Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

# Guidance Notes
# Risk Evaluation Questionnaire
## Credit Institutions

## Contents

# 1   Background and Scope

The Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (the CJA 2010) obliges credit and financial institutions (institutions) to put in place an effective, risk based Anti-Money Laundering/Countering the financing of Terrorism (AML/CFT) framework, which includes the application of a risk based approach, customer due diligence (CDD) measures, reporting of suspicious transactions, governance, policies and procedures, record keeping and training. There is also a legal obligation for institutions to comply with EU Council Regulations relating to Financial Sanctions (FS) measures as soon as they are adopted.

The Risk Evaluation Questionnaire (REQ) seeks to consider:

1.1. Information of the nature of the institution's business relevant to the inherent risk of AML/CTF/FS

1.2 Information on the way in which an institution has assessed the Money Laundering (ML) Terrorist Financing (TF) and Financial Sanction (FS) risks posed by its business model (based on high level information provided by the institution); and

1.3 Information on the AML/CFT/FS framework put in place by the institution.

The Central Bank of Ireland (the Central Bank) has developed new sector specific REQs to capture more detailed and pertinent risk data. Based on the information contained within the REQs, the Central Bank will conduct analysis and assess the level of ML/TF risks for individual institutions and across sectors. This REQ also seeks to cover the data points to be collected on behalf of AMLA as per the Regulatory Technical Standards ('RTS') under Article 40(2) of Directive (EU) 2024/1640 and Article 12(7) of Regulation (EU) 2024/1620.

Institutions will be required to submit their completed REQs to the Central Bank via the Central Bank of Ireland Portal (the Portal).

The reporting frequency, the timeline for submission and the submission process are outlined in Sections 2 and 4.

**Please Note: Where an institution has identified a material issue requiring notification to the Central Bank, the institution should communicate any such material issues through normal supervisory channels. Institutions are reminded the REQ is not an appropriate channel for sole communication of such issues.**

# 2   Timeline for Submitting the REQ

The reference date for data included in the REQ is 31 December of the preceding calendar year unless otherwise stated. Given the extended timeline for the first submission the reference date for the first submission is 31 December 2024.

The deadline for the first submission (in respect of reference date of 31 December 2024) is 27 February 2026. This is a hard deadline and no extensions will be granted.

# 3   Requirement to provide information to the Central Bank

The Central Bank considers that the receipt of the REQ is necessary for the purposes of the performance of its functions under financial services legislation, including the CJA 2010, relating to the proper and effective regulation of financial service providers. The Central Bank will therefore require submission of the REQ pursuant to Section 22 of the Central Bank (Supervision and Enforcement) Act 2013.

# 4   Mechanism for Submission of Returns

The XML (Extensible Markup Language) files for the REQs must be generated in accordance with the rules specified in the XSD schema which is provided with this guidance document. Each institution is required to submit to the Central Bank, the information set out in Section 8 of this guidance. The XSD schema is accessible on the Central Bank website. An Excel version of the REQ is also available on the website but this is solely to support understanding. Only XML format submissions will be accepted. A completed sample XML is available on the Central Bank website alongside this guidance and the XSD schema.

In addition to conforming to the XSD schema, the following constraints must be observed:

1.  Explicit closing XML tags must be used for all elements.
    *e.g. <A01011 Identifier="AAH" EnumerationYesNo="Yes"></A01011>* rather than *<A01011 Identifier="AAH" EnumerationYesNo="Yes"/ >*
2.  The XML tags must be contained in the following wrapper:
    <?xml version="1.0" encoding="utf-8"?>
    <CreditInstitutions xmlns="http://www.centralbank.ie/Schemas/AML/2025/A01">
    ...
    ...
    ...
    </CreditInstitutions>

The completed REQ return file should be uploaded on the Portal at:
https://www.centralbank.ie/regulation/central-bank-portal

**The submission file must conform to the guidance issued in this document and should be validated against the XSD schema before uploading to the Portal.**

The Portal will run basic validations against the file as part of the submission process. Institutions will be unable to complete the file submission until all of these validations have been passed. Further validations will be carried out following submission and firms notified accordingly.

**When uploading the REQ to the Portal for submission, please ensure to 'Finalise' and 'Sign-Off' the REQ return. These steps are critical and must be completed to ensure successful completion and transmission of the REQ.**

## 5   Where do I go if I need further information?

Section 8 (Instructions / Guidance Notes for completing the REQ) is designed to aid institutions when completing each section of the return. A reference sample of a completed XML is available on the Central Bank website alongside this guidance to assist with potential queries and support understanding.

Any further queries in relation to the completion and/or submission of the REQ should be directed to AML_Analytics@centralbank.ie.

## 6   Where do I go if I have technical issues with the Portal?

https://www.centralbank.ie/regulation/central-bank-portal/contact-us

**E-mail:** portalsupport@centralbank.ie

## 7   Overview of the REQ and Information to be provided by Institutions

This guidance document is for Credit Institutions. Each institution must use the XSD schema specific to its sector. If the institution is part of a group with multiple institutions regulated by the Central Bank, then each individual institution must submit a REQ.

# 8 Instructions / Guidance Notes for Completing the REQ

Instructions for each field are detailed below. Where applicable, definitions are in line with definitions in the CJA 2010 and Regulation (EU) 2024/1624 (the AML Regulation) and Directive (EU) 2024/1640 (the AML Directive).

Transaction data based on customer risk ratings can use the ratings as at the reference date, even if customer risk rating has changed during the year.

All values should be entered in Euro unit value. Exchange rate can be based on the time of the transactions if available or can be as at the reference date.

All questions are mandatory with a reference date of 31 December of the preceding calendar year unless otherwise stated.

Depending on the business model of your institution, not every question will be applicable but every data point must be completed. The business model of your institution will be taken into account in the review of the answers. If a question is not applicable to your institution:

- Integer Value: Enter 0

- Decimal Value: Enter 0

- Date Value: Enter 2000-01-01

- String Value: Enter N/A

- LEI: Enter 00000000000000000000

- EnumerationCountry: Select 00

- Other enumerations: Select N/A

If any of sections 8.5-8.13 are not applicable to your institution then enter one line of non-applicable values, i.e. Select 00 from Country and enter zeros for the rest of the fields, e.g.

| Country | Overall | | | | | of which High Risk (per your Institution's Customer Risk Assessment) | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | No. of customers | No. of incoming transactions | Value of incoming transactions | No. of outgoing transactions | Value of outgoing transactions | No. of customers | No. of incoming transactions | Value of incoming transactions | No. of outgoing transactions | Value of outgoing transactions |
| BLU | BAU | BLV | BLW | BLX | BLY | BLZ | BMA | BMB | BMC | BMD |
| 00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

<A0110>

<A01101 BLU="00" BAU="0" BLV="0" BLW="0" BLX="0" BLY="0" BLZ="0" BMA="0" BMB="0" BMC="0" BMD="0"></A01101>

</A0110>

## 8.1   Table structures

The XSD taxonomy has two different types of table structure, Table Structure A and Table Structure B. The way to complete each table structure in the XML file is different. Please see below two examples illustrating how to complete each. A full XML example file is available on our website and it is noted in this guidance which structure should be used for each table.

It is important to note that to build the aforementioned XML file, two items have to be considered: "REF" and "Description" (both in this guidance document). "REF" identifies the code associated to the specific "Field". "Description" includes the Data Type (for Table Structure A) or the Variable Name (for Table Structure B).

### 8.1.1   Table Structure A

In this example, three different "REFs" are needed, meaning AAI, AAJ and AAK. In this guidance document, we can see that the respective Data Types for these three fields under "Description" are "EnumerationValue", "DecimalValue" and "DecimalValue". You must enter the REF and the appropriate answer using the correct Data Type.

```
<A0101B>
  <A01012 AAI="AT" AAJ="328.44" AAK="920.17"></A01012>
  <A01012 AAI="BE" AAJ="904.26" AAK="400.81"></A01012>
  <A01012 AAI="BG" AAJ="182.25" AAK="664.32"></A01012>
  <A01012 AAI="CY" AAJ="983.31" AAK="691.02"></A01012>
  <A01012 AAI="CZ" AAJ="163.60" AAK="923.17"></A01012>
  <A01012 AAI="DE" AAJ="517.86" AAK="815.83"></A01012>
  <A01012 AAI="DK" AAJ="41.24" AAK="129.13"></A01012>
  <A01012 AAI="EE" AAJ="518.01" AAK="737.37"></A01012>
```

Select each EEA country and for each EEA country enter the Value of Transactions by customers that are resident in that EEA country where the institution operates on a FOE basis and on a FOS basis.

| Select EEA Country | FOE | FOS |
|---|---|---|
| AAI | AAJ | AAK |
| AT | 328.44 | 920.17 |
| BE | 904.26 | 400.81 |
| BG | 182.25 | 664.32 |
| CY | 983.31 | 691.02 |
| CZ | 163.60 | 923.17 |
| DE | 517.86 | 815.83 |
| DK | 41.24 | 129.13 |
| EE | 518.01 | 737.37 |
| ES | 1.023.562 | 2.145.632 |

In Table Structure A, each enumeration option must not be repeated, e.g. AAI in the example above cannot have AT entered twice.

The following tables have Table Structure A:

| Guidance Section | Tab_Code | Table_Code |
|---|---|---|
| 8.2.2 International Presence | A0101B | A01012 |
| 8.3.1 Customer segments | A0102B | A01022 |
| 8.3.2 Sector | A0102C | A01023 |
| 8.4.8 Suspicious Alerts and Transaction Rejections | A0103B | A01032 |
| 8.5 Physical Presence | A0104 | A01041 |
| 8.6 Residence & Establishment | A0105 | A01051 |
| 8.7 Beneficial Owners | A0106 | A01061 |
| 8.8 Payment Transactions | A0107 | A01071 |
| 8.9 Pooled Accounts | A0108 | A01081 |
| 8.10 Correspondent Relationship | A0109 | A01091 |
| 8.11 Trade Finance | A0110 | A01101 |
| 8.12 Geography of Funds Flow | A0111 | A01111 |
| 8.13 Transaction Monitoring | A0112 | A01121 |

## 8.1.2 Table Structure B

Different from Table Structure A, in this case we do not use "REF" in the same way. Now we employ only the items "Identifier" and Variable Name ("String500", "EnumerationYesNo", "LEI", etc.). As previously stated, the Variable Name is specified under "Description" in this guidance document. For example, AAA under "Description" is identified as "EnumerationLegalStructure", you must enter this Variable Name in the XML as below and you must pick the appropriate answer from the corresponding list in 9.2 Enumerations ("LegalStructure" in this case).

```
<A0101A>
    <A01011 Identifier="AAA" EnumerationLegalStructure="Stand_alone_entity"></A01011>
    <A01011 Identifier="AAB" String500="Consultoria Lola"></A01011>
    <A01011 Identifier="AAL" LEI="F5WCUMTUM4RKZ1MAIE39"></A01011>
    <A01011 Identifier="AAC" EnumerationCountryEEANA="HR"></A01011>
    <A01011 Identifier="AAD" String500="frferffgeferfrgergergregrgerg"></A01011>
    <A01011 Identifier="BHT" String500="Consultoria Pepe"></A01011>
    <A01011 Identifier="BHU" LEI="F5WCUMTUM4RKZ1MAIE39"></A01011>
    <A01011 Identifier="BHV" EnumerationCountry="HR"></A01011>
```

## Section 1 - Legal Structure

| | |
|---|---|
| What is the legal structure of your institution? | Stand_alone_entity |
| *If your institution is a subsidiary within a group:* *Please state the name of the parent entity of the group, the country where the parent entity of the group is established, and the AML/CFT supervisory authority of the parent entity of the group* | |
| Name of the ultimate EEA parent entity | Consultoria Lola |
| LEI of the ultimate EEA parent entity | F5WCUMTUM4RKZ1MAIE39 |
| Country where the ultimate EEA parent entity is established | HR |
| The AML/CFT supervisory authority of the ultimate EEA parent entity | frferffgeferfrgergergregrgerg |
| Name of the global parent entity of the group | Consultoria Pepe |
| LEI of the global parent entity of the group | F5WCUMTUM4RKZ1MAIE39 |
| Country where the global parent entity of the group is established | HR |
| The AML/CFT supervisory authority of the global parent entity of the group | fedwdfwefwefdwfwfff |
| *If your institution is a branch of an entity:* | |

In Table Structure B, each identifier/REF must not be repeated, e.g. AAA in the example above cannot be entered twice.

The following tables have Table Structure B:

| Guidance Section | Tab_Code | Table_Code |
|---|---|---|
| 8.2.1 Legal Structure | A0101A | A01011 |
| 8.2.3 Statement of Compliance | A0101A | A01011 |
| 8.3.1 Customer segments | A0102A | A01021 |
| 8.3.2 Sector | A0102A | A01021 |
| 8.3.3 Anonymity | A0102A | A01021 |
| 8.3.4 Correspondent Relationship | A0102A | A01021 |
| 8.3.5 Cryptos and tokens | A0102A | A01021 |
| 8.3.6 Deposits and Withdrawals | A0102A | A01021 |
| 8.3.7 Currency Cash Exchange | A0102A | A01021 |
| 8.3.8 Safe Deposit Boxes | A0102A | A01021 |
| 8.3.9 Virtual IBAN Accounts | A0102A | A01021 |
| 8.3.10 Prepaid Cards | A0102A | A01021 |
| 8.3.11 Lending | A0102A | A01021 |
| 8.3.12 Factoring | A0102A | A01021 |
| 8.3.13 Investment Services and Activities | A0102A | A01021 |
| 8.3.14 Money Remittance | A0102A | A01021 |
| 8.3.15 Exchange crypto-fiat | A0102A | A01021 |
| 8.3.16 Exchange fiat-crypto | A0102A | A01021 |
| 8.3.17 Exchange crypto-crypto | A0102A | A01021 |
| 8.3.18 Transfer crypto-assets | A0102A | A01021 |
| 8.3.19 Custody of Crypto Assets | A0102A | A01021 |
| 8.3.20 Crowdfunding | A0102A | A01021 |
| 8.3.21 Other Products and/or Services | A0102A | A01021 |
| 8.3.22 Intermediaries and Distribution Channels | A0102A | A01021 |
| 8.3.23 Remote Onboarding | A0102A | A01021 |

| | | |
|---|---|---|
| 8.4.1 Business Wide Risk Assessment | A0103A | A01031 |
| 8.4.2 Policies and Procedures | A0103A | A01031 |
| 8.4.3 Onboarding | A0103A | A01031 |
| 8.4.4 Offboarding | A0103A | A01031 |
| 8.4.5 Customer Due Diligence | A0103A | A01031 |
| 8.4.6 Transaction Monitoring | A0103A | A01031 |
| 8.4.7 Alerts | A0103A | A01031 |
| 8.4.9 Suspicious Transaction Reporting | A0103A | A01031 |
| 8.4.10 Sanctions Screening | A0103A | A01031 |
| 8.4.11 Outsourcing | A0103A | A01031 |
| 8.4.12 Education & Training | A0103A | A01031 |
| 8.4.13 Compliance & Assurance Testing | A0103A | A01031 |
| 8.4.14 Audit | A0103A | A01031 |
| 8.4.15 Internal controls and reporting systems | A0103A | A01031 |
| 8.4.16 Governance | A0103A | A01031 |
| 8.4.17 Compliance with Fund Transfers Regulation | A0103A | A01031 |

Variable Names:
- Identifier: "REF" code.
- LEI: Legal Entity Identifier (20 characters).
- String100/500/1000/2000: String with 100/500/1000/2000 character limit. Only ASCII printable characters plus € and £ allowed, please use pre-defined XML entity references as below. No empty/exclusively blank space values allowed.
- DecimalValue: Decimal value, limit to 6 decimal places.
- DateValue: YYYY-MM-DD.
- PercentageValue: Percentage as a decimal, e.g. enter 4.7% as 0.047, limit to 6 decimal places.
- IntegerValue: Non-negative integer values.
- Enumerations: Check the corresponding list in 9.2 Enumerations.

Do not use variable names other than those defined.

Pre-defined entity references:

| English | Symbol (Entity References) | XML (predefined entity references) |
|---|---|---|
| less than | < | &lt; |
| greater than | > | &gt; |
| ampersand | & | &amp; |
| apostrophe | ' | &apos; |
| quotation mark | " | &quot; |

### 8.1.3 Table Order

The XSD taxonomy defines a strict order in which the tables must be entered into any XML submission file in order for it to be accepted.

```
<xs:element ref="A01:A0101A"/> <!--General Table-->
<xs:element ref="A01:A0101B"/> <!--General InternationalPresence Table-->
<xs:element ref="A01:A0102A"/> <!--Inherent Risk Table-->
<xs:element ref="A01:A0102B"/> <!--Inherent Risk Segment Table-->
<xs:element ref="A01:A0102C"/> <!--Inherent Risk Sector Table-->
<xs:element ref="A01:A0103A"/> <!--Mitigation and Control Table-->
<xs:element ref="A01:A0103B"/> <!--Mitigation and Control Alerts Table-->
<xs:element ref="A01:A0104"/> <!--Physical Presence Table -->
<xs:element ref="A01:A0105"/> <!--Residence and Establishment Table-->
<xs:element ref="A01:A0106"/> <!--PEP and BO Table-->
<xs:element ref="A01:A0107"/> <!--Payment Transactions Table-->
<xs:element ref="A01:A0108"/> <!--Pooled Accounts Table-->
<xs:element ref="A01:A0109"/> <!--Correspondent Relationship Table-->
<xs:element ref="A01:A0110"/> <!--Trade Finance Table-->
<xs:element ref="A01:A0111"/> <!--Geography of Funds Flow Table-->
<xs:element ref="A01:A0112"/> <!--Transaction Monitoring Table-->
```

Any XML file submitted which is in any other order other than that detailed above will result in the submission being rejected.

