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# **AML Survey – Completion Guide: Insurance**

Document version: 1.3

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**Revision History:**

<b>Effective Date</b>	<b>Version Number</b>	<b>Revision Description</b>
24 November 2022	1.0	Initial release of document
14 December 2022	1.1	Update to guidance for products and services questions.
31 July 2023	1.2	Updates to definitions, descriptions, explanations and questions.
31 July 2024	1.3	Updates to inherent risk and controls questions.

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## 1 INTRODUCTION

The Cayman Islands Monetary Authority (the “Authority”) periodically undertakes sectoral ML/TF/PF 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 Division”). The AML Survey Form is issued in accordance with section 22(1)(b) of the Insurance Act, 2010.

This Guide provides support to FSPs which carry out insurance business, in accessing, completion and submission of the AML Survey – Insurance.

## 2 FORM INFORMATION

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

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

## 3 ACCESSING AND SUBMITTING THE AML SURVEY

### 3.1 ACCESS TO THE AML SURVEY

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

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

The Authority is using the following entity contacts to distribute the AML Survey: Registered Office, AMLCO, MLROs, AML Officers of the Insurance Manager and other principal contacts. If an Entity is unsure of what their contact details are or to add additional contacts, they can contact the Authority at [AMLSurveys@cima.ky](mailto:AMLSurveys@cima.ky).

To access the AML Survey:

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



**Cayman Islands Monetary Authority**

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

Confirm Account

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLI86VZVCRbBxm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYSoP%2Bk8rPURRSvrPSQt6JA5hgSaBaC6uvcZV4KB266HiFgh4FhAtaTNSa3IE3aiA%3D>

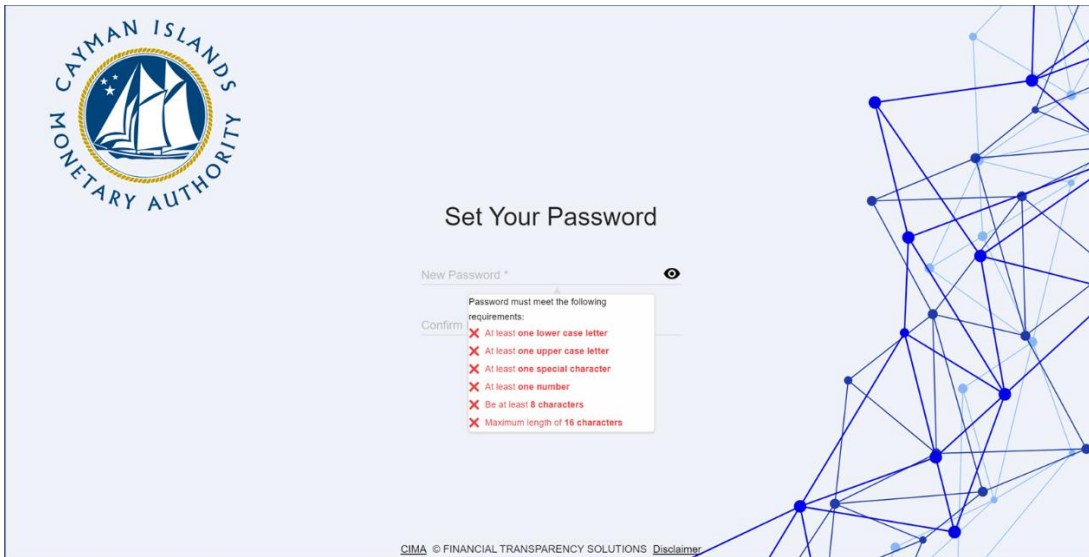
For any questions concerning the survey or the current reporting cycle, please contact: [AMLSurvey@cima.ky](mailto:AMLSurvey@cima.ky)

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

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

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- 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.

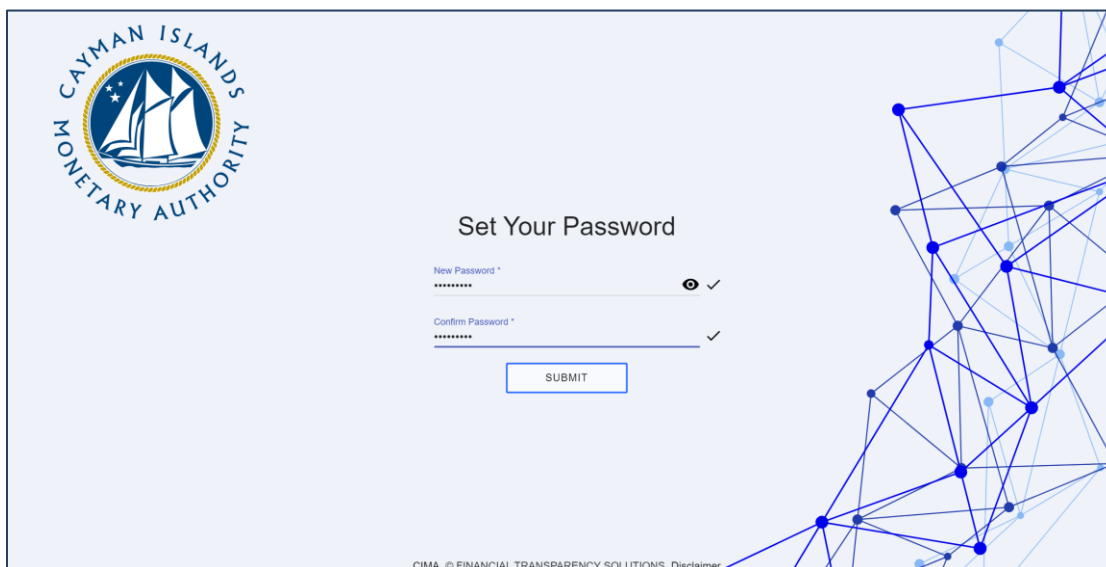


The screenshot shows the 'Set Your Password' form for the Cayman Islands Monetary Authority. The form includes a 'New Password' field and a 'Confirm' field. A tooltip is displayed over the 'Confirm' field, listing the password requirements:

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

The form also features the Cayman Islands Monetary Authority logo in the top left corner and a network diagram in the background. At the bottom, there is a copyright notice: 'CIMA © FINANCIAL TRANSPARENCY SOLUTIONS Disclaimer'.

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



The screenshot shows the 'Set Your Password' form after the password has been re-entered. The 'New Password' and 'Confirm Password' fields are now filled with asterisks and have checkmarks next to them, indicating that the passwords match. A 'SUBMIT' button is visible below the fields. The form also features the Cayman Islands Monetary Authority logo in the top left corner and a network diagram in the background. At the bottom, there is a copyright notice: 'CIMA © FINANCIAL TRANSPARENCY SOLUTIONS Disclaimer'.

