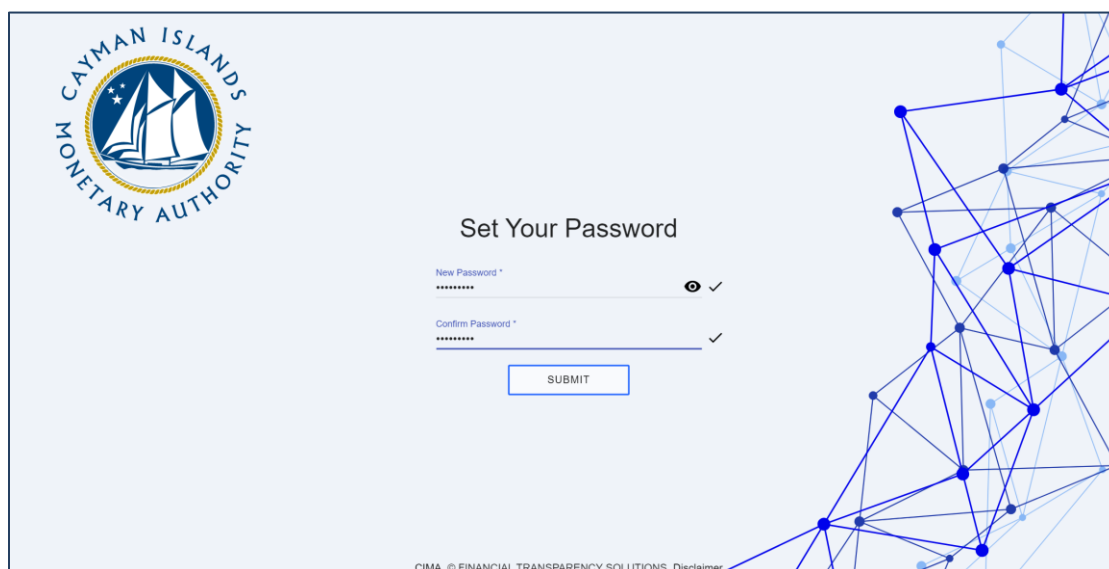
Confirm

Password must meet the following requirements:

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

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



**CAYMAN ISLANDS
MONETARY AUTHORITY**

Set Your Password

New Password * ✓

Confirm Password * ✓

SUBMIT

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



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

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

Disclaimer:

