



AML Survey – Completion Guide: Securities & Registered Persons

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Revision History:

Effective Date	Version Number	Revision Description
12 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update to definitions
31 May 2023	1.2	Updates to definitions, descriptions, and explanations.
31 May 2024	1.3	Updates to definitions, descriptions, and explanations.
24 June 2024	1.4	Update to section 1 of the completion guidance and question 89.

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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 – Securities and Registered Persons Form is to be completed by each FSP holding a Securities Licence or Registration, who are commonly referred to as “Entity” for purposes of this form.

The AML Survey – Securities and Registered Persons 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

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=YJa0JBLI86VZVCRbBxrm3fq3fSoAMoPYyQ6XKFqtx0MoYgkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtlwMObYSoP%2Bk8rPURRSVrPSQt6JA5hgSaBaC6uvcZV4KB266HIFgh4FhAtaTNSa3IE3aIA%3D>

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

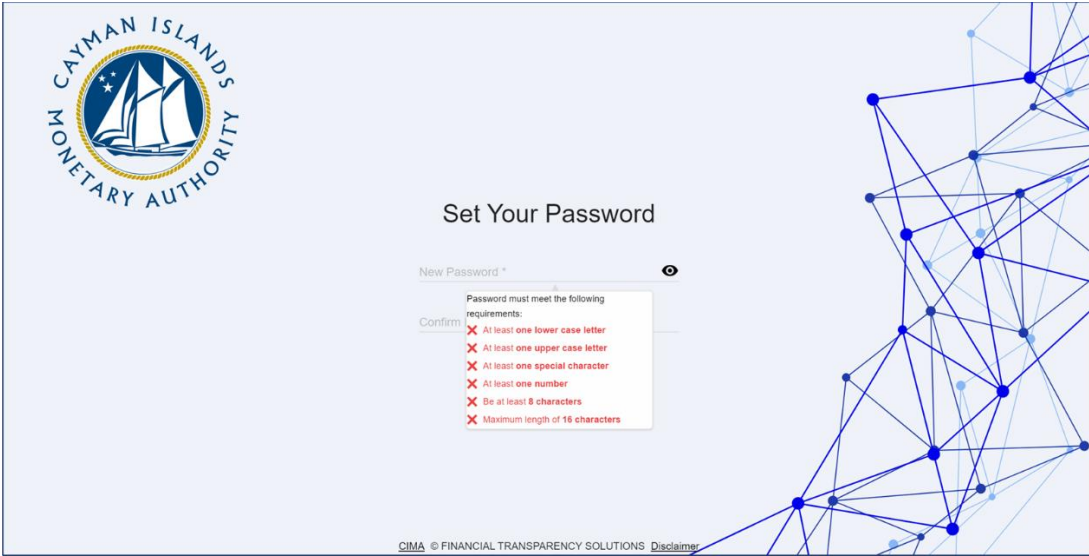
Please do not reply to this email, it is automatically generated.

Disclaimer:

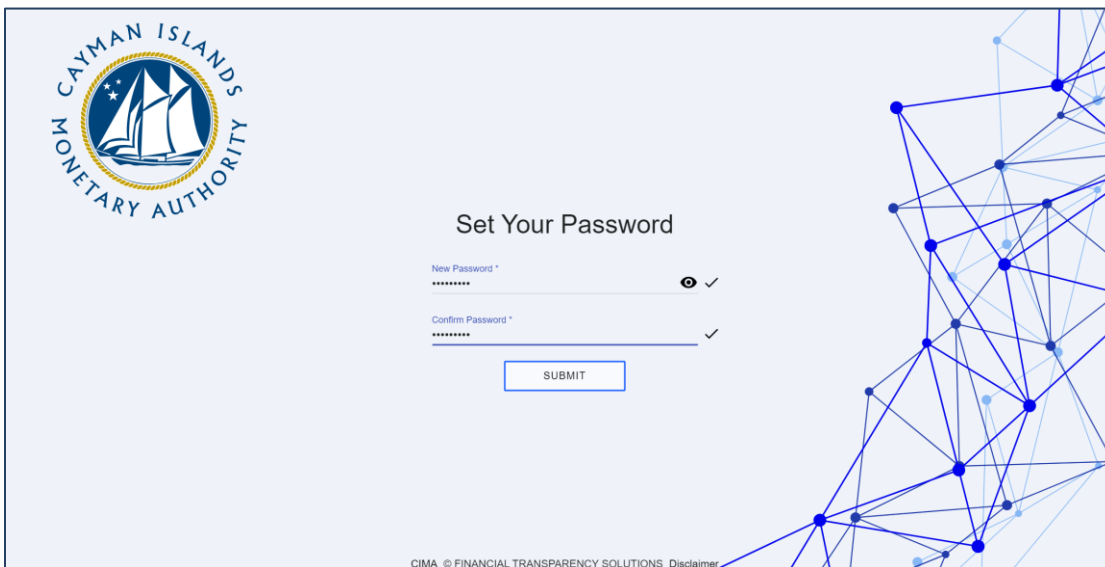
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2. The recipient will then be asked to create a password using uppercase, lowercase, number, and a special character. The password is required to be between 8 and 16 characters long.



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



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



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

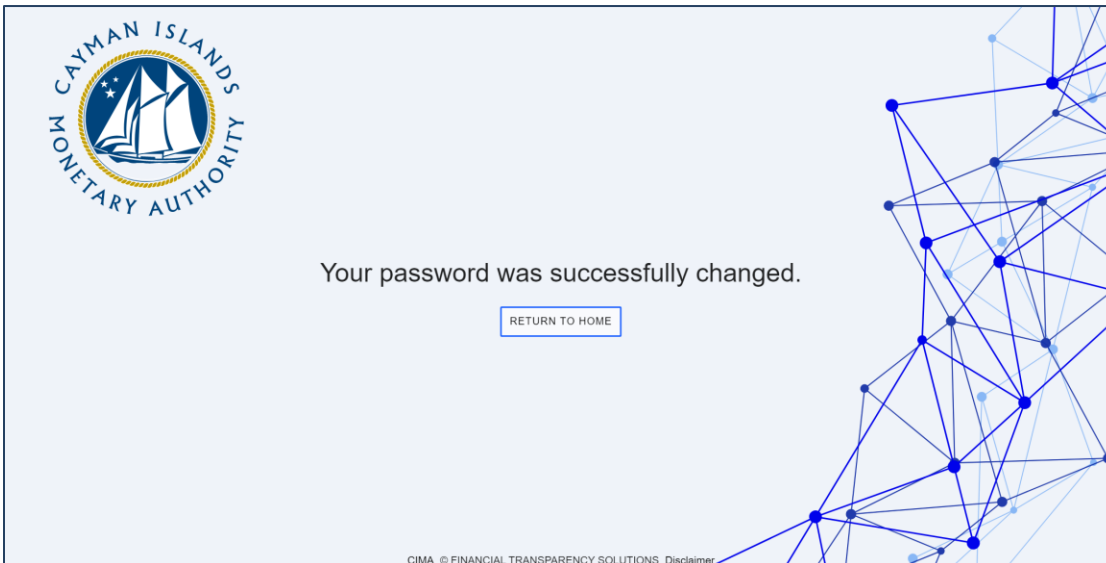
Please do not reply to this email, it is automatically generated.

Disclaimer:

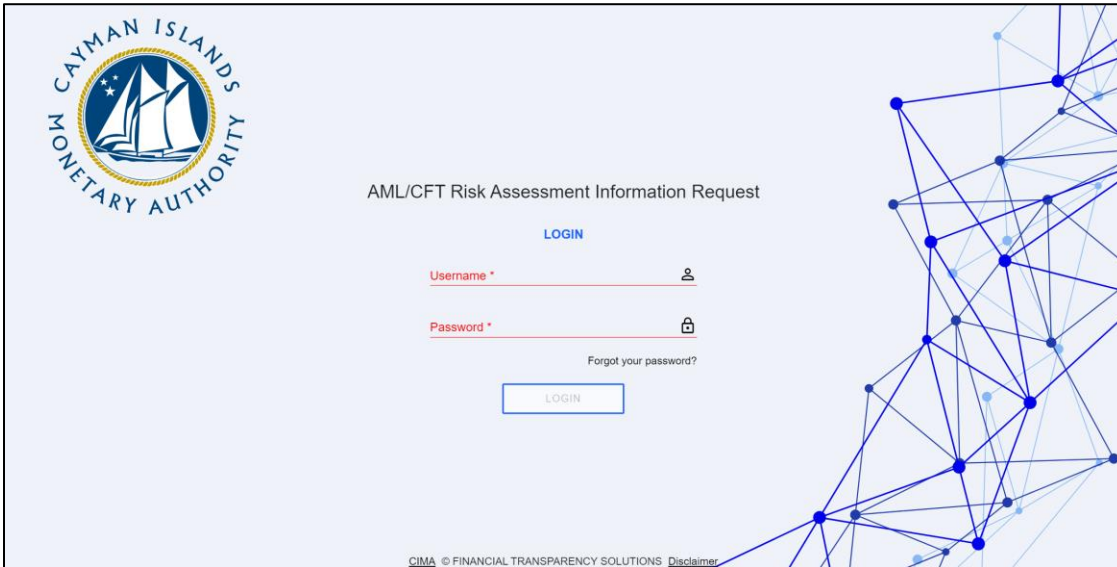
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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



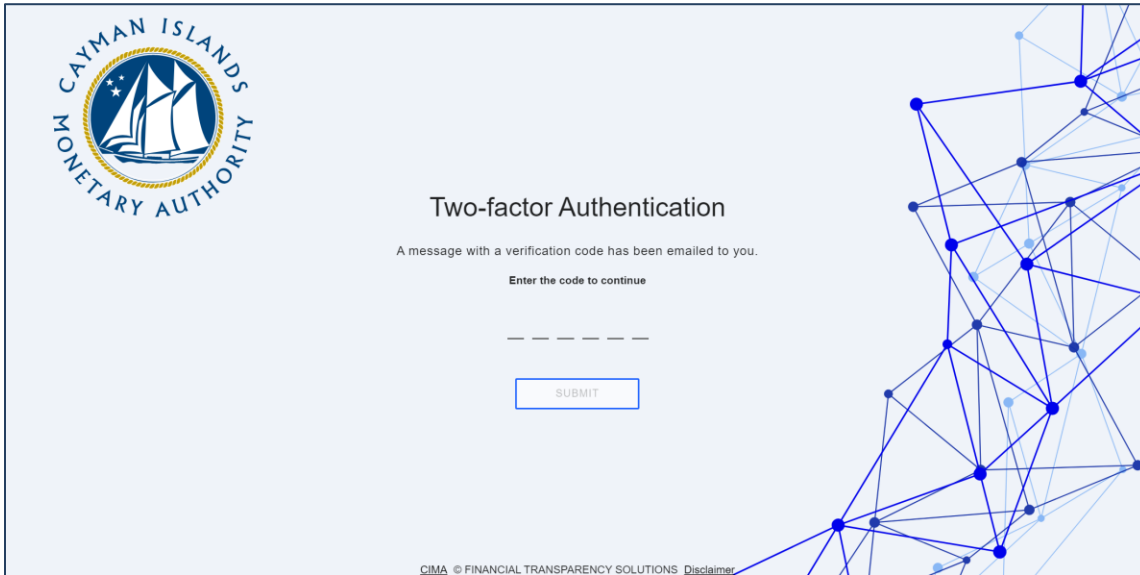
- 6. The recipient should then enter their username, which is their email address where they received the AML Survey invite, and the password they just created.



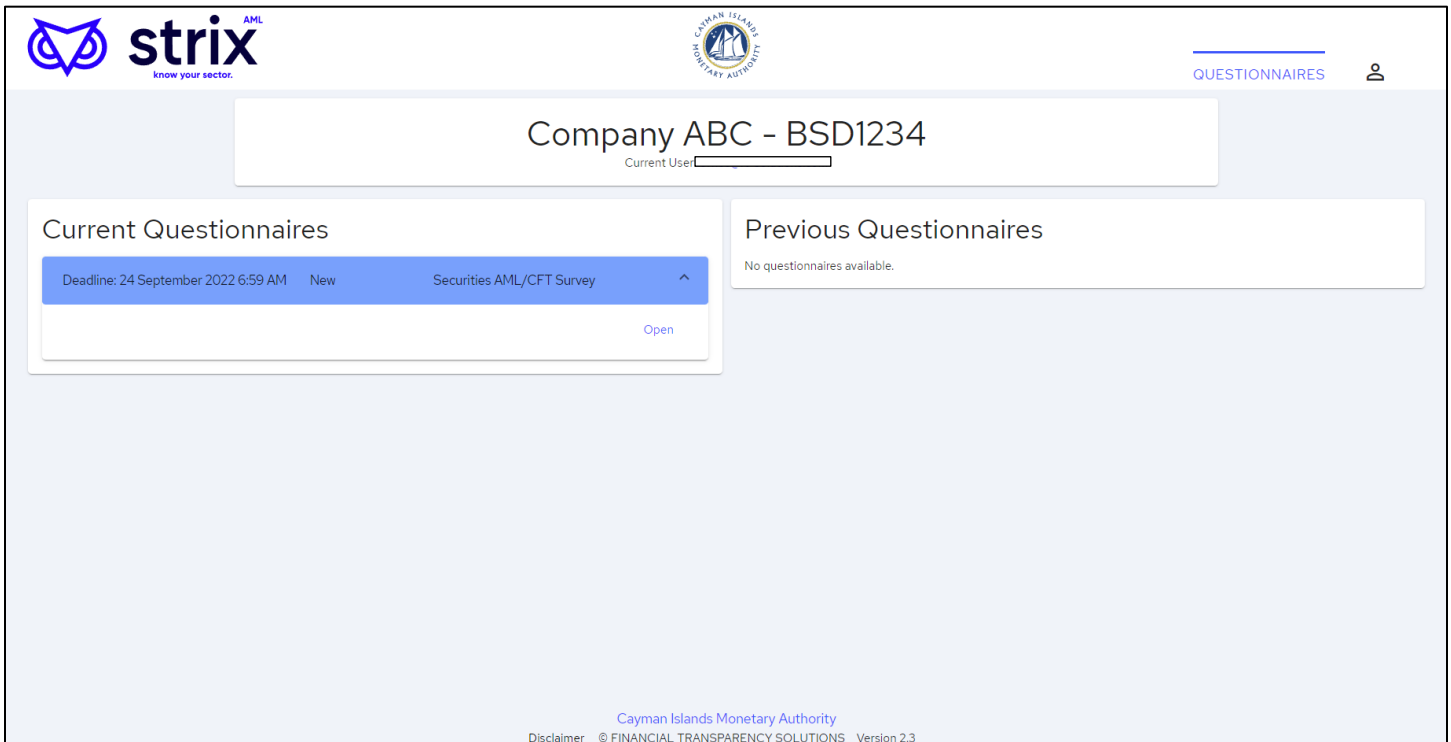
- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email



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



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



3.2 COMPLETING THE AML SURVEY FORM

1. Click the Current Questionnaire to access the AML Survey Form and start populating the form with the required data.
 - a. Completion guidance for the AML Survey is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Survey as many times as needed prior to the survey due date so long as the recipient selects 'Save'.
 - c. Once the AML Survey has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
 - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
 - e. Once the AML Survey is 'Submitted' an Excel and PDF copy of the completed survey will be available under 'Current Questionnaire'.
 - f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD, if information is missing or needs clarification the Authority will 'Reject' the AML Survey through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an 'Incomplete' AML Survey, they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLSurveys@cima.ky detailing the following:
 - i. Licence or Registration Name
 - ii. Licenced or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current directors
 - v. Number of Clients
 - vi. Reason for requesting to make an Incomplete Submission.
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.
AMLCO	Anti-Money Laundering Compliance Officer
BO	<p>Beneficial Owner (or UBO) (as defined in Regulation 2 of the Anti-Money Laundering Regulations (as revised)) means 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>
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>
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	United States Dollars (US\$).

	All other currencies must be converted to US\$ unless otherwise stated.
Dealers in Precious Metals and Stones	Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer
Eligible Introducers	A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Entity	For the purposes of this form/survey, an ‘entity’ is the holder of the Securities licence or the Registered Person registration that is responding to this survey.
F2F	The engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
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.

High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods.
HNWI	A high net worth individuals (HNWI) is: (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.
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 Arrangement	A trust or partnership, or other entity created between parties which lacks separate legal personality.
Legal Person	“Legal person” means a company or other entity created by operation of law with separate legal personality.
MLRO	Money Laundering Reporting Officer
ML/TF/PF	Money Laundering / Terrorism Financing / Proliferation Financing.
Money Service Business (MSB)	Money services business means the business of providing, in or from within the Islands, any of the following services: (a) money transmission; (b) cheque cashing. (c) currency exchange. (d) the issuance, sale or redemption of money orders or traveller’s cheques.
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	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. Outsourcing does not include purchasing contracts.
PEP	"Politically Exposed Person" includes — (a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official. (b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and (c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions. Politically exposed persons also include: (i) Family members of a PEP who are related either directly (consanguinity) or through

	<p>marriage or similar (civil) forms of partnership.</p> <p>(ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.</p>
Reporting Period	January 1 through December 31, 2023, and future calendar years thereafter.
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, BOs, 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>For the purposes of this survey, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client.</p> <p>Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction.</p> <p>Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated to securities trades should be excluded from the definition.</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.
Ultra HNWI		Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWI whose net worth is greater than or equal to US\$30,000,000.
Value of Assets Under Management		The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio.
Virtual Asset Products and Services		Includes those services identified within the Virtual Asset (Service Providers) Act (2022 Revision), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.
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.
1.1.2	2	Total Clients <u>during</u> the reporting period	Enter the total number of clients the entity had <u>during</u> the reporting period.
1.1.3	3	Total Transactions.	Enter the total number of all transactions conducted for clients during the reporting period.
1.1.4	4	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.

1.1.5	5	Clients / customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client.	<p>Enter the total number of clients that are legal persons and arrangements broken down by their country of incorporation, or formation, 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 have such clients, a '0' value should be used.</p>
1.1.6	6	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>
1.1.7	7	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>
1.1.8	8	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, BOs, Directors, or hold any other form of control, including signatories.</p>
1.1.9	9	Total Number of High Risk Clients.	<p>Enter the total number of clients / customers that are 'high' risk, at the end of the reporting period.</p>
1.1.10	10	Total number of Non-Compliant Accounts at the end of the reporting period.	<p>Enter the number of customer accounts that remain non-compliant with required identification and verification procedures.</p>

1.2.1	11	Total number of BOs of clients who are Legal Persons and Arrangements.	<p>Enter the total number of BOs of all clients who are legal persons or arrangements, broken down by nationality of the BO, 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 BOs of Corporate entities and Settlers of Trusts.</i></p> <p><i>A BO should not be counted more than once regardless of the number of business relationships they have with the entity.</i></p>
1.2.2	12	Does the entity have any clients who are Legal Arrangements?	Answer 'Yes' or 'No'
1.2.3	13	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	14	Number of Partners of clients who are Legal Arrangements.	Enter the number of partners of legal arrangement clients, broken down by the nationality of the partner.
1.2.5	15	Does the entity have any clients which have BOs who are HNWI's?	<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 BO of a Company or Settlor of a Trust is a HNWI.</i></p>
1.2.6	16	Number of Clients which have BOs who are HNWI's.	<p>Enter the total number of clients that have BOs who are HNWI's.</p> <p><i>HNWI's 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>
1.2.7	17	Does the entity have any clients which have BOs who are Ultra HNWI's?	<p>Please answer 'Yes' or 'No'.</p> <p><i>UHNWI's is specific to those persons whose net worth is equal to or greater than \$30,000,000.</i></p>
1.2.8	18	Number of Clients which have BOs who are Ultra HNWI's.	Enter the total number of clients who have BOs who are Ultra HNWI's.

1.2.9	19	Does the entity have any clients who are Legal Persons or Arrangements that have BOs who are PEPs?	Please answer 'Yes' or 'No'.
1.2.10	20	Number of BOs of clients who are Legal Persons or Arrangements which are also PEPs.	Enter the total number of clients who are Legal Person and Arrangements that have BOs who are PEPs, as at the end of the reporting period.
1.2.11	21	Does the entity have any clients which have Nominees acting on behalf of a BO (inc. any Nominees within the ownership structure)?	Please answer 'Yes' or 'No'.
1.2.12	22	Number of clients which have Nominees appointed acting on behalf of a BO, or a Nominee within the ownership structure, broken down by nationality of the BO.	Enter the total number of clients which have nominees acting on behalf of BOs, or within its ownership structure, categorised by nationality of the BO. This category is specific to clients who are legal persons and arrangements.
1.3.1	23	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	24	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	25	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	26	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 HNWIs, as at the end of the reporting period.
1.3.5	27	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 HNWIs as at the end of the reporting period.

1.3.6	28	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	29	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	30	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	31	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	32	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	33	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	34	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.7	35	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	36	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period.
1.4.9	37	NPO - Value of Transactions.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.
1.4.10	38	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	39	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.12	40	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	41	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.
1.4.14	42	Foundations – Value of Transactions.	Enter the value of transactions processed for clients that are Foundations, during the reporting period.
1.4.15	43	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	44	Does the entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.17	45	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	46	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients that are Trusts, during the reporting period.
1.4.19	47	Trusts – Value of Transactions.	Enter the Value of transactions conducted by clients that are Trust, during the reporting period.
1.4.20	48	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	49	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	50	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	51	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	52	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	53	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	54	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	55	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	56	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	57	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	58	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	59	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	60	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	61	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	62	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	63	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	64	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	65	Clients / customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period. If an entity does not have such clients, a '0' value should be used. <i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i>
1.5.3	66	Clients/customers that are Natural Persons, broken down by Residency of the client.	Enter the number of clients that are natural persons, broken down by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a '0' value should be used. <i>Note: This category <u>does not</u> include clients/ customers that are Legal Persons and Arrangements.</i>
1.5.4	67	Natural Person Clients – Total Transactions.	Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period. This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a '0' value should be used.

			<i>Note: This category <u>does not</u> include clients / customers that are <u>Legal Persons and Arrangements</u>.</i>
1.5.5	68	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	69	Does the entity have any Natural Person clients that are PEPs?	Please answer 'Yes' or 'No'. This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.
1.5.7	70	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	71	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	72	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	73	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	74	Does the entity have any Natural Person Clients that are HNWI's?	Please answer 'Yes' or 'No'.
1.5.12	75	Number of Natural Person Clients who are HNWI's.	Enter the number of Natural Person clients the entity has that are HNWI's.
1.5.13	76	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	77	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	78	Natural Person Clients - HNWI's - Value of Assets Under Management.	Enter the Value of Assets Under Management of Natural Person clients

			that are HNWIs, as at the end of the reporting period.
1.5.16	79	Does the entity have any Natural Person clients that are Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.5.17	80	Number of Natural Person Clients who are Ultra HNWIs.	Enter the number of Natural Person clients that are Ultra HNWIs, at the end of the reporting period.
1.5.18	81	Natural Person Clients – Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are Ultra HNWIs, during the reporting period.
1.5.19	82	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	83	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	84	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	85	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	86	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	87	Natural Persons - PEPs & HNWIs - 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	88	Natural Persons - PEPs & HNWIs - 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	89	<p>Nature of Business / Source of Funding:</p> <p>Enter the <u>total number of clients</u> whose source of funding falls within the list of sectors below:</p> <ul style="list-style-type: none"> • Banking Institutions • Other Financial regulated Business* • Financial Leasing • Money Lending • Accountants • Fintech <p>*excluding MSBs, Virtual Asset Products and Services, and TCSPs.</p>	Provide the <u>total number of clients</u> whose source of funding falls within the list of sectors.
1.6.2	90	Does the entity have any clients whose source of funding is from the Banking sector (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.6.3	91	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the banking sector.
1.6.4	92	Does the entity have any clients whose source of funding is from the financial services sector, other than banking, VASPs, MSBs and TCSPs?	Please answer 'Yes' or 'No'.
1.6.5	93	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is from the financial sector (excluding Banking, VASPs, MSBs and TCSPs).
1.6.6	94	Does the entity have any clients whose source of funding is from Financial Leasing operations?	Please answer 'Yes' or 'No'.
1.6.7	95	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations.
1.6.8	96	Does the entity have any clients whose source of funding is from Money Lending operations?	Please answer 'Yes' or 'No'.

1.6.9	97	Money Lending - Number of Clients.	Enter the number of clients the entity has whose source of funding is from Money Lending operations.
1.6.10	98	Does the entity have any clients whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, Insolvency)?	Please answer 'Yes' or 'No'.
1.6.11	99	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, and Insolvency).
1.6.12	100	Does the entity have any clients whose source of funding is from the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.13	101	Fintech - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the Fintech industry.
1.6.14	102	<p>Nature of Business / Source of Funding:</p> <p>Enter the total number of clients whose source of funding falls within the list of sectors below.</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Services Business (MSBs) ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ Import/Export Industry ▪ Shipping and Transport of Goods 	Provide the total number of clients whose source of funding falls within the list of sectors.
1.6.15	103	Does the entity have any clients whose source of funds is derived from being a Legal Practitioners?	Please answer 'Yes' or 'No'

1.6.16	104	Legal Practitioners – Number of clients.	Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner.
1.6.17	105	Does the entity have any clients whose source of funds is derived from Dealers in Precious Metals and Stones operations?	Please answer 'Yes' or 'No'
1.6.18	106	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.6.19	107	Does the entity have any clients whose source of funds are derived from Money Services Business operations?	Please answer 'Yes' or 'No'.
1.6.20	108	Money Services Business - Number of Clients.	Enter the number of clients whose source of funds are derived from Money Services Business operations.
1.6.21	109	Does the entity have any clients whose source of funds is derived from the virtual asset sector (products, services, investments)?	Please answer 'Yes' or 'No'.
1.6.22	110	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the virtual asset sector (products, services, or investments).
1.6.23	111	Does the entity have any clients whose source of funds is derived through High Value Dealer operations?	Please answer 'Yes' or 'No'.
1.6.24	112	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funds is derived from High Value Dealer operations.
1.6.25	113	Does the entity have any clients whose source of funds is derived from TCSP operations?	Please answer 'Yes' or 'No'.

1.6.26	114	TCSPs - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from TCSP operations.
1.6.27	115	Does the entity have any clients whose source of funds is derived from the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.28	116	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 the Import / Export industry.
1.6.29	117	Does the entity have any clients whose source of funding is derived from the Shipping and Transport of Goods industry?	Please answer 'Yes' or 'No'.
1.6.30	118	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Shipping and Transport of Goods industry.
1.6.31	119	<p>Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below:</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 	Provide the total number of clients whose source of funding falls within the list of sectors.
1.6.32	120	Does the entity have any clients whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers)?	Please answer 'Yes' or 'No'.

1.6.33	121	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers).
1.6.34	122	Does the entity have any clients whose source of funds is derived through the Gambling industry (including online gambling)?	Please answer 'Yes' or 'No'.
1.6.35	123	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived through the Gambling industry (including online gambling).
1.6.36	124	Does the entity have any clients whose source of funds is derived from the adult entertainment industry?	Please answer 'Yes' or 'No'.
1.6.37	125	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Adult Entertainment Industry.
1.6.38	126	Does the entity have any clients whose source of funds are derived from the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.39	127	Defence Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Defence industry.
1.6.40	1280	Does the entity have any clients whose source of funds are derived from operating in the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.41	129	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from operating in the Oil and Gas industry.
1.6.42	130	Does the entity have any clients whose source of funds is derived from the Mining Industry?	Please answer 'Yes' or 'No'.

1.6.43	131	Mining Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Mining Industry.
1.6.44	132	Does the entity have any clients whose source of funds are derived through operating in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.6.45	133	Construction / Development - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from operating in the Construction / Development industry.
1.6.46	134	Does the entity have any clients whose source of funds are derived from operating in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.6.47	135	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived in the Retail & Restaurant Business.
1.6.48	136	Does the entity have any clients whose source of funds are derived through Cannabis Production & Distribution operations?	Please answer 'Yes' or 'No'.
1.6.49	137	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.
1.6.50	138	Does the entity have any clients whose source of funds is Unknown to the entity?	Please answer 'Yes' or 'No'.
1.6.51	139	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has whose source of funds is Unknown to the entity. Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.

1.6.52	140	Does the entity have any clients where the nature of business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.53	141	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has whose source of funds is known businesses however not mentioned above.
1.7.1	142	<p>Source of Funds – Value of Client Assets. Enter the total value of client assets under management for clients whose source of funds falls within the list of sectors below:</p> <ul style="list-style-type: none"> ▪ Banking Institutions ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech <p><i>*excluding MSBs, Virtual Asset Products and Services, and TCSPs.</i></p>	<p>Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors.</p> <p>If there are no client assets under management, please record '0'.</p>
1.7.2	143	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from the Banking Institutions (excluding MSBs).
1.7.3	144	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds is derived from 'Other Financial Regulated Business' and <u>not</u> the following: banking, MSBs, VASPs, and TCSPs.
1.7.4	145	Financial Leasing - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Financial Leasing operations.
1.7.5	146	Money Lending- Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from Money Lending operations.

1.7.6	147	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived through Accountant operations (Audit / Assurance / Bookkeeping / Insolvency).
1.7.7	148	Fintech - Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds are derived through the Fintech industry.
1.7.8	149	<p>Source of Funds – Value of Client Assets. Enter the total value of client assets for clients whose source of funds falls within the list of sectors below:</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ MSBs ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ TCSPs ▪ Import/Export industry ▪ Shipping and Transport of Goods 	<p>Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors.</p> <p>If there are no client assets under management, please record '0'.</p>
1.7.9	150	Legal Practitioners – Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds is derived from Legal Practitioner operations.
1.7.10	151	Dealers in Precious Metals and Stones	Enter the value of client assets under management of clients whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.7.11	152	Money Services Business - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Money Services Business operations.
1.7.12	153	Virtual Asset Products and Services - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from the virtual asset sector (products, services, and investments).
1.7.13	154	High Value Dealers - Value of Client Assets.	Enter the value of client assets under management of clients whose source of

			funds is derived from High Value Dealer operations.
1.7.14	155	TCSPs - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from TCSP operations.
1.7.15	156	Import / Export Industry - Value Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from Import / Export operations.
1.7.16	157	Shipping and Transport of Goods - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from Shipping and Transport of Goods operations.
1.7.17	158	<p>Source of Funds – Value of Client Assets Enter the total value of client assets for clients whose source of funds falls within the list of sectors below:</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 	<p>Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors.</p> <p>If there are no client assets under management, please record '0'.</p>
1.7.18	159	Real Estate Agents / Brokers - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from the Real Estate industry (Agents, Brokers, and Sellers).
1.7.19	160	Gambling Business (including online gambling) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Gambling.
1.7.20	161	Adult Entertainment - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Adult Entertainment industry.
1.7.21	162	Defence Industry - Value of Client Assets.	Enter the value of assets under management of clients whose source of

			funds is derived from operating in the Defence Industry.
1.7.22	163	Oil and Gas Industry - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Oil and Gas industry.
1.7.23	164	Mining Industry - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Mining Industry.
1.7.24	165	Construction / Development - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Construction / Development industry.
1.7.25	166	Retail & Restaurant Business - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Retail & Restaurant Business operations.
1.7.26	167	Cannabis Production & Distribution - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Cannabis Production & Distribution business.
1.7.27	168	Industry / profession not known or not recorded - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from unknown or unrecorded Industries / Professions.
1.7.28	169	Other - Not listed above - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from industries/ Professions not listed above.
1.8.1	170	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.8.2	171	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	172	Does the entity provide products or services for shares trading (listed or unlisted)?	Please answer 'Yes' or 'No'.

2.1.2	173	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	174	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	175	Does the entity provide any products related to Instruments of indebtedness?	Please answer 'Yes' or 'No'.
2.1.5	176	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	177	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	178	Does the entity provide any products related to Securities Traded - Securities Entitlements?	Please answer 'Yes' or 'No'.
2.1.8	179	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	180	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	181	Does the entity provide any products related to Certificates?	Please answer 'Yes' or 'No'.
2.1.11	182	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	183	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	184	Does the entity provide any products related to Options?	Please answer 'Yes' or 'No'.
2.1.14	185	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	186	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	187	Does the entity provide any products related to Futures?	Please answer 'Yes' or 'No'.
2.1.17	188	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	189	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	190	Does the entity provide any products related to Forward Contracts?	Please answer 'Yes' or 'No'.
2.1.20	191	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	192	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	193	Does the entity provide any products related to Contracts for Differences?	Please answer 'Yes' or 'No'.
2.1.23	194	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	195	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	196	Does the entity provide any products related to Securities Traded - Virtual Assets?	Please answer 'Yes' or 'No'.
2.1.26	197	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	198	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	199	Does the entity provide any Products related to Securities Traded - Penny / Micro Stocks?	Please answer 'Yes' or 'No'.
2.1.29	200	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	201	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	202	Does the entity provide any other products related to securities not mentioned above?	Please answer 'Yes' or 'No'.
2.1.32	203	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	204	Please indicate the other Securities Products not captured above.	List the other Securities Products not mentioned above.
2.2.1	205	Does the entity provide custodial or depository services?	Please answer 'Yes' or 'No'.

2.2.2	206	Custodian / Depository - Number of Clients.	Enter the number of clients the entity provides Custodial Services to, during the reporting year.
2.2.3	207	Custodian / Depository - Value of Client Assets.	Enter the value of client assets at end of the reporting year.
2.2.4	208	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	209	Does the entity service Clients as Broker Dealer?	Please answer 'Yes' or 'No'.
2.2.6	210	Broker Dealer - Number of Clients.	Enter the number of clients the entity provides Broker Dealer services, during the reporting period.
2.2.7	211	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	212	Does the entity service Clients as Market Maker?	Please answer 'Yes' or 'No'.
2.2.9	213	Market Maker - Number of Clients.	Enter the number of clients the entity provided market maker services to during the reporting period.
2.2.10	214	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	215	Does the entity service Clients as Securities Advisor?	Please answer 'Yes' or 'No'.
2.2.12	216	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	217	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	218	Does the entity service Clients as Securities Arranger?	Please answer 'Yes' or 'No'.
2.2.15	219	Securities Arranger - Number of Clients.	Enter the number of clients the entity provides securities arranger services to, during the reporting period.

2.2.16	220	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	221	Does the entity service Clients as Securities Manager?	Please answer 'Yes' or 'No'.
2.2.18	222	Securities Manager - Number of Clients.	Enter the number of clients the entity provides Securities Manager services to, during the reporting period.
2.2.19	223	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	224	Does the entity have any clients that are Administered Funds?	Please answer 'Yes' or 'No'.
2.2.21	225	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	226	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	227	Does the entity facilitate payments to / from Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.3.2	228	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	229	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	230	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	231	Does the entity facilitate payments to / from Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.3.6	232	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	233	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	234	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	235	Does the entity facilitate payments to / from Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.3.10	236	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	237	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	238	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	239	Does the entity facilitate payments to / from Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.3.14	240	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	241	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	242	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	243	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	244	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	245	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	246	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.3.21	247	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	248	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	249	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	250	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	251	Does the entity facilitate payments to / from Clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.3.26	252	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	253	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	254	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	255	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	256	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	257	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	258	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	259	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	260	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.5.2	261	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	262	Number of Clients - 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: F2F, Referrals within Group – F2F, Eligible Introducers – F2F, and Other Introducers – F2F.
3.1.2	263	Number of Clients - 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 Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have F2F contact with the clients.</p>
3.1.3	264	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	265	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 BOs 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	266	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 BOs.</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	267	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	268	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 BO.
3.1.8	269	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 BOs.
3.1.9	270	Clients via Online Platforms.	Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the BO.
3.2.1	271	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	272	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	273	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	274	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	275	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	276	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	277	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	278	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	279	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	280	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	281	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	282	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	283	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	284	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	285	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	286	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	287	Has the entity outsourced the function of transaction monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	288	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	289	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	290	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	291	Has the entity outsourced the function of trading platform within the reporting period?	Please answer 'Yes' or 'No'.
3.2.22	292	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	293	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	294	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	295	Has the entity outsourced the function of liquidity platforms within the reporting period?	Please answer 'Yes' or 'No'.
3.2.26	296	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	297	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	298	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	299	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.3.2	300	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.
3.3.2	301	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.
3.3.4	302	In which country is the parent or holding company incorporated?	Enter the country the parent or holding company is incorporated.
3.3.5	303	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.
3.3.6	304	How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period?	Enter the number of beneficial Owners the entity has, broken down by nationality of the beneficial owner, at the end of the reporting period.
3.3.7	305	How many directors does the entity have appointed, by country of nationality of the directors, at the end of the reporting period?	Enter the number of directors appointed to the entity at the end of the reporting period, broken down by the nationality of the directors.
3.3.8	306	Is the entity a Single Family Office?	Please answer 'Yes' or 'No'.

3.4.1	307	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	308	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 Controls Questions:			
No.	Question No.	Question	Description/Explanation
1.1.1	309	Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues?	Please answer 'Yes' or 'No'.
1.1.2	310	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	311	What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?	Enter the frequency in number of months.
1.1.4	312	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	313	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	314	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	315	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	316	Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?	Please answer 'Yes' or 'No'.
1.1.9	317	Does the Board / Governing Body ensure that recommendations made by the internal and external auditors	Please answer 'Yes' or 'No'.

		and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	
1.1.10	318	Has the entity, or its directors, shareholders, beneficial owners, or senior officers been denied an application by any regulatory body?	Please answer 'Yes' or 'No'.
1.1.11	319	Provide the country of jurisdiction.	Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body.
1.1.12	320	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	321	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	322	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.2.2	323	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	324	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	325	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	326	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	327	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	328	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	329	Does the AMLCO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.2.9	330	Does the AMLCO conduct any sample testing and review any	Please answer 'Yes' or 'No'.

		exception reports to identify potential AML/CFT/CPF compliance breaches?	
1.2.10	331	Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures?	Please answer 'Yes' or 'No'.
1.2.11	332	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	333	Does the MLRO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework?	Please answer 'Yes' or 'No'.
1.3.1	334	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	335	Have the directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	336	Has the AML Compliance Officer received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	337	Has the MLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	338	Has the DMLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.6	339	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	340	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.

1.3.8	341	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	342	What percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the company during the reporting period?	Enter the percentage of employees/ agents/ directors that have NOT been exposed to AML/CFT/CPF training by the entity during the reporting period.
1.3.10	343	Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually?	Please answer 'Yes' or 'No'.
1.4.1	344	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	345	Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board?	Please answer 'Yes' or 'No'.
1.4.3	346	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	347	Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes?	Please answer 'Yes' or 'No'.
1.4.5	348	Has the AML audit function performed an AML/CFT/CPF and Sanctions audit and issued a report for conclusions and recommendations?	Please answer 'Yes' or 'No'.
1.4.6	349	What is the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?	Enter the frequency, in months, of how often an internal AML audit for the AML/CFT/CPF and Sanctions programme is conducted.
1.4.7	350	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	351	Enter the frequency, in months, of the Board review of the AML audit program?	Enter the frequency, in months, of the Board review of the AML audit program.
1.4.9	352	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.

1.4.10	353	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	354	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	355	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	356	Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors?	Please answer 'Yes' or 'No'.
1.5.2	357	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	358	Does the entity consider the ML/TF/PF risks of the clients, (including BOs, in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.4	359	Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.5	360	Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.6	361	Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.7	362	Does the entity ensure ML/TF/PF business risk assessments are done / updated prior to the launch of any new products/services/delivery channels/technologies?	Please answer 'Yes' or 'No'.
1.5.8	363	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	364	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.

1.5.10	365	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	366	Does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.
1.5.12	367	Does the entity take their nature, size and complexity into consideration and consider the need for other risk factors, other than those listed above, when developing their business risk assessment?	Please answer 'Yes' or 'No'.
1.5.13	368	How often, in months, do you review High-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.14	369	How often, in months, do you review medium-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.5.15	370	How often, in months, do you review low-Risk relationships/accounts?	Please respond using the following: Never, More than 18 months, 7 – 12 months, 1 – 6 months.
1.6.1	371	Does the entity rely on Group AML/CFT policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	372	If yes, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?	Please answer 'Yes' or 'No'.
1.6.3	373	Has the Board, or governing body, ensured that necessary amendments are made to the entity's policies and procedures for alignment with the requirements in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.6.4	374	Does the entity have Board, or governing body, approved policies and procedures for Customer Due Diligence measures i.e. customer identification and verification?	Please answer 'Yes' or 'No'.

1.6.5	375	Does the entity have Board, or governing body, approved policies and procedures for identification of high risk customers inc. PEPs?	Please answer 'Yes' or 'No'.
1.6.6	376	Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds?	Please answer 'Yes' or 'No'.
1.6.7	377	Does the entity have Board, or governing body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	378	Does the entity have Board or governing body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	379	Does the entity have Board or governing body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?	Please answer 'Yes' or 'No'.
1.6.10	380	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	381	Does the entity have procedures for declining, de-risking, terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons?	Please answer 'Yes' or 'No'.
1.6.12	382	Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period.	
1.7.1	383	Does the entity have a screening process?	Please answer 'Yes' or 'No'.
1.7.2	384	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.

1.7.3	385	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	386	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	387	Is sanctions monitoring done in real time or after the event?	Select what applies: 'No process', 'After the event', or 'Real time'.
1.7.6	388	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	389	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	390	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	391	Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen?	Please answer 'Yes' or 'No'.
1.7.10	392	Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting of sanction screening?	Please answer 'Yes' or 'No'.
1.7.11	393	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.7.12	394	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or	Please answer 'Yes' or 'No'.

		indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions?	
1.7.13	395	Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries surrounding sanctioned jurisdictions are scrutinized to ensure those the unlisted countries are not being used as conduits to evade targeted financial sanctions and proliferation alerts / risks?	Please answer 'Yes' or 'No'.
1.8.1	396	Does the entity have transaction monitoring policies and procedures developed commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	397	Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?	Please answer 'Yes' or 'No'.
1.8.3	398	Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	Please answer 'Yes' or 'No'.
1.8.4	399	Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs?	Please answer 'Yes' or 'No'.
1.8.5	400	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	401	Does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	402	Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out?	Please answer 'Yes' or 'No'.

1.8.8	403	Enter the total number of Alerts resulting in Suspicious Activity Reports related to ML/TF/PF and Sanctions matters identified during transaction monitoring.	The total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR.
1.9.1	404	Does the entity have Internal Reporting policies and procedures i.e. Identification and Reporting of Suspicious Activities and Transactions to the MLRO?	Please answer 'Yes' or 'No'.
1.9.2	405	Does the entity's policies and procedures identify the MLRO and how to make a filing to them?	Please answer 'Yes' or 'No'.
1.9.3	406	Does the entity have policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.9.4	407	How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period?	Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period.
1.9.5	408	How many Suspicious Activity Reports have been reported, to the FRA, by the MLRO for the current reporting period?	Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period.
1.9.6	409	How many hours on average does it take to file a SAR to the FRA?	Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.
1.9.7	410	Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management?	Please answer 'Yes' or 'No'.
1.9.8	411	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	412	Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status?	Please answer 'Yes' or 'No'.
1.9.10	413	Does the entity maintain a log identifying all SARs filed to the FRA along with their status?	Please answer 'Yes' or 'No'.

1.9.11	414	If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented?	Please answer 'Yes' or 'No'.
1.10.1	415	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	416	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	417	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	418	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	419	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	420	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	421	If applicable, is there a board approved documented policy on outsourcing?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.2	422	Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'.
1.11.3	423	Are there regular ongoing reviews of the outsourcing arrangement?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.4	424	In total, how many services does the entity outsource to either third parties, or within its group or subsidiaries, during the reporting period?	Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.
1.11.5	425	Does the outsourcing agreement clearly set out the obligations of both parties?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.

1.11.6	426	If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.7	427	If relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.8	428	If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.9	429	If relevant, does the outsourced AMLCO/MLRO have access to the entity's board?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.10	430	If relevant, are there policies and procedures to ensure data protection restrictions would NOT delay access to data and documents?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.11	431	Is sub-contracting of any of the outsourced activities permitted?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.11.12	432	Does the entity conduct testing to ensure the outsourced service provider complies with record keeping requirements?	Select which best applies: 'Yes', 'No' or 'Not Applicable'. This question is only applicable if the entity outsources any activities.
1.12.1	433	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	434	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.
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