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



## Cayman Islands Monetary Authority

The **Username** for this account is:

**Your account has been successfully activated.**

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

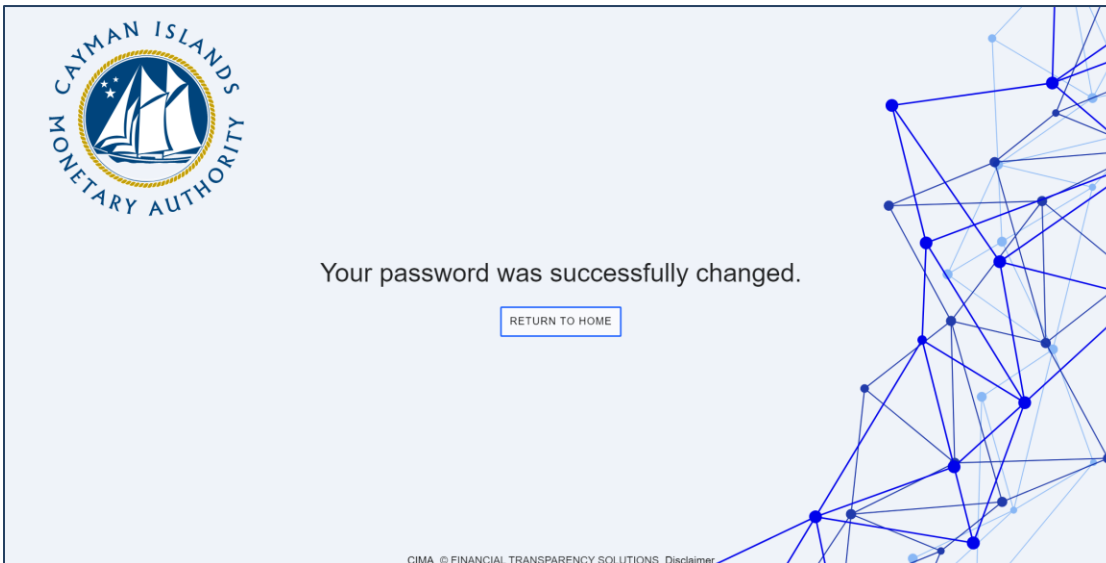
Please do not reply to this email, it is automatically generated.

**Disclaimer:**

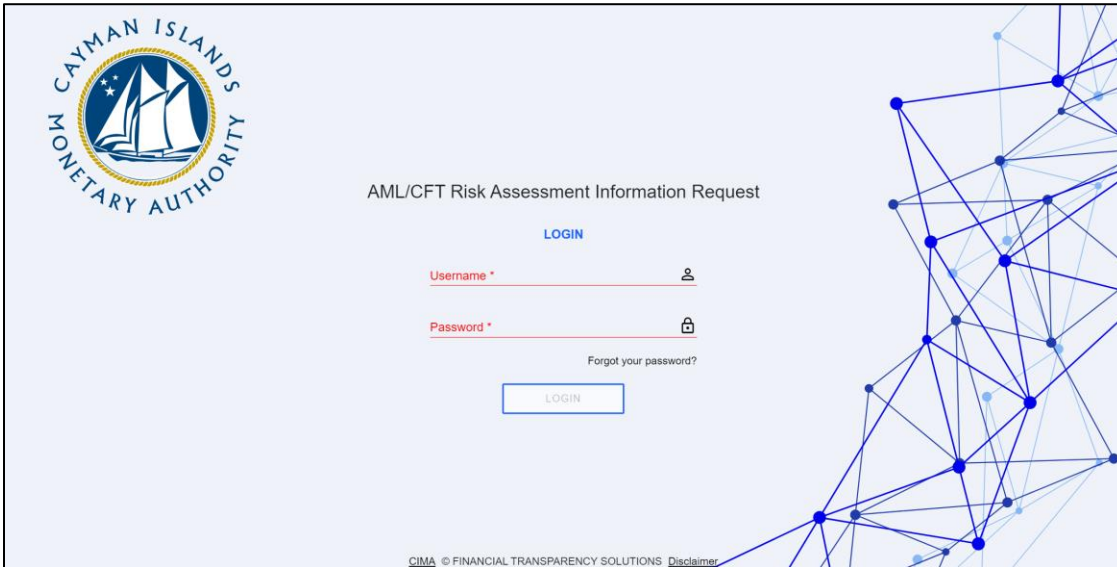
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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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.

