



AML Survey – Completion Guide: Corporate Service Provider

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Revision History:

Effective Date	Version Number	Revision Description
16 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update definitions
4 November 2022	1.2	Updates to definitions, descriptions, and explanations
31 May 2023	1.3	Updates to definitions, descriptions, explanations and questions.
31 May 2024	1.4	Updates to definitions, descriptions, explanations and 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 (“AML/D”). This AML Survey Form is issued in accordance with section 16(1)(b) of the Companies Management Act (2021 Revision)

This Guide gives support to FSPs which carry out Corporate Service Provider business for accessing, completion and submission of the AML Survey – Corporate Service Provider Form.

2 FORM INFORMATION

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

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

3 ACCESSING AND SUBMITTING THE AML SURVEY

3.1 ACCESS TO THE AML SURVEY


Entities will receive an invitation to the web-based survey by email using the current email contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient’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: Anti-Money Laundering Compliance Officer (“AMLCO”), Money Laundering Reporting Officer (“MLRO”), Deputy-Money Laundering Reporting Officer (“DMLRO”), and any other additional contacts, upon request from the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at AMLSurveys@cima.ky.

To access the AML Survey:

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



Cayman Islands Monetary Authority

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

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

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

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

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

Confirm Account

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

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLI86VZCRbBxm3fq3fSoAMoPYyQ6XKfqt0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYsoP%2Bk8rPURRSVrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhAtaTNSa3IE3aiA%3D>

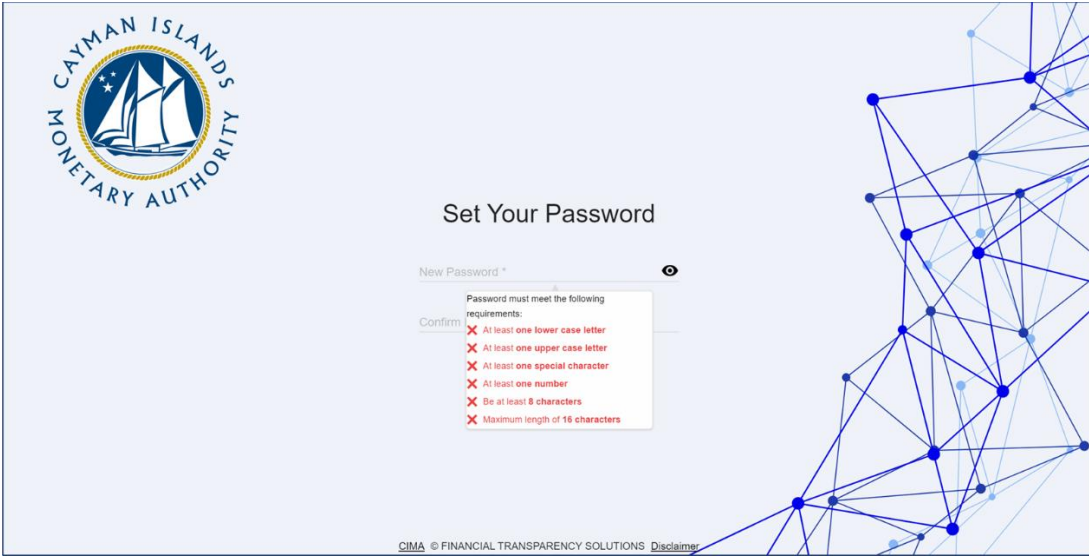
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

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

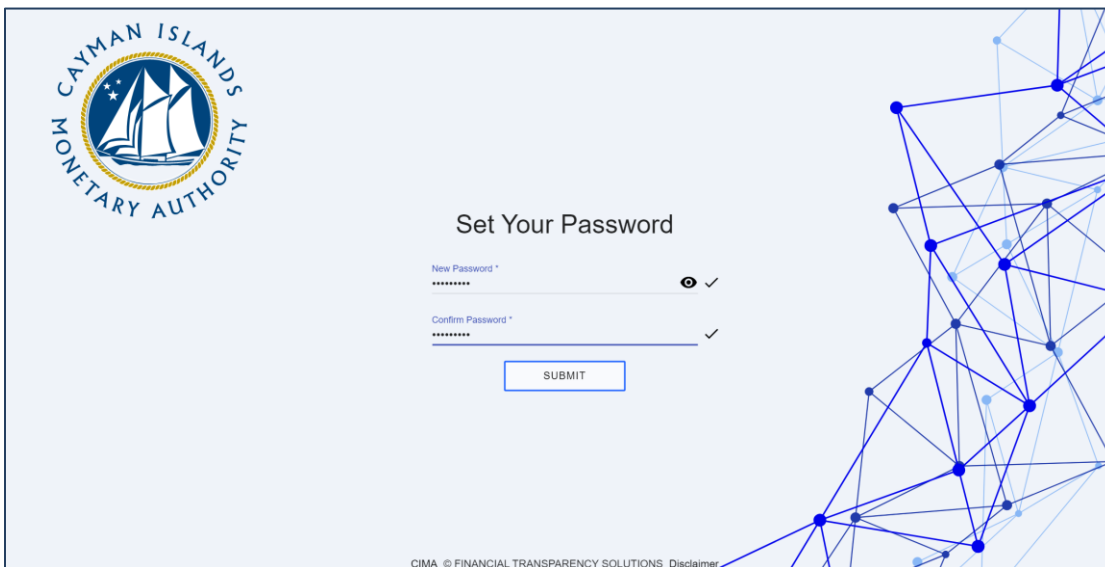
Disclaimer:
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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



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



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



Cayman Islands Monetary Authority

The **Username** for this account is:

Your account has been successfully activated.