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

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

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

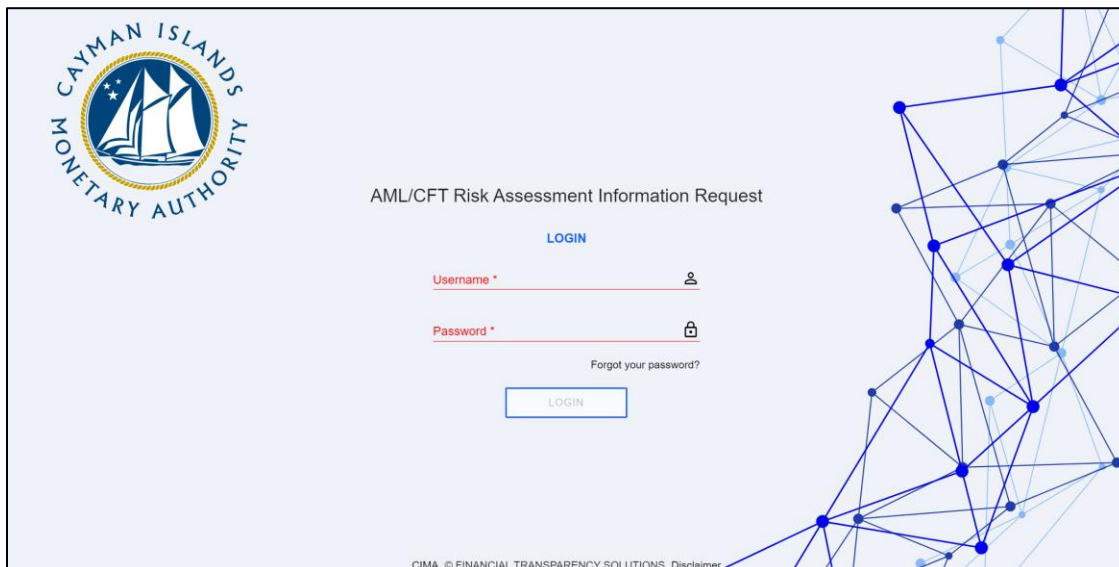


Your password was successfully changed.

[RETURN TO HOME](#)

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6. The recipient should then enter their username, which is their email address where they received the VASP Travel Rule report 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 address.



CAYMAN ISLANDS
MONETARY AUTHORITY

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:

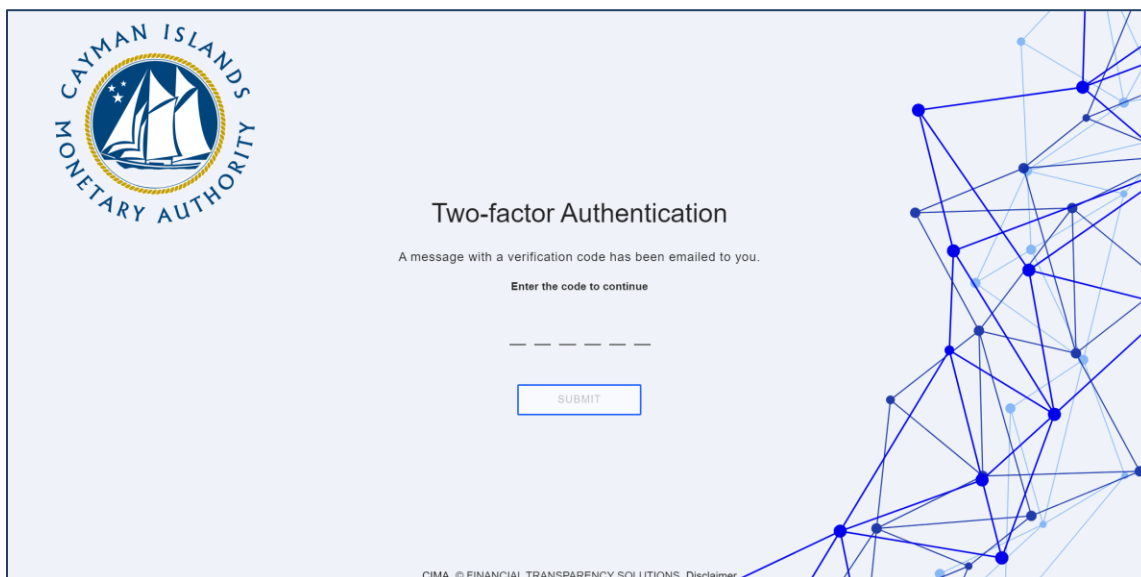
951247

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

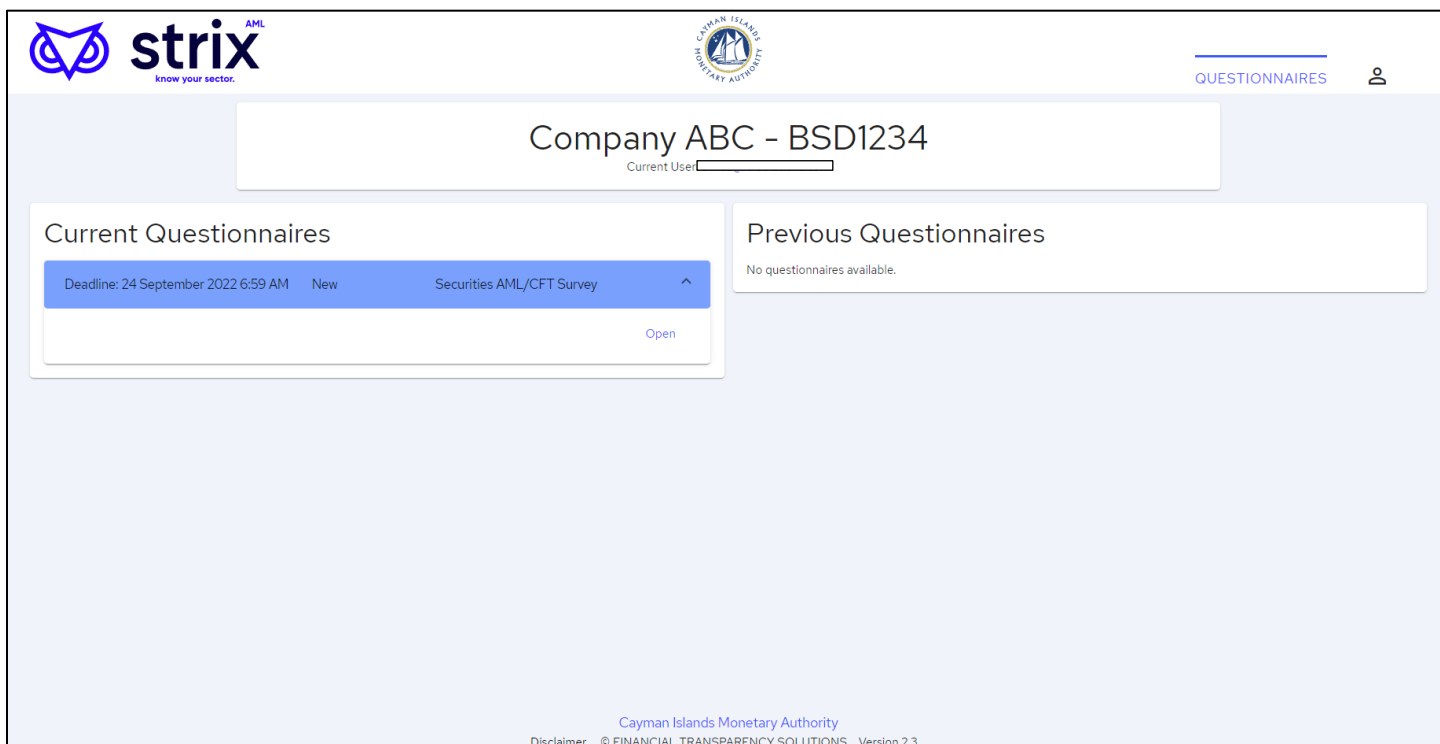
A message with a verification code has been emailed to you.

Enter the code to continue

SUBMIT

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9. Click 'Open' to access the VASP Travel Rule Return 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.



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**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.

Cayman Islands Monetary Authority
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3.2 COMPLETING THE VASP TRAVEL RULE RETURN

1. Click the Current Questionnaire to access the VASP Travel Rule Return and start populating the form with the required data.
 - a. Completion guidance for the VASP Travel Rule Return is available at section 4.8 of this Guide below.
 - b. The recipient(s) can open, update, and close the VASP Travel Rule Return as many times as needed prior to the survey due date so long as the recipient selects 'Save'.
 - c. Once the VASP Travel Rule report 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 VASP Travel Rule Return 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 VASP Travel Rule Return will be conducted by a member of the AMLD, if information is missing or needs clarification the Authority will 'Reject' the VASP Travel Rule Return through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an 'Incomplete' VASP Travel Rule Return, 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. Licence 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.
 - h. The VASP Travel Rule Return is to be completed quarterly and should be submitted through the STRIX portal ten (10) days after being distributed by the Authority.
2. If a user receives or has access to more than one survey, they will not see the additional survey(s) in the 'Current Surveys' section of the web page. At the top of the page, where it shows the Entity name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

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

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

4.2 INTERNET BROWSER

Users should be aware that the VASP Travel Rule Return 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 another modern browser.