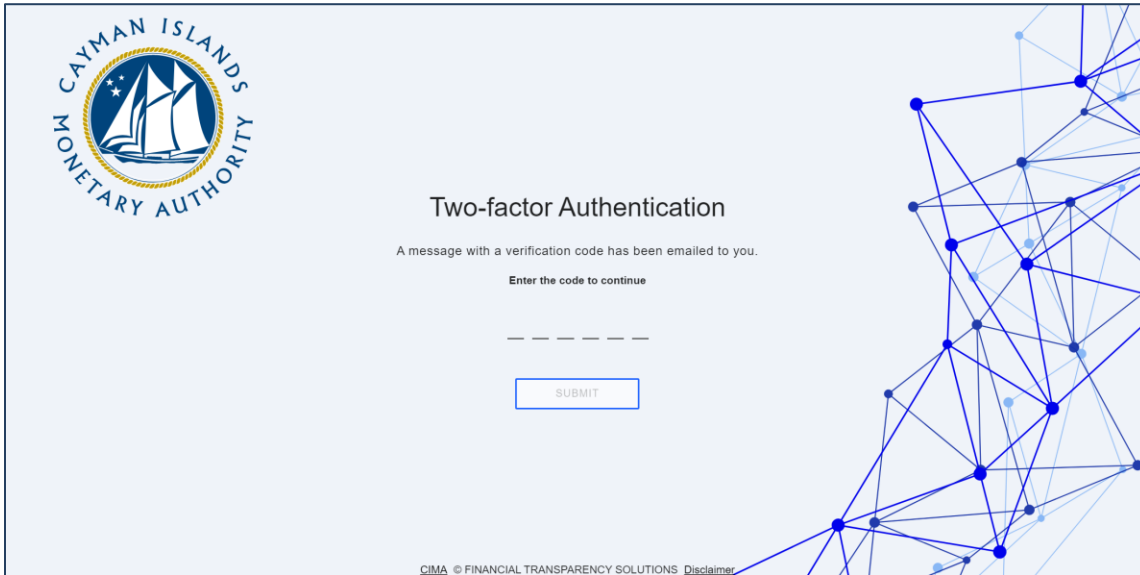


- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email

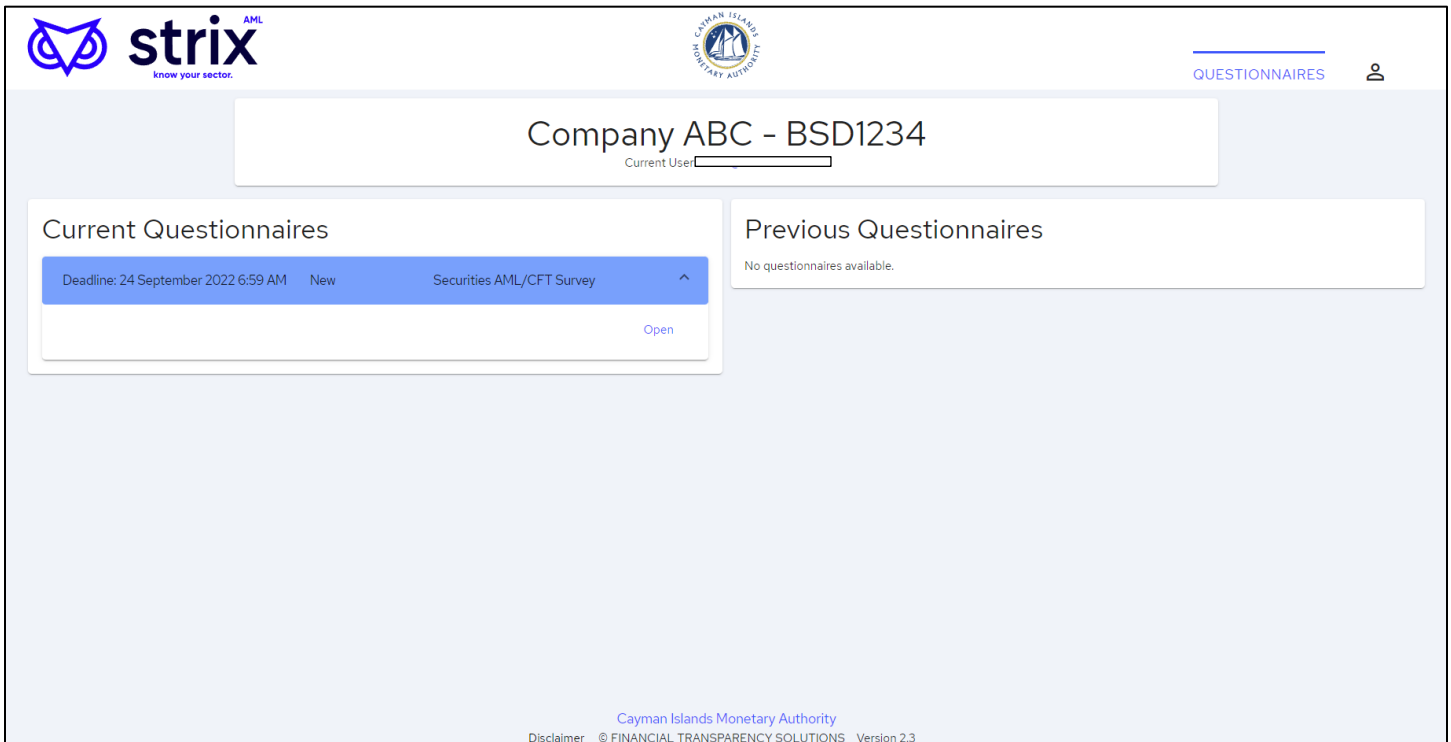




- 8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted.



- 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](mailto:AMLSurveys@cima.ky) detailing the following:
    - i. Licence or Registration Name
    - ii. Licenced or Registration Number
    - iii. Date of Licence or Registration
    - iv. List of current directors
    - v. Number of Clients
    - vi. Reason for requesting to make an Incomplete Submission.
2. If a User receives or has access to more than one survey, they will see the additional survey(s) in the 'Current User' section of the web page. At the top of the page, where it shows the Entity's 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 were several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of imputing 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](mailto:AMLSurveys@cima.ky) to request having their account re-activated.

### 4.2 INTERNET BROWSER

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

### 4.3 DATA AND SECURITY

The AML Survey, the auto-generated communication from STRIX, and the data collected from FSPs in the AML Survey are all maintained on-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 about. 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	<b>United States Dollars (US\$).</b>

	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 an Insurance licence that is responding to this survey.
F2F	The face-to-face engagement with a client directly, with the natural person physically present. The engagement <u>will not be</u> via phone, email, online, etc.
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:

	<p>(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</p> <p>(ii) any person that has total assets of not less than CI\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency.</p>
Import and Export Business	A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it's a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.
Individual	A Natural Person that is not a Legal Person or Legal Arrangement.
Legal Person	A company or other entity created by operation of law with separate legal personality.
Legal Arrangement	A trust or partnership, or other entity created between parties which lacks separate legal personality.
MLRO	Money Laundering Reporting Officer
ML/TF/PF	Money Laundering/Terrorism Financing/Proliferation Financing.
Mutual Fund	A company, unit trust or partnership that issues equity interests, the purpose or effect of which is the pooling of investor funds with the aim of spreading investment risks and enabling investors in the mutual fund to receive profits or gains from the acquisition, holding, management or disposal of investments but does not include a person licensed under the Banks and Trust Companies Act (2021 Revision) or the Insurance Act, 2010, or a person registered under the Building Societies Act (2020 Revision) or the Friendly Societies Act (1998 Revision).
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	Or Non-F2F, 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	<p>"Politically Exposed Person" includes —</p> <ul style="list-style-type: none"> <li>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.</li> <li>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;</li> <li>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.</li> </ul> <p>Politically exposed persons also include:</p> <ul style="list-style-type: none"> <li>(i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership.</li> </ul>

	(ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.
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 Law in force in the Islands.
Targeted Financial Sanctions (TFS)	Means both asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").
TCSP	Includes those entities conducting Trust, Company Manager, and Corporate Service Provider business.
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 HNWIs whose net worth is greater than or equal to US\$30,000,000.	
Value of Assets Under Management	The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio.	
Virtual Assets 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 <b>as at the end of the reporting period.</b>
Timeframe	Number of Clients	Number of clients <b>as at the end of the reporting period.</b>
Timeframe	Number of Transactions	Number of Transactions conducted for the client <b>during the reporting period.</b>

### AML Inherent Risk Questions:

Ref. No.	Question No.	Question	Description/Explanation
1.1.1	1	Total Clients / Customers.	Enter the total number of clients. This will include all customers on the entity's client list at the end of the reporting period. This number should include all clients the entity provides financial products and services.  Total clients consist of natural persons and legal persons and arrangements.
1.1.2	2	Total Transactions for the reporting period.	Enter the total number of all transactions conducted for clients during the reporting period.

1.1.3	3	Total Value of Business.	<p>Enter the total Value of Premiums/ Fees/ Commissions collected during the reporting period.</p> <ul style="list-style-type: none"> <li>Insurance Company - Premiums collected including, for long term investment contracts, include the total assets under management at the end of the reporting period.</li> <li>Insurance Manager - Management Fees</li> <li>Insurance Agent - Fees and Commissions</li> <li>Insurance Broker - Fees and Commissions</li> </ul>
1.1.4	4	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, Investors, Promoters, or hold any other form of control, including signatories.</p>
1.1.5	5	Total number of High Risk Clients.	Enter the total number of clients / customers that are high risk, at the end of the reporting period.
1.1.6	6	Total number of Non-Compliant Accounts at the end of the reporting period.	Enter the number of customer accounts that remain non-compliant with required identification and verification procedures.
1.1.7	7	Total value of client/ policyholder assets, by geographic location of the assets, at the end of the reporting period.	Enter the total value of client/ policyholder assets, by the geographic location where the assets of the client / policyholder assets are custodied, at the end of the reporting period.
1.2.1	8	Does the entity have any clients that are Legal Persons or Arrangements?	Please answer 'Yes' or 'No'.
1.2.2	9	Clients/customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client.	<p>Enter the total number of clients that are Legal Persons and Arrangements as at the end of the reporting period.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.3	10	Number of Transactions - Legal Persons and Arrangements.	Enter the total number of transactions that were conducted by customers who are Legal Person and Arrangements.