The following link provides access to your account:

[Go to Portal](#)

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

<https://amlsurvey.cimaconnect.com>

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

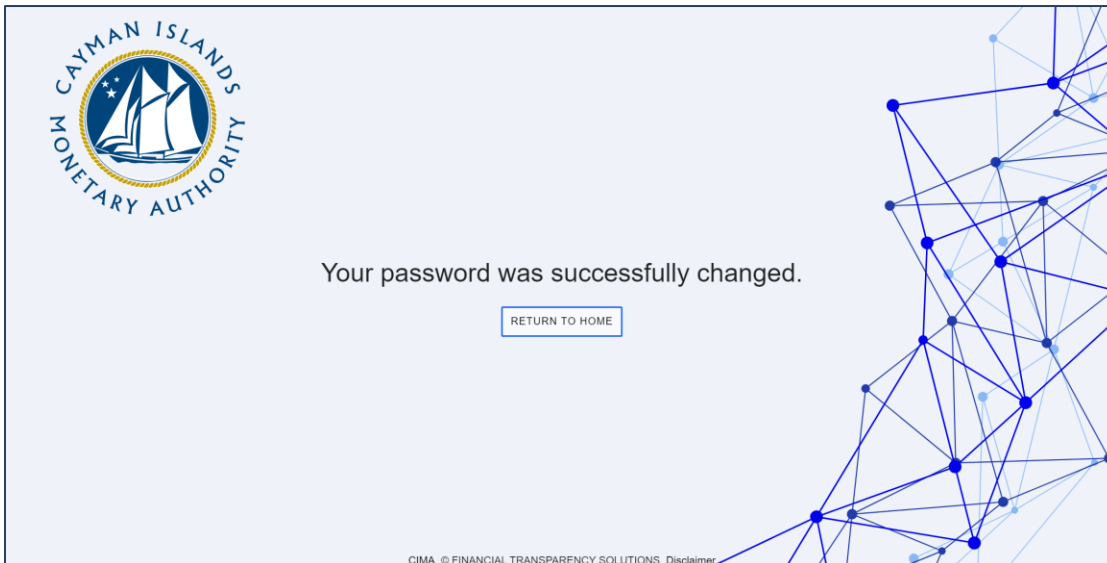
Please do not reply to this email, it is automatically generated.

Disclaimer:

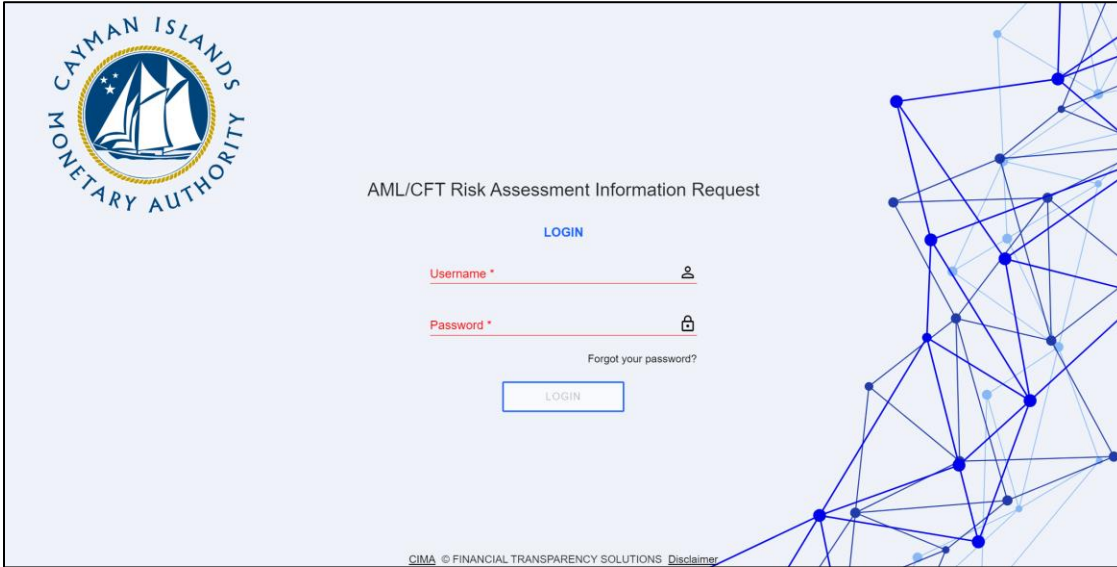
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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

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



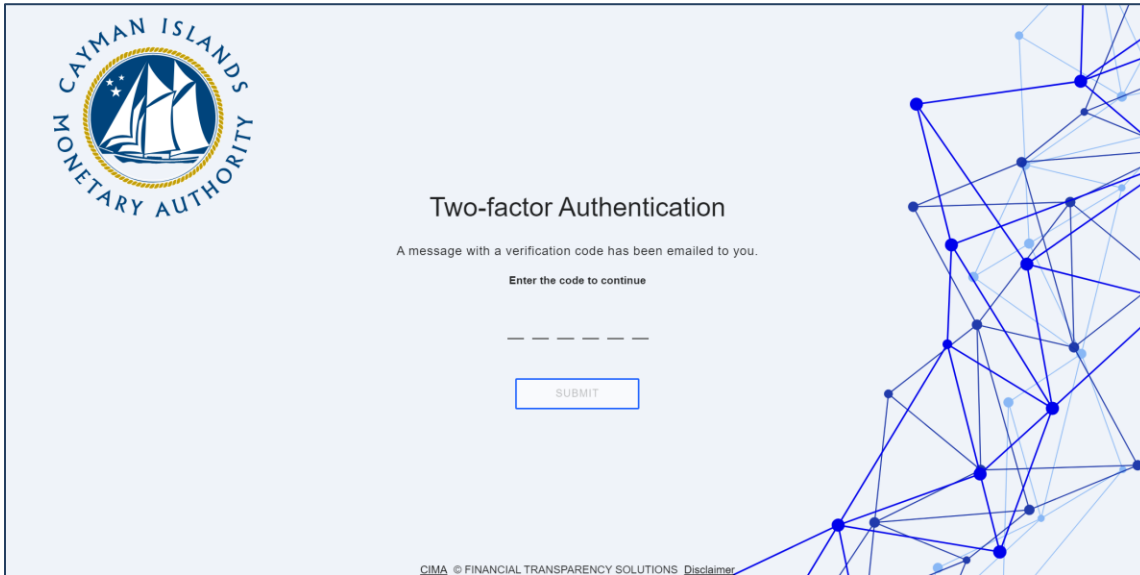
- 6. The recipient should then enter their username, which is their email address where they received the AML Survey invite, and the password they just created.



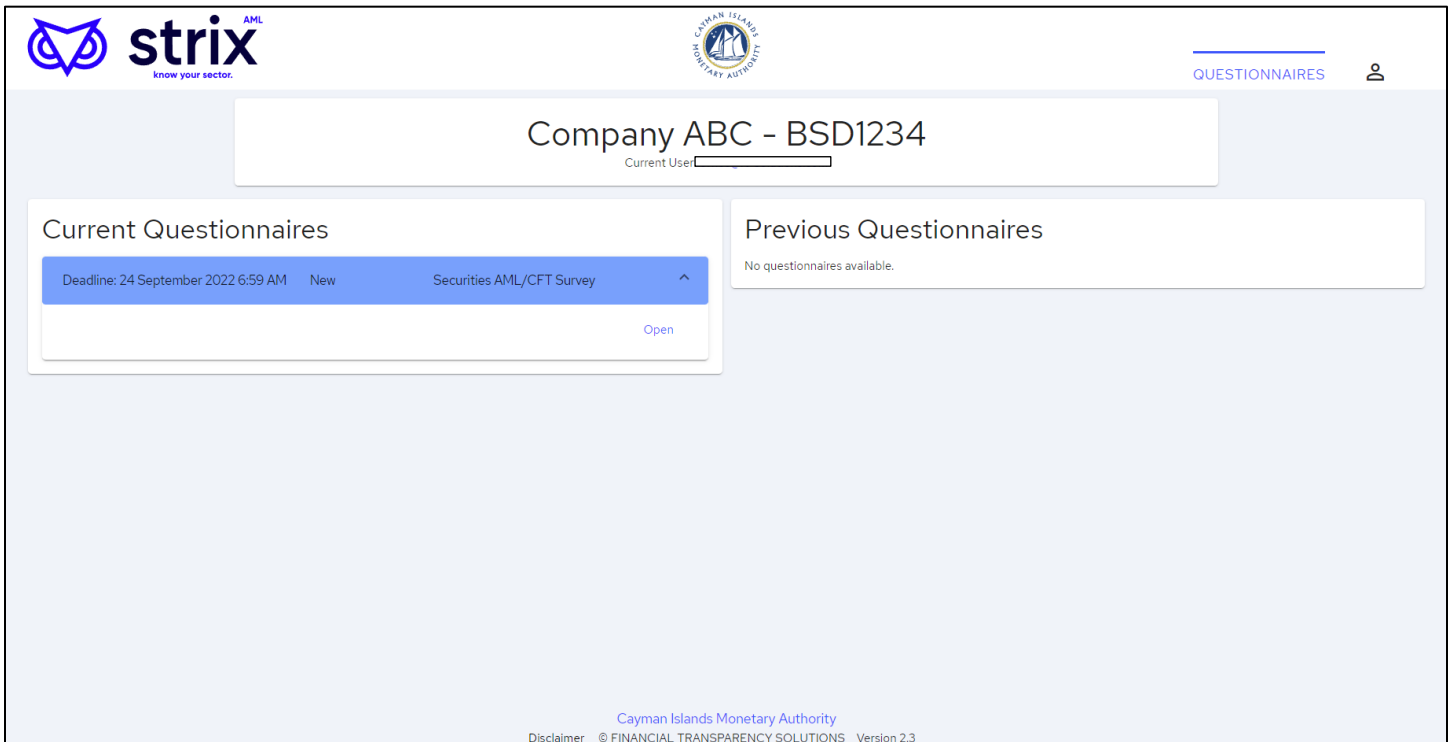
- 7. A six digit two-factor authentication code will be sent to the survey recipient’s email.



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



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



3.2 COMPLETING THE AML SURVEY FORM

1. Click the Current Questionnaire to access the AML Survey Form and start populating the form with the required data.
 - a. Completion guidance for the AML Survey is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Survey as many times as needed prior to the survey due date so long as the recipient selects 'Save'.
 - c. Once the AML Survey has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority.
 - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
 - e. Once the AML Survey is 'Submitted' an Excel and PDF copy of the completed survey will be available under 'Current Questionnaire'.
 - f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Survey through an email notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the email.
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an 'Incomplete' AML Survey, they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to AMLSurveys@cima.ky detailing the following:
 - i. Licence or Registration Name
 - ii. Licenced or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current directors
 - v. Number of Clients
 - vi. Reason for requesting to make an Incomplete Submission.
2. If a User receives or has access to more than one survey, they will not see the additional survey(s) in the 'Current Surveys' section of the web page. At the top of the page, where it shows the Entity'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 lockout: **1)** locked out for five (5) minutes; **2)** locked out for ten (10) minutes; and, **3)** if the user persists, locked out permanently.

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

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

4.2 INTERNET BROWSER

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

4.3 DATA AND SECURITY

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

4.4 APPLICABLE FEES

There are no fees associated with this Form.

5 AML SURVEY GUIDANCE

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

Terms and Definitions:

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 Arrangements 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	<p>United States Dollars (US\$).</p> <p>All other currencies must be converted to US\$ unless otherwise stated.</p>

Dealers in Precious Metals and Stones	Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer.
Eligible Introducers	A person that “introduces” applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Entity	For the purposes of this form/survey, an ‘entity’ is the holder of the Corporate Service Provider licence that is responding to this survey.
F2F	The face-to-face introduction / onboarding with a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.
Fintech service	A service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service.
Foundation	This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (Revised), except to the extent that it is modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions.
FRA	Financial Reporting Authority.
Gov / Pub Sector	Business conducted in or with Government or Public Sector.
High Value Dealers	Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods.

HNWIs	<p>A High net worth individual (HNWI) is:</p> <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> <p>HNWIs are <u>NOT</u> Ultra HNWIs and should not be double counted.</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 client who is a Natural Person and not a Legal Person and Arrangement.
Legal Arrangement	A trust or partnership, or other entity created between parties which lacks separate legal personality.
Legal Person	A company or other entity such as a foundation, created by operation of law with separate legal personality.
MLRO	Money Laundering Reporting Officer
ML/TF/PF	Money Laundering/Terrorism Financing/Proliferation Financing.
Money Service Businesses (MSB)	<p>Money services business means the business of providing, in or from within the Islands, any of the following services:</p> <p>(a) money transmission;</p> <p>(b) cheque cashing.</p> <p>(c) currency exchange.</p> <p>(d) the issuance, sale or redemption of money orders or traveller's cheques.</p>
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Shareholder	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	<p>Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to the corporate group, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>
PEP	<p>"Politically Exposed Person" includes —</p> <p>(a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official.</p> <p>(b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and</p> <p>(c) a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p> <p>Politically exposed persons also include:</p> <ul style="list-style-type: none"> (i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership. (ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.

Reporting Period	January 1 through December 31, 2023, and future calendar years thereafter.
Signatories	Signatories are those Persons authorised to act on behalf of a clients, for example, BOs, Directors, or other Third Parties.
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. As such, a client with multiple sources of funds should be recorded and counted as all the sources of funds that were used when forming the business relationship and the ongoing activity with the business relationship.</p> <p>Take this into account when answering questions relating to the 'Nature of Business - Source of Funding.</p>
Special Economic Zone Business	Any type of business authorised to be carried on in a special economic zone pursuant to any legislation enforced in the Islands.
Targeted Financial Sanctions (TSF)	Includes asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ("OFSI").
TCSP	Includes those entities conducting Trusts, 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 HNWI whose net worth is greater than or equal to US\$30,000,000.	
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	Number of Clients	Number of clients as at the end of the reporting period.
Timeframe	Number of Transactions	Number of Transactions conducted for the client during the reporting period.

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. 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	Clients/customers that are Legal Persons, broken down by country of incorporation of the client.	Enter the total number of clients that are Legal Persons, broken down by their country of incorporation, as at the end of the reporting period. Examples include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies.
1.1.4	4	Clients / customers who are Legal Arrangements, broken down by the country of establishment of the client.	Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as at the end of the reporting period.

			<p>If an entity does not have such clients, a '0' value should be used.</p> <p>Example of legal arrangements include but are not limited to Trusts and Partnerships.</p>
1.1.5	5	Total number of PEPs	<p>Enter the total number of PEPs, by nationality of the PEP, broken down by the nationality of the PEP, at the end of the reporting period.</p> <p>Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, BOs, Directors, or hold any other form of control, including signatories.</p>
1.1.6	6	Total number of High Risk Clients	Enter the total number of clients/customers that are 'high' risk, at the end of the reporting period.
1.1.7	7	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.
1.2.1	8	Total number of BOs of clients that are Legal Persons and Arrangements.	<p>Enter the total number of BOs of all clients who are Legal Persons and Arrangements.</p> <p>A BO should not be counted more than once regardless of the number of business relationships they have with the entity.</p> <p>This category is specific to all Legal persons and Arrangements. Examples include, but are not limited to, the total number of BOs of Corporate entities, Settlers of Trusts and General Partners of limited Partnerships.</p>
1.2.2	9	Does the entity have any clients who are Legal Persons?	Answer 'Yes' or 'No'
1.2.3	10	Number of BOs of clients who are Legal Persons.	Enter the number of BOS of legal person clients, broken down by the nationality of the BO.
1.2.4	11	Does the entity have any clients that are Legal Arrangements?	Answer 'Yes' or 'No'
1.2.5	12	Number of settlors of clients who are Legal Arrangements.	Enter the number of settlors of legal arrangement clients, broken down by the nationality of the Settlor.

			This category is specific to clients who are legal arrangements and are Trusts.
1.2.6	13	Number of Partners of clients who are Legal Arrangements.	Enter the number of partners of legal arrangement clients, broken down by the nationality of the Partners.
1.2.7	14	Does the entity have any clients that have BOs who are HNWI's?	Please answer 'Yes' or 'No'. This category is specific to clients who are Legal Persons and Arrangements. Examples include, but not limited to, a BO of a LLC, Partners of a Partnership or Settlor of a Trust who is a HNWI.
1.2.8	15	Number of Clients that have BOs who are HNWI's.	Enter the total number of clients who have BOs that are HNWI's. HNWI's is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least CI\$4,000,000 (approx. US\$5,000,000) <u>Do Not include</u> clients/customers with net worth equal to or greater than US\$30,000,000. If the entity does not have any clients that fit this category record a '0'.
1.2.9	16	Does the entity have any clients which have BOs who are Ultra HNWI's?	Please answer 'Yes' or 'No'. UHNWI's is specific to those persons whose net worth is equal to or greater than \$30,000,000.
1.2.10	17	Number of Clients that have BOs who are Ultra HNWI's.	Enter the total number of clients who have BOs that are Ultra HNWI's. If the entity does not have any clients that fit this category record a '0'.
1.2.11	18	Does the entity have any clients who are Legal Persons or Arrangements that have BOs who are PEPs?	Please answer 'Yes' or 'No'.
1.2.12	19	Number of BOs of clients who are Legal Persons or Arrangements who are also PEPs.	Enter the total number of clients who are Legal Person and Arrangements that have BOs who are PEPs, at the end of the reporting period.

1.2.13	20	Does the entity have any clients that have Nominees acting on behalf of a beneficial owner (inc. any Nominees within the ownership structure)?	Please answer 'Yes' or 'No'.
1.2.14	21	Number of clients that have Nominees acting on behalf of a beneficial owner, or a Nominee within the ownership structure, broken down by nationality of the beneficial owner.	Enter the total number of clients that have nominees acting on behalf of beneficial owners, or within its ownership structure, broken down by the nationality of the beneficial owner. This category is specific to clients who are Legal Persons and Arrangements.
1.3.1	22	Number of total directors appointed to clients.	Enter the total number of directors appointed to clients, as at the end of the reporting period.
1.3.2	23	Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the director.	Enter the total number of clients that have nominee directors appointed as at the end of the reporting period, broken down by country of nationality of the director and <u>not</u> the director, that person in control.
1.3.3	24	Number of clients that have a nominee appointed on behalf of a director, broken down by the country of nationality of the nominee director.	Enter the total number of clients that have a nominee director as at the end of the reporting period, broken down by country of nationality of the director (not the nominee).
1.3.4	25	Number of directors and/or senior management of clients who are PEPs.	Enter the total number of clients who have directors and/or senior management who are also PEPs, at the end of the reporting period.
1.3.5	26	Number of directors and/or senior management of clients who are High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are also HNWIs, as at the end of the reporting period. <u>Do No include</u> persons who are directors / senior management who are Ultra HNWIs.
1.3.6	27	Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals.	Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs, as at the end of the reporting period. Individuals whose net worth is equal to or greater than US\$30,000,000.

1.3.7	28	Number of directors and/or senior management of clients who are PEPs & HNWI/ Ultra - HNWI.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI/ Ultra - HNWI, as at the end of the reporting period.
1.4.1	29	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	30	Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction.	Enter the number of clients that the entity has, as at the end of the reporting period, that are a Government or Public Sector, broken down by government jurisdiction.
1.4.4	31	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.5	32	NPO - Number of Clients.	Enter the number of NPO clients the entity has, as at the end of the reporting period, broken down by country of incorporation / formation of the client.
1.4.7	33	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.8	34	Foundations - Number of Clients.	Enter the number of clients the entity has that are a Foundation, broken down by country of establishment of the client, at the end of the reporting period.
1.4.10	35	Does the entity have any clients that are trusts?	Please answer 'Yes' or 'No'.
1.4.11	36	Trusts - Number of Clients.	Enter the number of clients the entity has, that are Trusts, broken down by country of formation, at the end of the reporting period.
1.4.13	37	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.14	38	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients the entity has that are Segregated Portfolio Companies, at the end of reporting period.

1.4.16	39	Does the entity have any clients that operate from Special Economic Zone?	Please answer 'Yes' or 'No'.
1.4.17	40	Special Economic Zone - Number of Clients	Enter the number of clients the entity has that are registered/operate in a Special Economic Zone, at the end of reporting period.
1.4.19	41	Does the entity have any clients that are Funds / Collective Investment Vehicles?	Please answer 'Yes' or 'No'.
1.4.20	42	Funds / Collective Investment Vehicles - Number of Clients.	Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles at the end of reporting period.
1.4.22	43	Does the entity have any clients that are Partnerships?	Please answer 'Yes' or 'No'
1.4.23	44	Partnership – Number of clients	Enter the number of clients the entity has that are Partnerships, as at the end of the reporting period.
1.5.1	45	Does the entity have any clients that are natural Persons?	Please answer 'Yes' or 'No'. This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.
1.5.2	46	Clients / customers that are Natural Persons, broken down by the nationality of the client.	Enter the number of clients that are natural persons, broken down by the nationality of the individual client, at the end of the reporting period. <i>Note: This category does not include clients/ customers that are Legal Persons and Arrangements.</i>
1.5.3	47	Clients/customers that are Natural Person, broken down by Residency of the client.	Enter the number of clients that are natural persons, broken down by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity. <i>Note: This category <u>does not</u> include clients/ customers that are Legal Persons and Arrangements.</i>

1.5.4	48	Natural Persons - Total transactions for the reporting period for all Natural Person clients.	<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><i>Note: This category <u>does not</u> include clients / customers that are Legal Persons and Arrangements.</i></p>
1.5.5	49	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>
1.5.6	50	Number of Natural Person clients who are PEPs.	<p>Enter the total number of Natural Person clients that are PEPs, as at the end of the reporting period.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.7	51	Natural Persons - PEPs - Number of Transactions	<p>Enter the number of transactions conducted by Natural Person clients, that are PEPs, during the reporting period.</p>
1.5.8	52	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. This category does not include those individuals who are Ultra HNWIIs.</p>
1.5.9	53	Number of Natural Person clients who are HNWIIs.	<p>Enter the number of Natural Person clients the entity has who are HNWIIs.</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIIs.</p>
1.5.10	54	Natural Person Clients - HNWIIs - Number of Transactions.	<p>Enter the number of transactions conducted by Natural Person clients, who are HNWIIs, during the reporting period.</p>
1.5.11	55	Does the entity have any Natural Person clients that are Ultra HNWIIs?	<p>Please answer 'Yes' or 'No'.</p> <p>Individuals whose net worth is equal to or greater than US\$30,000,000.</p>
1.5.12	56	Number of Natural Person clients who are Ultra HNWIIs	<p>Enter the number of Natural Person clients the entity has that</p>

			are Ultra HNWIs at the end of the reporting period.
1.5.13	57	Natural Person Clients - Ultra HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are Ultra HNWIs, during the reporting period.
1.5.14	58	Does the entity have any Natural Person clients that are PEPs and HNWIs / Ultra HNWIs?	Please answer 'Yes' or 'No'.
1.5.15	59	Number of Natural Person Clients who are PEPs and HNWIs / Ultra HNWIs.	Enter the number of Natural Person clients the entity has that are both PEPs and HNWIs / Ultra HNWIs, at the end of the reporting period.
1.5.16	60	Natural Person Clients – PEPs and UHNIs/ UHNWIs - Number of Transactions.	Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and UHNIs/ Ultra HNWIs, during the reporting period.
1.6.1	61	<p>Nature of Business/Source of Funding:</p> <p>Enter the total number of clients whose source of funding falls within the list of sectors below.</p> <ul style="list-style-type: none"> ▪ Banking Institutions ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech <p>*excluding MSBs, Virtual Asset Products and Services, and TCSPs.</p>	Provide the total number of clients whose source of funding falls within the list of sectors.
1.6.2	62	Does the entity have any clients whose source of funding is from the Banking sector (excluding MSBs)?	Please answer 'Yes' or 'No'.
1.6.3	63	Banking Institutions – (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the banking sector.
1.6.4	64	Does the entity have any clients whose source of funding is from the financial services sector, other than banking, VASPs, MSBs and TCSPs?	Please answer 'Yes' or 'No'.
1.6.5	65	Other Financial Regulated Business - Number of Clients.	Enter the number of clients the entity has, whose source of funding is from the financial sector

			(excluding Banking, VASPs, MSBs and TCSPs).
1.6.6	66	Does the entity have any clients whose source of funding is from Financial Leasing operations?	Please answer 'Yes' or 'No'.
1.6.7	67	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations.
1.6.8	68	Does the entity have any clients whose source of funding is from Money Lending operations?	Please answer 'Yes' or 'No'.
1.6.9	69	Money Lending - Number of Clients.	Enter the number of clients the entity has whose source of funding is from Money Lending operations.
1.6.10	70	Does the entity have any clients whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, Insolvency)?	Please answer 'Yes' or 'No'.
1.6.11	71	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, and Insolvency).
1.6.12	72	Does the entity have any clients whose source of funding is from the Fintech industry?	Please answer 'Yes' or 'No'.
1.6.13	73	Fintech - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the Fintech industry.
1.6.14	74	<p>Nature of Business/Source of funding:</p> <p>Enter the total number of clients whose source of funding falls within the list of sectors below.</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ Money Service Business (MSBs) ▪ Virtual Asset Products Services ▪ High Value Dealers ▪ TCSPs ▪ Import/Export industry ▪ Shipping and transport of Goods 	Provide the total number of clients whose source of funding falls within the list of sectors.

1.6.15	75	Does the entity have any clients whose source of funds is derived from being a Legal Practitioners?	Please answer 'Yes' or 'No'
1.6.16	76	Legal Practitioners – Number of clients	Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner.
1.6.17	77	Does the entity have any clients whose source of funds is derived from Dealers in Precious Metals and Stones operations?	Please answer 'Yes' or 'No'
1.6.18	78	Dealers in Precious Metals and Stones – Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.6.19	79	Does the entity have any clients whose source of funds are derived from Money Services Business operations?	Please answer 'Yes' or 'No'.
1.6.20	80	Money Services Business - Number of Clients.	Enter the number of clients whose source of funds are derived from Money Services Business operations.
1.6.21	81	Does the entity have any clients whose source of funds is derived from the virtual asset sector (products, services, investments)?	Please answer 'Yes' or 'No'.
1.6.22	82	Virtual Asset Products and Services- Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the virtual asset sector (products, services, or investments).
1.6.23	83	Does the entity have any clients whose source of funds is derived through High Value Dealer operations?	Please answer 'Yes' or 'No'.
1.6.24	84	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funds is derived from High Value Dealer operations.
1.6.25	85	Does the entity have any clients whose source of funds is derived from TCSP operations?	Please answer 'Yes' or 'No'.
1.6.26	86	TCSPs - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from TCSP operations.

1.6.27	87	Does the entity have any clients whose source of funds is derived from the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.6.28	88	Import / Export - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Import / Export business operations.
1.6.29	89	Does the entity have any clients whose source of funding is derived from the Shipping and Transport of Goods industry?	Please answer 'Yes' or 'No'.
1.6.30	90	Shipping and Transport of Goods - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived from the Shipping and Transport of Goods industry.
1.6.31	91	<p>Nature of Business/Source of Funding:</p> <p>Enter the total number of clients whose source of funding falls within the list of sectors below.</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry 	Provide the total number of clients whose source of funding falls within the list of sectors.
1.6.32	92	Does the entity have any clients whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers)?	Please answer 'Yes' or 'No'.
1.6.33	93	Real Estate Agents / Brokers / Sellers - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers).
1.6.34	94	Does the entity have any clients whose source of funds is derived through the Gambling industry (including online gambling)?	Please answer 'Yes' or 'No'.

1.6.35	95	Gambling business (including online gambling) - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived through the Gambling industry (including online gambling).
1.6.36	96	Does the entity have any clients whose source of funds is derived from the adult entertainment industry?	Please answer 'Yes' or 'No'.
1.6.37	97	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Adult Entertainment Industry.
1.6.38	98	Does the entity have any clients whose source of funds are derived from the Defence Industry?	Please answer 'Yes' or 'No'.
1.6.39	99	Defence Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Defence industry.
1.6.40	100	Does the entity have any clients whose source of funds are derived from operating in the Oil and Gas Industry?	Please answer 'Yes' or 'No'.
1.6.41	101	Oil and Gas Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from operating in the Oil and Gas industry.
1.6.42	102	Does the entity have any clients whose source of funds is derived from the Mining Industry?	Please answer 'Yes' or 'No'.
1.6.43	103	Mining Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Mining Industry.
1.6.44	104	Does the entity have any clients whose source of funds are derived through operating in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.6.45	105	Construction / Development - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from operating in the Construction / Development industry.
1.6.46	106	Does the entity have any clients whose source of funds are derived from	Please answer 'Yes' or 'No'.

		operating in the Retail & Restaurant Business?	
1.6.47	107	Retail & Restaurant Business - Number of Clients.	Enter the number of clients the entity has whose source of funding is derived in the Retail & Restaurant Business.
1.6.48	108	Does the entity have any clients whose source of funds are derived through Cannabis Production & Distribution operations?	Please answer 'Yes' or 'No'.
1.6.49	109	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.
1.6.50	110	Does the entity have any clients whose source of funds is Unknown to the entity?	Please answer 'Yes' or 'No'.
1.6.51	111	Unknown Businesses and Professions - Number of Clients.	Enter the number of clients the entity has whose source of funds is Unknown to the entity. Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client.
1.6.52	112	Does the entity have any clients where the nature of business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.6.53	113	Other - Not mentioned above - Number of Clients.	Enter the number of clients the entity has whose source of funds is known businesses however not mentioned above.
1.7.1	114	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.7.2	115	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.

2.1.1	116	Number of clients that the entity provides the services of Registered Office.	Enter the number of clients the entity provides the services of Registered Office.
2.1.2	117	Number of Clients the entity provides the service of Formation Agent.	Enter the number of clients that the entity provides the service of Formation Agent.
2.1.3	118	Number of Clients the entity provides the Registered Agent / Statutory Filing services.	Enter the number of clients, the entity provides Statutory Filings services as at the end of the reporting period.
2.1.4	119	Number of Clients the entity provides the service of BO Filings.	Enter the number of clients, that the entity provides the service of BO Filings, as at the end of the reporting period,
2.1.5	120	Number of Clients the entity provides MLRO services.	Enter the number of clients the entity provides MLRO.
2.1.6	121	Number of Clients the entity provides AML Compliance Officer services.	Enter the number of clients that the entity provides AML Compliance Officer services.
2.1.7	122	Does the entity provide Other Services to clients that are not listed above?	Please answer 'Yes' or 'No'.
2.1.8	123	Number of Clients the entity provides Other Services not mentioned above.	Enter the number of clients, that the entity provides Other Services not mentioned above.
2.1.9	124	Please describe the other types of services that are provided to clients that are not listed above.	Enter all other types of services, that are provided to clients, that are not listed above that.
2.2.1	125	Number of clients with assets that are marine vessels within their client structure, by the nationality of the BO.	Enter the number of clients with assets that are marine vessels within their client structure, broken down by nationality of the BO.
2.2.2	126	Number of clients with assets that are marine vessels within the client structure, by jurisdiction of registration of the marine vessels.	Enter the number of clients with assets that are marine vessels within their client structure, broken down by jurisdiction of registration of the marine vessels.
2.2.3	127	Number of clients with assets that are aircraft within their client structure, by the nationality of the BO.	Enter the number of clients with assets that are aircraft within their client structure, broken down by nationality of the BO.

2.2.4	128	Number of clients with assets that are aircraft within the client structure, by jurisdiction of registration of the aircraft.	Enter the number of clients with assets that are aircraft within their client structure, broken down by jurisdiction of registration of the aircraft.
2.2.5	129	Number of clients with assets that are real estate assets within their client structure, by the nationality of the BO.	Enter the number of clients with real estate assets within their client structure, broken down by nationality of the BO.
2.2.6	130	Country location of the assets that are real estate.	Enter the number of clients with real estate assets within their client structure, broken down by country location of the real estate.
2.2.7	131	Number of clients with 'Other Assets', that are not listed above, within their client structure, by the nationality of the BO.	Enter the number of clients with 'Other Assets', not listed above, within their client structure, broken down by nationality of the BO.
2.2.8	132	Country location of the 'Other Assets'.	Enter the number of clients with 'Other Assets' within their client structure, broken down by country location of the assets.
2.2.1	133	Does the entity facilitate payments for or on behalf of Clients in the form of Physical cash?	Please answer 'Yes' or 'No'.
2.2.2	134	Physical Cash - Number of Clients.	Enter the number of clients where payments were made to / from or on behalf of clients, in the form of Physical Cash, during the reporting period.
2.2.3	135	Physical Cash - Value of Transactions.	Enter the value of the Physical Cash transactions conducted for or on behalf of clients, during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the client.
2.2.4	136	Does the entity facilitate payments for or on behalf of clients in the form of Virtual Currencies?	Please answer 'Yes' or 'No'.
2.2.5	137	Virtual Currencies - Number of Clients.	Enter the number of clients where payments were made, to/from or on behalf of client, in the form of Virtual Currency, during the reporting period.

2.2.6	138	Virtual Currencies - Value of Transactions	Enter the value of the Virtual Currency transactions conducted for or on behalf of clients during the reporting period.
2.2.7	139	Does the entity facilitate payments for or on behalf of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.2.8	140	Third Parties - Number of Clients.	Enter the number of clients where payments to/from the client were conducted via Third Parties, during the reporting period. Payments via third party means that the payment was paid to/from a third party not associated with the direct business relationship or transaction.
2.2.9	141	Third Parties – Value of Transactions	Enter the value of transactions where payments to/from, or on behalf of clients were conducted via Third Parties, during the reporting period.
2.2.10	142	Does the entity facilitate payments via Credit Card?	Please answer 'Yes' or 'No'.
2.2.11	143	Credit Card Payments - Number of Clients	Enter the number of clients where payments to/from or on behalf of clients were conducted via Credit Card, during the reporting period.
2.2.12	144	Credit Card Payments - Value of Transactions.	Enter the value of Credit Card payments processed for clients during the reporting period.
2.2.13	145	Does the entity facilitate payments for or on behalf of clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'.
2.2.14	146	Wire Transfers - Number of Clients.	Enter the number of clients where payments to/from or on behalf of clients were made via Wire Transfers, during the reporting period.
2.2.15	147	Wire Transfers - Value of Funds Transferred.	Enter the value of Wire Transfers transactions conducted to/from or on behalf of clients, during the reporting period.
2.2.16	148	Does the entity facilitate payments for or on behalf of clients in the form of Transfer of securities?	Please answer 'Yes' or 'No'.

2.2.17	149	Transfer of securities - Number of Clients.	Enter the number of clients where payments were made via transfer of securities, during the reporting period.
2.2.18	150	Transfer of securities from another provider - Value of Funds Transferred.	Enter the value of all transactions relating to Transfer of Securities conducted by, or on behalf of, clients in the form of Transfer of securities, during the reporting period.
2.2.19	151	Does the entity facilitate payments for or on behalf of clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.2.20	152	Other Forms of Payment - Number of Clients.	Enter the number of clients where Other Forms of Payments, not listed above, were conducted to/from or on behalf of clients, during the reporting period.
2.2.21	153	Other Forms of Payment - Value of Funds Transferred.	Enter the value of funds that were transferred to/from or on behalf of clients using Other Forms of Payments, during the reporting period.
2.2.22	154	Please indicate the types of Other Forms of Payment.	List the Other Forms of Payment processed to/from or on behalf of clients, during the reporting period, which are not listed above.
2.3.1	155	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 country of origin of the funds.
2.3.2	156	Total number of transactions received, broken down by origin of the funds.	Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds.
2.3.3	157	Total value of funds transferred out, broken down by the country of payment destination.	Enter the total value of funds transferred out of the jurisdiction by clients during the reporting period, broken down by the country of payment destination.
2.3.6	158	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of outgoing transactions during the reporting period, broken down by

			destination country of the transaction.
2.4.1	159	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
2.4.2	160	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	161	Number of Clients - F2F	<p>Enter 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.</p> <p>F2F channels include: F2F; Referrals within Group -F2F; Eligible Introducers -F2F; and Other Introducers – F2F.</p>
3.1.2	162	Number of Clients - Non-F2F.	<p>Enter the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and <u>not only</u> those onboarded during the reporting period.</p> <p>Examples of Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have F2F contact with the clients.</p>
3.1.3	163	Total number of clients via Online Platforms.	Enter the total number of clients, in the entity's <u>entire portfolio</u> , that were onboarded via Online platforms, and not only those onboarded during the reporting period.
3.1.4	164	Number of Clients through Referrals within Group - F2F.	<p>Enter the number of clients that were onboarded using referrals within Group – F2F for clients onboarded during the reporting period, broken down by the nationality of the BOs.</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 had F2F interaction with the clients.</p>
3.1.5	165	Number of Clients through Referrals within Group - Non F2F.	Enter the number of clients which were onboarded using referrals within Group and via Non – Face to

			<p>Face channels during the reporting period, broken down by nationality of the BOs.</p> <p>Example of Group Non – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients.</p>
3.1.6	166	Total number of Clients onboarded through Eligible Introducers.	<p>Enter the 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	167	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	168	Number of Clients through Other Introducers Non-F2F.	Enter the number of clients which were onboarded through Other Introducers Non – F2F, for the reporting period, broken down by the nationality of the BO.
3.1.9	169	Clients via Online Platforms.	Enter the number of clients which were onboarded using online platforms during the reporting period, broken down by the nationality of the BO.
3.2.1	170	Has the entity outsourced the role of the AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	171	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group

			<ul style="list-style-type: none"> • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	172	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	173	How many AML Compliance Officers has the entity had within the past 3 years?	If no turnover of the AML Compliance Officer role in the three-year period, answer "1".
3.2.5	174	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.6	175	To whom has the Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.7	176	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	177	How many Money Laundering Reporting Officers did the entity have in the past 3 years?	If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1".
3.2.9	178	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	179	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:

			<ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.11	180	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	181	How many Deputy Money Laundering Reporting Officers did the entity have 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	182	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	183	To whom has the Targeted Financial Sanction screening function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the screening of targeted financial sanctions:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.</p>
3.2.15	184	What was the country of the outsourced Targeted Financial Sanction screening function at the end of the reporting period?	Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, during the reporting period.
3.2.16	185	How many TFS Screening platforms/software or OSPs 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	186	Has the entity outsourced the function of transaction or client monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	187	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"> • Member within Group • 3rd Party and Member within Group • 3rd Party <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	188	What was the country of the outsourced 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	189	How many transaction monitoring platforms/software or OSPs 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	190	Where is the entity's physical place of business?	Select the country where the entity operates.
3.3.2	191	Number of branches, broken down by country of operation.	Enter the number of branches the entity has, broken down by country of operation.
3.3.3	192	Number of Subsidiaries, broken down by country of operation.	Enter the number of subsidiaries the entity has, broken down by country of operation.
3.3.4	193	In which country is the parent or holding company incorporated?	Enter the country in which the parent or holding company was incorporated.
3.3.5	194	In which countries, by percentage of equity ownership are all shareholders of the entity located.	Enter 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	195	How many Beneficial Owners does the entity have, by country of nationality of the	Enter the number of beneficial Owners the entity has, broken

		Beneficial Owner, at the end of the reporting period?	down by nationality of the beneficial owner, at the end of the reporting period.
3.3.7	196	How many directors does the entity have appointed, by country of nationality of the directors, at the end of the reporting period?	Enter the number of directors appointed to the entity at the end of the reporting period, broken down by the nationality of the directors.
3.4.1	197	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
3.4.2	198	Please use this area to provide any comments or feedback for this tab.	Use this area to provide any comments or feedback for this tab. Please enter 'NA' if no comment.

AML Controls Questions:

No.	Question No.	Question	Description/Explanation
1.1.1	199	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	200	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	201	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	202	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	203	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	204	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	205	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.

1.1.8	206	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	207	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	208	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	209	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	210	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	211	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	212	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.2.2	213	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.
1.2.3	214	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	215	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	216	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	217	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	218	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.

1.2.8	219	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	220	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	221	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	222	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	223	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	224	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	225	Have the directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	226	Has the AML Compliance Officer received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.4	227	Has the MLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.5	228	Has the DMLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position?	Please answer 'Yes' or 'No'.
1.3.6	229	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.

1.3.7	230	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.3.8	231	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	232	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	233	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	234	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	235	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	236	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	237	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	238	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	239	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	240	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	241	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	242	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.

1.4.10	243	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	244	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	245	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	246	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	247	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	248	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	249	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	250	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	251	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	252	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	253	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	254	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	255	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	256	Does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.

1.5.12	257	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	258	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	259	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	260	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	261	Does the entity rely on Group AML/CFT policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	262	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	263	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	264	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	265	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	266	Does the entity have Board, or governing body, approved policies and	Please answer 'Yes' or 'No'.

		procedures for establishing Source of Funds?	
1.6.7	267	Does the entity have Board, or governing body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	268	Does the entity have Board or governing body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	269	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	270	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.
1.6.11	271	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	272	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.	Enter the total number client accounts that were declined, terminated, or restricted due to AML/CFT/CPF and Sanctions concerns.
1.7.1	273	Does the entity have a screening process?	Please answer 'Yes' or 'No'.
1.7.2	274	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	275	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	276	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	277	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	278	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	279	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	280	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	281	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	282	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	283	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	284	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	285	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	286	Does the entity have transaction monitoring policies and procedures	Please answer 'Yes' or 'No'.

		developed commensurate to its operations?	
1.8.2	287	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	288	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	289	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	290	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	291	Does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	292	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	293	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	294	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	295	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	296	Does the entity have policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.9.4	297	How many internal Suspicious Activity/Transaction Reports have been	Enter the number of internal Suspicious Activity/Transaction

		reported to the MLRO for the current reporting period?	Reports reported to the MLRO during the reporting period.
1.9.5	298	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	299	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	300	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	301	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	302	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	303	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	304	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	305	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	306	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	307	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	308	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	309	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	310	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.

1.11.1	311	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	312	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	313	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	314	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	315	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	316	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	317	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	318	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	319	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	320	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	321	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	322	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	323	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	324	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.