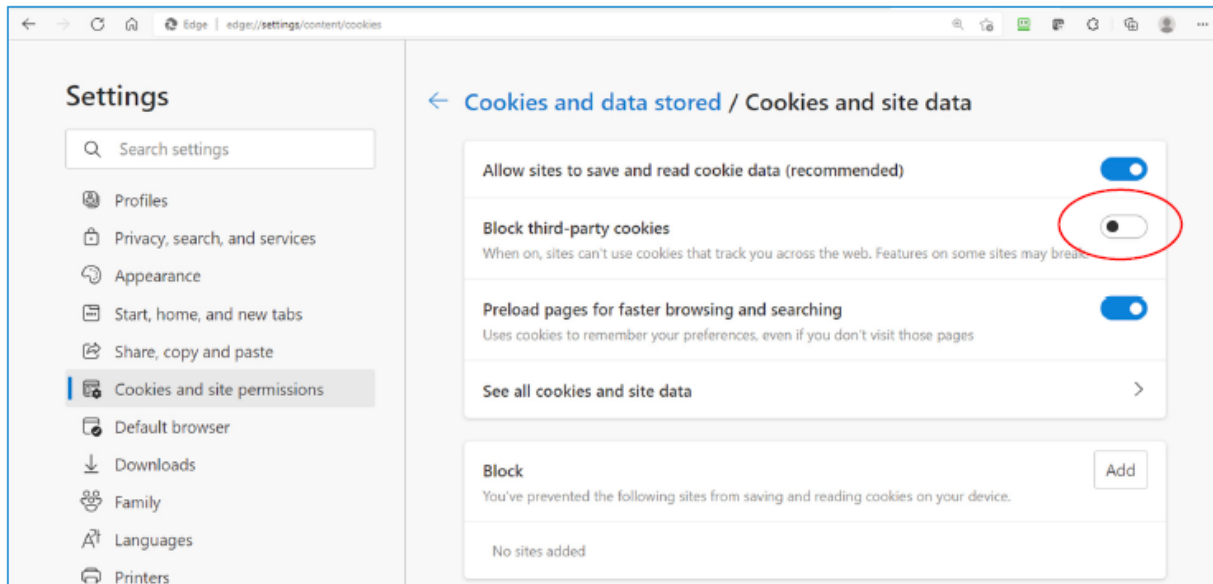
4.3 TWO-FACTOR AUTHENTICATION

Due to the security permissions around the two-factor authentication, the invite to the Travel Rule Return, or the access to the portal, cannot be shared with uninvited recipients. If entities wish to add additional users to assist with completing or reviewing the form they can contact AMLSurveys@cima.ky.

If an Entity's recipient is set up as a contact to the STRIX portal however they are not receiving their two-factor authentication code, they should attempt the following prior to contacting AMLSurveys@cima.ky:

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

Example of Microsoft Edge Cookie Setting:



4.4 USING EXCEL

The Strix portal allows you to copy two-column lists from an Excel document and paste the data directly into the 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:

- 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.
- 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.
- 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.

4.5 PARTIAL OR INCOMPLETE SURVEY SUBMISSIONS

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

- Licence or Registration Name
- Licensed or Registration Number
- Date of Licence or Registration
- List of current directors

- e. *Number of Clients*
- f. *Reason for requesting to make an Incomplete Submission.*

4.6 DATA AND SECURITY

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

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

4.7 APPLICABLE FEES

There are no fees associated with this Form.

5 TRAVEL RULE RETURN GUIDANCE

5.1 TRANSACTIONS

Entities are to report the sum of all transactions include any movement or conversion of virtual currency (including to fiat or other digital form of asset), to a party other than the entity.

5.2 TERMS AND DEFINITIONS

Terms/Abbreviations	Definition/Meaning
AMLRs	Anti-Money Laundering Regulations (2025 Revision), as amended.
Beneficiary	<p>In relation to a transfer of virtual assets, means:</p> <ul style="list-style-type: none"> a) the client (natural person, legal person, or legal arrangement) that receives virtual assets that were transferred to a virtual asset service provider or directly to the client; or b) where the transfer is received by a virtual asset service provider on behalf of a client or other third party, the natural person, legal person, or legal arrangement that ultimately receives the transfer.

Client / Customer	A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands.
Currency used for the Survey	United States Dollars (US\$). All other currencies must be converted to US\$ unless otherwise stated, using the prevailing rate of exchange as at the last day of the reporting period.
Country	The country of origin is the initial ordering country for transfers received and/or booked by the reporting entity. For example, if an entity in country Y initiates a transfer from its bank or another VASP in country X, then the country of origin is country X. For transfers sent and/or booked by the reporting entity, the end beneficiary country is the country where the end beneficiary's bank or another VASP is located.
Fiat Currency	Currency that is issued by the relevant body in a country or by a government that is designated as legal tender in its country of issuance through, among other things, government decree or law.
First-Party Transaction	'First party' transactions are instances where: a) the customer owns both wallets that the virtual assets are being transferred to and from, that is, the customer is both the originator and the beneficiary; and b) transfers are internal, that is, the reporting entity is both the originator and beneficiary VASP. ^[TM2]
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.
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Originator	In relation to a transfer of virtual assets, means:

	<p>a) the client (natural person, legal person, or legal arrangement) that places an order with the virtual asset service provider for the virtual asset transfer; or</p> <p>b) where the transfer is carried out by a virtual asset service provider on behalf of a client or third party who owned the virtual asset immediately before the transfer.</p>
Reporting Periods	<p>Every Quarter of each Year as follows:</p> <p>Quarter 1: 1 January to 31 March Quarter 2: 1 April to 30 June Quarter 3: 1 July to 30 September Quarter 4: 1 October to 31 December</p>
Transaction	<p><i>For the purpose of this form, transactions include any movement or conversion of virtual currency (including to fiat or other digital form of asset), to a party other than the entity. Transactions include but may not be limited to:</i></p> <ul style="list-style-type: none"> - transactions from the Entity to another member within its group structure, - transactions from a client wallet to a third party. - transactions between two wallets of the same client with one wallet being held with another financial institution. - transactions of exchange between virtual assets and fiat currencies. - transactions of exchange between one or more other forms of convertible assets. - The initial sale or offer of a virtual asset.^[TM3]
Virtual Asset	<p>A digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies;</p>

5.3 SURVEY COMPLETION GUIDE

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Has the Entity conducted any transfers of virtual	Please respond 'Yes' or 'No' as applicable.

		assets or fiat currency during the reporting period? [TM4][JS5]	
1.1.2	2	Did the Entity conduct 'first-party' transactions only during the reporting period?	Please respond 'Yes' or 'No' as applicable.
1.2.1	3	Total Clients / Customers during the reporting period.	Enter the total number of clients the entity conducted business with <i>during</i> the reporting period. Where applicable, the number of clients/ customers should only include those of the Cayman Islands legal entity. Total clients consist of natural persons and legal persons and arrangements.
1.2.2	4	Total Transactions for the reporting period.	Enter the total number of all transactions conducted for clients <i>during</i> the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.2.3	5	Total Value of Transactions processed during the reporting period.	Enter the total value of transactions processed for clients <i>during</i> the reporting period. Where applicable, the total value of transactions should only include those of the Cayman Islands legal entity.
1.3.1	6	Do you have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
1.3.2	7	Please use this area to provide any comments or feedback for this tab.	If 'Yes' to Q6, please input any comments or feedback for this tab.
2.1.1	8	Number of <u>all</u> outgoing Transactions from an Originator client, for the reporting period, broken down by the transaction destination country.	Enter the total number of <u>all</u> transactions transferred out (by or on behalf of clients), during the reporting period, where the entity is the Originator. <i>Refer to section 3.2(3) above for guidance on how to respond to this question using Excel.</i>

2.1.2	9	Total value of <u>all</u> outgoing Transactions from an Originator client for the reporting period, broken down by the transaction destination country.	Enter the total value of <u>all</u> transactions transferred out (by or on behalf of clients), during the reporting period, where the entity is the Originator. <i>Refer to section 3.2(3) above for guidance on how to respond to this question using Excel.</i>
2.1.3	10	Number of <u>all</u> incoming Transfers to a Beneficiary client for the reporting period, broken down by Country of origin.	Enter the total number of <u>all</u> incoming transfers received by beneficiary clients, during the reporting period, broken down by country of origin. <i>Refer to section 3.2(3) above for guidance on how to respond to this question using Excel.</i>
2.1.4	11	Total value of <u>all</u> incoming Transfers to a Beneficiary client for the reporting period, broken down by Country of origin.	Enter the total value of <u>all</u> incoming transfers received by beneficiary clients, during the reporting period, broken down by country of origin. <i>Refer to section 3.2(3) above for guidance on how to respond to this question using Excel.</i>
2.1.5	12	Number of transactions not executed due to incomplete / insufficient CDD, during the reporting period.	Enter the total number of incoming and outgoing transactions not executed due to incomplete client due diligence ("CDD") on either the Originator or Beneficiary, during the reporting period.
2.1.6	13	Total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information.	The number of incoming transactions the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.7	14	Total value of incoming funds rejected due to insufficient applicant for business or beneficiary information.	The value of incoming funds the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.8	15	Total number of outgoing transactions rejected due to insufficient applicant for business or beneficiary information.	The number of outgoing transactions the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.9	16	Total value of outgoing funds rejected due to	The value of outgoing funds the entity declined to process, during the reporting

		insufficient applicant for business or beneficiary information.	period, due to insufficient CDD information on an applicant for business or beneficiary.
2.1.10	17	Total number of prospective client business relationships that were declined due to ML/TF/PF or sanctions concerns, during the reporting period.	<p>The number of potential new client relationships that were declined, during the reporting period, because of ML/TF/PF or Sanctions concerns, during the reporting period.</p> <p>ML/TF/PF or Sanctions concerns are known events or red flags that may be raised. Known events include lack of CDD, the potential client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through screening of potential clients via both internal systems and/or external databases. Note: These examples are not exhaustive.</p>
2.1.11	18	Total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF or sanctions concerns during the reporting period.	<p>Total number of transactions (both incoming and outgoing) the entity stopped or declined, during the reporting period, due to ML/TF/PF or Sanctions concerns.</p> <p>ML/TF/PF or Sanctions concerns are known events or red flags that may be raised. Known events include lack of CDD, client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through ongoing transaction monitoring and routine screening of remitters and beneficiary clients via both internal systems and/or external databases. Note: These examples are not exhaustive.</p>
2.1.12	19	Total number of client business relationships that have been terminated due to ML/TF/PF or sanctions concerns during the reporting period.	<p>The number of client business relationships the entity terminated, during the reporting period, due to ML/TF/PF or Sanctions concerns.</p> <p>ML/TF/PF or Sanctions concerns are known events or red flags that may be raised. Known events include lack of CDD, the client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through screening of existing clients via both internal systems and/or external databases. Note: These examples are not exhaustive.</p>
2.2.1	20	Do you have any comments or feedback for this tab?	Please select 'Yes' or 'No'.
2.2.2	21	Please use this area to provide any comments or feedback for this tab.	If 'Yes' to Q20, please input any comments or feedback for this tab.