1.2.4	11	Value of Business - Legal Persons and Arrangements.	Enter the total Value of Premiums / Commissions / Fees for clients who are Legal Persons or Arrangements, as at the end of the reporting period.
1.2.5	12	Total number of BOs by country of nationality of the BO.	Enter the total number of BOs of all clients who are Legal Persons or Arrangements, broken down by the nationality of the BO.
1.2.6	13	Does the entity have any clients that have BOs that are directors of the client?	Please answer 'Yes' or 'No'.
1.2.7	14	Number of clients which have BOs that are directors of the client.	Enter the total number of clients which have BOs that are also directors of the client.
1.2.8	15	Does the entity have any clients that have BOs that are Controllers of the client?	Please answer 'Yes' or 'No'.
1.2.9	16	Number of clients which have BOs that are Controllers of the client.	Enter the total number of clients whose BOs are also Controllers of the client.
1.2.10	17	Does the entity have any clients that have BOs that are also senior managing officials of the client?	Please answer 'Yes' or 'No'.
1.2.11	18	Number of clients which have BOs that are also senior managing officials of the client.	<p>Enter the total number of clients whose BOs are also senior managing officials of the client.</p> <p>Senior managers are individuals at the highest level of organizational management, who have the day-to-day responsibilities of managing a company or corporation. They hold specific executive powers conferred onto them by the board of directors and/or the shareholders.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>
1.2.12	19	Does the entity have any clients which have BOs - HNWIIs?	Please answer 'Yes' or 'No'.
1.2.13	20	Number of Clients which have BOs - HNWIIs.	<p>Enter the total number of clients who have BOs that are HNWIIs.</p> <p>HNWIIs is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those</p>

			assets valued at least CI\$4,000,000 (approx. US\$5,000,000).  If the entity does not have any clients that fit this category record a '0'
1.2.14	21	Does the entity have any clients which have BOs - Ultra HNWIIs?	Please answer 'Yes' or 'No'.  UHNWIIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.
1.2.15	22	Number of Clients which have BOs - Ultra HNWIIs.	Enter the total number of clients who have BOs that are Ultra HNWIIs.  If the entity does not have any clients that fit this category record a '0'.
1.2.16	23	Does the entity have any clients which have BOs which are PEPs?	Please answer 'Yes' or 'No'.
1.2.17	24	Number of BOs of clients which are PEPs, broken down by nationality of the PEP.	Enter the total number of clients who have BOs that are PEPs, broken down by nationality of the PEP.
1.2.18	25	Does the entity have any clients which have Nominees acting on behalf of a BO?	Please answer 'Yes' or 'No'.
1.2.19	26	Number of clients which have Nominees appointed acting on behalf of a BO, broken down by nationality of the BO.	Enter the total number of clients which have nominees acting on behalf of BOs, broken down by the nationality of the BO.
1.3.1	27	Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director.	Enter the total number of clients which have nominees appointed on behalf of a director, broken down by the nationality of the director.
1.3.2	28	Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.	Enter the total number of clients who have directors and/or senior management who are PEPs, broken down by nationality of the director / senior management.
1.3.3	29	Number of directors and/or senior management of clients	Enter the number of directors and/or senior management of the clients who are HNWIIs.

		who are High Net Worth Individuals.	
1.3.4	30	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.  Individuals whose net worth is greater than or equal to US\$30,000,000.
1.3.5	31	Number of directors and/or senior management of clients who are PEPs & HNWIs/ Ultra HNWIs.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs/ Ultra HNWIs, as at the end of the reporting period.
1.4.1	32	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	33	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	34	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	35	Gov / Pub Sector - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period, for clients that are government or public sector.
1.4.5	36	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.6	37	NPO - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, that are NPOs.
1.4.7	38	NPO - Number of Transactions.	Enter the number of transactions conducted by clients that are NPOs during the reporting period, broken down by country of incorporation.
1.4.8	39	NPOs - Value of Business for the reporting period.	Enter the Value of premiums / commissions / fees collected during the reporting period, of clients that are NPOs.
1.4.9	40	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.

			<p>Answer 'Yes' if the entity has clients that have a Foundation within its structure.</p> <p><i>Note that one client can fall under multiple categories within this 'Structure' section.</i></p>
1.4.10	41	Foundations - Number of Clients, broken down by the country of establishment of the client.	Enter the number of clients the entity has for this category.
1.4.11	42	Foundations - Number of Transactions.	Enter the number of transactions conducted by clients for this category during the reporting period.
1.4.12	43	Foundations - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected from clients that are a Foundation, as at the end of the reporting period.
1.4.13	44	Does the entity have any clients that are Trusts?	<p>Please answer 'Yes' or 'No'.</p> <p>Answer 'Yes' if the entity has clients that have a Trust within its structure.</p> <p><i>Note that one client can fall under multiple categories within this 'Structure' section.</i></p>
1.4.14	45	Trusts - Number of Clients, broken down by country of formation of the client.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.4.15	46	Trusts - Number of Transactions.	Enter the number of transactions conducted by clients for this category during the reporting period.
1.4.16	47	Trusts - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period, for clients that are Trusts.
1.4.17	48	Does the entity have any clients that are Segregated Portfolio Companies?	<p>Please answer 'Yes' or 'No'.</p> <p>Answer 'Yes' if the entity has any clients which have a Segregated Portfolio Company within their structure.</p> <p><i>Note that one client can fall under multiple categories within this 'Structure' section.</i></p>
1.4.18	49	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.

1.4.19	50	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions conducted by clients, for this category, during the reporting period.
1.4.20	51	Segregated Portfolio Companies - Value of business collected for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period.
1.4.21	52	Does the entity have any clients that are from Special Economic Zone?	<p>Please answer 'Yes' or 'No'.</p> <p>Answer 'Yes' if the entity has any clients which are a member of a Special Economic Zone.</p> <p><i>Note that one client can fall under multiple categories within this 'Structure' section.</i></p>
1.4.22	53	Special Economic Zone - Number of Clients.	Enter the number of clients the entity has, as at the end of the reporting period, for this category.
1.4.23	54	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients, for this category, during the reporting period.
1.4.24	55	Special Economic Zone - Value of Business for the reporting period.	Enter the Value of Premiums / Commissions / Fees collected for the reporting period.
1.5.1	56	Does the entity have any clients that are Natural Persons?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.2	57	Clients / customers that are Natural Persons, broken down by Nationality of the client.	<p>Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i></p>
1.5.3	58	Clients/customers that are Natural Persons, broken down by Residency of the client.	<p>Enter the number of clients that are natural persons, broken down by their residency.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p>

			<p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients/ customers that are Legal Persons and Arrangements.</i></p>
1.5.4	59	Natural Persons - Total Transactions for the reporting period.	<p>Enter the total number of transactions conducted for clients who are Natural Persons during the reporting period.</p> <p>This category is specific to clients who are natural persons who have a direct business relationship with the entity.</p> <p>If an entity does not have such clients, a '0' value should be used.</p> <p><i>Note: This category <u>does not</u> include clients / customers that are Legal Persons and Arrangements.</i></p>
1.5.5	60	Value of Business - Natural Persons.	Enter the total value of Premiums / Commissions / Fees earned for clients that are Natural Persons as at the end of the reporting period.
1.5.6	61	Natural Person Clients - Does the entity have any clients that are PEPs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.7	62	Number of Natural Person clients who are PEPs, broken down by the nationality of the client.	<p>Enter the total number of Natural Person clients that are PEPs, broken down by the nationality of the client.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.8	63	Natural Persons - PEPs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.
1.5.9	64	Does the entity have any Natural Person clients that are HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIIs.</p>
1.5.10	65	Number of Natural Person clients who are HNWIIs.	Enter the number of Natural Person clients the entity has that are HNWIIs.



1.5.11	66	Natural Person Clients - HNWI's - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are HNWI's, during the reporting period.
1.5.12	67	Does the entity have any Natural Person clients that are Ultra HNWI's?	Please answer 'Yes' or 'No'.  Individuals whose net worth is equal to or greater than US\$30,000,000.
1.5.13	68	Number of Natural Person clients who are Ultra HNWI's.	Enter the number of Natural Person clients the entity has that are Ultra-HNWI's at the end of the reporting period.
1.5.14	69	Natural Person Clients - Ultra HNWI's- Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are Ultra HNWI's, during the reporting period.
1.5.15	70	Does the entity have any Natural Person clients that are PEPs and HNWI's /Ultra HNWI's?	Please answer 'Yes' or 'No'.
1.5.16	71	Number of Natural Person clients who are PEPs and HNWI's / Ultra HNWI's.	Enter the number of Natural Person clients the entity has that are both PEPs and HNWI's / Ultra HNWI's, at the end of the reporting period.
1.5.17	72	Natural Person Clients - PEPs and HNWI's / UHNWI's - Number of Transactions.	Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWI's/Ultra HNWI's, during the reporting period.
1.6.1	73	Total Number of Beneficiaries, Natural and Legal Persons.	Enter the Total Number of Beneficiaries, for clients that are Natural and Legal Persons.
1.6.2	74	Number of Beneficiaries Clients that are Natural Persons.	Enter the Number of Beneficiaries for Clients that are Natural Persons.
1.6.3	75	Number of Beneficiaries Clients that are Corporations.	Enter the Number of Beneficiaries for Clients that are Corporations.
1.6.4	76	Number of Beneficiaries Clients that are Corporate Group Structures.	Enter the Number of Beneficiaries for Clients that are Corporate Group Structures.

1.6.5	77	Number of Beneficiaries Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary.	Enter the Number of Beneficiaries for Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary.
1.6.6	78	Number of Beneficiaries Clients that are NPOs.	Enter the Number of Beneficiaries for Clients that are NPOs.
1.6.7	79	Number of Beneficiaries Clients that are Trusts.	Enter the Number of Beneficiaries for Clients that are Trusts.
1.6.8	80	Number of Beneficiaries Clients that are Foundations.	Enter the Number of Beneficiaries for Clients that are Foundations.
1.6.9	81	Number of Beneficiaries Clients that are PEPs, broken down by nationality of the Beneficiary.	Enter the Number of Beneficiaries for Clients that are PEPs, broken down by nationality of the Beneficiary.
1.7.1	82	<p><b>Nature of Business / Source of Funding:</b></p> <p>Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> <li>• Banking Institutions exc. MSBs</li> <li>• Other Financial regulated Business*</li> <li>• Financial Leasing</li> <li>• Money Lending</li> <li>• Accountants</li> <li>• Fintech</li> </ul> <p><i>*excluding MSBs, Virtual Assets Products and Services and TCSPs.</i></p>	Enter the total number of clients which fall within the list of sectors as at the end of the reporting period.
1.7.2	83	Does the entity have any clients that are legal persons or arrangements, operating as Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)?	Please answer 'Yes' or 'No'.

1.7.3	84	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements and are Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs).
1.7.4	85	Does the entity have any clients that are legal persons or arrangements operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses not listed in this section?	Please answer 'Yes' or 'No'.
1.7.5	86	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above.
1.7.6	87	Does the entity have any clients that are legal persons or arrangements operating in Financial Leasing, or natural persons employed by Financial Leasing?	Please answer 'Yes' or 'No'.
1.7.7	88	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Financial Leasing companies or natural persons that are employed by Financial Leasing companies.
1.7.8	89	Does the entity have any clients that are legal persons or arrangements operating as Money Lending, or natural persons employed by Money Lending?	Please answer 'Yes' or 'No'.
1.7.9	90	Money Lending - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Money Lending institutions, and / or natural persons that are employed by Money Lending institutions.

1.7.10	91	Does the entity have any clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or natural persons employed as Accountants?	Please answer 'Yes' or 'No'.
1.7.11	92	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).
1.7.12	93	Does the entity have any clients that are legal persons or arrangements operating in the Fintech industry, or natural persons employed in the Fintech industry?	Please answer 'Yes' or 'No'.
1.7.13	94	Fintech - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry.
1.7.14	95	<p><b>Nature of Business / Source of Funding:</b> Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> <li>▪ Legal Practitioners</li> <li>▪ Dealers in Precious Metals and Stones</li> <li>▪ Money Services Business (MSBs)</li> <li>▪ Virtual Asset Products and Services</li> <li>▪ High Value Dealers</li> <li>▪ Import/Export Industry</li> <li>▪ Shipping and Transport of Goods</li> </ul>	Enter the total number of clients which fall within the list of sectors, as at the end of the reporting period.

1.7.15	96	Does the entity have any clients that are legal persons or arrangements operating as Legal Practitioners, or natural persons employed as Legal Practitioner?	Please answer 'Yes' or 'No'
1.7.16	97	Legal Practitioners – Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by a Legal Practitioner.
1.7.17	98	Does the entity have any clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, or natural persons employed by Dealers in Precious Metals and Stones?	Please answer 'Yes' or 'No'
1.7.18	99	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.7.19	100	Does the entity have any clients that are legal persons or arrangements operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses?	Please answer 'Yes' or 'No'.
1.7.20	101	Money Services Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Money Services Business, and / or are natural persons that are employed in the Money Services Business.
1.7.21	102	Does the entity have any clients that are legal persons or arrangements offering Virtual Asset products or services or natural persons employed by or earning income from Virtual Asset products or services?	Please answer 'Yes' or 'No'.

1.7.22	103	Virtual Asset Products and Services - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements offering virtual assets products and services, and natural persons that are employed by institutions which offer virtual assets products and services.
1.7.23	104	Does the entity have any clients that are legal persons or arrangements operating as High Value Dealers or natural persons employed by High Value Dealers?	Please answer 'Yes' or 'No'.
1.7.24	105	High Value Dealers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.7.25	106	Does the entity have any clients that are legal persons or arrangements operating as TCSPs, or natural persons employed by TCSPs?	Please answer 'Yes' or 'No'.
1.7.26	107	Trusts, Company Managers, or Corporate Service Providers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as a TCSP, and natural persons that are employed by TCSPs.
1.7.27	108	Does the entity have any clients that are legal persons or arrangements operating in the Import / Export Industry, or natural persons employed by the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.7.28	109	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 in the Import / Export industry.
1.7.29	110	Does the entity have any clients that are legal persons or arrangements operating in the Shipping and Transport of Goods industry, or natural	Please answer 'Yes' or 'No'.

		persons employed by the Shipping and Transport of Goods industry?	
1.7.30	111	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Shipping and Transport of Goods business, and natural persons that are employed within the Shipping and Transport of Goods industry.
1.7.31	112	<p><b>Nature of Business / Source of Funding:</b></p> <p>Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Gambling Business</li> <li>▪ Adult Entertainment Industry</li> <li>▪ Defence Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> </ul>	Provide the total number of clients which fall within the list of sectors, broken down by nationality or country of incorporation / formation of the clients, as at the end of the reporting period.
1.7.32	113	Does the entity have any clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, or natural persons employed as Real Estate Agents / Brokers?	Please answer 'Yes' or 'No'.
1.7.33	114	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.7.34	115	Does the entity have any clients that are legal persons or arrangements operating in the Gambling business (including online gambling), or natural persons employed	Please answer 'Yes' or 'No'.

		or earning income in the Gambling business?	
1.7.35	116	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).
1.7.36	117	Does the entity have any clients that are legal persons or arrangements operating in the Adult Entertainment industry, or natural persons employed or earning income in the Adult Entertainment industry?	Please answer 'Yes' or 'No'.
1.7.37	118	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry.
1.7.38	119	Does the entity have any clients that are legal persons or arrangements operating in the Defence Industry, or natural persons employed by the Defence Industry?	Please answer 'Yes' or 'No'.
1.7.39	120	Defence Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.7.40	121	Does the entity have any clients that are legal persons or arrangements operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.7.41	122	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.



1.7.42	123	Does the entity have any clients that are legal persons or arrangements operating in the Mining Industry, or natural persons employed by the Mining Industry?	Please answer 'Yes' or 'No'.
1.7.43	124	Mining Industry - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.7.44	125	Does the entity have any clients that are legal persons or arrangements operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.7.45	126	Construction / Development - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry.
1.7.46	127	Does the entity have any clients that are legal persons or arrangements operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.7.47	128	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.7.48	129	Does the entity have any clients that are legal persons or arrangements operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry?	Please answer 'Yes' or 'No'.

1.7.49	130	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in Cannabis Production & Distribution Business, and natural persons that are employed in the Cannabis Production & Distribution industry.
1.7.50	131	Does the entity have any clients that are legal persons or arrangements of Unknown Businesses, or natural persons employed in Unknown Professions or Industries?	Please answer 'Yes' or 'No'.
1.7.51	132	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions.  Unknown business and profession is where the entity does not know, was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.
1.7.52	133	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'.
1.7.53	134	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has, that are legal persons or arrangements operating in known businesses, not mentioned above, or natural persons that are employed in known businesses/industries, not mentioned above.
1.8.1	135	<p><b>Source of Funds – Value of Client Assets.</b></p> <p>Please provide the total value of client assets for clients that are legal persons or arrangements of, or are natural persons employed in, the following sectors:</p> <ul style="list-style-type: none"> <li>▪ Banking Institutions</li> </ul>	<p>Enter the total value of client assets under management, of the clients that are legal persons or arrangements operating as, and natural persons employed in the listed sectors.</p> <p>If there are no client assets under management, please record '0'.</p>

		<ul style="list-style-type: none"> <li>▪ Other Financial regulated Business*</li> <li>▪ Financial Leasing</li> <li>▪ Money Lending</li> <li>▪ Accountants</li> <li>▪ Fintech</li> </ul> <p><i>*excluding MSBs, Virtual Asset Products and Services, Trusts, Company Managers, or Corporate Service Providers.</i></p>	
1.8.2	136	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs).
1.8.3	137	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Other Financial Regulated Business, not already mentioned in this section, and natural persons that are employed in these Other Financial Regulated Business.
1.8.4	138	Financial Leasing - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business.
1.8.5	139	Money Lending- Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Money Lending business, and natural persons that are employed by Money Lending businesses.
1.8.6	140	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).

1.8.7	141	Fintech - Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed in the Fintech industry.
1.8.8	142	<p><b>Source of Funds – Value of Client Assets.</b></p> <p>Please provide the total value of client assets under management, from clients that are legal persons or arrangements of, or are natural persons employed in the following sector:</p> <ul style="list-style-type: none"> <li>▪ Legal Practitioners</li> <li>▪ Dealers in Precious Metals and Stones</li> <li>▪ MSBs</li> <li>▪ Virtual Asset Products and Services</li> <li>▪ High Value Dealers</li> <li>▪ Trusts, Company Managers or Corporate Service Providers</li> <li>▪ Import/Export Industry</li> <li>▪ Shipping and Transport of Goods</li> </ul>	Enter the total value of client assets under management, of the clients that are legal persons or arrangements of, and are natural persons employed in the listed sectors.
1.8.9	143	Legal Practitioners – Value of Client Assets.	Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.
1.8.10	144	Dealers in Precious Metals and Stones- Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones.
1.8.11	145	Money Services Business - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Money Services Business, and natural persons that are employed in the Money Services Business.

1.8.12	146	Virtual Asset Products and Services - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements offering virtual asset products and services, and natural persons that are employed by providers or earning income through virtual asset products and services.
1.8.13	147	High Value Dealers - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers.
1.8.14	148	Trusts, Company Managers and Corporate Service Providers - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as TCSPs, and natural persons that are employed by TCSPs.
1.8.15	149	Import / Export Industry – Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Import / Export Industry, and natural persons that are employed by the Import / Export Industry.
1.8.16	150	Shipping and Transport of Goods - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Shipping and Transport of Goods, and natural persons that are employed by the Shipping and Transport Industry.
1.8.17	151	<p><b>Source of Funds – Value of Client Assets</b></p> <p>Please provide the total value of client assets under management from clients that are legal persons or arrangements of, or are natural persons employed in, the following sector:</p> <ul style="list-style-type: none"> <li>▪ Real Estate Agents/Brokers</li> <li>▪ Gambling Business</li> <li>▪ Adult Entertainment Industry</li> <li>▪ Defence Industry</li> <li>▪ Oil and Gas Industry</li> <li>▪ Mining</li> </ul>	Enter the total value of client assets under management, of the clients that are legal persons or arrangements of, and are natural persons employed in the listed sectors.

		<ul style="list-style-type: none"> <li>▪ Construction / Development</li> <li>▪ Retail / Restaurant</li> <li>▪ Cannabis Industry</li> </ul>	
1.8.18	152	Real Estate Agents / Brokers - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.
1.8.19	153	Gambling Business (including online gambling) - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in Gambling business (including online gambling), and natural persons that are employed in, or earning income, in the Gambling business (including online gambling).
1.8.20	154	Adult Entertainment - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business.
1.8.21	155	Defence Industry - Value of Client Assets.	Enter the value of assets under management, of clients that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry.
1.8.22	156	Oil and Gas Industry - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.
1.8.23	157	Mining Industry - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry.
1.8.24	158	Construction / Development - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Construction / Development business, and natural persons that are

			employed in the Construction / Development industry.
1.8.25	159	Retail & Restaurant Business - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.
1.8.26	160	Cannabis Production & Distribution - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Cannabis Production & Distribution business, and natural persons that are employed in the Cannabis Production & Distribution business.
1.8.27	161	Industry / profession not known or not recorded - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in unknown or unrecorded Industries / Professions, and natural persons that are employed in unknown or unrecorded Industries / Professions.
1.8.28	162	Other - Not listed above - Value of Client Assets.	Enter the value of client assets under management, of clients that are legal persons or arrangements operating in Known Businesses /industries/ Professions not listed above, and natural persons that are employed in Known Businesses / Industries / Professions, not listed above.
1.9.1	163	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.9.2	164	Please use this area to provide any comments or feedback for this tab.	Provide any comments or feedback that may be relevant, which you could not provide on the tabs above.  Enter 'N/A' if no comments.
2.1.1	165	Does the entity provide any products / services related to Professional Indemnity insurance?	Please answer 'Yes' or 'No'.
2.1.2	166	Professional Indemnity – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Professional Indemnity, broken down by the country of the insured.

2.1.3	167	Professional Indemnity - Value of Business.	Enter the Value of Premiums / Commissions / Fees collected from clients provided products related to Professional Indemnity.
2.1.4	168	Does the entity provide any products / services related to Life & Annuity?	Please answer 'Yes' or 'No'.
2.1.5	169	Life & Annuity - Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Life & Annuity, broken down by the country of the insured. This excludes Term Life policies.
2.1.6	170	Life & Annuity - Value of Business.	Enter the Value of Premiums / Commissions / Fees collected for products related to Life & Annuity, which the entity provides to clients, as at the end of the reporting period.
2.1.7	171	Life & Annuity - Value of Policyholder Assets.	Enter the Value of Policyholder Assets for products related to Life & Annuity, the entity provides to clients, as at the end of the reporting period.  If the entity is not an insurance company or this question is not applicable enter '0'
2.1.8	172	Life & Annuity – Reinsurance – Is all activity transacted for this line of business reinsurance coverage?	Enter 'Yes' or 'No'  Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.  If less than 100% reinsurance include the percentage in the Feedback section.
2.1.9	173	Does your entity provide any products / services related to Collateralized Insurance?	Please answer 'Yes' or 'No'.  Includes those Class C insurer licences who are collateralised by funding sources which include the issuance of bonds or other instruments, contracts for differences and such other funding mechanisms which fall under investment products.
2.1.10	174	Collateralized Insurance – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Collateralized Insurance, broken down by the country of the insured.
2.1.11	175	Collateralized Insurance - Value of business.	Enter the Value of Premiums / Commissions / Fees from products related to Collateralized Insurance,



			which the entity provides to clients, as at the end of the reporting period.
2.1.12	176	Does your entity provide any products / services related to Long Term Disability, AD&D, Critical Illness +5 years?	Please answer 'Yes' or 'No'.
2.1.13	177	Long Term Disability, AD&D, Critical Illness +5 years – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Long Term Disability, AD&D, Critical Illness +5 years, broken down by the country of the insured.
2.1.14	178	Long Term Disability, AD&D, Critical Illness +5 years – Value of business.	Enter the Value of Premiums / Commissions / Fees from products related to Long Term Disability, AD&D, Critical Illness +5 years, which the entity provides to clients, as at the end of the reporting period.
2.1.15	179	Long Term Disability, AD&D, Critical Illness +5 years – Is all activity transacted for this line of business reinsurance?	Enter 'Yes' or 'No'  Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.  If less than 100% reinsurance include the percentage in the Feedback section.
2.1.16	180	Does your entity provide any products / services related to Other Long-Term Health +5 years?	Please answer 'Yes' or 'No'.
2.1.17	181	Other Long-Term Health +5 years – Number of Clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Other Long-Term Health +5 years, broken down by the country of the insured.
2.1.18	182	Other Long-Term Health +5 years - Value of Business.	Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Health +5 years, which the entity provides to clients, as at the end of the reporting period.
2.1.19	183	Other Long-Term Health +5 years - Is all activity transacted for this line of business reinsurance?	Enter 'Yes' or 'No'  Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.

			If less than 100% reinsurance include the percentage in the Feedback section.
2.1.20	184	Does the entity provide any products / services related to Coverage of Market Outcome?	Please answer 'Yes' or 'No'.
2.1.21	185	Coverage of Market Outcome – Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Coverage of Market Outcome, broken down by the country of the insured.
2.1.22	186	Coverage of Market Outcome - Value of business	Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Market Outcome, which the entity provides to clients, as at the end of the reporting period.
2.1.23	187	Does your entity provide any products / services related to Coverage of Legal Outcome?	Please answer 'Yes' or 'No'.
2.1.24	188	Coverage of Legal Outcome – Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Coverage of Legal Outcome, broken down by the country of the insured.
2.1.25	189	Coverage of Legal Outcome - Value of Business	Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Legal Outcome, which the entity provides to clients, as at the end of the reporting period.
2.1.26	190	Does your entity provide any products / services related to Pension Coverage?	Please answer 'Yes' or 'No'.
2.1.27	191	Pension Coverage- Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Pension Coverage, broken down by the country of the insured.
2.1.28	192	Pension Coverage - Value of Business	Enter the Value of Premiums / Commissions/ Fees from products related to Pension Coverage, which the entity provides to clients, as at the end of the reporting period.
2.1.29	193	Pension Coverage - Is all activity transacted for this line of business reinsurance?	Enter 'Yes' or 'No' Responding 'Yes' means this business activity falls under reinsurance transactions by the entity.

			If less than 100% reinsurance include the percentage in the Feedback section.
2.1.30	194	Does your entity provide any products / services related to Hull Coverage?	Please answer 'Yes' or 'No'.
2.1.31	195	Hull Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Hull Coverage, broken down by the country of the insured.
2.1.32	196	Hull Coverage - Value of Business	Enter the Value of Premiums / Commissions / Fees from products related to Hull Coverage, which the entity provides to clients, as at the end of the reporting period.
2.1.33	197	Does your entity provide any products / services related to Aviation coverage?	Please answer 'Yes' or 'No'.
2.1.34	198	Aviation Coverage - Number of Clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Aviation Coverage, broken down by the country of the insured.
2.1.35	199	Aviation Coverage - Value of Business.	Enter the Value of Premiums / Commissions / Fees from products related to Aviation Coverage, which the entity provides to clients, as at the end of the reporting period.
2.1.36	200	Does your entity provide any Products with Loan Features?	Please answer 'Yes' or 'No'. Loans include promissory notes.
2.1.37	201	Loan Features - Number of active loans at the end of the reporting period, broken down by country of the borrower.	Enter the number of active loans the entity processed for or on behalf of customers, related parties or third parties, broken down by the country of the insured.
2.1.38	202	Loan Features - Value of active loans	Enter the value of loans issued by the entity, including for or on behalf of clients, for the reporting period.
2.1.39	203	Does your entity provide any products / services relating to Early Surrenders?	Please answer 'Yes' or 'No'.
2.1.40	204	Early Surrenders - Number of clients, broken down by country of insured.	Enter the number of clients the entity provides products related to Loan

			Features, broken down by the country of the insured.
2.1.41	205	Early Surrenders - Value of Surrenders for the reporting period.	Enter the Value of Premiums / Commissions / Fees from products related to Early Surrenders, which the entity provides to clients, as at the end of the reporting period.
2.1.42	206	Does your entity provide any Other Long-Term Coverage insurance products / services not included in the above questions?	Please answer 'Yes' or 'No'.
2.1.43	207	Other Long-Term Coverage - Number of clients, broken down by country of the insured.	Enter the number of clients the entity provides products related to Other Long-Term Coverages, broken down by the country of the insured.
2.1.44	208	Other Long-Term Coverage - Value of Business	Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Coverage, which the entity provides to clients, as at the end of the reporting period.
2.2.1	209	Does the entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.2.2	210	Physical Cash - Number of Clients.	Enter the number of clients which made payments in the form of Physical Cash during the reporting period.
2.2.3	211	Physical Cash - Number of Transactions.	Enter the number of Physical Cash transactions conducted by clients during the reporting period.
2.2.4	212	Physical Cash - Value of Funds Transferred.	Enter the value of the Physical Cash transactions conducted by clients during the reporting period.  Payments include those between the entity and the client and those conducted on behalf of the entity.
2.2.5	213	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.2.6	214	Virtual Currencies - Number of Clients.	Enter the number of clients which had payments in the form of Virtual Currency during the reporting period.