## 8.2   General

### 8.2.1   Legal Structure

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01011 Identifier="AAA" EnumerationLegalStructure="Stand_alone_entity"></A01011>

| REF | Field | Description |
|-----|-------|-------------|
| AAA | Legal Structure | What is the legal structure of your institution?<br><br>Select from *LegalStructure*<br><br>Variable name: EnumerationLegalStructure |
| AAB | Name of the ultimate EEA parent entity | Enter the statutory name of your ultimate European Economic Area (EEA) parent entity if your institution is a **subsidiary** within a group. If not applicable enter N/A.<br><br>Character limit: 500 characters.    Variable name: String500 |
| AAL | LEI of the ultimate EEA parent entity | Enter the Legal Entity Identifier (LEI) of your institution's ultimate EEA parent if your institution is a **subsidiary** within a group.<br><br>If not applicable or LEI not available please enter 00000000000000000000<br><br>Character limit: 20 characters.    Variable name: LEI |
| AAC | Country where the ultimate EEA parent entity is established | Select the country where the ultimate EEA parent of the group is established if your institution is a **subsidiary** within a group. If not applicable select 00.<br><br>Select from list of Alpha-2 country codes; CountriesEEANA<br><br>Variable name: EnumerationCountryEEANA |
| AAD | The AML/CFT supervisory authority of the ultimate EEA parent entity | Enter the AML/CFT supervisory authority of the ultimate EEA parent entity if your institution is **a subsidiary** within a group.<br><br>If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A.<br><br>The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.<br><br>Character limit: 500 characters.    Variable name: String500 |
| BHT | Name of the global parent entity of the group | Enter the statutory name of your ultimate global parent entity if your institution is a **subsidiary** within a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity. If not applicable enter N/A.<br><br>Character limit: 500 characters.<br><br>Variable name: String500 |
| BHU | LEI of the global parent entity of the group | Enter the Legal Entity Identifier (LEI) of your institution's ultimate global parent entity if your institution is **a subsidiary** within a group.<br><br>If not applicable or LEI not available please enter 00000000000000000000<br><br>Character limit: 20 characters.    Variable name: LEI |

| BHV | Country where the global parent entity of the group is established | Select the country where the ultimate global parent entity is established, if your institution is a **subsidiary** within a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity.<br>If not applicable select 00.<br><br>Select from list of Alpha-2 country codes.<br><br>Variable name: EnumerationCountry |
| --- | --- | --- |
| BHW | The AML/CFT supervisory authority of the global parent entity of the group | Enter the AML/CFT supervisory authority for your institution's ultimate global parent entity if your institution is a **subsidiary** within a group. Enter N/A if the ultimate global parent entity is not regulated for AML/CFT purposes or if not applicable.<br><br>Character limit: 500 characters.<br><br>Variable name: String500 |
| AAE | Name of the ultimate EEA parent entity | Enter the legal name of your ultimate European Economic Area (EEA) parent entity if your institution is a **branch** of an EEA institution which is passporting into Ireland under FOE. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.<br><br>Character limit: 500 characters.    Variable name: String500<br>If not applicable enter N/A |
| AAM | LEI of the ultimate EEA parent entity | Enter the Legal Entity Identifier (LEI) of your ultimate EEA parent entity if your institution is a **branch** of an EEA institution which is passporting into Ireland under FOE. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.<br><br>Character limit: 20 characters.    Variable name: LEI<br>If not applicable or LEI not available please enter 00000000000000000000 |
| AAF | Country where the ultimate EEA parent entity is established | Select the country where the ultimate European parent entity of the group is established if your institution is a **branch** of an EEA institution which is passporting into Ireland under FOE.  The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.<br><br>Select from list of Alpha-2 country codes, CountriesEEANA.<br>Variable name: EnumerationCountryEEANA<br>If not applicable choose 00 |
| AAG | The AML/CFT supervisory authority of the ultimate EEA parent entity | Enter the AML/CFT supervisory authority of the ultimate European parent entity if your institution is a **branch** of an EEA institution which is passporting into Ireland under FOE.<br><br>If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A.<br><br>The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.<br><br>Character limit: 500 characters.    Variable name: String500 |

| | | |
|---|---|---|
| BHX | Name of the global parent entity | Enter the legal name of your ultimate global parent entity if your institution is a **branch** of an institution with its head office in a third country, regardless of the existence of an EEA parent entity. If not applicable enter N/A.<br><br>Character limit: 500 characters.<br><br>Variable name: String500 |
| BHY | LEI of the global parent entity | Enter the Legal Entity Identifier (LEI) of your institution's ultimate global parent entity if your institution is a **branch** of an institution with its head office in a third country, regardless of the existence of an EEA parent entity.<br><br>If not applicable or LEI not available please enter 00000000000000000000<br><br>Character limit: 20 characters.<br><br>Variable name: LEI |
| BHZ | Country where the global parent entity is established | Select the country where the ultimate global parent entity is established if your institution is a **branch** of an institution with its head office in a third country, regardless of the existence of an EEA parent entity.<br><br>Select from list of Alpha-2 country codes, Country.<br><br>Variable name: EnumerationCountry<br>If not applicable choose 00 |
| BIA | The AML/CFT supervisory authority of the global parent entity | Enter the AML/CFT supervisory authority for your institution's ultimate global parent entity if your institution is a **branch** of an institution with its head office in a third country, regardless of the existence of an EEA parent entity. Enter N/A if not applicable or if the ultimate global parent entity is not regulated for AML/CFT purposes.<br><br>Character limit: 500 characters.<br><br>Variable name: String500 |

## 8.2.2   International Presence

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
\<A01011 Identifier="AAH" EnumerationYesNo="Yes">\</A01011>

| REF | Field | Description |
|---|---|---|
| AAH | Operate in EEA under FOE or FOS | Does your institution operate within the EEA under Freedom of Establishment (FOE) and/or Freedom to Provide Services (FOS)?<br><br>Select from YesNo   Variable name: EnumerationYesNo |
| ACO | Established Outside EEA | Has your institution established a branch or is it providing services outside the EEA through subsidiaries, agents, distributors, or other physical presence?<br><br>Select from YesNo   Variable name: EnumerationYesNo |

Table Structure A – XML only requires REFs, e.g.

<A01012 AAI="AT" AAJ="98.98" AAK="988.99"></A01012>

| REF | Field | Description |
|---|---|---|
| AAI | EEA Country | Select each EEA country and for each EEA country enter the Value of Transactions in the preceding calendar year by customers that are resident in that EEA country on a FOE basis and on a FOS basis.<br><br>Select from CountriesEEA<br>Data Type: EnumerationValue |
| AAJ | FOE | For each EEA country, enter the Value of Transactions in the preceding calendar year by customers that are resident in that EEA country where the institution operates on a FOE basis. If you do not operate on a FOE basis in a country then enter 0 for that country.<br><br>Data Type: DecimalValue |
| AAK | FOS | For each EEA country, enter the Value of Transactions in the preceding calendar year that are resident in that EEA country where the institution operates on a FOS basis. If you do not operate on a FOS basis in a country then enter 0 for that country.<br><br>Data Type: DecimalValue |

## 8.2.3   Statement of Compliance

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01011 Identifier="ACP" EnumerationYesNo="Yes"></A01011>

| REF | Field | Description |
|---|---|---|
| ACP | Compliance | To the best of your knowledge, has your institution materially complied with all of its obligations and requirements under relevant anti-money laundering, countering the financing of terrorism and financial sanctions legislation including Part 4 of the CJA 2010, Criminal Justice (Terrorist Offences) Act 2005 and financial sanctions regulations during the 12 month period covered by this REQ?<br><br>Select from YesNo   Variable name: EnumerationYesNo |
| ACQ | Reason for Non Compliance | If the answer is No to the Statement of Compliance above, please provide a brief summary of material non-compliance. If not applicable enter N/A.<br><br>Character limit: 500 characters.    Variable name: String500 |
| ACR | Name | Name of the person signing this Statement of Compliance on behalf of the Institution<br>Character limit: 100 characters.    Variable name: String100 |
| ACS | Position Held | Position of the person signing this Statement of Compliance on behalf of the Institution<br>Character limit: 100 characters.    Variable name: String100 |
| ACT | PCF | Is the person signing this Statement of Compliance on behalf of the firm been approved by the Central Bank to a Pre-Approval Control Function (PCF) position?<br><br>Select from YesNo   Variable name: EnumerationYesNo |

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## 8.3  Inherent Risk

### 8.3.1  Customer segments

For each customer type listed please specify each of the below as at the reference date i.e. 31 December of the preceding calendar year. Please note customers can come under more than one customer type and the sum of all customer types does not need to sum to the total number of customers. For example, a customer can be both onboarded physically and a cash-intensive customer.

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01021 Identifier="ACU" IntegerValue="73887"></A01021>

| REF | Field | Description |
|---|---|---|
| **ACU** | Total NP Customers | Enter the total number of Natural Person customers at 31 December of the preceding calendar year. This includes inactive customers, frozen/blocked customers and customers awaiting off-boarding. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| **ACV** | Total LE Customers | Enter the total number of Legal Entity customers at 31 December of the preceding calendar year. This includes inactive customers, frozen/blocked customers and customers awaiting off-boarding. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| **BIM** | Active NP Customers | Enter the total number of **active** Natural Person customers at 31 December of the preceding calendar year. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| **BIN** | Active LE Customers | Enter the total number of **active** Legal Entity customers at 31 December of the preceding calendar year. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| **BIO** | Total Occasional Customers | Enter the total number of occasional customers during the preceding calendar year. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| **BIP** | Active NP Transactions | Enter the total number of transactions during the preceding calendar year by Natural Person customers active at 31 December of the preceding calendar year. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| **BIQ** | Active LE Transactions | Enter the total number of transactions during the preceding calendar year by Legal Entity customers active at 31 December of the preceding calendar year. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| **BIR** | Active Occasional Transactions | Enter the total number of transactions during the preceding calendar year by occasional customers. If not applicable enter 0. <br><br> Variable name: IntegerValue |

| BIS | Active NP Value | Enter the total value of transactions (EUR) during the preceding calendar year by Natural Person customers active at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
|-----|-----------------|---------|
| BIT | Active LE Value | Enter the total value of transactions (EUR) during the preceding calendar year by Legal Entity customers active at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BIU | Active Occasional Value | Enter the total value of transactions (EUR) during the preceding calendar year by occasional customers. If not applicable enter 0.<br><br>Variable name: DecimalValue |

## Table Structure A – XML only requires REFs, e.g.

`<A01022 ACW="NP_physcially_on" ACX="979"></A01022>`

| REF | Field | Description |
|-----|-------|-------------|
| ACW | Segment | Select each customer type from *CustomerType* at 31 December of the preceding calendar year. Each customer segment **must** be selected.<br><br>Data Type: EnumerationValue |
| ACX | No. of Customers | Specify the total number of customers at 31 December of the preceding calendar year per *CustomerType*. If any customer type is not applicable enter 0 for that customer type.<br><br>Data Type: IntegerValue |

## 8.3.2 Sector

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01021 Identifier="BML" IntegerValue="745"></A01021>

| REF | Field | Description |
|-----|-------|------------|
| BML | Total number of customers with high risk activities | Total number of customers with high risk activities that should include, at least, activities mentioned under Annex III of Regulation (EU) 2024/1624. If not applicable enter 0. <br><br> Variable name: IntegerValue |

Please specify the total number of legal entity high risk customers who were active customers at 31 December of the preceding calendar year.

If the customer is active in multiple sectors then you may use the principal customer sector or all customer sectors. It is not necessary for the sum of sectors to equal the total number of customers.

Table Structure A – XML only requires REFs, e.g.
<A01023 ADA="Mining" ADB="6"></A01023>

| REF | Field | Description |
|-----|-------|------------|
| ADA | Sector | Select each sector from Sector. Note that customers can fall in more than one sector. Each sector **must** be selected. <br><br> Data Type: EnumerationValue |
| ADB | No. of High Risk Customers | For each specific Sector, specify the total number of legal entity **high risk** active customers at 31 December of the preceding calendar year to which your institution provides services that are active in the sectors listed. If any sector is not applicable enter 0 for that sector. <br><br> Data Type: IntegerValue |

### 8.3.3  Anonymity

## Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A0121 Identifier="ADZ" EnumerationYesNo="Yes"></A0121>

| REF | Field | Description |
|---|---|---|
| ADZ | Anonymity Provided | Is it possible for your institution's customers to conceal any aspect of their identity or remain anonymous when using the products, services, and transactions offered by your institution?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AAN | Anonymity Product Detail | Provide details on the nature of the concealment of identity or anonymity available for customers using the products, services, and transactions offered by your institution. If not applicable enter N/A.<br><br>List the areas separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters     Variable name: String500 |
| AEA | No. of Products and/or Services | State the number of products and/or services in the preceding calendar year that allowed your institution's customers to conceal any aspect of their identity or remain anonymous. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AEB | No. of Transactions | State the total number of transactions in the preceding calendar year that allowed your institution's customers to conceal any aspect of their identity or remain anonymous. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AEC | Value of Transactions | State the value (EUR) of transactions in the preceding calendar year that allowed your institution's customers to conceal any aspect of their identity or remain anonymous. If not applicable enter 0.<br><br>Variable name: DecimalValue |

## 8.3.4  Correspondent Relationship

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A0121 Identifier="AEL" EnumerationYesNo="Yes"></A0121>

| REF | Field | Description |
|---|---|---|
| AEL | Respondent Nesting | Does your institution's *Correspondent relationship* service allow for "nesting" or downstream clearing, where other respondent institutions with a direct relationship with the respondent but not your institution can indirectly use the account?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AEM | Respondent Nesting Percentage | State the proportion of the total corresponding relationship accounts that have been used in the manner described above during the preceding calendar year. If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| AEN | Respondent Group | Does your institution's correspondent relationship service allow other entities within the respondent's group to use the account without undergoing your institution's due diligence process?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AEO | Respondent Group Percentage | State the proportion of the total corresponding relationship accounts that have been used in the manner described above during the preceding calendar year. If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| AEP | Respondent payable-through accounts (PTA) | Does your institution's correspondent relationship service include opening a payable-through account for the respondent's customers to make transactions directly on their account?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| BED | Respondent PTA In Value | Total Value (EUR) of correspondent service transactions on payable-through accounts in the preceding calendar year (incoming). If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BEE | Respondent PTA Out Value | Total Value (EUR) of correspondent service transactions payable-through accounts in the preceding calendar year (outgoing). If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGV | Respondent Nested Accounts In | Total Value (EUR) of correspondent service transactions going through nested accounts in the preceding calendar year (incoming). If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGW | Respondent Nested Account Out | Total Value (EUR) of correspondent service transactions going through nested accounts in the preceding calendar year (outgoing). If not applicable enter 0.<br><br>Variable name: DecimalValue |

## 8.3.5   Cryptos and tokens

### Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

`<A0121 Identifier="AEQ" EnumerationYesNo="Yes"></A0121>`

| REF | Field | Description |
|---|---|---|
| AEQ | Financial Product with Crypto underlying | Does your institution acquire or trade in Financial products with *Crypto-asset* as the underlying value?<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| AER | Cryptos | Does your institution acquire or trade in cryptos (e.g. Bitcoin, Ethereum, Ripple, Bitcoin Cash, Cardano, Litecoin etc.)?<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| AES | Tokens | Does your institution acquire or trade in crypto tokens (issued through an Initial Coin Offering)?<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| AET | Financial Products | What financial products with *Crypto-asset* did you acquire or trade in? If not applicable enter N/A.<br><br>List the areas separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters      Variable name: String500 |
| AEU | ETFs Number of Transactions | What are the total numbers of Exchange Traded Funds (ETFs) in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AEV | ETFs Value | What are the total values (EUR) of Exchange Traded Funds (ETFs) in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AEW | Regulated FPs Number of Transactions | What are the total numbers of Other financial products traded on the regulated market in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AEX | Regulated FPs Value | What are the total values (EUR) of Other financial products traded on the regulated market in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AEY | Non Regulated FPs Number of Transactions | What are the total numbers of Other financial products traded on the non-regulated market in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AEZ | Non Regulated FPs Value | What are the total values (EUR) of Other financial products traded on the non-regulated market in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFA | Bitcoin Number of Transactions | What are the total numbers of Bitcoin in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFB | Bitcoin Value | What are the total values (EUR) of Bitcoin in the preceding calendar year? If not applicable enter 0. |

| | | |
|---|---|---|
| | | Variable name: DecimalValue |
| AFC | Ethereum Number of Transactions | What are the total numbers of Ethereum in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFD | Ethereum Value | What are the total values (EUR) of Ethereum in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFE | Crypto Token Number of Transactions | What are the total numbers of Crypto tokens in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFF | Crypto Token Value | What are the total values (EUR) of Crypto tokens in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFG | Other Crypto Number of Transactions | What are the total numbers of other cryptos (not listed above) in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFH | Other Crypto Value | What are the total values (EUR) of other cryptos (not listed above) in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFI | Financial Product Type | If you entered a value greater than 0 at RegulatedFPsValue or NonRegulatedFPsValue, please specify which financial products. If not applicable enter N/A.<br><br>Character limit: 500 characters     Variable name: String500 |
| AFJ | Crypto Type | If you entered a value greater than 0 at "Other cryptos", please specify which cryptos. If not applicable enter N/A.<br><br>Character limit: 500 characters     Variable name: String500 |
| AFK | Crypto Wallets | Does your institution offer crypto wallets?<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| AFL | Crypto Wallet Future | If your institution currently does not offer crypto wallets, does it intend to do so in the future?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AFM | Crypto Currency Trading Exposure | Does your institution engage in Cryptocurrency trading services?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AFN | Custody Service Exposure | Does your institution engage in virtual asset Custody services?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AFO | Crypto Investment Exposure | Does your institution engage in virtual asset Investment products?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AFP | Blockchain Technology and partnership Exposure | Does your institution make use of Blockchain Technology and partnership?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |

## 8.3.6   Deposits and Withdrawals

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A0121 Identifier="AFQ" IntegerValue="4546"></A0121>

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| REF | Field | Description |
|-----|-------|-------------|
| AFQ | Cash NP Deposits Number of Transactions | Deposits (by natural persons): Cash - Total Number (No.) of Transactions. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFR | Cash NP Deposits Value | Deposits (by natural persons): Cash - Total Value (EUR) of Transactions. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFS | Cash NP Deposits Number of Transactions 10000 or more | Deposits (by natural persons): Cash - Total Number (No.) of Transactions amounting to EUR 10,000 or more. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFT | Cash NP Deposits Value 10000 or more | Deposits (by natural persons): Cash - Total Value (EUR) of Transactions amounting to EUR 10,000 or more<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFU | Cash NP Deposits Highest | Deposits (by natural persons): Cash - Highest Value (EUR) single transaction. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFV | Cash LE Deposits Number of Transactions | Deposits (by legal entities): Cash - Total Number (No.) of Transactions. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFW | Cash LE Deposits Value | Deposits (by legal entities): Cash - Total Value (EUR) of Transactions. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AFX | Cash LE Deposits Number of Transactions 10000 or more | Deposits (by legal entities): Cash - Total Number (No.) of Transactions amounting to EUR 10,000 or more<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AFY | Cash LE Deposits Value 10000 or more | Deposits (by legal entities): Cash - Total Value (EUR) of Transactions amounting to EUR 10,000 or more<br>If not applicable enter 0.<br>Variable name: DecimalValue |
| AFZ | Cash LE Deposits Highest | Deposits (by legal entities): Cash - Highest Value (EUR) per type of transaction. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGA | Cash NP Withdraw Number of Transactions | Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGB | Cash NP Withdraw Value | Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGC | Cash NP Withdraw Number of Transactions 10000 or more | Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions amounting to EUR 10,000 or more<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGD | Cash NP Withdraw Value 10000 or more | Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions amounting to EUR 10,000 or more<br>If not applicable enter 0. |

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| | | |
|---|---|---|
| | | Variable name: DecimalValue |
| AGE | Cash NP Withdraw Highest | Withdrawals (by natural persons): Cash - Highest Value (EUR) per type of transaction. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGF | Cash LE Withdrawals Number of Transactions | Withdrawals (by legal entities): Cash - Total Number (No.) of Transactions. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGG | Cash LE Withdrawals Value | Withdrawals (by legal entities): Cash - Total Value (EUR) of Transactions. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGH | Cash LE Withdrawals Number of Transactions 10000 or more | Withdrawals (by legal entities): Cash - Total Number (No.) of Transactions amounting to EUR 10,000 or more<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGI | Cash LE Withdrawals Value 10000 or more | Withdrawals (by legal entities): Cash - Total Value (EUR) of Transactions amounting to EUR 10,000 or more<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGJ | Cash LE Withdrawals Highest Value | Withdrawals (by legal entities): Cash - Highest Value (EUR) per type of transaction. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AOF | Cash Total 20000 or more | Number of customers totalling cash transactions over EUR 20,000 or more during the preceding calendar year, where cash transactions include all movements of physical cash, regardless of the method of deposit or withdrawal. This includes, but is not limited to, over-the-counter cash deposits and withdrawals, ATM transactions, cash-in-transit operations (such as cash courier vans), night safe deposits, and bulk cash movements. If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.3.7 Currency Cash Exchange

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A0121 Identifier="AGK" IntegerValue="4234"></A0121>

| REF | Field | Description |
|---|---|---|
| AGK | Cash FX Number of Transactions Buy | Total Number (No.) of Currency Cash Exchange Transactions. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGL | Cash FX Number of Transactions Sell | Total Number (No.) of Currency Cash Exchange Transactions If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGM | Cash FX Value Buy | Total Value (EUR) of Currency Cash Exchange Transactions If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGN | Cash FX Value Sell | Total Value (EUR) of Currency Cash Exchange Transactions If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGO | Cash FX Number of Transactions 1000 or more Buy | Total Number (No.) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGP | Cash FX Number of Transactions 1000 or more Sell | Total Number (No.) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGQ | Cash FX Value 1000 or more Buy | Total Value (EUR) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGR | Cash FX Value 1000 or more Sell | Total Value (EUR) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGS | Cash FX High Value Buy | Highest Value (EUR) of single Currency Cash Exchange transaction (buy) If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AGT | Cash FX High Value Sell | Highest Value (EUR) of single Currency Cash Exchange transaction (sell) If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AOG | Cash FX Cash Total Value | Total Value (EUR) of transactions cash-to-cash carried out during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |

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### 8.3.8   Safe Deposit Boxes

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A0121 Identifier="AGU" IntegerValue="756"></A0121>

| REF | Field | Description |
|---|---|---|
| AGU | Deposit Box - Number of Customers | No. of customers who availed of safe deposit box services in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGV | Deposit Box - Number Rented | No. of safe deposit boxes rented out to your customers in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGW | Deposit Box - Number of Locations | No. of locations where safe deposit boxes are offered for rent in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

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## 8.3.9    Virtual IBAN Accounts

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A0121 Identifier="AGX" EnumerationYesNo="Yes"></A0121>

| REF | Field | Description |
|---|---|---|
| AGX | IBAN Own Name | Does your institution provide the facility to its customers to map a range of virtual IBANs against an IBAN-identifiable master account held in their name?<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| AGY | IBAN Own Name Number of Transactions | Report the total number of master accounts provided with virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AGZ | IBAN Entity Name | Does your institution offer its customers virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution?<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| AHA | IBAN Entity Name Number of Transactions | State the total number of master accounts provided with virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEF | IBAN Transactions In Number of Transactions | Number of transactions on Virtual IBANs (incoming) in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEG | IBAN Value In | Total Value (EUR) of transactions on Virtual IBANs (incoming) in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BEH | IBAN Transactions Out Number of Transactions | Number of transactions on Virtual IBANs (outgoing) in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEI | IBAN Value Out | Total Value (EUR) of transactions on Virtual IBANs (outgoing) in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BEJ | IBAN Reissued | Total Number of re-issued IBANs. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEK | IBAN Number Reissued | Total Number of re-issued IBANs where the end-user is not a customer of the institution.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.3.10   Prepaid Cards

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

<A0121 Identifier="AHB" IntegerValue="4545"></A0121>

| REF | Field | Description |
|-----|-------|-------------|
| AHB | No. of prepaid cards – Issued over all years | No. of Prepaid Cards –Total Issued by your institution (overall) still in issuance at the end of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHC | No. of reloadable prepaid cards - Issued over all years | No. of reloadable Prepaid Cards -Issued by your institution (overall). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHD | No. of customers to whom prepaid cards were issued to - Issued over all years | No. of customers to whom Prepaid Cards were issued to -Issued by your institution (overall). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHE | No. of customers with more than 3 prepaid cards - Issued over all years | No. of customers to whom more than 3 Prepaid Cards were issued by your institution (overall).<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHF | Total value of issued prepaid cards – Issued over all years | Total value (EUR) issued on/loaded to Prepaid Cards -Issued by your institution (over all years). If not applicable enter 0. For example, where you have issued prepaid cards worth €50,000 with a current outstanding balance of €670 then AHF = 50000<br><br>Variable name: DecimalValue |
| AHG | Total value outstanding on issued prepaid cards - In issuance at end of preceding year | Total value (EUR) outstanding on issued Prepaid Cards -Issued by your institution (over all years). If not applicable enter 0. This is the value of the outstanding balance of all cards ever issued. For example, where you have issued prepaid cards worth €5,000 with a current outstanding balance of €670 then AHG = 670<br><br>Variable name: DecimalValue |
| AHH | No. of prepaid cards with outstanding balance >150 - In issuance at end of preceding year | No. of Prepaid Cards with outstanding balance > EUR 150 -Issued by your institution (over all years). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHI | No. of prepaid cards - Issued in preceding year | No. of Prepaid Cards -Issued by your institution (during the preceding calendar year). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHJ | No. of reloadable prepaid cards - Issued in preceding year | No. of reloadable Prepaid Cards -Issued by your institution (during the preceding calendar year). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHK | No. of customers to whom prepaid cards were issued to - Issued in preceding year | No. of customers to whom Prepaid Cards were Issued to -Issued by your institution (during the preceding calendar year). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHL | No. of customers with more than 3 prepaid cards - Issued in preceding year | No. of customers to whom Prepaid Cards were issued with more than three prepaid cards -Issued by your institution (during the preceding calendar year). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHM | Total value of issued prepaid cards - Issued in preceding year | Total value (EUR) issued on/loaded to Prepaid Cards, issued by your institution (during the preceding calendar year). If not applicable enter 0. For example, where you have issued prepaid |

| | | |
|---|---|---|
| | | cards worth €5,000 over the preceding calendar year with a current outstanding balance of €120 then AHM = 5000<br><br>Variable name: DecimalValue |
| **AHN** | Total value outstanding on issued prepaid cards - Issued in preceding year | Total value (EUR) outstanding on issued Prepaid Cards, issued by your institution (during the preceding calendar year). If not applicable enter 0. This is the value of the outstanding balance of cards issued during the preceding calendar year. For example, where you have issued prepaid cards worth €2,000 over the preceding calendar year that still remain valid with a current outstanding balance of €120 then AHN = 120<br><br>Variable name: DecimalValue |
| **AHO** | No. of prepaid cards with outstanding balance >150 - Issued in preceding year | No. of Prepaid Cards with outstanding balance > EUR 150 -Issued by your institution (during the preceding calendar year). If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.3.11 Lending

### Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

<A01021 Identifier="BEL" IntegerValue="43324"></A01021>

| REF | Field | Description |
|---|---|---|
| BEL | Outstanding loans - Number | Total Number of outstanding loans. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEM | Loans granted during the preceding calendar year - Number | Total Number of loans granted during the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEN | Outstanding asset backed loans with cash collateral - Number | Total Number of outstanding asset backed loans with cash collateral. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEO | Loan repayments during the preceding calendar year - Number | Total Number of loan repayments during the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEP | Prematurely repaid loans during the preceding calendar year - Number | Total Number of prematurely repaid loans during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEQ | Loan repayments from non-EEA countries during the preceding calendar year - Number | Total Number of loan repayments from non-EEA countries during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BER | Lending Granted No Associated Product | Total Number of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BGO | Outstanding loans - Value | Total Value (EUR) of outstanding loans. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGP | Loans granted during the preceding calendar year - Value | Total Value (EUR) of loans granted during the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGQ | Outstanding asset backed loans with cash collateral - Value | Total Value (EUR) of outstanding asset backed loans with cash collateral. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGR | Loan repayments during the preceding calendar year - Value | Total Value (EUR) of loan repayments during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGS | Prematurely repaid loans during the preceding calendar year - Value | Total Value (EUR) of prematurely repaid loans during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGT | Loan repayments from non-EEA countries during the preceding calendar | Total Value (EUR) of loan repayments from non-EEA countries during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |

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| REF | Field | Description |
|-----|-------|-------------|
| | year - Value | |
| BGU | Lending Granted No Product Value | Total Value (EUR) of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service. If not applicable enter 0.<br><br>Variable name: DecimalValue |

### 8.3.12 Factoring

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01021 Identifier="BES" IntegerValue="0"></A01021>`

| REF | Field | Description |
|-----|-------|-------------|
| BES | Factoring Volume | Total Number of factoring contracts granted in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BET | Factoring Value | Total Value (EUR) of factoring contracts granted during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BEU | Factoring Value Non-EEA | Total Value (EUR) of factoring contracts granted to obligors established in non-EEA countries during the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |

### 8.3.13 Investment Services and Activities

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01021 Identifier="BIY" IntegerValue="424"></A01021>`

| REF | Field | Description |
|-----|-------|-------------|
| BIY | Invest Orders Retail | Reception and transmission of orders - Number of retail clients. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BIZ | Invest Orders Professional | Reception and transmission of orders - Number of professional clients. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJA | Invest Orders Unlisted | Reception and transmission of orders - Percentage of amounts of orders transmitted (orders forwarded to the market, including unexecuted orders) involving unlisted financial instruments (that are not traded on a regulated market, multilateral trading facility (MTF), or organised trading facility (OTF)), other than financial instruments issued by the institution or its group.<br>If not applicable enter 0.<br><br>Variable name: PercentageValue<br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 |
| BJB | Invest Orders Outside EEA | Reception and transmission of orders - Number of AML/CFT regulated customers outside the EEA. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJC | Invest Custody Retail | Custody - Number of retail clients. If not applicable enter 0.<br><br>Variable name: IntegerValue |

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| REF | Field | Description |
|-----|-------|-------------|
| BJD | Invest Custody Professional | Custody - Number of professional clients. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJE | Invest Custody No Relationship | Custody - Percentage of assets under custody for which the institution does not have a direct business relationship with the final investor. If not applicable enter 0.<br><br>Variable name: PercentageValue<br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 |
| BJF | Invest Custody Outside EEA | Custody - Number of AML/CFT regulated customers outside the EEA. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJG | Invest Portfolio Retail | Portfolio management - Number of retail clients<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJH | Invest Portfolio Professional | Portfolio management - Number of professional clients<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJI | Invest Portfolio AUM | Portfolio management - Total assets under management<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BJJ | Invest Portfolio 5000000 or more | Portfolio management - Number of customers for which customer holding total assets with a value of at least EUR 5,000,000<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.3.14 Money Remittance

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01021 Identifier="BJK" IntegerValue="42"></A01021>`

| REF | Field | Description |
|-----|-------|-------------|
| BJK | Remit Volume In | Total Number of money remittance payments in the preceding calendar year (incoming). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJL | Remit Volume Out | Total Number of money remittance payments in the preceding calendar year (outgoing). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJM | Remit Value In | Total Value (EUR) of remittance payments in the preceding calendar year (incoming). If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BJN | Remit Value Out | Total Value (EUR) of remittance payments in the preceding calendar year (outgoing). If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BJO | Remit 1000 In | Total Number of money remittance transactions above 1000 euro in the preceding calendar year (incoming). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJP | Remit 1000 Out | Total Number of money remittance transactions above 1000 euro in the preceding calendar year (outgoing). If not applicable enter 0. |

| Variable name: IntegerValue |
|---|

## 8.3.15 Exchange crypto-fiat

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01021 Identifier="BJX" DecimalValue="83889.798"></A01021>`

| REF | Field | Description |
|---|---|---|
| BJX | Crypto Fiat Value | Total amount (EUR) crypto-fiat in the previous year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BJY | Crypto Fiat Trans number | Total number of transactions crypto-fiat in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BJZ | Crypto Fiat Customers | Number of customers using this type of service in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKA | Crypto Fiat To Unhosted | Total number of transactions crypto-fiat to unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKB | Crypto Fiat From Unhosted | Total number of transactions crypto-fiat from unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.3.16 Exchange fiat-crypto

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01021 Identifier="BKC" DecimalValue="424.78"></A01021>`

| REF | Field | Description |
|---|---|---|
| BKC | Fiat Crypto Value | Total amount (EUR) fiat-crypto in the previous year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BKD | Fiat Crypto Transaction Numbers | Total number of transactions fiat-crypto in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKE | Fiat Crypto Customers | Number of customers using this type of service in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKF | Fiat Crypto To Unhosted | Total number of transactions fiat-crypto to unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKG | Fiat Crypto From Unhosted | Total number of transactions fiat-crypto from unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

### 8.3.17 Exchange crypto-crypto

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01021 Identifier="BKH" DecimalValue="424.7878"></A01021>

| REF | Field | Description |
|-----|-------|-------------|
| BKH | Crypto Crypto Value | Total amount (EUR) crypto-crypto in the previous year.<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BKI | Crypto Crypto Customers | Number of customers using this type of service in the previous year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKJ | Crypto Crypto To Unhosted | Total number of transactions crypto-crypto to unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKK | Crypto Crypto From Unhosted | Total number of transactions crypto-crypto from unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

### 8.3.18 Transfer crypto-assets

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01021 Identifier="BKL" DecimalValue="4.887"></A01021>

| REF | Field | Description |
|-----|-------|-------------|
| BKL | Transfer Crypto Value | Total amount (EUR) that customers transferred in the previous year.<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BKM | Transfer Crypto Customers | Number of customers using this type of service in the previous year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKN | Transfer Crypto To Unhosted | Total number of transactions to unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKO | Transfer Crypto From Unhosted | Total number of transactions from unhosted wallets in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.3.19 Custody of Crypto Assets

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

<A01021 Identifier="BKU" IntegerValue="5466"></A01021>

| REF | Field | Description |
|-----|-------|-------------|
| BKU | Crypto Asset Customers | Total number of customers owning crypto-assets<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKV | Custodian Wallet Value | Total value (EUR) hosted on the custodian wallets<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |

## 8.3.20 Crowdfunding

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

<A01021 Identifier="BKP" DecimalValue="747.89"></A01021>

| REF | Field | Description |
|-----|-------|-------------|
| BKP | Crowdfunding Value | Total Value (EUR) of funding projects in the previous year<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BKQ | Crowdfunding Projects | Total Number of projects being funded in the previous year<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKR | Crowdfunding Donor HRJ | Total Number of donors from high-risk countries<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKS | Crowdfunding Projects HRJ | Total Number of projects where the owner is from a high-risk country<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BKT | Crowdfunding Charity | Total Number of projects funded for philanthropic purposes in the previous year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

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## 8.3.21 Other Products and/or Services

The number of active customers at 31 December of the preceding calendar year, number of transactions and value of transactions during the preceding calendar year should be completed for each product/service.

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01021 Identifier="AHP" IntegerValue="5244"></A01021>`

| REF | Field | Description |
|-----|-------|-------------|
| AHP | Aircraft Finance - No. of Active Customers | Aircraft Finance - No. of Active customer at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHQ | Maritime Finance - No. of Active Customers | Maritime Finance - No. of Active customer at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHR | Wealth Management – No. of Active Customers | Wealth Management - No. of Active customer at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHS | Treasury Services - No. of Active Customers | Treasury Services - No. of Active customer at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHT | Securities Services - No. of Active Customers | Securities Services - No. of Active customer at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHU | Depositary Services - No. of Active Customers | Depositary Services - No. of Active customer at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHW | Merchant Services - No. of Active Customers | Merchant Services - No. of Active customer at 31 December of the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AHX | Aircraft Finance - Value of Transactions | Aircraft Finance - Value of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AHY | Maritime Finance - Value of Transactions | Maritime Finance - Value of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AHZ | Wealth Management - Value of Transactions | Wealth Management - Value of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AIA | Treasury Services - Value of Transactions | Treasury Services - Value of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AIB | Securities Services - Value of Transactions | Securities Services - Value of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AIC | Depositary Services - Value of | Depositary Services - Value of Transactions during the preceding calendar year. If not applicable enter 0. |

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| | Transactions | Variable name: DecimalValue |
|---|---|---|
| AIE | Merchant Services - Value of Transactions | Merchant Services - Value of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AIF | Aircraft Finance - No. of Transactions | Aircraft Finance - Count of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AIG | Maritime Finance - No. of Transactions | Maritime Finance - Count of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AIH | Wealth Management - No. of Transactions | Wealth Management - Count of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AII | Treasury Services - No. of Transactions | Treasury Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AIJ | Securities Services - No. of Transactions | Securities Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AIK | Depositary Services - No. of Transactions | Depositary Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AIM | Merchant Services - No. of Transactions | Merchant Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.3.22 Intermediaries and Distribution Channels

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01021 Identifier="AIN" EnumerationYesNo="Yes"></A01021>`

| REF | Field | Description |
|-----|-------|-------------|
| AIN | Intermediary Used | Does your institution use Intermediaries in the provision of services to your customers?<br><br>Select from YesNo<br>Variable name: EnumerationYesNo |
| AIO | Intermediary Total Number | State the total number of intermediaries that your institution has a relationship as of 31 December of the preceding calendar year.<br>. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AIP | Intermediary Non Designated | State the number of the intermediaries above that are not themselves obliged entities under Regulation (EU) 2024/1624 or national legislation. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEC | Intermediary No AML | Number of new customers onboarded in the preceding calendar year by third parties not directly subject to AML/CTF supervision.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AIQ | Intermediary Commission | What was the total value of paid commissions and fees (EUR) in the preceding calendar year?<br>The total should be all fees and commission based payments made to intermediaries your institution has had a relationship with regarding to the provision of services over the entirety of the preceding calendar year even if at 31 December of the year that contract or relationship has ended.<br>If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AIR | Intermediary Customer Proportion | Of the new customers introduced to your institution in the preceding calendar year, what proportion were introduced through an intermediary with which you have a relationship with regarding the provision of services? If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |

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## 8.3.23 Remote Onboarding

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01021 Identifier="AIT" PercentageValue="0.67"></A01021>

| REF | Field | Description |
|-----|-------|-------------|
| AIT | Onboarding Remote NP Prop | Of those Natural Persons who have been onboarded in the preceding calendar year what proportion of these underwent remote onboarding? If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| AIU | Onboarding Remote NP Prop High | How many of the Natural Persons who were remotely onboarded in the preceding calendar year have been assigned a High customer risk rating (or a rating that is appropriately similar internally)?<br>If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| AIW | Onboarding Remote LE Prop | Of those Legal Entities who have been onboarded in the preceding calendar year what proportion of these underwent Remote onboarding? If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| AIX | Onboarding Remote LE Prop High | How many of the Legal Entities who were remotely onboarded in the preceding calendar year have been assigned a High customer risk rating (or a rating that is appropriately similar internally)?<br>If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |

## 8.4    Mitigation & Control

### 8.4.1    Business Wide Risk Assessment

This section gathers information in relation to your institution's Business Wide Risk Assessment ('BWRA').

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

`<A01031 Identifier="AIY" EnumerationBWRAConducted="Yes"></A01031>`

| REF | Field | Description |
|---|---|---|
| AIY | BWRA Conducted | State whether your institution conducts a Business Wide Risk Assessment (BWRA). <br><br> Select from BWRAConducted <br><br> Variable name: EnumerationBWRAConducted |
| AIZ | BWRA Senior Management Approval | State whether Senior Management of your institution approved the latest version of the BWRA. <br><br> Select from: Yes; No; N/A <br> Variable name: EnumerationYesNoNA |
| AJA | BWRA Last Approval Date | State the approval date of your institution's most recent BWRA in the format of YYYY-MM-DD. <br><br> Variable name: DateValue <br> Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AJB | BWRA Review Frequency | Select the frequency of BWRA review by your institution. <br><br> Select from Frequency <br><br> Variable name: EnumerationFrequency |
| AJC | BWRA Business Change | State whether the most recent BWRA review identified any areas for improvement or changes such as to your institution's policies, procedures, oversight measures, or risk appetite. <br><br> Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AJD | BWRA Business Change Description | Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made. If not applicable enter N/A. <br><br> Character limit: 500 characters <br> Variable name: String500 |
| AJE | BWRA Money Laundering | State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA. <br><br> Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AJF | BWRA Terrorist Financing | State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA. <br><br> Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AJG | BWRA Sanctions | State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA. <br><br> Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AJH | BWRA Corruption | State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA. |

| | | Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
|---|---|---|
| AJI | BWRA Conflicts of Interest | State whether risks of conflicts of interests are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJJ | BWRA Tax Evasion | State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJK | BWRA Internal Fraud | State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJL | BWRA External Fraud | State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJM | BWRA Cybercrime | State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJN | BWRA Market Abuse | State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJX | BWRA Customer Groups | State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJY | BWRA Geographies | State whether geographies are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJZ | BWRA Product Groups | State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AKA | BWRA Distribution Channel | State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AKC | BWRA Crypto | State whether *cryptos* as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJO | BWRA Risk Other | State whether risks of other areas are explicitly identified and assessed in your institution's most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AJP | BWRA Risk Other Detail | If Yes to BWRA Risk Other, please describe the areas that were explicitly identified and assessed in your institution's most recent BWRA. If not applicable enter N/A.<br><br>List the areas separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters |

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| | | Variable name: String500 |
|---|---|---|
| BGX | Other Risk Assessment Process - Money laundering | State whether risks of money laundering are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BGY | Other Risk Assessment Process - Terrorist financing | State whether risks of terrorist financing are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BGZ | Other Risk Assessment Process - Circumvention of sanctions regulations | State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHA | Other Risk Assessment Process - Corruption (bribery) | State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHB | Other Risk Assessment Process - Conflicts of interests | State whether risks of conflicts of interests are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHC | Other Risk Assessment Process - Evasion of tax regulations | State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHD | Other Risk Assessment Process - Internal fraud and embezzlement (by employees/management of your institution) | State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHE | Other Risk Assessment Process - External fraud and embezzlement (by customers or other business relations) | State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHF | Other Risk Assessment Process - Cybercrime/ Ransomware | State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHG | Other Risk Assessment Process - Market abuse | State whether risks of market abuse are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHH | Other Risk Assessment Process - Customer groups | State whether customer groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BHI | Other Risk Assessment Process - Geographies | State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |

| | | |
|---|---|---|
| BHJ | Other Risk Assessment Process - Product groups | State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| BHK | Other Risk Assessment Process - Distribution channels | State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| BHL | Other Risk Assessment Process - Cryptos | State whether _cryptos_ as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AJQ | BWRA Risk Appetite | State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AJR | BWRA Policy Procedure | State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AJS | BWRA Product Service | State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AJT | BWRA Transaction Monitoring | State whether the outcomes of the BWRA were used for setting scenarios and rules for transaction monitoring.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AJU | BWRA Process Other | State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |
| AJV | BWRA Process Other Detail | If Yes to BWRA Process Other, briefly describe the other processes and activities in which your institution uses the outcomes of the BWRA. If not applicable enter N/A.<br><br>List the processes separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters<br>Variable name: String500 |
| AJW | Risk App Formulated | State whether your institution formulates a ML/TF risk appetite.<br><br>Select from YesNo     Variable name: EnumerationYesNo |

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## 8.4.2   Policies and Procedures

State the date when the relevant documents are formally approved by the management body in its management function or the compliance manager in accordance with Article 9 of Regulation (EU) 2024/1624. Where more than one topic (e.g. CDD and transaction monitoring) are covered by the same document, the approval date of the document should be reported for all topics covered. When there is no policy or procedure available for one or more items, please enter 2000-01-01.

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
&lt;A01031 Identifier="AKF" DateValue="2024-02-12"&gt;&lt;/A01031&gt;

| REF | Field | Description |
|---|---|---|
| AKF | Customer onboarding | Enter the date when your institution's management approved the last version of policies and procedures for customer onboarding (e.g. steps to be taken in setting up an account, or requirements before being able to transact, etc.).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKG | Ongoing Customer Due Diligence | Enter the date when your institution's management approved the last version of policies and procedures for customer review (e.g. the frequency of review on high risk customers).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKH | Customer Offboarding | Enter the date when your institution's management approved the last version of policies and procedures for customer offboarding (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKI | Politically Exposed Persons | Enter the date when your institution's management approved the last version of policies and procedures for Politically Exposed Persons (PEPs).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKJ | High risk customers | Enter the date when your institution's management approved the last version of policies and procedures for high risk customers.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKK | Transaction monitoring | Enter the date when your institution's management approved the last version of policies and procedures for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, customer risk review in result of positive alerts, etc.).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKL | Suspicious transaction reporting | Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process. |

| | | |
|---|---|---|
| | | This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the conducts of your institution's business to both Revenue and the FIU of any STR generated within your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKM | Evasion of tax regulations | Enter the date when your institution's management approved the last version of policies and procedures for evasion of tax regulations by customers (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKN | Ongoing monitoring of business relationships | Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of business relationships.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKP | Bribery | Enter the date when your institution's management approved the last version of policies and procedures for bribery (e.g. monitoring and reporting of bribery instances).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKQ | Conflicts of interest | Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKR | Fraud within or outside the organisation | Enter the date when your institution's management approved the last version of policies and procedures for fraud within or outside your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKS | Sanctions screening | Enter the date when your institution's management approved the last version of policies and procedures for sanctions screening (e.g. monitoring and detecting instances of financial sanctions evasion).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKT | Sanction hits handling | Enter the date when your institution's management approved the last version of policies and procedures for sanction hits handling (e.g. escalating, recording, and investigating instances of financial sanctions evasion).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AKU | Sanction hits reporting | Enter the date when your institution's management approved the last version of policies and procedures for sanction hits reporting (e.g. in the case of a sanction "hit", the Sanctions Return Form is correctly |

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| | | completed and reported to the Central Bank Sanctions Team as required).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| --- | --- | --- |
| **AKV** | Treating and reporting of ML/TF & Financial Sanctions incidents | Enter the date when your institution's management approved the last version of policies and procedures for identification, investigation and where required, reporting of potential instances of money laundering, terrorist financing, and confirmed financial sanctions evasion matches.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| **AKW** | Whistleblowing | Enter the date when your institution's management approved the last version of policies and procedures for whistleblowing.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| **AKX** | Compliance function | Enter the date when your institution's management approved the last version of policies and procedures and resourcing the compliance function so it operates to an acceptable standard.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| **AKY** | Internal Audit/Assurance Testing | Enter the date when your institution's management approved the last version of policies and procedures and resourcing for the internal audit or assurance testing so it operates to an acceptable standard.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| **AKZ** | Separation of functions (Three Lines of Defence) | Enter the date when your institution's management approved the last version of policies and procedures for separation of functions (i.e. Three Lines of Defence).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| **ALA** | Training | Enter the date when your institution's management approved the last version of policies and procedures for training (e.g. staff members of your institution complete relevant required training).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| **ALB** | Geographic Risk Factors | Enter the date when your institution's management approved the last version of policies and procedures for geographic risk factors (e.g. business activity in high risk jurisdictions, enhanced customer due diligence due to geographic risk, etc.).<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| **ALC** | AML/CFT Record Keeping | Enter the date when your institution's management approved the last version of policies and procedures for record keeping (e.g. provisions in Section 55 of the CJA 2010). |

| | | |
|---|---|---|
| | | Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **ABB** | Business wide risk assessment process | Enter the date when your institution's management approved the last version of policies and procedures to support business wide risk assessment processes.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **ABC** | Customer risk assessment process | Enter the date when your institution's management approved the last version of policies and procedures to support customer risk assessment processes.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **ABD** | Correspondent relationships | Enter the date when your institution's management approved the last version of policies and procedures for Correspondent relationships<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **ABE** | Legislation changes/regulatory guidance | Enter the date when your institution's management approved the last version of policies and procedures and internal processes on foot of legislative changes/regulatory guidance.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **ALD** | Review Frequency | Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures.<br><br>Select from *Frequency*<br>    Variable name: EnumerationFrequency |

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## 8.4.3   Onboarding

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01031 Identifier="ALE" EnumerationYesNo="Yes"></A01031>

| REF | Field | Description |
|---|---|---|
| ALE | Internet / Email - Natural person customers | State whether your institution offers onboarding via Internet/Email for natural person customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALF | App - Natural person customers | State whether your institution offers onboarding via mobile app for natural person customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALG | Counter/Desk i.e. face to face – Natural person customers | State whether your institution offers onboarding via counter/desk (i.e. face to face) for natural person customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALH | Third party - Natural person customers | State whether your institution offers onboarding via third party for natural person customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALI | Other - Natural person customers | State whether your institution offers onboarding via other options for natural person customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALJ | Onboarding Other Details Natural person customers | If Yes to Other - Natural person customers, specify other onboarding options. If not applicable enter N/A.<br><br>List the other onboarding options available to natural persons separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters<br>Variable name: String500 |
| ALK | Internet / Email - Legal entity customers | State whether your institution offer onboarding via Internet/Email for legal entity customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALL | App - Legal entity customers | State whether your institution offer onboarding via mobile app for legal entity customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALM | Counter/Desk i.e. face to face - Legal entity customers | State whether your institution offer onboarding via counter/desk (i.e. face to face) for legal entity customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALN | Third party - Legal entity customers | State whether your institution offer onboarding via third party for legal entity customers.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| ALO | Other - Legal entity customers | State whether your institution offer onboarding via other options for legal entity customers.<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| ALP | Onboarding Other Details Legal entity customers | If Yes to Other - Legal entity customers, specify other onboarding options. If not applicable enter N/A. |

| | | List the other onboarding options available to legal entities separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
|---|---|---|
| ALQ | Remote Data | State whether your institution has policies and procedures in place defining which data is considered adequate for correctly establishing and verifying a customer's identity for the remote onboarding process (i.e. options excluding counter/desk).<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| ALR | Purpose Questions | State whether the onboarding process includes specific questions aimed at identifying the intended purpose and nature of the business relationship.<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| ALS | Purpose Questions Specify | If Yes to Purpose Questions, briefly specify the subject matter of these questions. If not applicable enter N/A.<br><br>List the subject matter of these questions asked separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| ALT | Excluded Customer | State whether your institution has specific customer groups that may not be remotely onboarded.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| ALU | Excluded Customer Specify | If Yes to Excluded Customer, briefly specify these customer groups. If not applicable enter N/A.<br><br>List the specific customer groups separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| ALV | Verify Irish Transfer NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. EUR 1.00, transfer from an Irish bank account in the customer's own name.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| ALW | Verify Foreign Transfer NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. EUR 1.00, transfer from a foreign bank account in the customer's own name. |

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| | | |
|---|---|---|
| | | Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| **ALX** | Verify Upload Photo NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via uploading a photo or photocopy of the customer's ID document.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| **ALY** | Verify Person Photo NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via scan of ID document and image of the customer to be authenticated by a natural person.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| **ALZ** | Verify Upload Doc NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity with uploading a photo of a bank account statement, payslip, or other documents with the customer's proof of address.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| **AMA** | Verify Chip Doc NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a scan of an ID documents with a chip device.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| **AMB** | Verify Passport NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via request for passport details in an online application form.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| **AMC** | Verify At Desk NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via verification of the customer's identity at the counter/desk.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |

| AMD | Verify other Human intervention NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other methods of human intervention not listed above.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
|---|---|---|
| AME | Other Human intervention NP Detail | If Yes to Verify other Human intervention NP, briefly describe the method of other human intervention (natural person customer). If not applicable enter N/A.<br><br>List the other methods of human intervention used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AMF | Verify Other NP | In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other procedures.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMG | Other NP Detail | If Yes to Verify Other NP, briefly specify the other procedures (natural person customer). If not applicable enter N/A.<br><br>List the other methods used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AMH | Verify Other Human Intervention Legal entity customer | In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other human intervention not listed above.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMI | Other Human intervention Legal entity customer Detail | If Yes to Verify Other Human Intervention Legal entity customer, briefly describe the method of other human intervention (legal entity customer). If not applicable enter N/A.<br><br>List the other methods of human intervention used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AMJ | Verify Other Legal entity customer | In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other procedures.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |

| | | N/A indicates that the institution does not offer remote onboarding. |
|---|---|---|
| AMK | Other Legal entity customer Detail | If Yes to Verify Other Legal entity customer, briefly specify the other procedures (legal entity customer). If not applicable enter N/A.<br><br>List the other methods of identity verification used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.    Variable name: String500 |
| AML | Verify Upload Photo Representatives | In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo or photocopy of the customer representative's ID document.<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMM | Verify Person Photo Representatives | In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via scan of ID document and image of the customer representative to be authenticated by a natural person.<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMN | Verify Upload Doc Representatives | In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo of a bank account statement, payslip or other documents with the representative's proof of address.<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMO | Verify Chip Doc Representatives | In your institution's remote onboarding process, state whether your institution verifies representative identity via a scan of an ID document with a chip device.<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMP | Verify Passport Representatives | In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via request for passport details in an online application form.<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMQ | Verify At Desk Representatives | In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via verification of the representative's identity at the counter/desk. |

| | | |
|---|---|---|
| | | Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMR | Verify other Human intervention Representatives | In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via other human intervention not listed above.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMS | Other Human intervention Representatives Detail | If Yes to Verify other Human intervention  Representatives, briefly describe the method of other human intervention (representatives). If not applicable enter N/A.<br><br>List the other methods of human intervention used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AMT | Verify Other Representatives | In your institution's remote onboarding process, state whether your institution verifies representative identity with other procedures.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMU | Other Representatives Detail | If Yes to Verify Other Representatives, briefly specify the other procedures (representatives). If not applicable enter N/A.<br><br>List the methods of identity verification used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AMV | Verify Human intervention BO | In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other human intervention.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br><br>N/A indicates that the institution does not offer remote onboarding. |
| AMW | Other Human Intervention BO Detail | If Yes to Verify Human intervention BO, briefly describe the method of other human intervention (beneficial owners). If not applicable enter N/A.<br><br>List the methods of other human intervention used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AMX | Verify Other BO | In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other procedures.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA |

| | | N/A indicates that the institution does not offer remote onboarding. |
|---|---|---|
| AMY | Other BO Detail | If Yes to Verify Other BO, briefly specify the other procedures (beneficial owners). If not applicable enter N/A.<br><br>List the other methods of identity verification separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.    Variable name: String500 |

## 8.4.4   Offboarding

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01031 Identifier="AMZ" IntegerValue="44234"></A01031>

| REF | Field | Description |
|---|---|---|
| AMZ | Customer Offboarding Number | State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ANA | Customer Offboarding Number ML | State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ANB | Customer Offboarding Number TF | State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ANC | Customer Offboarding Number FS | State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AND | Customer Offboarding Number HR | State the total number of customers rated higher risk as per your institution's CDD process prior to offboarding, whose business relationships with your institution were terminated in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.4.5   Customer Due Diligence

For questions with Fields ending in NP, answer the question with regards to explicitly Natural Persons. For Fields ending in LE, answer the question with regards to explicitly Legal Entities.

If your institution does not use low/medium/high risk classification for customers, alignment to this classification on a best effort basis is acceptable.

In the instance where your institution uses in-between values, please use the driving level, e.g.
High( - ) -> High
Low( + ) -> Low

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01031 Identifier="ANE" EnumerationCDD="Yes_in_all_cases"></A01031>

| REF | Field | Description |
|---|---|---|
| ANE | Identity Verification NP | State whether the identity of natural person customers or legal entity customers is verified prior to providing services.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANF | Identity Verification LE | |
| ANG | Identity Verification BO LE | State whether the identity of the beneficial owner of legal entity customers is established and verified prior to providing services.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANH | Ownership Structure Identified LE | State whether ownership and/or control structure is identified for legal entity customers prior to providing services.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANI | Nature Of Relationship NP | State whether the purpose and intended nature of the business relationship is established prior to providing services to natural person customers or legal entity customers.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANJ | Nature Of Relationship LE | |
| ANK | Source Of Funds NP | State whether source/origin of the funds/assets is identified prior to providing services to natural person customers or legal entity customers.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANL | Source Of Funds LE | |
| ANM | Customer Rep Identified NP | State whether a customer's representative is identified prior to providing services to natural person customers or legal entity customers.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANN | Customer Rep Identified LE | |
| ANO | Tax Motive Identified NP | State whether tax motives are identified prior to providing services to natural person customers or legal entity customers.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANP | Tax Motive Identified LE | |
| ANQ | Geos Identified NP | State whether geographies involved are identified prior to providing services to natural person customers or legal entity customers.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANR | Geos Identified LE | |

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|---|---|---|
| ANS | Group Activities LE | State whether intragroup activities (such as activities among entities within a group which are non-transactional in nature) are identified prior to providing services to legal entity customers.<br><br>Select from BWRAConducted<br>Variable name: EnumerationCDD |
| ANT | Group Transactions LE | State whether intragroup transactions (such as transactions among entities within a group) are identified prior to providing services to legal entity customers.<br><br>Select from BWRAConductedVariable name: EnumerationCDD |
| ANU | CDD Review NP | State whether your institution periodically reviews its customers' risk profiles for natural person or legal entity customers.<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| ANV | CDD Review LE | |
| ANW | CDD Review NP Low | If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for low-risk natural person or legal entity customers.<br><br>Select from Frequency<br>   Variable name: EnumerationFrequency |
| ANX | CDD Review LE Low | |
| ANY | CDD Review NP Medium | If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for medium-risk natural person or legal entity customers.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| ANZ | CDD Review LE Medium | |
| AOA | CDD Review NP High | If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for high-risk natural person or legal entity customers.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AOB | CDD Review LE High | |
| AOC | CDD Review NP PEP | State the Frequency of these reviews for customers who are politically exposed persons, their family members or persons that are close associates.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AOD | CDD Review NP Unacceptable | If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for unacceptable-risk natural person or legal entity customers (e.g. yet to be exited).<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AOE | CDD Review LE Unacceptable | |
| BFO | CDD CRA Update | Date when your institution assessed the need to update the Customer Risk Assessment for the last time<br><br>Variable name: DateValue<br>Format YYYY-MM-DD     If not applicable enter 2000-01-01 |
| BFP | CDD Low Customer | Number of customers per ML/TF risk category (low risk). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BFQ | CDD Medium-Low Customer | Number of customers per ML/TF risk category (medium-low risk). If not applicable enter 0.<br><br>Variable name: IntegerValue |

| | | |
|---|---|---|
| **BFR** | CDD MH Customer | Number of customers per ML/TF risk category (medium-high risk). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| **BFS** | CDD High Customer | Number of customers per ML/TF risk category (high-risk). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| **BJU** | CDD customers Due NP | Number of customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| **BJV** | CDD customers Due LE | |
| **BGM** | CDD customers Reviewed NP | Number of customers for whom customer information was reviewed and updated in the preceding calendar year. If not applicable enter 0. |
| **BGN** | CDD customers Reviewed LE | Variable name: IntegerValue |
| **AOJ** | Backlog Prop NP Total | Specify the percentage of backlogs of all natural person or legal entity customers.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047      Variable name: PercentageValue. Input 0 if no there is no backlog. |
| **AOK** | Backlog Prop LE Total | |
| **AOL** | Backlog Prop NP High | Of the customer reviews in the backlog, specify the proportion of these that are high risk customers.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue. Input 0 if no there is no backlog. |
| **AOM** | Backlog Prop LE High | |
| **AON** | Backlog Prop NP PEP | Specify the percentage of backlogs of customers who are politically exposed persons, their family members or persons to be close associates.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue. Input 0 if no there is no backlog. |
| **AOO** | Backlog Prop NP Unacceptable | Of the customer reviews in the backlog, specify the percentage of backlogs of unacceptable-risk natural person or legal entity customers (e.g. yet to be exited).<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue. Input 0 if no there is no backlog. |
| **AOP** | Backlog Prop LE Unacceptable | |
| **AOQ** | Concrete Timelines NP | State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| **AOR** | Concrete Timelines LE | |
| **BHM** | No Ident Total | What proportion of **total active** customers have no CDD documentation/information. If not applicable enter 0.<br><br>Variable name: PercentageValue<br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 |
| **BHN** | No Ident High | What proportion of **high risk active** customers have no CDD documentation/information. If not applicable enter 0.<br><br>Variable name: PercentageValue<br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 |
| **BHO** | No Ident PEP | What proportion of active customers who are **PEP**s have no CDD documentation/information? If not applicable enter 0. |

| | | |
|---|---|---|
| | | Variable name: PercentageValue<br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 |
| AOT | Incomplete Total | Specify the percentage of total active customers with incomplete CDD documentation over the overall active customers.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047     Variable name: PercentageValue. Input 0 if no there is no incomplete CDD documentation.<br><br>Incomplete CDD documentation in this context refers to missing or outdated CDD documents as per your institution's CDD review process. |
| AOU | Incomplete High | Specify the percentage of high-risk active customers with incomplete CDD documentation over the overall active customers.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047     Variable name: PercentageValue. Input 0 if no there is no incomplete CDD documentation.<br><br>Incomplete CDD documentation in this context refers to missing or outdated CDD documents as per your institution's CDD review process. |
| AOV | Incomplete PEP | Specify the percentage of active customers who are politically exposed persons, their family members or persons known to be close associates with incomplete CDD documentation over the overall active customers.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047     Variable name: PercentageValue. Input 0 if no there is no incomplete CDD documentation<br><br>Incomplete CDD documentation in this context refers to missing or outdated CDD documents as per your institution's CDD review process. |
| BFT | CDD BO not Identified | Number of customers that are legal entities /trusts whose beneficial owners have not been identified. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BFU | CDD BO not Verified HR | Number of high-risk customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified. If not applicable enter 0.<br>Variable name: IntegerValue |
| BFW | CDD no Purpose | Number of customers for whom no information on the purpose and intended nature of the business relationship has been obtained (excluding customers with whom your institution does not have a business relationship). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BFX | CDD no Business | Number of customers for whom no information has been obtained on the nature of the customers' business, or of their employment or occupation (excluding customers with whom your institution does not have a business relationship). If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BFY | CDD BO entered | Number of customers (excluding natural persons) for whom beneficial ownership identification details are entered in the institution's database. If not applicable enter 0.<br><br>Variable name: IntegerValue |

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| BFZ | CDD NP entered | Number of customers, who are natural persons, for whom all identification details (name/ dob, nationality, tax number) are entered in the institution's database. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| --- | --- | --- |

## 8.4.6   Transaction Monitoring

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01031 Identifier="AOW" EnumerationYesNoNA="No"></A01031>

| REF | Field | Description |
|-----|-------|-------------|
| AOW | TM Profile | Does your institution draw up a transaction profile for customers at the initiation of services?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AOX | TM Profile Review | What is the frequency of review of the transaction profile?<br><br>Select from _Frequency_<br><br>   Variable name: EnumerationFrequency |
| AOY | TM Profile Number Transactions | Does your institution include number of transactions in an expected transactions profile?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |
| AOZ | TM Profile Value of Aggregated Transactions | Does your institution include the value of total transactions in an expected transactions profile?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |
| APA | TM Profile Value of Single Transa | Does your institution include the value of single transactions in an expected transactions profile?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |
| APB | TM Profile Counterparties | Does your institution include counterparties in an expected transactions profile?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |
| APC | TM Profile Geographies | Does your institution include geographies in an expected transactions profile?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |
| APD | TM Profile Group Transactions | Does your institution include intra-group transactions in an expected transactions profile, i.e. do you include the expected movement of customer funds between their group companies?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |
| APE | TM Profile Banks | Does your institution include banks involved in an expected transactions profile?<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |

| | | |
|---|---|---|
| **BIC** | TM Alert Number of Transactions | If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA<br>If no profile is created please select N/A |
| **BID** | TM Alert Value of Aggregated Transactions | If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA<br>If not applicable please select N/A |
| **BIE** | TM Alert Value of Single Transact | If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of single transactions?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA<br>If not applicable please select N/A |
| **BIF** | TM Alert Counterparties | If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA<br>If not applicable please select N/A |
| **BIG** | TM Alert Geographies | If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA<br>If not applicable please select N/A |
| **BIH** | TM Alert Group Transactions | If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual intra-group transactions?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA<br>If not applicable please select N/A |
| **BII** | TM Alert Banks | If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual banks/payment institutions involved?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA<br>If not applicable please select N/A |
| **APF** | TM How Monitor | State whether your institution monitors transactions and how this is done.<br><br>Select from MonitoringApproach<br>Variable name: EnumerationMonitoringApproach |

| APG | TM Model Validation | Are formal steps taken after creating the rules for an automated transaction monitoring system in which the rules are tested for appropriateness and efficacy?<br><br>Select from ModelValidation<br>Variable name: EnumerationModelValidation<br>Select N/A if transaction monitoring is conducted manually or no transaction monitoring is in place |
|---|---|---|
| APH | TM AI | Does your institution use artificial intelligence technology in its transaction monitoring process?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If no transaction monitoring in place please select N/A |
| API | TM Rule | Does your institution use rules as part of its transaction monitoring process?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If no transaction monitoring in place please select N/A |
| APJ | TM High Risk Geographies | Does your institution have rules in its transaction monitoring process with respect to high risk geographies?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APK | TM Offshore Jurisdictions | Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APL | TM Customer Segments | Does your institution have rules in its transaction monitoring process with respect to Customer Segments?<br><br>Customer segments can be any internal definition of customer groupings, retail or corporate customers, risk levels, associated sector, high value customer etc.<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APM | TM Sectors | Does your institution have rules in its transaction monitoring process with respect to Sectors?<br><br>Does your institution risk rate various sectors and apply this information to transaction monitoring rules?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APN | TM PEP | Are there rules or conditions in your institution's transaction monitoring system to account for risk associate with PEPs and PEP close associates?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APO | TM Cash | Does your institution have rules in its transaction monitoring process with respect to cash transactions? |

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| | | |
|---|---|---|
| | | Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APP | TM Text | Are transaction description fields / bodies of text considered in any of the rules your institution has in its transaction monitoring system<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APQ | TM Complex | Does your institution have rules in its transaction monitoring process with respect to complex structures?<br><br>See definition of complex structure<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APR | TM Banks | Does your institution have rules in its transaction monitoring process with respect to what banks / payment institutions are involved in transactions?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APS | TM Other | Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their rules?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APT | TM Other Detail | Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system.<br><br>Character limit: 500 characters<br>Variable name: String500 |
| APU | TM Review | Does your institution periodically review its rules in its transaction monitoring process?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APV | TM Review Latest | Please give completion date of the review. If a repeating review process is in place, please give the most recent date for a rule which has been reviewed.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| APW | TM Review Latest Changes | Did the most recent review lead to any changes in rules?<br><br>Select from: Yes; No; N/A     Variable name: EnumerationYesNoNA<br>If you answered No to TMBusinessRule please select N/A |
| APX | TM Real Time or Post Event | State whether detection of (possible) suspicious financial transactions takes place in real-time or post-event.<br><br>In this context, real-time detection means monitoring which is carried out live and can react to transactions as they take place as opposed to post-event detection which is done in batches at certain points in time after the transactions take place. |

| | | Select from DetectionTime<br>Variable name: EnumerationDetectionTime |
|---|---|---|
| APY | TM Insufficient Info | How many transactions did your institution reject on the basis of insufficient information* about the payer or the payee in the preceding calendar year? If not applicable enter 0.<br><br>*Information as referred to in Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto assets.<br><br>Variable name: IntegerValue |

## 8.4.7   Alerts (in the preceding calendar year)

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01031 Identifier="APZ" IntegerValue="46456"></A01031>`

| REF | Field | Description |
|---|---|---|
| APZ | Rule Count - Automated | How many rules were in place in your institution's automated transaction monitoring system in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQA | Total Alert Count - Automated | How many alerts were generated by the automated transaction monitoring system in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQB | Percent Alerts - Automated | What is the proportion of automated transaction monitoring alerts to total transactions? If not applicable enter 0.<br><br>Please enter the proportion as a decimal, e.g. enter 4.7% as 0.047     Variable name: PercentageValue |
| AQD | Alerts Investigated - Automated | How many automated alerts were investigated by an AML/transaction monitoring staff member?<br>If not applicable enter 0.<br><br>Investigated refers to the process of analysing the alert to decide if it should be subject to escalation as a Suspicious Transaction Report<br><br>Variable name: IntegerValue |
| AQE | Alerts Escalated - Automated | How many automated alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQF | Alert Investigated FP - Automated | How many automated alerts were closed as false positives following investigation? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BDW | Rule Count -Manual | How many rules were in place in your institution's manual transaction monitoring process in the preceding calendar year? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BDX | Total Alert Count - Manual | How many alerts were generated by the manual transaction monitoring process in the preceding calendar year? |

| | | If not applicable enter 0.<br><br>Variable name: IntegerValue |
|---|---|---|
| BDY | Percent Alerts - Manual | What is the proportion of manual transaction monitoring alerts to total transactions? If not applicable enter 0.<br><br>Please enter the proportion as a decimal, e.g. enter 4.7% as 0.047    Variable name: PercentageValue |
| BDZ | Alerts Investigated - Manual | How many manual alerts were investigated by an AML/transaction monitoring staff member? If not applicable enter 0.<br><br>Investigated refers to an initial check to indicate if a transaction monitoring alert is worth sending to investigators/compliance.<br><br>Variable name: IntegerValue |
| BEA | Alerts Escalated - Manual | How many manual alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BEB | Alert Investigated FP - Manual | How many manual alerts were closed as false positives following investigation? If not applicable enter 0.<br><br>A false positive is an alert which results in no Suspicious Transaction Report (STR) being filed.<br><br>Variable name: IntegerValue |
| AQG | Alert TP Review - Automated | How many true positive alerts (STR filed from automated alerts) led to a review of the customer's risk, CDD or otherwise?<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQH | Alert Backlog - Automated | At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQI | Alert Mean Time To Close TP - Automated | Over the course of the preceding calendar year, what was the average time in days to close an alert (account for automated alerts), from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| AQJ | Alert Max Time To Close TP - Automated | Over the course of the preceding calendar year, what was the maximum time to close an alert (account for automated alerts) which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGA | Alert Ratio STR - Automated | If automated system: Ratio between number of STRs and number of alerts. This corresponds to the number of alerts generated by the automated systems and the number of STRs resulting from alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) of Regulation (EU) 2024/1624. This excludes alerts of systems exclusively meant to detect transaction subject to targeted financial sanctions. |

| | | Variable name: PercentageValue<br>If not applicable enter 0. |
|---|---|---|
| BHP | Alert TP Review - Manual | How many true positive alerts (STR filed from manual alerts) led to a review of the customer's risk, CDD or otherwise? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BHQ | Alert Backlog - Manual | At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed? If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BHR | Alert Mean Time To Close TP – Manual | Over the course of the preceding calendar year, what was the average time in days to close an alert (account for manual alerts), from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BHS | Alert Max Time To Close TP – Manual | Over the course of the preceding calendar year, what was the maximum time to close an alert (account for manual alerts) which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGB | Alert Trans Excess - Manual | If manual system, does the annual number of transactions exceed the number of transactions that the institution can manually process?<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| BGC | Alert Days - Manual | If manual system: Average time in days to analyse the transaction since the moment it occurred. If not applicable enter 0.<br><br>Variable name: DecimalValue |

## 8.4.8 Suspicious Alerts and Transaction Rejections

With reference to the total number of transaction monitoring alerts generated by the transaction monitoring system in the preceding calendar year, all questions in this section must be completed to confirm

1. How many of those transaction alerts were due to each of the risk scenarios listed
2. How many of those transactions were rejected on the grounds of the risk scenario listed

Table Structure A – XML only requires REFs, e.g.

`<A01032 AQK="Alert_ML" AQL="30" AQM="20"></A01032>`

| REF | Field | Description |
|-----|-------|-------------|
| AQK | Alert Type | Select specific suspicious AlertType<br><br>Data Type: EnumerationValue |
| AQL | Transaction Alert Number | For a specific suspicious alert type, state the total number of transaction alerts in the preceding calendar year.<br>If not applicable enter 0.<br><br>Data Type: IntegerValue |
| AQM | Transaction Reject Number | For a specific suspicious alert type, state the total number of transaction alerts rejected in the preceding calendar year.<br>If not applicable enter 0.<br><br>Data Type: IntegerValue |

## 8.4.9   Suspicious Transaction Reporting

For each of the GoAML categories state the total number of suspicious transaction reports (STRs) and the total number of suspicious transactions contained in STRs reported to the Financial Intelligence Unit and to the Revenue Commissioners in the preceding calendar year.

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01031 Identifier="AQP" EnumerationYesNo="No"></A01031>

| REF | Field | Description |
|-----|-------|-------------|
| AQP | Registered FIU | State whether your institution is registered with the Financial Intelligence Unit (FIU) GoAML system and with Revenue for the purposes of reporting STRs.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| AQR | Number STR | State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQS | Number STs | State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQV | Number STR Bribe | State the total number of suspicious transaction reports (STRs) based on bribery/corruption reported to the FIU in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQW | FIU Number STs Bribe | State the total number of suspicious transactions contained in STRs based on bribery/corruption reported to the FIU in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| AQZ | FIU Number STR HT | State the total number of suspicious transaction reports (STRs) based on human trafficking reported to the FIU in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ARA | FIU Number STs HT | State the total number of suspicious transactions contained in STRs based on human trafficking reported to the FIU in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ARD | FIU Number STR LWE | State the total number of suspicious transaction reports (STRs) based on left wing extremism reported to the FIU in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ARE | FIU Number STs LWE | State the total number of suspicious transactions contained in STRs based on left wing extremism reported to the FIU in the preceding calendar year.<br>If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ARH | FIU Number STR MS | State the total number of suspicious transaction reports (STRs) based on migrant smuggling reported to the FIU in the preceding calendar year.<br>If not applicable enter 0. |

| | | Variable name: IntegerValue |
|---|---|---|
| ARI | FIU Number STs MS | State the total number of suspicious transactions contained in STRs based on migrant smuggling reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ARL | FIU Number STR ML | State the total number of suspicious transaction reports (STRs) based on money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ARM | FIU Number STs ML | State the total number of suspicious transactions contained in STRs based on money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ARP | FIU Number STR PEP | State the total number of suspicious transaction reports (STRs) based on politically exposed person reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ARQ | FIU Number STs PEP | State the total number of suspicious transactions contained in STRs based on politically exposed person reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ART | FIU Number STR RWE | State the total number of suspicious transaction reports (STRs) based on right wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ARU | FIU Number STs RWE | State the total number of suspicious transactions contained in STRs based on right wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ARX | FIU Number STR Sanctions | State the total number of suspicious transaction reports (STRs) based on sanctions list match reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ARY | FIU Number STs Sanctions | State the total number of suspicious transactions contained in STRs based on sanctions list match reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ASB | FIU Number STR SE | State the total number of suspicious transaction reports (STRs) based on sexual exploitation reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |
| ASC | FIU Number STs SE | State the total number of suspicious transactions contained in STRs based on sexual exploitation reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue |

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| ASF | FIU Number STR SWF | State the total number of suspicious transaction reports (STRs) based on social welfare fraud reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
|-----|--------------------|--------------------------------------------------------|
| ASG | FIU Number STs SWF | State the total number of suspicious transactions contained in STRs based on social welfare fraud reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ASJ | FIU Number STR TE | State the total number of suspicious transaction reports (STRs) based on tax evasion reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ASK | FIU Number STs TE | State the total number of suspicious transactions contained in STRs based on tax evasion reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ASN | FIU Number STR TF | State the total number of suspicious transaction reports (STRs) based on terrorist financing reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ASO | FIU Number STs TF | State the total number of suspicious transactions contained in STRs based on terrorist financing reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ASR | FIU Number STR TBML | State the total number of suspicious transaction reports (STRs) based on trade based money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BME | FIU Number STs TBML | State the total number of suspicious transactions contained in STRs based on trade based money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| BGK | FIU Days to Report | Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGL | FIU Report Before Transaction | Number of STRs submitted to the FIU before the completion of the transaction during the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

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## 8.4.10 Sanctions Screening

### Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

`<A01031 Identifier="ASV" EnumerationYesNo="No"></A01031>`

| REF | Field | Description |
|-----|-------|-------------|
| ASV | Sanctions Prior To Service | State whether your institution verifies, prior to providing services, whether or not customers or potential customers and their beneficial owners are included on sanction list.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| BGD | Sanction Average Hours | Average number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| BGE | Sanction Max Hours | Maximum number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools. If not applicable enter 0.<br><br>Variable name: DecimalValue |
| ASX | Sanction EU | Specify if customers and beneficial owners are checked against EU sanctions lists<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ASW | Sanction National List | Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC).<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ASZ | Sanction UN | Specify if customers and beneficial owners are checked against UN lists.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ATA | Sanction Other | Specify if customers and beneficial owners are checked against other sanctions lists.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ATB | Sanction Other Specify | If your institution uses any other sanctions lists not mentioned above please specify. If not applicable enter N/A.<br><br>List the sanction lists used separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters<br>Variable name: String500 |
| ATC | Sanction Transact Check | At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when executing a transaction.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ATD | Sanction List Update | At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when sanctions listing updated.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ATE | Sanction Periodic Customer | At and after the start of service provision, state whether your institution periodically checks whether customers are included on sanctions lists.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ATF | Sanction Periodic Customer Frequency | State the frequency (number of checks per calendar year) that the periodic checks are performed for customers. |

| | | |
|---|---|---|
| | | State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| ATG | Sanction Periodic BO | At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to non-high risk customers are included on sanctions lists.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ATH | Sanction Periodic BO Frequency | State the frequency (number of checks per calendar year) that the periodic checks are performed for beneficial owners connected to non-high risk customers.<br><br>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0.<br>Variable name: IntegerValue |
| ATI | Sanction Periodic Rep | At and after the start of service provision, state whether your institution periodically checks whether representatives connected to non-high risk customers are included on sanctions lists.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| ATJ | Sanction Periodic Rep Frequency | State the frequency (number of checks per calendar year) that the periodic checks are performed for representatives connected to non-high risk customers.<br><br>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0.<br>Variable name: IntegerValue |
| ATK | Sanction Total Hits | State the number of actual hits that the sanctions list screening delivered in the preceding calendar year. If not applicable enter 0.<br><br>In this context "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list<br>Variable name: IntegerValue |
| ATL | Sanction Total Hits Value | State the total value (EUR) of frozen assets recorded in relation to those hits that the sanctions list screening delivered in the preceding calendar year. If not applicable enter 0.<br><br>In this context "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list. In the case of currency conversions, conversion at time of transaction or exchange rate as of 31 December of the preceding calendar year is acceptable.<br>Variable name: DecimalValue |

## 8.4.11 Outsourcing

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01031 Identifier="ATU" EnumerationOutsource="No_but_concrete_plans_to_source_in_future"></A01031>

| REF | Field | Description |
|-----|-------|-------------|
| ATU | Outsource CDD Onboarding | State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br><br>Variable name: EnumerationOutsource |
| ATV | Outsource CDD Review | State whether CDD periodic customer review (e.g. recurring process of reviewing customer CDD status/documentation/risk) has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| ATW | Outsource TM | State whether transaction monitoring has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| ATX | Outsource Alert Processing | State whether alerts processing has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| ATY | Outsource STR Reporting | State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| ATZ | Outsource Sanction Screen | State whether sanctions screening has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| AUB | Outsource CDM | State whether customer data management (e.g. external storage, management and handling of customer data) has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| BIV | Outsource Training | State whether AML/CFT training has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| BIW | Outsource PEP | State whether PEP detection has been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |
| BIX | Outsource Compliance | State whether compliance monitoring checks have been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>Variable name: EnumerationOutsource |

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| AUC | Outsource Other AMLCFT | State whether other processes related to risk management with regard to AML/CFT/proliferation financing have been outsourced to third parties (including within the Group).<br><br>Select from *Outsource*<br>    Variable name: EnumerationOutsource |
|---|---|---|
| AUD | Outsource Other AMLCFT Specify | If Yes to Outsource Other AMLCFT, specify the other processes. If not applicable enter N/A.<br><br>List the other outsourced elements of your AML/CFT processes separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters<br>Variable name: String500 |
| AUE | Outsource Provider Compliance Requirements | State the proportion of outsourced AML/CFT tasks where your institution incorporates compliance requirements with respect to financial crime legislation within its outsourcing agreements (e.g. Criminal Justice Act).<br><br>To calculate apply the following process:<br>Denominator: number of tasks (customer due diligence, training, transaction monitoring, etc.) that are at least partly outsourced.<br>Numerator: number of such tasks for which one or more written outsourcing agreement covering all outsourced aspects is in place.<br><br>Variable name: PercentageValue<br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047<br>If not applicable enter 0. |
| AUG | Outsource Assess Report Obligation | State whether your institution ensures outsource provider compliance with the requirements via reporting obligation.<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AUH | Outsource Assess Training | State whether your institution ensures outsource provider compliance with the requirements via training (e.g. ensure outsource providers are sufficiently trained in topics relating to the compliance requirements).<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AUJ | Outsource Assess Audit Rights | State whether your institution ensures outsource provider compliance with the requirements via audit rights (e.g. retain rights to audit the outsource providers).<br><br>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA |
| AUK | Outsource Assess Other | State, if any, which other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. If not applicable enter N/A.<br><br>List the processes separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters<br>Variable name: String500 |

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## 8.4.12 Education & Training

### Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01031 Identifier="AUL" IntegerValue="324"></A01031>`

| REF | Field | Description |
|---|---|---|
| AUL | Non-AML/CFT specialist staff - Average hours per person | State the average number of hours of AML training attended in the preceding calendar year by your institution's non-AML/CFT specialist staff members. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| AUM | AML Specialist staff - Average hours per person | State the average number of hours of AML training attended in the preceding calendar year by your institution's AML specialist staff members. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| AUN | Agents and distributors - Average hours per person | State the average number of hours of AML training attended in the preceding calendar year by your institution's agents and distributors. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| AUQ | Board members & non-executive directors - Average hours per person | State the average number of hours of AML training attended in the preceding calendar year by your institution's Board and non-executive directors. Board includes Board of Directors or where no board exists such management body or bodies, which set the institution's strategy, objectives and overall direction, and which oversee and monitor management decision-making, and include persons who effectively direct the business of the institution. <br><br> If not applicable enter 0. <br><br> Variable name: IntegerValue |
| AUR | Other - Average hours per person | State the average number of hours of AML training attended in the preceding calendar year by other employees not previously mentioned. If not applicable enter 0. <br><br> Variable name: IntegerValue |
| AUS | Non-AML/CFT specialist staff - % Staff coverage | State the proportion of non-AML/CFT specialist staff (e.g. customer facing staff, executive directors) who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0. <br><br> Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 <br> Variable name: PercentageValue |
| AUT | AML Specialist staff - % Staff coverage | State the proportion of AML specialist staff who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0. <br><br> Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 <br> Variable name: PercentageValue |
| AUU | Agents and distributors - % Staff coverage | State the proportion of agents and distributors who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0. <br><br> Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 <br> Variable name: PercentageValue |
| AUX | Board members & non-executive directors - % Staff coverage | State the proportion of members of Board members and non-executive directors who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0. <br><br> Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 |

| | | Variable name: PercentageValue |
|---|---|---|
| **AUY** | Other - % Staff coverage | State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| **BFN** | Training Test | State the proportion of staff or trainees for whom at least one training was validated by a test. If not applicable enter 0.<br><br>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| **BIL** | Staff Numbers | Enter the total number of full-time equivalent employees employed by the institution.<br><br>Variable name: IntegerValue |

## 8.4.13 Compliance & Assurance Testing

State the dates when the various AML/CFT obligations/controls were last assessed by your institution's compliance function. If there were any material findings or potential breaches found during these assessments, please give a brief description of these material findings or potential breaches.

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01031 Identifier="AUZ" DateValue="2024-03-12"></A01031>`

| REF | Field | Description |
|-----|-------|-------------|
| AUZ | Compliance SEBWRA | State the most recent date when the structure and effectiveness of your institution's business-wide risk assessment was assessed by the compliance function in your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD   If not applicable enter 2000-01-01 |
| AVA | Compliance Training | State the most recent date when AML/CFT-related awareness-raising and staff training measures were assessed by the compliance function in your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD   If not applicable enter 2000-01-01 |
| AVB | Compliance Verification | State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD   If not applicable enter 2000-01-01 |
| AVC | Compliance Sanctions | State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD   If not applicable enter 2000-01-01 |
| AVD | Compliance Resources | State the most recent date when the adequacy of the human and technical resources dedicated to AML/CFT were assessed by the compliance function in your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD   If not applicable enter 2000-01-01 |
| AVE | Compliance Organisation | State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was assessed by the compliance function in your institution.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD   If not applicable enter 2000-01-01 |
| AVL | Compliance CDD | State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was assessed by the compliance function.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD   If not applicable enter 2000-01-01 |
| AVM | Compliance TM | State the most recent date when the transaction monitoring process was assessed by the compliance function. |

| | | Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
|---|---|---|
| AVN | Compliance STR | State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AVO | Compliance Records | State the most recent date when record keeping policies and procedures were assessed by the compliance function.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AVP | Compliance TPDD | State the most recent date when outsourcing arrangements were assessed by the compliance function.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AVQ | Compliance Other | State whether any other financial crime topics or processes were assessed by the compliance function in the preceding calendar year<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| AVR | Compliance Other Specify | Specify the other financial crime topics or processes that were assessed by the compliance function in your institution in the preceding calendar year. If not applicable enter N/A.<br><br>Provide a list of topics or processes separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.<br><br>Variable name: String500 |
| AVF | Compliance BWRA Descript | Briefly describe any material findings/potential breaches identified from the last assessment of your institution's business-wide risk assessment. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters<br>Variable name: String500 |
| AVG | Compliance Training Descript | Briefly describe any material findings/potential breaches identified from the last assessment of AML/CFT-related awareness-raising and staff training measures. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br>Character limit: 500 characters.    Variable name: String500 |
| AVH | Compliance Verification Descript | Briefly describe any material findings/potential breaches identified from the last assessment of identification and identity verification procedures. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br>Character limit: 500 characters.    Variable name: String500 |

| AVI | Compliance Sanctions Descript | Briefly describe any material findings/potential breaches identified from the last assessment of compliance with sanctions regulations. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
|---|---|---|
| AVJ | Compliance Resources Descript | Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AVK | Compliance Organisation Descript | Briefly describe any material findings/potential breaches identified from the last assessment of the organisation of the AML/CFT system, governance and reporting to management bodies. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br>Character limit: 500 characters.     Variable name: String500 |
| AVS | Compliance CDD Descript | Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of customers in a business relationship. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AVT | Compliance TM Descript | Briefly describe any material findings/potential breaches identified from the last assessment of the transaction monitoring process. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.     Variable name: String500 |
| AVU | Compliance STR Descript | Briefly describe any material findings/potential breaches identified from the last assessment of the suspicious transaction reporting process. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br>Character limit: 500 characters.     Variable name: String500 |
| AVV | Compliance Records Descript | Briefly describe any material findings/potential breaches identified from the last assessment of record keeping policies and procedures. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br>Character limit: 500 characters.     Variable name: String500 |
| AVW | Compliance TPDD Descript | Briefly describe any material findings/potential breaches identified from the last assessment of outsourcing arrangements. If not applicable enter N/A. |

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| | | Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side. <br> Character limit: 500 characters.    Variable name: String500 |
|------|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AVX | Compliance Other Process Descript | If it is Yes to ComplianceOther, briefly describe any material findings/potential breaches identified. If not applicable enter N/A. <br><br> Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side. <br><br> Character limit: 500 characters. <br><br> Variable name: String500 |
| AWG | Compliance to Senior Management | State the *Frequency* of compliance function reporting (i.e. financial crime, AML, sanctions) to senior management. <br><br> Select from *Frequency* <br><br> Variable name: EnumerationFrequency |
| AWH | Compliance to Board | State the *Frequency* of compliance function reporting (i.e. financial crime, AML, sanctions) to the Board. <br><br> Select from *Frequency* <br><br> Variable name: EnumerationFrequency |
| BFM | Compliance AML Staff | Number of dedicated AML/CFT compliance staff (in Full Time Equivalent) <br><br> Variable name: IntegerValue |

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## 8.4.14 Audit

State the dates when the various AML/CFT obligations/controls were last assessed by an internal audit or external expert. If there were any material findings or potential breaches found during these assessments please, give a brief description of these material findings or potential breaches.

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01031 Identifier="AWW" DateValue="2024-03-12"></A01031>`

| REF | Field | Description |
|-----|-------|-------------|
| AWW | Audit BWRA | State the most recent date when the structure and effectiveness of Business Wide Risk Assessment (BWRA) was subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AWK | Audit Training | State the most recent date when AML/CFT-related awareness-raising and staff training measures were subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AWM | Audit Verification | State the most recent date when identification and identity verification procedures were subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AWQ | Audit Sanctions | State the most recent date when compliance with sanctions regulations was subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AWY | Audit Resources | State the most recent date when the resources dedicated to AML/CFT were subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AXG | Audit Organisation | State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was subject to an internal audit by your institution or assessed by an external expert.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AXA | Audit CDD | State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |

| | | |
|---|---|---|
| AXC | Audit TM | State the most recent date when the transaction monitoring process was subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AXE | Audit STR | State the most recent date when the suspicious transactions reporting process was subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AWO | Audit Records | State the most recent date when record keeping policies and procedures were subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AXI | Audit TPDD | State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| AXK | Audit Other | State whether other financial crime processes were subject to an internal audit by your institution or assessed by an external expert.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| AXL | Audit Other Specify | If Yes to Audit Other Process, briefly specify the other processes that were was subject to an internal audit by your institution or assessed by an external expert. If not applicable enter N/A.<br><br>Provide a list of other processes separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AWX | Audit BWRA Descript | If Yes to Audit BWRA, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.    Variable name: String500 |
| AWL | Audit Training Descript | If Yes to Audit Training, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AWN | Audit Verification Descript | If Yes to Audit Verification, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side. |

| | | |
|---|---|---|
| | | Character limit: 500 characters    Variable name: String500 |
| AWR | Audit Sanctions Descript | If Yes to Audit Sanctions, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AWZ | Audit Resources Descript | If Yes to Audit Resources, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters.    Variable name: String500 |
| AXH | Audit Organisation Descript | If Yes to Audit Organisation, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AXB | Audit CDD Descript | If Yes to Audit CDD, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AXD | Audit TM Descript | If Yes to Audit TM, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AXF | Audit STR Descript | If Yes to Audit STR, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AWP | Audit Records Descript | If Yes to Audit Records, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AXJ | Audit TPDD Descript | If Yes to Audit TPDD, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AXM | Audit Other Process Descript | If other financial crime topic assessed by the Internal Audit function, then briefly describe any material findings/potential breaches identified. If not applicable enter N/A. |

| | | |
|---|---|---|
| | | Character limit: 500 characters     Variable name: String500 |
| **AXV** | Audit to Senior Management | State the *Frequency* of internal audit function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management.<br><br>Select from *Frequency*<br><br>Variable name: EnumerationFrequency |
| **AXW** | Audit to Board | State the *Frequency* of internal audit function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board.<br><br>Select from *Frequency*<br><br>Variable name: EnumerationFrequency |
| **AYE** | NCA ML | State whether a foreign supervisory authority issued findings regarding your institution's anti-money laundering framework in the preceding calendar year.<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| **AAU** | NCA ML Descript | If Yes to NCA ML, briefly describe the findings/gaps identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters     Variable name: String500 |
| **AYF** | NCA TF | State whether a foreign supervisory authority issued findings regarding your institution's countering the financing of terrorism framework in the preceding calendar year.<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| **AAV** | NCA TF Descript | If Yes to NCA TF, briefly describe the findings/gaps identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters     Variable name: String500 |
| **AYG** | NCA FTR | State whether a foreign supervisory authority issued findings on your institution's compliance with Funds Transfer Regulation in the preceding calendar year.<br><br>Select from YesNo     Variable name: EnumerationYesNo |
| **AAW** | NCA FTR Descript | If Yes to NCA FTR, briefly describe the findings/gaps identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters     Variable name: String500 |
| **AYH** | NCA Sanctions | State whether a foreign supervisory authority issued findings on your institution's prevention of circumvention of sanctions framework in the preceding calendar year. |

| | | Select from YesNo    Variable name: EnumerationYesNo |
|---|---|---|
| **AAX** | NCA Sanctions Descript | If Yes to NCA Sanctions, briefly describe the findings/gaps identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AYI | NCA Corruption | State whether a foreign supervisory authority issued findings on your institution's management of anti-corruption (bribery) and prevention of conflicts of interests frameworks in the preceding calendar year.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| **AAY** | NCA Corruption Descript | If Yes to NCA Corruption, briefly describe the findings/gaps identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |
| AYJ | NCA Other | State whether a foreign supervisory authority issued findings on your institution's preventative frameworks with regard to other financial crime areas in the preceding calendar year.<br><br>Select from YesNo    Variable name: EnumerationYesNo |
| **AYK** | NCA Other Specify | If Yes to NCA Other, briefly specify. If not applicable enter N/A.<br><br>Provide a list of other topics separated by semicolon ( ; ) with no spaces either side.<br>Character limit: 500 characters<br>Variable name: String500 |
| AAZ | NCA Other Descript | If Yes to NCA Other, briefly describe the findings/gaps identified. If not applicable enter N/A.<br><br>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.<br><br>Character limit: 500 characters    Variable name: String500 |

## 8.4.15 Internal controls and reporting systems

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.

`<A01031 Identifier="BEY" DateValue="2022-03-12"></A01031>`

| REF | Field | Description |
|---|---|---|
| **BEY** | Report Improve | State the most recent date when reports on the areas where the operation of AML&CFT controls should be implemented or improved and suggested improvements were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |

| | | |
|---|---|---|
| **BEZ** | Report Compliance Action | State the most recent date when reports on compliance monitoring actions and a plan of activities regarding AML/CFT compliance were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFA** | Report Remedial | State the most recent date when a progress report of any significant remedial programmes were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFB** | Report Compliance Adequacy | State the most recent date when reports on adequacy of the human and technical resources in the AML/CFT compliance function were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFC** | Report BWRA Findings | State the most recent date when reports on the main findings of the business-wide ML/TF risk assessment were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFD** | Report Profiling Change | State the most recent date when reports on the changes in the methodology for assessing customer risk profiles were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFE** | Report Customers | State the most recent date when reports on the classification of customers by risk category were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFF** | Report ST Data | State the most recent date when reports on statistical data on unusual and suspicious transaction were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFG** | Report Audit | State the most recent date when reports on AML/CFT related findings of internal and external audits were submitted to your institution's senior management.<br><br>Variable name: DateValue<br>Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
| **BFH** | Report Training | State the most recent date when reports on AML/CFT training activities and plan were submitted to your institution's senior management.<br><br>Variable name: DateValue |

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| | | Format YYYY-MM-DD    If not applicable enter 2000-01-01 |
|---|---|---|
| AWA | Compliance Total Outstand | State the total number of actions outstanding, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year.<br><br>Enter 0 if none.<br>Variable name: IntegerValue |
| AVY | Compliance Critical Outstand | State the number of critical-rated actions, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year.<br><br>Enter 0 if none. Variable name: IntegerValue |
| AVZ | Compliance High Outstand | State the number of high-rated actions outstanding, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year.<br><br>Enter 0 if none. Variable name: IntegerValue |
| AWE | Compliance Total Overdue > 6 Months | State the total number of actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year.<br><br>Enter 0 if none. Variable name: IntegerValue |
| AWC | Compliance Critical Overdue > 6 Months | State the number of critical-rated actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year.<br><br>Enter 0 if none. Variable name: IntegerValue |
| AWD | Compliance High Overdue > 6 Months | State the number of high-rated actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year.<br><br>Enter 0 if none. Variable name: IntegerValue |

## 8.4.16 Governance

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A01031 Identifier="AYL" EnumerationFrequency="Only_every_5_years_or_less"></A01031>

| REF | Field | Description |
|-----|-------|-------------|
| AYL | Money Laundering Senior Management | State the Frequency that money laundering is considered as a regular reporting item on the agenda at Senior Management/management body meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYM | Terrorist Financing Senior Management | State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Senior Management/management body meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYN | FTR Senior Management | State the Frequency that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Senior Management/management body meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYO | Sanction Circumvent Senior Management | State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Senior Management/management body meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYP | Corruption Senior Management | State the Frequency that corruption (bribery) and conflicts of interests is considered as a regular reporting item on the agenda at Senior Management/management body meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYS | Money Laundering Board | State the Frequency that money laundering is considered as a regular reporting item on the agenda at Board meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYT | Terrorist Financing Board | State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Board meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYU | FTR Board | State the Frequency that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Board meetings.<br><br>Select from Frequency |

| | | |
|---|---|---|
| | | Variable name: EnumerationFrequency |
| AYV | Sanction Circumvent Board | State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Board meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYW | Corruption Board | State the Frequency that corruption (bribery) and conflicts of interests is considered as a regular reporting item on the agenda at Board meetings.<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AYZ | Designated Responsibility | State whether there is a designated board member with responsibility for AML/CFT compliance as required by the CJA 2010.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| BIJ | Designated Compliance Officer | Has your institution appointed an individual at management level (to be called a 'Compliance Officer') to monitor and manage compliance with, and the internal communication of, internal policies, controls and procedures adopted by your institution as required under Section 54(7) of the CJA 2010?<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| BIK | COR Frequency | State the Frequency that the Board has been presented with a report ('Compliance Officer Report') from the compliance officer on your institution's AML/CFT activities?<br><br>Select from Frequency<br><br>Variable name: EnumerationFrequency |
| AZA | Reported Shortcomings | State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year.<br><br>Select from YesNo      Variable name: EnumerationYesNo |
| AZB | Shortcomings Recovery | Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken.<br><br>Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA |
| AZC | Shortcomings Recovery Details | If Yes to Shortcomings Recovery, briefly describe the reported AML/CFT shortcomings and remediation measures taken. If not applicable enter N/A.<br><br>Provide a list of shortcomings and recovery measures in pairs, with each pair separated by semicolon ( ; ) with no spaces either side.<br><br>i.e. <shortcoming1><recovery1>;<shortcoming2><recovery2>; etc.<br><br>Character limit: 500 characters.    Variable name: String500 |

## 8.4.17 Compliance with Fund Transfers Regulation

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
`<A01031 Identifier="BGF" IntegerValue="53"></A01031>`

| REF | Field | Description |
| --- | --- | --- |
| **BGF** | FTR Out Missing Info | Number of outbound transfers for which requests were received from a counterparty in the transfer chain for information that is missing, incomplete or provided using inadmissible characters in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| **BGG** | FTR Outbound | Total number of outbound transfers in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| **BGH** | FTR Outbound Reject | Enter the proportion of outbound transfers rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters in the preceding calendar year. If not applicable enter 0.<br><br>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047<br>Variable name: PercentageValue |
| **BGI** | FTR Counter Fail | Number of repeatedly failing counterparties flagged to the supervisor in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |
| **BGJ** | FTR Counter Total | Total number of counterparties of outbound and inbound transfers in the preceding calendar year. If not applicable enter 0.<br><br>Variable name: IntegerValue |

## 8.5  Physical Presence

The questions below concern the institution providing products or services through subsidiaries, branches, representative offices, and other physical presences.

Please state the number of subsidiaries, branches, agents, distributors, and other physical presences such as representative offices, broken down by country code.

Table Structure A – XML only requires REFs, e.g.

`<A01041 AZD="AD" AZE="5741" AZF="3290" AZG="8442" AZH="6753" BEV="646" BEW="457" BEX="0"></A01041>`

| REF | Field | Description |
|---|---|---|
| AZD | Country | Select from the list of Alpha-2 country codes, Country  for each applicable country where the institution has subsidiaries, branches, agents, distributors, representative offices, and participating interests<br><br>Data Type: EnumerationValue<br><br>If not applicable select 00 |
| AZE | No. of subsidiaries | Number of subsidiaries in each country<br><br>Data Type: IntegerValue |
| AZF | No. of branches | Number of branches in each country<br><br>Data Type: IntegerValue |
| AZG | No. of representative offices | Number of representative offices in each country<br><br>Data Type: IntegerValue |
| AZH | No. of other physical presences | Number of other physical presence in each country<br><br>Data Type: IntegerValue |
| BEV | No. of agents | Number of agents in each country<br><br>Data Type: IntegerValue |
| BEW | No. of distributors | Number of distributors in each country<br><br>Data Type: IntegerValue |
| BEX | Number of white labelling partners | Number of white labelling partners in each country, where white labelling refers to a business arrangement where a product or service is provided by one company but is offered to customers by another company, regulated or non-regulated, under its own brand<br><br>Data Type: IntegerValue |

For example, if your institution has one subsidiary in the UK, and one branch in France, report as below.

| Country | No. of subsidiaries | No. of branches | No. of representative offices | No. of other physical presences | No. of agents | No. of distributors | Number of white labelling partners |
|---|---|---|---|---|---|---|---|
| AZD | AZE | AZF | AZG | AZH | BEV | BEW | BEX |
| FR | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| GB | 1 | 0 | 0 | 0 | 0 | 0 | 0 |

`<A0104>`

`<A01041 AZD="FR" AZE="0" AZF="1" AZG="0" AZH="0" BEV="0" BEW="0" BEX="0"></A01041>`

`<A01041 AZD="GB" AZE="1" AZF="0" AZG="0" AZH="0" BEV="0" BEW="0" BEX="0"></A01041>`

`</A0104>`

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## 8.6   Residence & Establishment

The questions below concern the institution's customer base.

Please specify the number of your customers who are natural persons **residing** or legal entities **established** in that country.

Table Structure A – XML only requires REFs, e.g.
<A01051 AZI="AD" AZJ="2864" AZK="5527" AZL="5464" AZO="8393" AZP="1374" AZQ="2642" AZR="8867" AZU="9930" ABA ="6756"></A01051>

| REF | Field | Description |
|-----|-------|-------------|
| AZI | Country | Select from the list of Alpha-2 country codes, Country for each applicable country that has natural persons residing or legal entities established in that country.<br><br>Data Type: EnumerationValue<br>If not applicable select 00 |
| AZJ | Natural person customers – Total Number | Natural person customers – Total<br>Data Type: IntegerValue |
| AZK | Natural person customers – No. of which are New Customers | Natural person customers - Number of which are New Customers<br><br>Data Type: IntegerValue |
| AZL | Natural person customers – No. of which are High Risk | Natural person customers - Number of which are High Risk according to institution's customer risk assessment<br>Data Type: IntegerValue |
| AZO | Natural person customers – No. of which are PEPs | Natural person customers - Number of which are PEPs, their family members or persons known to be close associates.<br>Data Type: IntegerValue |
| AZP | Legal entity customers – Total Number | Legal entity customers – Total<br>Data Type: IntegerValue |
| AZQ | Legal entity customers - No. of which are New Customers | Legal entity customers - Number of which are New Customers<br><br>Data Type: IntegerValue |
| AZR | Legal entity customers - No. of which are High Risk | Legal entity customers - Number of which are High Risk according to institution's customer risk profiling<br>Data Type: IntegerValue |
| AZU | Legal entity customers - No. with at least one beneficial owner residing in non-EEA countries | Legal entity customers - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence).<br><br>Data Type: IntegerValue |
| ABA | Legal entity customers - No. of which have PEP Risk Identified | Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment<br><br>Data Type: IntegerValue |

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For example:

1. Your institution has 4 total natural person customers residing in the UK

    a. 2 of which are new customers

    b. 2 of which are PEP

    c. 2 of which are rated high risk

2. Your institution has 4 total legal entity customers established in the UK

    a. 1 of which is a new customer

    b. 2 of which are rated high risk

    c. 1 of which has a UBO residing in a non-EEA country

    d. 1 of which has PEP risk identified in its customer profile

| Country | Natural person | | | | Legal entity customers | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| | Total No. | No. of which are New Customers | No. of which are High Risk | No. of which are PEPs, their family members or persons known to be close associates | Total No. | No. of which are New Customers | No. of which are High Risk | No. of which are with at least one beneficial owner residing in non-EEA countries | No. of which have PEP Risk Identified |
| AZI | AZJ | AZK | AZL | AZO | AZP | AZQ | AZR | AZU | ABA |
| GB | 4 | 2 | 2 | 2 | 4 | 1 | 2 | 1 | 1 |

<A0105>
  <A01051 AZI="GB" AZJ="4" AZK="2" AZL="2" AZO="2" AZP="4" AZQ="1" AZR="2" AZU="1"> ABA="1" </A01051>
<A0105>

## 8.7   Beneficial Owners

The questions below concern the Beneficial Owners (BOs) of your institution's customer base.

Please specify (based on residency in a particular country) the number of BOs for your legal entity customers, and how many of those are PEPs, their family members, or persons known to be close associates.

Table Structure A – XML only requires REFs, e.g.

`<A01061 AZV="AD" AZW="1073" AZX="9794"></A01061>`

| REF | Field | Description |
|-----|-------|-------------|
| **AZV** | Country | Select from the list of Alpha-2 country codes, Country for each applicable country that has a PEP or legal entity BO residing in that country. <br><br> Data Type: EnumerationValue <br> If not applicable select 00 |
| **AZW** | Number of beneficial owners | Number of beneficial owners of your legal entity customers residing in the country. <br><br> Data Type: IntegerValue |
| **AZX** | No. of which are PEPs | Number of beneficial owners that are PEPs, their family members or persons known to be close associates residing in the country. <br><br> Data Type: IntegerValue **Error! Reference source not found.** |

For example:

- 4 BOs of your institution's legal entity customers **reside in** the UK
    - 2 of which are PEPs, their family members or persons known to be close associates
- 1 BO of your institution's legal entity customers resides in Denmark
    - Zero of which have PEP associations

Report as below:

| Country | Your legal entity customers' BOs | |
| | Total No. | No. of which are PEPs, their family members or persons known to be close associates |
|---------|-----------|-------------------------------------|
| AZV | AZW | AZX |
| GB | 4 | 2 |
| DK | 1 | 0 |

`<A0106>`
`<A01061 AZV="GB" AZW="4" AZX="2"></A01061>`
`<A01061 AZV="DK" AZW="1" AZX="0"></A01061>`
`<A0106>`

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## 8.8  Payment Transactions

The questions in this section only relate to international non-cash transactions between two bank accounts (customer-to-customer transfers). Domestic interbank transfers, debit card payments and cash deposits/withdrawals should be excluded.

Select each country, to and from, which your institution provided or received payments transactions in the preceding calendar year stating for **each** country:

- the total number of your customer accounts to which your institution provided payment transactions in the preceding calendar year

- the total number and value (EUR) of incoming and outgoing payment transactions in the preceding calendar year, excluding the following transactions:

    o Internal transfers: transactions between accounts held by the same customer within the institution that do not represent true external inflows;

    o Reversals: transactions that were subsequently cancelled, refunded, or otherwise reversed;

    o Intra-group transactions. Transactions between child entities that sit under / are linked to one group parent and/or transfers between parent and child entities within the one group.

The country selected should be based on the country of the bank account from which payments originated (inward payments), or of the ultimate recipient bank account (outward payments), e.g. using the IBAN, BIC or Swift Code country of the bank account.

The total data by country provided should be broken down by the customer risk ratings assigned to those accounts.

Table Structure A – XML only requires REFs, e.g.

<A01071 AZY="AD" AZZ="4918" BAA="2442" BAB="416.24134" BMF="234" BAC="2230" BAD="9592.4994" BAE="0" BAF="0" BAG="0" BMG="741258" BAH="9802" BAI="8130.6211"></A01071>

| REF | Field | Description |
|-----|-------|-------------|
| AZY | CountryPT | Select from dropdown list of Alpha-2 country codes, Country for each applicable country that has non-cash transactions between two bank accounts in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions.<br><br>Data Type: EnumerationValue<br>If not applicable select 00 |
| AZZ | Overall - No. of accounts (incoming) | Overall number of accounts that completed non-cash incoming transactions between two bank accounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BAA | Overall - No. of incoming transactions | Overall number of incoming non-cash transactions between two bank accounts in the preceding calendar year.<br>Data Type: IntegerValue |

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| | | |
|---|---|---|
| BAB | Overall - Value of incoming transactions | EUR Value of total incoming non-cash transactions between two bank accounts in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BMF | Overall - No. of accounts (outgoing) | Overall number of accounts that completed non-cash outgoing transactions between two bank accounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BAC | Overall - No. of outgoing transactions | Overall number of total outgoing non-cash transactions between two bank accounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BAD | Overall - Value of outgoing transactions | EUR Value of total outgoing non-cash transactions between two bank accounts in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BAE | of which High Risk - No. of accounts (incoming) | Number of High Risk Customer accounts, per your institution's Customer risk assessment), that completed non-cash incoming transactions between two bank accounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BAF | of which High Risk - No. of incoming transactions | Number of incoming non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).<br>Data Type: IntegerValue |
| BAG | of which High Risk - Value of incoming transactions | EUR Value of incoming non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).<br><br>Data Type: DecimalValue |
| BMG | of which High Risk - No. of accounts (outgoing) | Number of High Risk Customer accounts, per your institution's Customer risk assessment), that completed non-cash outgoing transactions between two bank accounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BAH | of which High Risk - No. of outgoing transactions | Number of outgoing non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).<br>Data Type: IntegerValue |
| BAI | of which High Risk - Value of outgoing transactions | EUR Value of outgoing non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).<br><br>Data Type: DecimalValue |

## 8.9 Pooled Accounts

The following questions are related to pooled accounts, which are bank accounts opened by customers such as financial institutions or legal practitioners to hold their clients' money. In these accounts, clients' money is comingled, but the clients cannot directly tell your institution to carry out transactions.

Please state the number of pooled accounts and subaccounts, the total number and value (EUR) of incoming and outgoing transactions per country. The country selected should be based on the country of the bank accounts used in the preceding calendar year, e.g. using the IBAN, BIC or Swift Code country of the bank account.

Table Structure A – XML only requires REFs, e.g.
<A01081 BLA="AD" BLB="8838" BLC="4403" BLD="5948.978" BLE="586" BLF="7880.477" BLG="9569" BLH="9373" BLI="7648.933" BLJ="8061" BLK="6342.9986"></A01081>

| REF | Field | Description |
|-----|-------|-------------|
| BLA | Country | Select from dropdown list of Alpha-2 country codes, Country for each applicable country that had pooled accounts in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions.<br><br>Data Type: EnumerationValue<br>If not applicable select 00 |
| BLB | Overall - No. of pooled accounts and subaccounts | Overall number of pooled accounts and subaccounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BLC | Overall - No. of incoming transactions | Overall number of incoming transactions for pooled accounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BLD | Overall - Value of incoming transactions | EUR Value of total incoming transactions for pooled accounts in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BLE | Overall - No. of outgoing transactions | Overall number of total outgoing transactions for pooled accounts in the preceding calendar year.<br>Data Type: IntegerValue |
| BLF | Overall - Value of outgoing transactions | EUR Value of total outgoing transactions for pooled accounts in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BLG | of which High Risk – No. of pooled accounts and subaccounts | Number of High Risk Customer pooled accounts, per your institution's Customer risk assessment), in the preceding calendar year.<br>Data Type: IntegerValue |
| BLH | of which High Risk – No. of incoming transactions | Number of incoming transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).<br>Data Type: IntegerValue |
| BLI | of which High Risk – Value of incoming | EUR Value of incoming transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). |

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| | transactions | |
|---|---|---|
| | | Data Type: DecimalValue |
| **BLJ** | of which High Risk – No. of outgoing transactions | Number of outgoing transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). Data Type: IntegerValue |
| **BLK** | of which High Risk – Value of outgoing transactions | EUR Value of outgoing transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). Data Type: DecimalValue |

## 8.10 Correspondent Relationship

The questions below concern *Correspondent relationships*, where your institution is the correspondent.

Please state the number of respondent institutions to which your institution provides correspondent services and specify the total number and value (EUR) of incoming and outgoing transactions in the preceding calendar year.

### Table Structure A – XML only requires REFs, e.g.

<A01091 BLL="AD" BAT="9925" BLM="9983" BLN="1433.2988" BLO="7631" BLP="5165.4292" BJW="5583" BLQ="9273" BLR="4481.5426" BLS="7360" BLT="4739.3305"></A01091>

| REF | Field | Description |
|-----|-------|-------------|
| BLL | Country | Select from dropdown list of Alpha-2 country codes, Country for each applicable country that had institutions to which your institution provides correspondent services in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions with a correspondent relationship.<br><br>Data Type: EnumerationValue<br>If not applicable select 00 |
| BAT | Overall - No. of respondent institutions | Overall number of **respondent institutions** to which your institution provides correspondent services, in the preceding calendar year.<br>Data Type: IntegerValue |
| BLM | Overall - No. of incoming transactions | Overall number of incoming transactions for institutions to which your institution provides correspondent services in the preceding calendar year.<br>Data Type: IntegerValue |
| BLN | Overall - Value of incoming transactions | EUR Value of total incoming transactions for institutions to which your institution provides correspondent services in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BLO | Overall - No. of outgoing transactions | Overall number of total outgoing transactions for institutions to which your institution provides correspondent services in the preceding calendar year.<br>Data Type: IntegerValue |
| BLP | Overall - Value of outgoing transactions | EUR Value of total outgoing transactions for institutions to which your institution provides correspondent services in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BJW | of which High Risk - No. of respondent institutions | Number of High Risk **respondent institutions**, per your institution's customer risk profiling), to which your institution provides correspondent services in the preceding calendar year.<br>Data Type: IntegerValue |
| BLQ | of which High Risk - No. of incoming transactions | Number of incoming transactions for Institutions to which your institution provides correspondent services in the preceding calendar year for High Risk Customers, per your institution's customer risk assessment).<br>Data Type: IntegerValue |

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| BLR | of which High Risk - Value of incoming transactions | EUR Value of incoming transactions for Institutions to which your institution provides correspondent services in the preceding calendar year for High Risk Customers, per your institution's customer risk assessment).<br><br>Data Type: DecimalValue |
|---|---|---|
| BLS | of which High Risk - No. of outgoing transactions | Number of outgoing transactions for Institutions to which your institution provides correspondent services in the preceding calendar year for High Risk Customers, per your institution's customer risk profiling).<br>Data Type: IntegerValue |
| BLT | of which High Risk - Value of outgoing transactions | EUR Value of outgoing transactions for Institutions to which your institution provides correspondent services in the preceding calendar year for High Risk Customers, per your institution's customer risk assessment).<br><br>Data Type: DecimalValue |

## 8.11 Trade Finance

The questions below concern trade finance services to customers with importing or exporting activities.

Please state the number of customers to whom your institution provided trade finance in the preceding calendar year and specify the total number and value (EUR) of incoming and outgoing trade finance transactions in the preceding calendar year, based on the BICs (country codes) of the accounts used. The country selected should be based on the country of the bank account from which transactions originated (inward transactions), or of the ultimate recipient bank account (outward transactions), e.g. using the IBAN, BIC or Swift Code country of the bank account.

Table Structure A – XML only requires REFs, e.g.

<A01101 BLU="AD" BAU="471" BLV="6006" BLW="7283.1896" BLX="1784" BLY="4957.672" BLZ="669" BMA="0" BMB="0" BMC="7577" BMD="448.36218"></A01101>

| REF | Field | Description |
|---|---|---|
| BLU | Country | Select from the list of Alpha-2 country codes, Country for each applicable country that had institutions to which your institution provides trade finance services in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions with trade finance services.<br><br>Data Type: EnumerationValue<br>If not applicable select 00 |
| BAU | Overall - No. of customers | Overall number of customers to which your institution provides trade finance services, in the preceding calendar year.<br>Data Type: IntegerValue |
| BLV | Overall - No. of incoming transactions | Overall number of incoming transactions for institutions to which your institution provides trade finance services in the preceding calendar year.<br>Data Type: IntegerValue |

| | | |
|---|---|---|
| BLW | Overall - Value of incoming transactions | EUR Value of total incoming transactions for institutions to which your institution provides trade finance services in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BLX | Overall - No. of outgoing transactions | Overall number of total outgoing transactions for institutions to which your institution provides trade finance services in the preceding calendar year.<br>Data Type: IntegerValue |
| BLY | Overall - Value of outgoing transactions | EUR Value of total outgoing transactions for institutions to which your institution provides trade finance services in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BLZ | of which High Risk - No. of customers | Number of High Risk accounts, per your institution's Customer risk assessment, to which your institution provides trade finance services in the preceding calendar year.<br>Data Type: IntegerValue |
| BMA | of which High Risk - No. of incoming transactions | Number of incoming transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br>Data Type: IntegerValue |
| BMB | of which High Risk - Value of incoming transactions | EUR Value of incoming transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br><br>Data Type: DecimalValue |
| BMC | of which High Risk - No. of outgoing transactions | Number of outgoing transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br>Data Type: IntegerValue |
| BMD | of which High Risk - Value of outgoing transactions | EUR Value of outgoing transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br><br>Data Type: DecimalValue |

## 8.12 Geography of Funds Flow

The questions below concern the source and destination of transmitted funds flow transacted by your customer using your products or services, e.g. end of location purchases, payment, withdrawals, transfers, remittance, value transfers, etc.

Specify by country the source and destination of funds flow, customer numbers, total number of transactions and values (EUR) for the preceding calendar year.

Table Structure A – XML only requires REFs, e.g.

<A0211 BDE="AD" BDF="1830" BDG="6170" BDH="44" BDI="1232" BDJ="9582" BDK="5961" BDL="1587" BDM="8184" BDN="7660" BDO="4506" BDP="4183" BDQ="5599"></A0211>

| REF | