



AML Survey – Completion Guide: Trusts

Document version: 1.4

Revision History:

Effective Date	Version Number	Revision Description
19 September 2022	1.0	Initial release of document.
3 October 2022	1.1	Update definitions.
21 October 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 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 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”). The AML Survey Form is issued in accordance with section 17(3)(a) of the Bank and Trust Companies Act (2021 Revision).

This Guide provides support to FSPs which carry out Trust business for accessing, completion, and submission of the AML Survey – Trust Form.

2 FORM INFORMATION

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

The AML Survey – Trusts 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: AMLCO, MLROs, DMLROs and 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=YJa0JBLI86VZVCRbBxmmm3fq3fSoAMoPYyQ6XKFqtx0MoYGkSpT5b5bDc%2B2cgghPQ8d%2BUVVhbZktQht%2F4d2cbioYpsg%2BJke0tE3GtLwMObYsoP%2Bk8rPURRSvrPSQt6JA5hgsaBaC6uvcZV4KB266HiFgh4FhAtaTNSa3IE3aiA%3D>

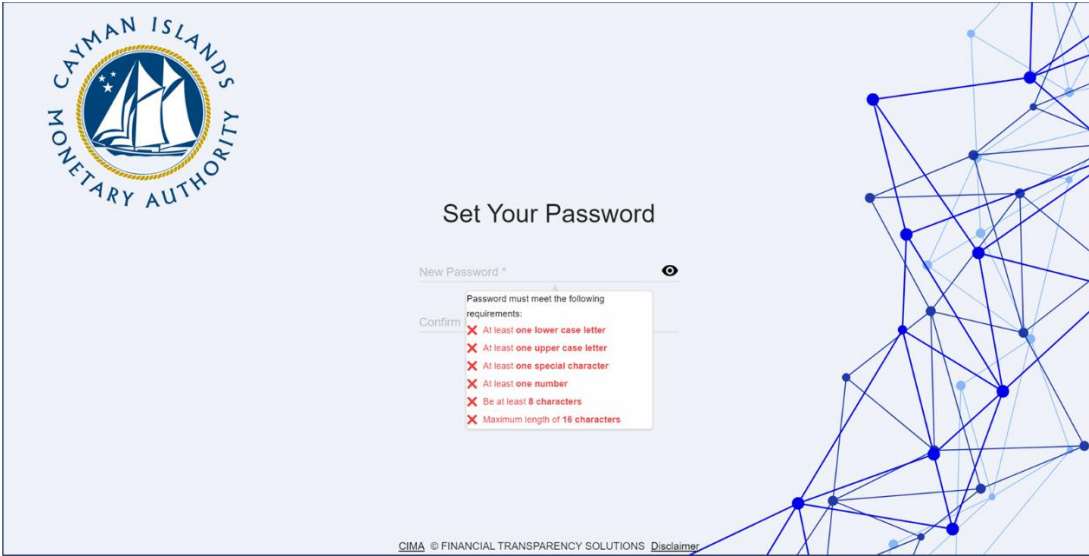
For any questions concerning the survey or the current reporting cycle, please contact: AMLSurvey@cima.ky

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

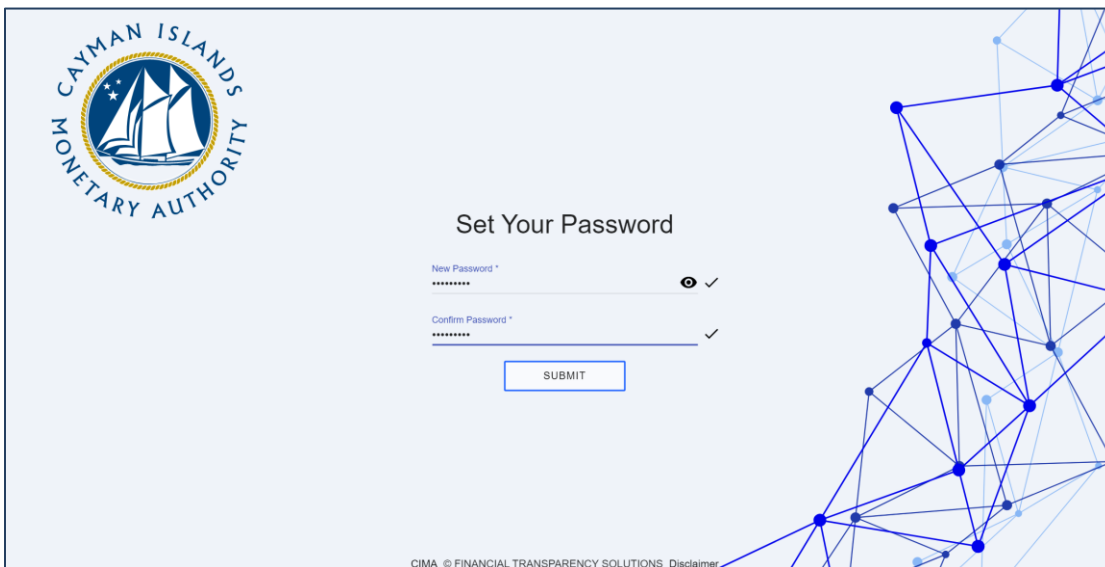
Disclaimer:
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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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

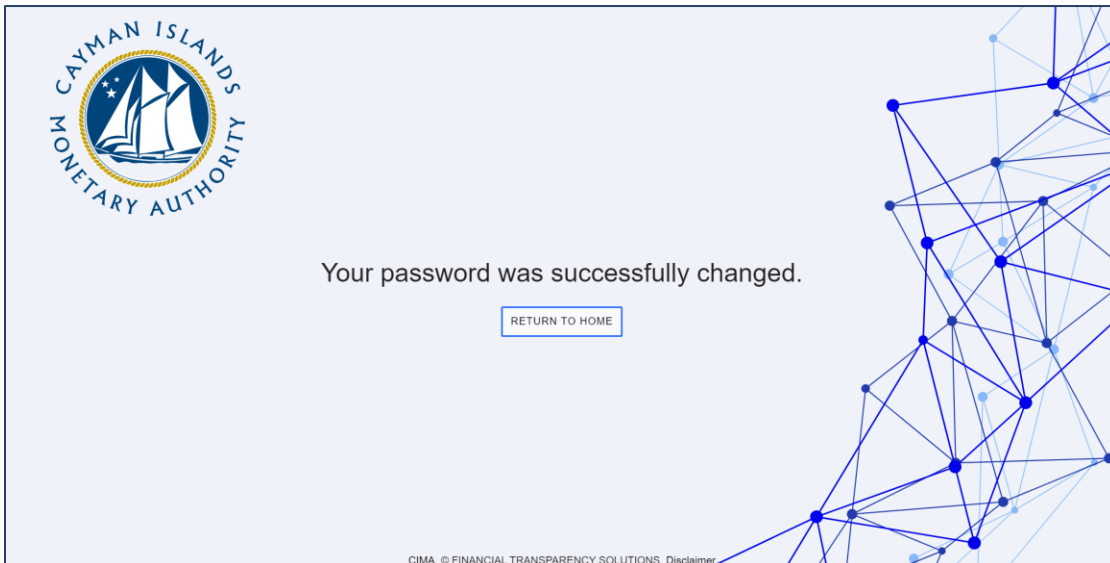
Please do not reply to this email, it is automatically generated.

Disclaimer:

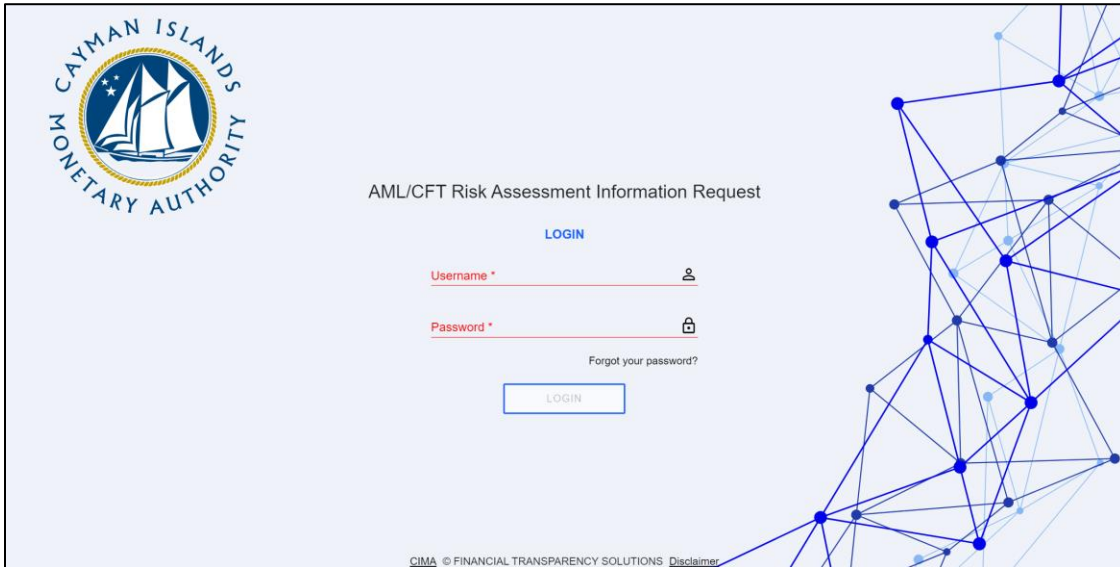
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

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



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



AML/CFT Risk Assessment Information Request

LOGIN

Username *

Password *

Forgot your password?

LOGIN

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



CAYMAN ISLANDS
MONETARY AUTHORITY

Cayman Islands Monetary Authority

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

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

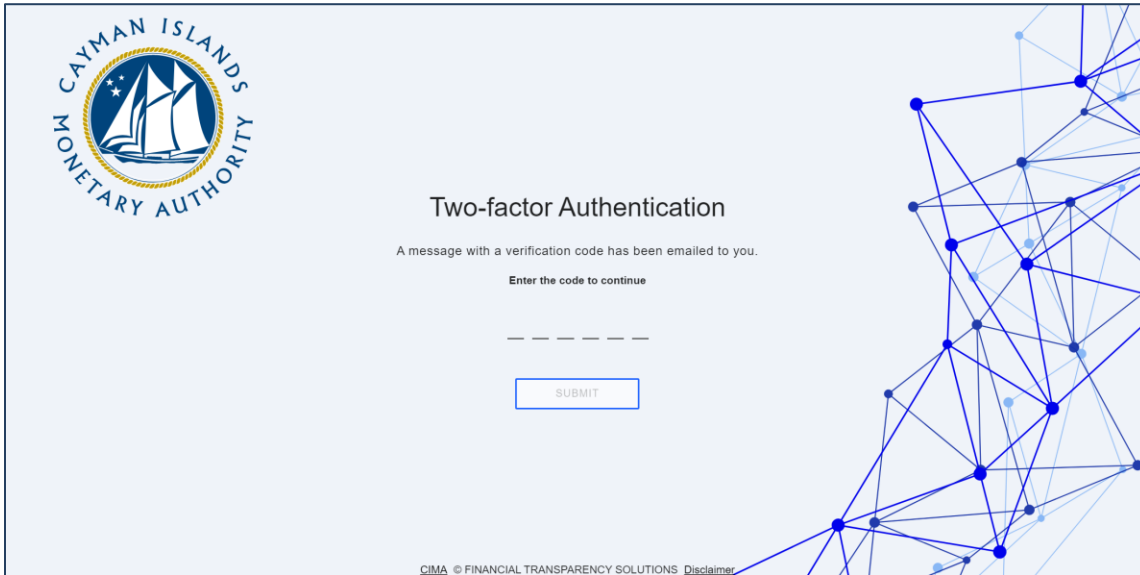
951247

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

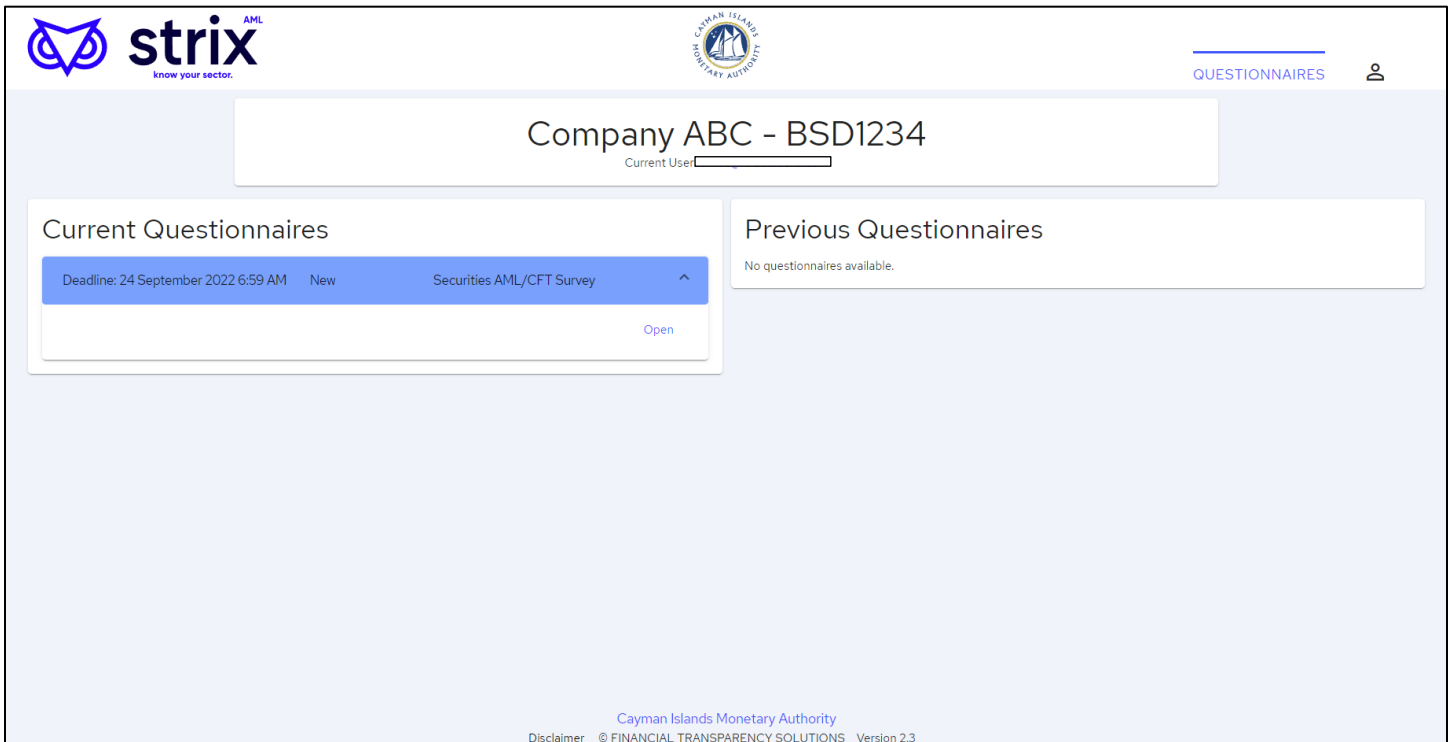
Please do not reply to this email, it is automatically generated.

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

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



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

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

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

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

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

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 carrying out a one-off transaction with a person who is conducting relevant financial business in the Islands.</p> <p>Generally, for an entity that has a Trust Licence, a client is a (1) Trust Structure, which is a 'Legal Arrangement', or (2) Settlor which is a 'Natural Person', or who has engaged with the entity to form a Trust Structure. However, it is possible for an entity to have other customer types (Individual or Legal Persons and Arrangements) depending on their business plan.</p> <p>Where an entity's clients are a trust structure, or other legal arrangement, with one or more</p>

	registered companies (Legal Persons) or Legan Arrangements within the structure it should be counted as one (1) client.
Corporate Entity	A body corporate constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets.
Currency used for the Survey	United States Dollars (US\$). All other currencies must be converted to US\$ unless otherwise stated.
Dealers in Precious Metals and Stones	Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets.
DMLRO	Deputy Money Laundering Reporting Officer
Eligible Introducers	A person that "introduces" applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
Entity	For the purposes of this form/survey, an 'entity' is the holder of the Trust 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.
HNWI	<p>A high net worth individual (HNWI) is:</p> <ul style="list-style-type: none"> (i) an individual whose net worth is at least CI\$800,000 (approx. US\$1,000,000) or its equivalent in any other currency; or (ii) any person that has total assets of not less than CI\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency. <p>HNWIs are <u>NOT</u> Ultra 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 is 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 Arrangements client.
Legal Arrangement	A trust or partnership, foundation or other entity created between parties which lacks separate legal personality.
Legal Person	A company or other entity created by operation of law with separate legal personality.
MLRO	Money Laundering Reporting Officer.
ML/TF/PF	Money Laundering/ Terrorism Financing/ Proliferation Financing.
Money Service Business (MSB)	<p>Money services business means the business of providing, in or from within the Islands, any of the following services:</p> <ul style="list-style-type: none"> (a) money transmission; (b) cheque cashing; (c) currency exchange;

	(d) the issuance, sale or redemption of money orders or traveller's cheques.
Natural Person	A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.
Nominee Director	A natural person 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 Non-Profit Organisation is a legal person or arrangement that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works".
OSP	Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future. Outsourcing does not include purchasing contracts.
PEP	"Politically Exposed Person" includes — (a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official. (b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and

	<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 client, for example, BOs, Directors, or other Third Parties.
Source of Funds	<p>Source of funds is 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)	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	For the purposes of this survey, a transaction is the movement of assets, whether it be between the

		<p>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		<p>A trust is 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.</p>
Ultra HNWI		<p>Ultra-High Net Worth Individuals, also referred to as UHNWIs, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.</p>
Value of Client Assets		<p>The total market value of assets or investments maintained / held for or on behalf of clients. The total amount can represent one client's assets under management / administration (AUM) or the entire asset portfolio.</p>
Virtual Assets Products and Services		<p>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.</p>
Timeframe	Assets Under Management	Value of AUM as at the end of the reporting period.
Timeframe	Number of Clients	Number of clients as at the end of the reporting period.
Timeframe	Number of Transactions	Number of Transactions conducted 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 the entity has at the end of the reporting period.

			Total clients consist of natural persons and legal persons and arrangements.
1.1.2	2	Total Transactions for the reporting period.	Enter the total number of all transactions conducted for clients during the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.3	3	Total Value of Client Assets Under Management, by geographic location of the assets, at the end of the reporting period.	Enter the total value of client assets for clients reported in Question 1, by geographic location of the assets, at the end of the reporting period. If an entity does not manage assets for its clients, a '0' value should be used.
1.1.4	4	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 country of incorporation as at the end of the reporting period. If an entity does not have such clients, a '0' value should be used.
1.1.5	5	Value of Client Assets Under Management - Legal Persons.	Enter the value of assets under management for clients who are Legal Persons, at the end of the reporting period. If the entity does not have any clients that fit this category record a '0'.
1.1.6	6	Clients / Customers that are Legal Arrangements, broken down by country of establishment of the client.	Enter the total number of clients that are legal arrangements, broken down by country of establishment of the client, at the end of the reporting period. Examples of legal arrangements include but are not limited to Partnerships and Trusts. If an entity does not manage assets for these clients, a '0' value should be used.
1.1.7	7	Value of Client Assets Under Management - Legal Arrangements.	Enter the value of assets under management for clients who are Legal Arrangements, at the end of the reporting period. If the entity does not have any clients that fit this category record a '0'.

1.1.8	8	Total Number of PEPs.	<p>Enter the total number of PEPs, by nationality of the PEP, as at the end of the reporting period.</p> <p>Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, BOs, Directors, or hold any other form of control, including signatories.</p>
1.1.9	9	Total Number of High Risk Clients.	<p>Enter the total number of clients/customers that are 'high' risk, at the end of the reporting period.</p>
1.1.10	10	Total number of Non-Compliant Accounts at the end of the reporting period.	<p>Enter the number of customer accounts that remain non-compliant with required identification and verification procedures.</p>
1.2.1	11	Total number of BOs of clients who are Legal Persons and Arrangements.	<p>Enter the total number of BOs of all clients who are legal persons or arrangements at the end of the reporting period.</p> <p>This category is specific to legal persons and arrangements. Examples include, but are not limited to, the total number of BOs of Corporate entities and Settlers of Trusts.</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>If the entity does not have any clients that fit this category record a '0'.</p>
1.2.2	12	Number of BOs of clients who are Legal Persons.	<p>Enter the number of BOs of Legal Person clients, broken down by the nationality of the BO.</p>
1.2.3	13	Number of settlors of clients who are Legal Arrangements.	<p>Enter the number of settlors of legal arrangement clients, broken down by the nationality of the settlor.</p> <p>This category is specific to clients who are legal arrangements and are Trusts.</p>
1.2.4	14	Number of Partners of clients who are Legal Arrangements.	<p>Enter the number of partners of legal arrangement clients, broken down by the nationality of the partner.</p>
1.2.5	15	Number of clients that have Nominees acting on behalf of a beneficial owner, or a Nominee within the ownership structure, broken	<p>Enter the total number of clients which have Nominees acting on behalf of beneficial owner, or within its ownership structure, categorised</p>

		down by nationality of the beneficial owner.	by nationality of the beneficial owner. This category is specific to clients who are Legal Persons and Arrangements. Examples include, but are not limited to, instances where a BO of a Corporate entity or the Settlor of a Trust has a Nominee appointed. If the entity does not have any clients that fit this category record a '0'.
1.2.6	16	Number of BOs of clients who are PEPs.	Enter the total number of BOs of clients who are PEPs as at the end of the reporting period. This category is specific to clients who are Legal Persons and Arrangements. Examples include, but are not limited to, instances where a BO of a Corporate entity or the Settlor of a Trust is a PEP. If the entity does not have any clients that fit this category record a '0'.
1.2.7	17	Number of clients that have BOs who are HNWIIs.	Enter the total number of clients which have BOs, who are also HNWIIs. HNWIIs is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least CI\$4,000,000 (approx. US\$5,000,000) <u>Do Not</u> include clients/customers who are Ultra HNWIIs, individuals 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'.
1.2.8	18	Number of Clients that have BOs who are Ultra HNWIIs.	Enter the total number of clients who have BOs who are also Ultra HNWIIs. UHNWIIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000. If the entity does not have any clients that fit this category record a '0'.
1.3.1	19	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	20	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 which have nominee directors appointed, as at the end of the reporting period, broken down by

			<p>country of nationality of the director and <u>not</u> the nominee director.</p> <p>If the entity does not have any clients that fit this category record a '0'.</p>
1.3.3	21	Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the nominee director.	Enter the total number of clients which 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	22	Number of directors and/or senior management of clients who are PEPs.	<p>Enter the total number of clients who have directors and/or senior management who are also PEPs as at the end of the reporting period.</p> <p>This category is specific to clients who are legal persons and arrangements. An example includes, but not limited to, a client that is a corporate entity that has a director/ senior manager who is also a PEP.</p> <p>If the entity does not have any clients that fit this category record a '0'.</p>
1.3.5	23	Number of directors and/or senior management of clients who are PEPs & HNWI's or Ultra HNWI's.	Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI's / Ultra-HNWI, at the end of the reporting period.
1.3.6	24	Number of clients with non-professional trustees (individuals) appointed, broken down by the nationality of the trustee.	Enter the number of clients with non-professional trustees (individuals) appointed, broken down by the nationality of the trustee.
1.3.7	25	Enter the total number of PEPs within all client trust structures.	Enter the total number of PEPs within all client trust structures.
1.4.1	26	Does the entity have any clients that are Gov / Pub Sector?	Please answer 'Yes' or 'No'.
1.4.2	27	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	28	Gov / Pub Sector - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are government or public sector during the reporting period, broken down by government jurisdiction.

1.4.4	29	Gov / Pub Sector - Value of Transactions.	Enter the value of transactions processed on behalf of clients that are government or public sector, during the reporting period.
1.4.5	30	Gov / Pub Sector - Value of Client Assets.	Enter the value of client assets under management of the clients that are Government or Public sector, at the end of the reporting period. If there are no client assets under management, please record '0'.
1.4.6	31	Does the entity have any clients that are Trusts?	Please answer 'Yes' or 'No'.
1.4.7	32	Trusts - Number of Clients.	Enter the number of clients the entity has that are Trusts, as at the end of the reporting period.
1.4.8	33	Trusts - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Trusts during the reporting period.
1.4.9	34	Trusts - Value of Transactions.	Enter the value of transactions processed for clients that are Trusts, during the reporting period.
1.4.10	35	Trusts - Value of Client Assets.	Enter the value of client assets under management for clients that are Trusts, at the end of the reporting period. If there are no client assets under management, please record '0'.
1.4.11	36	Does the entity have any clients that are NPOs?	Please answer 'Yes' or 'No'.
1.4.12	37	NPOs - Number of Clients, broken down by country of incorporation of the client.	Enter the number of NPO clients the entity has, broken down by country of incorporation, as at the end of the reporting period.
1.4.13	38	NPOs - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are NPOs, during the reporting period.
1.4.14	39	NPOs - Value of Transactions.	Enter the value of transactions processed for clients that are NPOs, during the reporting period.

1.4.15	40	NPOs - Value of Client Assets.	Enter the value of client assets under management for clients that are NPOs, as at the end of the reporting period. If there are no client assets under management, please record '0'.
1.4.16	41	Does the entity have any clients that are Private Trust Companies?	Please answer 'Yes' or 'No'.
1.4.17	42	Private Trust Companies - Number of Clients.	Enter the number of NPO clients the entity has, as at the end of the reporting period.
1.4.18	43	Private Trust Companies - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Private Trust Companies, during the reporting period.
1.4.19	44	Private Trust Companies - Value of Transactions.	Enter the value of transactions processed for clients that are Private Trust Companies, during the reporting period.
1.4.20	45	Private Trust Companies - Value of Client Assets.	Enter the value of client assets under management for clients that are Private Trust Companies, as at the end of the reporting period. If there are no client assets under management, please record '0'.
1.4.21	46	Does the entity have any clients that are Foundations?	Please answer 'Yes' or 'No'.
1.4.22	47	Foundations - Number of Clients, broken down by country of establishment of the client.	Enter the number of clients the entity has, that are Foundations, broken down by the country of establishment of the client, as at the end of the reporting period.
1.4.23	48	Foundations - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are a Foundation, during the reporting period.
1.4.24	49	Foundations - Value of Transactions.	Enter the value of transactions processed for clients that are Foundations, during the reporting period.
1.4.25	50	Foundations - Value of Client Assets.	Enter the value of client assets under management for clients that

			are Foundations, at the end of the reporting period. If there are no client assets under management, please record '0'.
1.4.26	51	Does the entity have any clients that are Segregated Portfolio Companies?	Please answer 'Yes' or 'No'.
1.4.27	52	Segregated Portfolio Companies - Number of Clients.	Enter the number of clients the entity has that are Segregated Portfolio Companies as at the end of the reporting period.
1.4.28	53	Segregated Portfolio Companies - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Segregated Portfolio Companies, during the reporting period.
1.4.29	54	Segregated Portfolio Companies - Value of Transactions.	Enter the value of transactions processed on behalf of clients that are Segregated Portfolio Companies, during the reporting period.
1.4.30	55	Segregated Portfolio Companies - Value of Client Assets.	Enter the value of client assets under management for clients that are Segregated Portfolio Companies, as at the end of the reporting period. If there are no client assets under management, please record '0'.
1.4.31	56	Does the entity have any clients that are registered in a Special Economic Zone?	Please answer 'Yes' or 'No'. <i>Note that one client can fall under multiple categories of structure.</i>
1.4.32	57	Special Economic Zone - Number of Clients.	Enter the number of clients the entity has, that are companies registered within a Special Economic Zone, as at the end of the reporting period.
1.4.33	58	Special Economic Zone - Number of Transactions.	Enter the number of transactions conducted by clients that are companies registered in a Special Economic Zone, during the reporting period.
1.4.34	59	Special Economic Zone - Value of Transactions.	Enter the value of transactions processed for clients that are registered in a Special Economic

			Zone Companies, during the reporting period.
1.4.35	60	Special Economic Zone - Value of Client Assets.	Enter the value of client assets under management for clients that are registered in a Special Economic Zone, as at the end of the reporting period. If there are no client assets under management, please record '0'.
1.4.36	61	Does the entity have any clients that are Funds or Collective Investment Vehicles?	Please answer 'Yes' or 'No'. <i>Note that one client can fall under multiple categories of structure.</i>
1.4.37	62	Funds / Collective Investment Vehicles - Number of Clients.	Enter the number of clients the entity has that are Funds / Collective Investment Vehicles, as at the end of the reporting period.
1.4.38	63	Funds / Collective Investment Vehicles - Number of Transactions.	Enter the number of transactions processed on behalf of clients that are Funds / Collective Investment Vehicles, during the reporting period.
1.4.39	64	Funds/Collective Investment Vehicles - Value of Transactions.	Enter the value of transactions processed on behalf of clients who are Funds or Collective Investment Vehicles, during the reporting period.
1.4.40	65	Funds / Collective Investment Vehicles - Value of Client Assets.	Enter the value of client assets under management for clients that are Funds / Collective Investment Vehicles, as at the end of the reporting period. If there are no client assets under management, please record '0'.
1.5.1	66	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	67	Clients / Customers that are Natural Persons, broken down by nationality of the client.	Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period.

			<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	68	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	69	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>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	70	Value of Assets Held Under Management for all Natural Person clients.	Enter the total value of transactions for clients who are Natural Persons during the reporting period.
1.5.6	71	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	72	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>

1.5.8	73	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	74	Value of Assets Held Under Management for Natural Person clients who are PEPs.	Enter the total value of assets under management for Natural Persons clients who are PEPs, during the reporting period.
1.5.10	75	Does the entity have any Natural Person clients that are HNWIs?	<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>Ultra-high-net-worth individuals (UHNWI) is an individual with a net worth of over C\$25,000,000 (US\$30,000,000).</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIs.</p>
1.5.11	76	Number of Natural Person clients who are HNWIs.	<p>Enter the number of Natural Person clients the entity has that are HNWIs.</p> <p>This category <u>does NOT</u> include those individuals who are Ultra HNWIs.</p>
1.5.12	77	Natural Person Clients - HNWIs - Number of Transactions.	Enter the number of transactions conducted by Natural Person clients, who are HNWIs, during the reporting period.
1.5.13	78	Does the entity have any Natural Person clients who are Ultra HNWIs?	<p>Please answer 'Yes' or 'No'.</p> <p>This question <u>does not</u> apply to clients who are Legal Persons or Arrangements.</p>
1.5.14	79	Number of Natural Person clients who are Ultra HNWIs.	Enter the number of Natural Person clients the entity has that are Ultra-HNWIs at the end of the reporting period.
1.5.15	80	Natural Person Clients - Ultra HNWIs- Number of Transactions.	Enter the number of transactions conducted by Natural Person who are Ultra HNWIs, during the reporting period.
1.5.16	81	Does the entity have any Natural Person clients that are PEPs and HNWIs /Ultra HNWIs?	Please answer 'Yes' or 'No'.

1.5.17	82	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.
1.5.18	83	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	84	Number of clients that have settlors who are natural persons.	Enter the total number of Settlers who are natural Persons.
1.6.2	85	Number of clients that have settlors who are Legal Persons.	Enter the number of clients that have settlors that are Legal Persons.
1.6.3	86	Number of clients that have Nominee Settlers appointed, broken down by nationality or country of incorporation of the individual the nominee acts on behalf.	Enter the number of clients that have a Nominee Settlor appointed, broken down by nationality or country incorporation of the individual the nominee is appointed on behalf.
1.6.4	87	Number of clients that have settlors that are Trusts.	Enter the number of clients that have settlors that is a Trust at the end of the reporting period.
1.6.5	88	Number of clients that have settlors that are Beneficiaries.	Enter the number of clients that have settlors that are also Beneficiaries.
1.6.6	89	Number of clients that have settlors that are PEPs.	Enter the number of clients that have settlors that are PEPs.
1.6.7	90	Number of clients that have settlors that are HNWI's.	Enter the number of clients that have Settlers that are HNWI's.
1.6.8	91	Number of clients with settlors where funds were received from a party other than the Settlor, broken down by nationality or country of incorporation of the settlor.	Enter the number of Trust clients where funds were received from a party other than the Settlor, broken down by nationality or country incorporation of the settlor.
1.7.1	92	Number of clients with Beneficiaries that are Natural Persons, broken down by nationality of the Beneficiary.	Enter the number of clients with Beneficiaries that are Natural Persons, broken down by nationality of the Beneficiary.
1.7.2	93	Number of clients with Beneficiaries that are Legal Persons, broken down by country of incorporation of the Beneficiary.	Enter the number of clients with Beneficiaries that are Legal Persons, broken down by country of incorporation of the Beneficiary.

1.7.3	94	Number of clients with Beneficiaries that are Legal Arrangements, broken down by country of formation of the Beneficiary.	Enter the number of clients with Beneficiaries that are Legal Arrangements, broken down by country of formation of the Beneficiary.
1.7.4	95	Number of clients with Beneficiaries that are PEPs.	Enter the number of clients with Beneficiaries that are PEPs.
1.7.5	96	Number of clients with Beneficiaries that are HNWI's.	Enter the number of clients with Beneficiaries that are HNWI's.
17.1.6	97	Number of clients with Beneficiaries that are Ultra HNWI's.	Enter the number of clients with Beneficiaries that are Ultra HNWI's.
1.7.7	98	Number of clients where funds are paid to a third-party on behalf of the Beneficiary, broken down by nationality or country of incorporation of the beneficiary.	Enter the number of clients where funds are paid to a third-party on behalf of the Beneficiary, or for another purpose, broken down by nationality or country of incorporation of the beneficiary. This category is specific to clients who are Trusts who made payments to a Beneficiary where the payment went to a third party whether for the Beneficiary's benefit or another purpose.
1.8.1	99	<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><i>*excluding MSBs, Virtual Asset Products and Services Providers, and TCSPs.</i></p>	Provide the total number of clients whose source of funding falls within the list of sectors.
1.8.2	100	Does the entity have any clients whose source of funding is from the Banking sector (excluding MSBs)?	Please answer 'Yes' or 'No'.

1.8.3	101	Banking Institutions (excluding MSBs) - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the banking sector.
1.8.4	102	Does the entity have any clients whose source of funding is derived from financial regulated businesses (excluding: banking, MSBs, TCSPs, and VASPs)?	Please answer 'Yes' or 'No'.
1.8.5	103	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, MSBs, VASPs, and TCSPs).
1.8.6	104	Does the entity have any clients whose source of funds are derived from Financial Leasing operations?	Please answer 'Yes' or 'No'.
1.8.7	105	Financial Leasing- Number of Clients.	Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations.
1.8.8	106	Does the entity have any clients whose source of funds are derived from Money Lending operations?	Please answer 'Yes' or 'No'.
1.8.9	107	Money Lending - Number of Clients.	Enter the number of clients the entity has whose source of funding is from Money Lending operations.
1.8.10	108	Does the entity have any clients whose source of funds is derived from Accountancy (Audit / Assurance / Bookkeeping / Insolvency)?	Please answer 'Yes' or 'No'.
1.8.11	109	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Accountancy (including any of: Audit, Assurance, Bookkeeping, and Insolvency).
1.8.12	110	Does the entity have any clients whose source of funds is derived from the Fintech industry?	Please answer 'Yes' or 'No'.
1.8.13	111	Fintech - Number of Clients.	Enter the number of clients the entity has whose source of funding is from the Fintech industry.

1.8.14	112	<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 Assets Products and Services ▪ High Value Dealers ▪ Trust Service Providers, Company Managers or Corporate Service Providers (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.
1.8.15	113	Does the entity have any clients whose source of funds is derived from Legal Practitioners?	Please answer 'Yes' or 'No'
1.8.16	114	Legal Practitioners – Number of Clients	Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner.
1.8.17	115	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'
1.8.18	116	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.
1.8.19	117	Does the entity have any clients whose source of funds are derived from Money Services Business operations?	Please answer 'Yes' or 'No'.
1.8.20	118	Money Services Business - Number of Clients.	Enter the number of clients whose source of funds are derived from Money Services Business operations.
1.8.21	119	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'.
1.8.22	120	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).
1.8.23	121	Does the entity have any clients whose source of funds is derived through High Value Dealer operations?	Please answer 'Yes' or 'No'.
1.8.24	122	High Value Dealers - Number of Clients.	Enter the number of clients whose source of funds is derived from High Value Dealer operations.
1.8.25	123	Does the entity have any clients whose source of funds is derived from TCSP operations?	Please answer 'Yes' or 'No'.
1.8.26	124	TCSPs - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from TCSP operations.
1.8.27	125	Does the entity have any clients whose source of funds is derived from the Import / Export Industry?	Please answer 'Yes' or 'No'.
1.8.28	126	Import / Export - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from Import / Export business operations.
1.8.29	127	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'.
1.8.30	128	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.
1.8.31	129	<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 	Provide the total number of clients whose source of funding falls within the list of sectors.

		<ul style="list-style-type: none"> ▪ Retail / Restaurant ▪ Cannabis Industry 	
1.8.32	130	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'.
1.8.33	131	Real Estate Agents / Brokers - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers)?
1.8.34	132	Does the entity have any clients whose source of funds is derived through the Gambling industry (including online gambling)?	Please answer 'Yes' or 'No'.
1.8.35	133	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).
1.8.36	134	Does the entity have any clients whose source of funds is derived from the adult entertainment industry?	Please answer 'Yes' or 'No'.
1.8.37	135	Adult Entertainment - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Adult Entertainment Industry.
1.8.38	136	Does the entity have any clients whose source of funds are derived from the Defence Industry?	Please answer 'Yes' or 'No'.
1.8.39	137	Defence Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Defence industry.
1.8.40	138	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'.
1.8.41	139	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.

1.8.42	140	Does the entity have any clients whose source of funds is derived from the Mining Industry?	Please answer 'Yes' or 'No'.
1.8.43	141	Mining Industry - Number of Clients.	Enter the number of clients the entity has whose source of funds is derived from the Mining Industry.
1.8.44	142	Does the entity have any clients whose source of funds are derived through operating in the Construction / Development industry?	Please answer 'Yes' or 'No'.
1.8.45	143	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.
1.8.46	144	Does the entity have any clients whose source of funds are derived from operating in the Retail & Restaurant Business?	Please answer 'Yes' or 'No'.
1.8.47	145	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.
1.8.48	146	Does the entity have any clients whose source of funds are derived through Cannabis Production & Distribution operations?	Please answer 'Yes' or 'No'.
1.8.49	147	Cannabis Production & Distribution - Number of Clients.	Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.
1.8.50	148	Does the entity have any clients whose source of funds is Unknown to the entity?	Please answer 'Yes' or 'No'.
1.8.51	149	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 businesses and professions are 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.

1.8.52	150	Does the entity have any clients where their business / Source of Funding is not listed in a category above?	Please answer 'Yes' or 'No'.
1.8.53	151	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.
1.9.1	152	<p>Source of Funds – Value of Client Assets. Enter the total value of client assets for clients whose source of funds falls within the list of sectors below:</p> <ul style="list-style-type: none"> ▪ Banking Institutions ▪ Other Financial regulated Business* ▪ Financial Leasing ▪ Money Lending ▪ Accountants ▪ Fintech <p><i>*excluding MSBs, Virtual Asset Products and Services, and TCSPs.</i></p>	<p>Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors.</p> <p>If there are no client assets under management, please record '0'.</p>
1.9.2	153	Banking Institutions (excluding MSBs) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from the Banking Institutions (excluding MSBs).
1.9.3	154	Other Financial Regulated Business - Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds is derived from 'Other Financial Regulated Business' and <u>not</u> the following: banking, MSBs, VASPs, and TCSPs.
1.9.4	155	Financial Leasing - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Financial Leasing operations.
1.9.5	156	Money Lending- Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from Money Lending operations.
1.9.6	157	Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived through

			Accountant operations (Audit / Assurance / Bookkeeping / Insolvency).
1.9.7	158	Fintech - Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds are derived through the Fintech industry.
1.9.8	159	<p>Source of Funds – Value of Client Assets.</p> <p>Enter the total value of client assets for clients whose source of funds falls within the list of sectors below:</p> <ul style="list-style-type: none"> ▪ Legal Practitioners ▪ Dealers in Precious Metals and Stones ▪ MSBs ▪ Virtual Asset Products and Services ▪ High Value Dealers ▪ TCSPs ▪ Import/Export industry ▪ Shipping and Transport of Goods 	<p>Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors.</p> <p>If there are no client assets under management, please record '0'.</p>
1.9.9	160	Legal Practitioners – Value of Client Assets.	Enter the value of client assets under management of the clients whose source of funds is derived from Legal Practitioner operations.
1.9.10	161	Dealers in Precious Metals and Stones	Enter the value of client assets under management of clients whose source of funds is derived from Dealers in Precious Metals and Stones operations.
1.9.11	162	Money Services Business - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Money Services Business operations.
1.9.12	163	Virtual Asset Products and Services - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from the virtual asset sector (products, services, and investments).
1.9.13	164	High Value Dealers - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from High Value Dealer operations.
1.9.14	165	TCSPs - Value of Client Assets.	Enter the value of client assets under management of clients whose

			source of funds is derived from TCSP operations.
1.9.15	166	Import / Export Industry - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from Import / Export operations.
1.9.16	167	Shipping and Transport of Goods - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds are derived from Shipping and Transport of Goods operations.
1.9.17	168	<p>Source of Funds – Value of Client Assets</p> <p>Enter the total value of client assets for clients whose source of funds falls within the list of sectors below:</p> <ul style="list-style-type: none"> ▪ Real Estate Agents/Brokers ▪ Gambling Business ▪ Adult Entertainment Industry ▪ Defence Industry ▪ Oil and Gas Industry ▪ Mining ▪ Construction / Development ▪ Retail / Restaurant ▪ Cannabis Industry 	<p>Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors.</p> <p>If there are no client assets under management, please record '0'.</p>
1.9.18	169	Real Estate Agents / Brokers - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from the Real Estate industry (Agents, Brokers, and Sellers).
1.9.19	170	Gambling Business (including online gambling) - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Gambling.
1.9.20	171	Adult Entertainment - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Adult Entertainment industry.
1.9.21	172	Defence Industry - Value of Client Assets.	Enter the value of assets under management of clients whose source of funds is derived from operating in the Defence Industry.
1.9.22	173	Oil and Gas Industry - Value of Client Assets.	Enter the value of client assets under management of clients whose

			source of funds is derived from operating in the Oil and Gas industry.
1.9.23	174	Mining Industry - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Mining Industry.
1.9.24	175	Construction / Development - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Construction / Development industry.
1.9.25	176	Retail & Restaurant Business - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from Retail & Restaurant Business operations.
1.9.26	177	Cannabis Production & Distribution - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from operating in the Cannabis Production & Distribution business.
1.9.27	178	Industry / profession not known or not recorded - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from unknown or unrecorded Industries / Professions.
1.9.28	179	Other - Not listed above - Value of Client Assets.	Enter the value of client assets under management of clients whose source of funds is derived from industries/ Professions not listed above.
1.10.1	180	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.10.2	181	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	182	Number of clients with Discretionary Trusts.	Enter the number of clients with Discretionary Trusts, at the end of the reporting period.

2.1.2	183	Number of clients with Non-Discretionary Trusts.	Enter the number of clients with Non-Discretionary Trusts, at the end of the reporting period.
2.1.3	184	Number of clients with Star Trusts.	Enter the number of clients with Star Trusts, at the end of the reporting period.
2.1.4	185	Number of clients with Unit Trusts.	Enter the number of clients with Unit Trusts, at the end of the reporting period.
2.1.5	186	Number of clients with Employee Benefit Trusts.	Enter the number of clients with Employee Benefit Trusts, at the end of the reporting period.
2.1.6	187	Number of clients with Fixed Interest Trusts.	Enter the number of clients with Fixed Interest Trusts, at the end of the reporting period.
2.1.7	188	Number of clients with Charitable Trusts.	Enter the number of clients with Charitable Trusts, at the end of the reporting period.
2.1.8	189	Number of clients with Nominee Trusts.	Enter the number of clients with Nominee Trusts, at the end of the reporting period.
2.1.9	190	Number of clients with foreign law trusts, broken down by the country of trust formation.	Enter the number of clients with Foreign Law trusts, broken down by the country of trust formation, at the end of the reporting period.
21.10	191	Value of assets of clients who are foreign law trusts, broken down by the country of trust formation.	Enter the value of assets of foreign law trusts, broken down by the country of trust formation, at the end of the reporting period.
2.1.11	192	Number of clients with Trust Products not listed above.	Enter the number of clients with other Trust Products not listed above, at the end of the reporting period.
2.1.12	193	Please indicate the Other Trust Products.	Please detail the types of 'Other' Trust Products.
2.2.1	194	Number of clients - Trustee.	Enter the number of clients the entity provides Trustee Services to, at the end of the reporting period.
2.2.2	195	Number of clients - Executor Services	Enter the number of clients the entity provides Executor Services to, at the end of the reporting period.

2.2.3	196	Number of clients – Administrator Services.	Enter the number of clients the entity provides Administrator Services to, at the end of the reporting period.
2.2.4	197	Number of clients - Protector Services.	Enter the number of clients the entity provides Protector Services to, at the end of the reporting period.
2.2.5	198	Number of clients- Enforcer Services.	Enter the number of clients the entity provides Enforcer Services to, at the end of the reporting period.
2.2.6	199	Number of clients - Nominee Services.	Enter the number of clients the entity provides Nominee Services to, at the end of the reporting period.
2.2.7	200	Number of clients - Registered Office Services.	Enter the number of clients the entity provides Registered Office Services to, at the end of the reporting period.
2.2.8	201	Does the entity provide any other Services under its Trust Licence not mentioned above?	Please answer 'Yes' or 'No'.
2.2.9	202	Number of Clients - Other Trust Services.	Enter the number of clients where the entity provides 'other' Trust Services, not listed above, at the end of the reporting period.
2.2.10	203	Please indicate all 'other' Trust Services.	Enter all other Trust Services that apply.
2.3.1	204	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.
2.3.2	205	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.
2.3.3	206	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.
2.3.4	207	Number of clients with assets that are aircraft within the client	Enter the number of clients with assets that are aircraft within their client structure, broken down by

		structure, by jurisdiction of registration of the aircraft.	jurisdiction of registration of the aircraft.
2.3.5	208	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.
2.3.6	209	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.
2.3.7	210	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.
2.3.8	211	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.
2.4.1	212	Does the entity facilitate payments of Clients in the form of Physical Cash?	Please answer 'Yes' or 'No'.
2.4.2	213	Physical Cash - Number of Clients.	Enter the number of the clients that made payments in the form of Physical Cash during the reporting period.
2.4.3	214	Physical Cash - Number of Transactions.	Enter the number of cash transactions processed 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.
2.4.4	215	Physical Cash - Value of Funds Transferred.	Enter the number of cash transactions processed 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.
2.4.5	216	Does the entity facilitate payments of Clients in the form of Virtual Currency?	Please answer 'Yes' or 'No'.
2.4.6	217	Virtual Currency - Number of Clients.	Enter the number of clients that conducted transactions in the form

			of Virtual Currency during the reporting period.
2.4.7	218	Virtual Currency - Number of Transactions.	Enter the number of Virtual Currency transactions clients conducted, during the reporting period.
2.4.8	219	Virtual Currency - Value of Transactions.	Enter the value of virtual currency transactions processed by or on behalf of clients.
2.4.9	220	Does the entity facilitate payments of Clients via Third Parties?	Please answer 'Yes' or 'No'.
2.4.10	221	Third Parties - Number of Clients.	Enter the number of clients that 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.
2.4.11	222	Third Parties - Number of Transactions.	Enter the number of Third-Party transactions processed by clients during the reporting period.
2.4.12	223	Third Parties - Value of Transactions.	Enter the value of transactions processed by clients during the reporting period, using payments via Third Parties.
2.4.13	224	Does the entity facilitate payments of Clients via Credit Card?	Please answer 'Yes' or 'No'.
2.4.14	225	Credit Card Payments - Number of Clients	Enter the number of clients that made payments via Credit Card during the reporting period.
2.4.15	226	Credit Card Payments - Number of Transactions.	Enter the number of transactions processed via credit card payments during the reporting period.
2.4.16	227	Credit Card Payments - Value of Transactions.	Enter the value of Credit Card payments processed for clients during the reporting period.
2.4.17	228	Does the entity facilitate payments of Clients in the form of Wire Transfers?	Please answer 'Yes' or 'No'. This section <u>does not include</u> Internal Bank Transfers.
2.4.18	229	Wire Transfers - Number of Clients.	Enter the number of clients that made payments in the form of Wire

			Transfers during the reporting period. This section <u>does not include</u> Internal Bank Transfers.
2.4.19	230	Wire Transfers - Number of Transactions.	Enter the number of Wire Transfer transactions that were conducted by clients, during the reporting period. This section <u>does not include</u> Internal Bank Transfers.
2.4.20	231	Wire Transfers - Value of Funds Transferred.	Enter the value of Wire Transfer transactions conducted by clients during the reporting period. This section <u>does not include</u> Internal Bank Transfers.
2.4.21	232	Does the entity facilitate payments of Clients in the form of Transfer of Securities?	Please answer 'Yes' or 'No'.
2.4.22	233	Transfer of Securities - Number of Clients.	Enter the number of clients that made payments in the form of Transfer of Securities during the reporting period.
2.4.23	234	Transfer of Securities - Number of Transactions.	Enter the number transactions made by clients, during the reporting period, in the form of Transfer of Securities.
2.4.24	235	Transfer of Securities - Value of Funds Transferred.	Enter the value of funds transferred o by clients during the reporting period, by way of Transfer of Securities.
2.4.25	236	Does the entity facilitate payments of Clients in other forms not listed above?	Please answer 'Yes' or 'No'.
2.4.26	237	Other Forms of Payment - Number of Clients.	Enter the number of clients which made payments using other Forms of Payment not listed above during the reporting period.
2.4.27	238	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.

2.4.28	239	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.
2.4.29	240	Please indicate the types of Other Forms of Payments.	List the Other Forms of Payment processed by clients during the reporting period, which are not listed above.
2.5.1	241	Total value of funds received, broken down by originating country of payment.	Enter the total value of funds received from clients, or on behalf of clients, into the entity's custody during the reporting period.
2.5.2	242	Total number of transactions received, broken down by originating country of the transaction.	Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, into the entity's custody during the reporting period.
2.5.3	243	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 or client assets transferred out of the jurisdiction from the entity during the reporting period.
2.5.4	244	Total number of transactions transferred out, broken down by destination country of the transaction.	Enter the total number of transactions relating to funds transferred out of the jurisdiction by the entity, during the reporting period.
2.6.1	245	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'. If the entity had to provide estimates or did not have data to specific questions for this section 'Products and Services Risk', please use this section to explain the entity's response(s) provided.
2.6.2	246	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Please include 'N/A' if no comment. If the entity had to provide estimates or did not have sufficient data to respond to specific questions under this section - 'Products and Services Risk'. Please use this section to explain the entity's response(s) provided.
3.1.1	247	Number of Clients - F2F.	Provide the total number of clients, in the entity's entire portfolio, that were onboarded via F2F methods, and <u>not only</u> those onboarded during the reporting period.

			F2F channels include F2F; Referrals within Group – F2F; Eligible Introducers - F2F; Other Introducers - F2F
3.1.2	248	Number of Clients - Non-F2F.	<p>Provide the total number of clients, in the entity’s entire portfolio, that were onboarded via Non-F2F methods, and not only 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	249	Total number of clients via Online Platforms.	Provide the total number of clients, in the entity’s entire portfolio, that were onboarded via Online platforms, and <u>not only</u> those onboarded during the reporting period.
3.1.4	250	Number of Clients through Referrals within Group - F2F.	<p>Enter the number of clients which were onboarded using referrals within Group - F2F during the reporting period, broken down by nationality of the BO.</p> <p>An example of Group – F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients.</p>
3.1.5	251	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, during the reporting period, broken down by the nationality of the BO.</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	252	Total number of Clients onboarded through Eligible Introducers.	<p>Total clients in the entity's entire portfolio 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</p>

			verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs.
3.1.7	253	Number of Clients through Eligible Introducers.	Enter the number of clients which were onboarded through Eligible Introducers during the reporting period, broken down by country of nationality of the BO.
3.1.8	254	Number of Clients through Other Introducers - Non-F2F.	Enter the number of clients, that were onboarded through Other Introducers Non - F2F, broken down by the country of nationality of the BO, for the reporting period.
3.1.9	255	Clients via Online Platforms.	Enter the number of clients which were onboarded during the reporting period, broken down by country of nationality of the BO.
3.2.1	256	Has the entity outsourced the role of AML Compliance Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.2	257	To whom has the AML Compliance Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the AML Compliance Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period.</p>
3.2.3	258	What was the country of residency of the AML Compliance Officer at the end of the reporting period?	Enter the country of residency of the AML Compliance Officer at the end of the reporting period.
3.2.4	259	How many AML Compliance Officers did the entity have in the past 3 years?	If no turnover of the Compliance Officer role in the three-year period, answer "1".
3.2.5	260	Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.

3.2.6	261	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	262	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	263	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	264	Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?	Please answer 'Yes' or 'No'.
3.2.10	265	To whom has the Deputy Money Laundering Reporting Officer role been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>
3.2.11	266	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	267	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	268	Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period?	Please answer 'Yes' or 'No'.
3.2.14	269	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	270	What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period?	Enter country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period.
3.2.16	271	How many TFS Screening platforms have you had 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	272	Has the entity outsourced the function of transaction monitoring within the reporting period?	Please answer 'Yes' or 'No'.
3.2.18	273	To whom has the transaction monitoring function been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship transaction monitoring:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover that includes one of each within the reporting period.</p>
3.2.19	274	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	275	How many Transaction monitoring platforms / services did the entity have in the past 3 years?	If no turnover of the transaction monitoring platforms / services in the three-year period, answer "1".
3.2.21	276	Has the entity outsourced any Trust Services functions during the reporting period?	Please answer 'Yes' or 'No'.
3.2.22	277	To whom has Trust Services Functions been outsourced?	<p>If outsourced, 'select' the status that best describes the outsource relationship transaction monitoring:</p> <ul style="list-style-type: none"> • Member within Group • 3rd Party and Member within Group • 3rd Party <p>Select "3rd Party and Member within Group", in cases where trust services were outsourced to both 3rd parties and members within the group.</p>
3.2.23	278	What was the country of the outsourced trust services function at the end of the reporting period?	Enter the country of which the entity outsourced Trust services functions to, at the end of the reporting period.
3.2.24	279	Enter the number of Trust Services functions that were outsourced in the past 3 years.	Enter the number of engagements where the entity outsourced Trust services, during the past 3 years.
1.3.1	280	Where is the entity's physical place of business?	Select the country where the entity operates.
3.3.2	281	Number of branches, broken down by country of operation.	<p>Enter the number of branches by location, broken down by country of operation.</p> <p>If the entity does not have branches enter '0'.</p>
3.3.3	282	Number of subsidiaries, broken down by country of operation.	<p>Enter the number of Subsidiaries by location, broken down by country of operation.</p> <p>If the entity does not have subsidiaries enter '0'.</p>
3.3.4	283	In which country is the parent or holding company incorporated?	Enter the country in which the entity's parent or holding company incorporated.
3.3.5	284	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	285	How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period?	Enter the number of beneficial Owners the entity has, broken down by nationality of the beneficial owner, at the end of the reporting period.
3.3.7	286	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	287	Does the entity have any comments or feedback for this tab?	Please answer 'Yes' or 'No'. If the entity had to provide estimates or did not have sufficient data to respond to specific questions, please use this section to explain the entity's response(s) provided.
3.4.2	288	Please use this area to provide any comments or feedback for this tab.	Provide comments or feedback. Please include 'N/A' if no comment. If the entity had to provide estimates or did not have sufficient data to respond to specific questions, please use this section to explain the entity's response(s) provided.

AML Controls Questions:			
No.	Question No.	Question	Description/Explanation
1.1.1	289	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	290	Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically?	Please answer 'Yes' or 'No'.
1.1.3	291	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	292	Is there an audit risk and compliance subcommittee?	Please answer 'Yes' or 'No'.
1.1.5	293	Is there an approved Charter for the Governing Body and Sub-Committees?	Please answer 'Yes' or 'No'.
1.1.6	294	Is the entity subject to group wide governance practices?	Please answer 'Yes' or 'No'.
1.1.7	295	Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?	Please answer 'Yes' or 'No'.
1.1.8	296	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	297	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	298	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	299	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	300	Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?	Please answer 'Yes' or 'No'.
1.1.13	301	Does the Board ensure that the AMLCO/MLRO receive the appropriate training?	Please answer 'Yes' or 'No'.
1.2.1	302	Has an AML Compliance Officer been appointed?	Please answer 'Yes' or 'No'.
1.2.2	303	Has an MLRO been appointed?	Please answer 'Yes' or 'No'.

1.2.3	304	Is a Deputy MLRO appointed?	Please answer 'Yes' or 'No'.
1.2.4	305	Is the AMLCO employed at a managerial level of the company?	Please answer 'Yes' or 'No'.
1.2.5	306	For reporting lines, does the AMLCO report to the Governing Body?	Please answer 'Yes' or 'No'.
1.2.6	307	Does the AMLCO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.7	308	Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?	Please answer 'Yes' or 'No'.
1.2.8	309	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	310	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	311	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	312	Does the MLRO maintain independence from revenues related / client facing activities?	Please answer 'Yes' or 'No'.
1.2.12	313	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	314	Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?	Please answer 'Yes' or 'No'.
1.3.2	315	Have the directors received AML/CFT/CPF and Sanctions training during the reporting period?	Please answer 'Yes' or 'No'.
1.3.3	316	Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF training	Please answer 'Yes' or 'No'.

		over the last year relevant to the current position?	
1.3.4	317	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	318	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	319	Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?	Please answer 'Yes' or 'No'.
1.3.7	320	Are changes to policy and procedures communicated to all staff/directors and senior management?	Please answer 'Yes' or 'No'.
1.3.8	321	Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?	Please answer 'Yes' or 'No'.
1.3.9	322	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	323	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	324	Does the entity have an internal audit department / unit / function with oversight over AML functions?	Please answer 'Yes' or 'No'.
1.4.2	325	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	326	Is the Internal Audit plan approved by the Board?	Please answer 'Yes' or 'No'.
1.4.4	327	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	328	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	329	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	330	Does the Board review the AML audit program?	Please answer 'Yes' or 'No'.
1.4.8	331	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	332	Where applicable, does the internal audit include testing on functions which are outsourced?	Please select 'Yes', 'No', or 'Not Applicable'.
1.4.10	333	Where applicable, does the internal audit include testing of EI relationships?	Please enter Yes, No, or Not Applicable.
1.4.11	334	Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?	Please answer 'Yes' or 'No'.
1.4.12	335	Does the Internal Audit include testing for the entity's TFS and PF controls?	Please answer 'Yes' or 'No'.
1.5.1	336	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	337	Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?	Please answer 'Yes' or 'No'.
1.5.3	338	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	339	Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates,	Please answer 'Yes' or 'No'.

		branches, subsidiaries etc.) in their risk assessment?	
1.5.5	340	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	341	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	342	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	343	Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.9	344	Does the entity consider Sanctions risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.10	345	Does the entity consider PF risk factors in their risk assessment?	Please answer 'Yes' or 'No'.
1.5.11	346	Does the entity consider outsourcing risk factors in its risk assessment?	Please answer 'Yes' or 'No'.
1.5.12	347	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	348	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	349	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	350	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	351	Does the entity rely on Group AML/CFT policies and procedures?	Please answer 'Yes' or 'No'.
1.6.2	352	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	353	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	354	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	355	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	356	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	357	Does the entity have Board, or governing body, approved policies and procedures for employee screening?	Please answer 'Yes' or 'No'.
1.6.8	358	Does the entity have Board or governing body approve policies and procedures for training of staff?	Please answer 'Yes' or 'No'.
1.6.9	359	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	360	Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?	Please answer 'Yes' or 'No'.

1.6.11	361	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	362	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	363	Does the entity have a screening process?	Please answer 'Yes' or 'No'.
1.7.2	364	Is the screening process manual, automated or a combination?	Select which best applies: Manual, Automated, or Automated with Manual Checks.
1.7.3	365	Is the screening process fully or partially outsourced?	Please select 'Fully' or 'Partially'.
1.7.4	366	When designated lists are updated, does the screening process reflect these updates within 24 hours?	Please answer 'Yes' or 'No'.
1.7.5	367	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	368	Is the customer and counterparty database screened against the designated H.M. Treasury list?	Please answer 'Yes' or 'No'.
1.7.7	369	Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?	Please answer 'Yes' or 'No'.
1.7.8	370	Does the entity have Asset Freeze procedures?	Please answer 'Yes' or 'No'.
1.7.9	371	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	372	Does the entity maintain a report of results of alerts, methodology of	Please answer 'Yes' or 'No'.

		clearing alerts, and those positive matches resulting of sanction screening?	
1.7.11	373	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	374	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	375	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	376	Does the entity have transaction monitoring policies and procedures developed commensurate to its operations?	Please answer 'Yes' or 'No'.
1.8.2	377	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	378	Does the entity have in place an automated system for monitoring transactions for potential suspicion	Please answer 'Yes' or 'No'.

		and reporting suspicious transactions?	
1.8.4	379	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	380	Does the entity have EDD procedures?	Please answer 'Yes' or 'No'.
1.8.6	381	Does the entity apply EDD on customers and counterparties based in higher-risk countries?	Please answer 'Yes' or 'No'.
1.8.7	382	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	383	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	384	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	385	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	386	Does the entity have policies and procedures for reporting to the FRA?	Please answer 'Yes' or 'No'.
1.9.4	387	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	388	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	389	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	390	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	391	Has the entity been penalized or received a warning for non-compliance, from the FRA?	Please answer 'Yes' or 'No'.
1.9.9	392	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	393	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	394	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	395	Does the entity maintain Record Keeping Procedures?	Please answer 'Yes' or 'No'.
1.10.2	396	How many years after the end of the business relationship are records retained?	Enter the number of years
1.10.3	397	Are any records retained and accessible in the Cayman Islands?	Please answer 'Yes' or 'No'.
1.10.4	398	How accessible and swiftly available are records for competent authorities - in hours?	Enter the average time to comply in hours.
1.10.5	399	Does the entity maintain a declined business log?	Please answer 'Yes' or 'No'.
1.10.6	400	Does the entity maintain records of its training programme?	Please answer 'Yes' or 'No'.
1.11.1	401	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	402	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	403	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	404	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	405	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	406	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	407	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	408	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	409	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	410	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	411	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	412	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	413	Do you have any comments or feedback for this tab?	Please answer 'Yes' or 'No'.
1.12.2	414	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.