2.2.7	215	Virtual Currencies - Number of Transactions.	Enter the number of Virtual Currency transactions conducted by clients during the reporting period.
2.2.8	216	Virtual Currencies - Value of Funds Transferred.	Enter the value of the Virtual Currency transactions conducted by clients during the reporting period.
2.2.9	217	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.2.10	218	Third Parties - Number of Clients.	Enter the number of clients which conducted payments via Third Parties during the reporting period.  Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction.
2.2.11	219	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions conducted by clients during the reporting period.
2.2.12	220	Third Parties - Value of Funds Transferred.	Enter the value of the Third-Party transactions conducted by clients during the reporting period.
2.2.13	221	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.2.14	222	Credit Card Payments - Number of Clients	Enter the number of clients which made payments via Credit Card during the reporting period.
2.2.15	223	Credit Card Payments - Number of Transactions.	Enter the number of Credit Card transactions conducted by clients during the reporting period.
2.2.16	224	Credit Card Payments - Value of Funds Transferred.	Enter the value of Credit Card transactions conducted by clients during the reporting period.
2.2.17	225	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.2.18	226	Wire Transfers - Number of Clients.	Enter the number of clients which made payments in the form of Wire Transfers during the reporting period.

2.2.19	227	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions conducted by clients during the reporting period.
2.2.20	228	Wire Transfers - Value of Funds Transferred.	Enter the value of funds wire transferred by clients during the reporting period.
2.2.21	229	Does your entity facilitate payments of Clients in the form of Transfer of securities?	Please answer 'Yes' or 'No'.
2.2.22	230	Transfer of securities - Number of Clients.	Enter the number of clients which facilitated payments via transfer of securities, during the reporting period.
2.2.23	231	Transfer of securities- Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, relating to transfer of securities.
2.2.24	232	Transfer of securities- Value of Transactions.	Enter the value of transactions relating to payments via Transfer of securities, conducted by clients during the reporting period.
2.2.25	233	Does your entity facilitate payments of Clients in Other Forms of Payment not mentioned above?	Please answer 'Yes' or 'No'.
2.2.26	234	Other Forms of Payment - Number of Clients.	Enter the number of clients who made payments using other forms of payment not listed above, during the reporting period.
2.2.27	235	Other Forms of Payment - Number of Transactions.	Enter the number of transactions conducted by clients during the reporting period, using other forms of payment other than the ones listed above.
2.2.28	236	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were transferred by clients using other forms of payments, during the reporting period.
2.2.29	237	Please indicate the types of other forms of payments.	List the other forms of payment conducted by clients during the reporting period, which are not listed above.

2.3.1	238	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.  These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.
2.3.2	239	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.  These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.
2.3.3	240	Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination.	Enter the total value of funds transferred out by clients, broken down by the country of payment destination.
2.3.4	241	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.
2.4.1	242	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.4.2	243	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	244	Number of Clients - Direct - F2F.	Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period.  F2F channels include: Direct-F2F, Referrals within Group – F2F, Eligible Introducers – F2F, and Other Introducers-F2F.
3.1.2	245	Number of Clients - Direct - Non-F2F.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and

			<p><u>not only</u> those onboarded during the reporting period.</p> <p>Examples of Direct Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have Direct F2F contact with the clients.</p>
3.1.3	246	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	247	Number of Clients through Referrals within Group - F2F.	<p>Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the UBOs nationality.</p> <p>An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself has F2F interaction with the clients.</p>
3.1.5	248	Number of Clients through Referrals within Group - Non F2F.	<p>Enter the number of clients which were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the UBOs.</p> <p>Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.</p>
3.1.6	249	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	250	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	251	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	252	Number of 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	253	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	254	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"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	255	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 as at the end of the reporting period.
3.2.4	256	How many AML Compliance Officers has the entity had within the past 3 years?	If no turnover of the Compliance Officer role in the three-year period, answer "1".
3.2.5	257	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	258	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> </ul>

			<ul style="list-style-type: none"> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	259	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	260	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover within the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	261	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	262	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"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.11	263	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	264	How many Deputy Money Laundering Reporting Officers have you had in the past 3 years?	If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.13	265	Has the entity outsourced the function of Targeted Financial	Please answer 'Yes' or 'No'.

		Sanction screening within the reporting period?	
3.2.14	266	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"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.</p>
3.2.15	267	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.16	268	How many TFS Screening platforms / software did the entity have in the past 3 years?	If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".
3.2.17	269	Has the entity outsourced the function of transaction or client monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	270	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship of the transaction monitoring function:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.</p>
3.2.19	271	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	272	How many Transaction monitoring platforms / software did the entity have in the past 3 years?	If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".
3.3.1	273	Physical presence - Place of Business.	Enter the country of the entity's physical business operations.
3.3.2	274	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.
3.3.3	275	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	276	In which country is the parent or holding company incorporated?	Enter the country the parent or holding company incorporated.
3.3.5	277	In which countries, by percentage of equity ownership, are shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more.	Select the 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	278	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 of the entity, holding 10% or more, broken down by country of nationality of the shareholder(s).
3.3.7	279	How many directors does the entity have appointed, by country of nationality of the director, at the end of the reporting period?	Enter the number of directors of the entity, broken down by country of nationality of the directors.
3.4.1	280	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	281	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.

<b>AML Controls Questions:</b>			
<b>No.</b>	<b>Question No.</b>	<b>Question</b>	<b>Description/Explanation</b>
1.1.1	282	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	283	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	284	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	285	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	286	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	287	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	288	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	289	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	290	Does the Board / Governing Body ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner?	Please answer 'Yes' or 'No'.
1.1.10	291	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	292	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	293	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	294	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	295	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.2.2	296	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	297	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	298	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	299	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	300	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	301	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	302	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	303	Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF compliance breaches?	Please answer 'Yes' or 'No'.
1.2.10	304	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	305	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.

1.2.12	306	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	307	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	308	Have the directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	309	Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	310	Has the MLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	311	Has the DMLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.6	312	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	313	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.3.8	314	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	315	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	316	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	317	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.

1.4.2	318	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	319	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	320	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	321	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	322	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	323	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	324	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	325	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	326	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	327	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	328	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	329	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	330	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.



1.5.3	331	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	332	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	333	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	334	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	335	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	336	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	337	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	338	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	339	Does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.
1.5.12	340	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	341	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	342	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	343	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	344	Does the entity rely on Group AML/CFT policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	345	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	346	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	347	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	348	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	349	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	350	Does the entity have Board, or governing body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	351	Does the entity have Board or governing body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	352	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	353	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	354	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	355	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	356	Does the entity have a screening process?	Please answer 'Yes' or 'No'.
1.7.2	357	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	358	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	359	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	360	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	361	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	362	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	363	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	364	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	365	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	366	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	367	Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/ jurisdiction that is subject to economic or financial sanctions?	Please answer 'Yes' or 'No'.
1.7.13	368	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	369	Does the entity have transaction monitoring policies and procedures developed commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	370	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	371	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	372	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	373	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	374	Does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	375	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	376	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	377	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	378	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	379	Does the entity have policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.9.4	380	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	381	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	382	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	383	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	384	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	385	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	386	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	387	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	388	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	389	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	390	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	391	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	392	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	393	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	394	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	395	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	396	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	397	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	398	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	399	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	400	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	401	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	402	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	403	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	404	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	405	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	406	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	407	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.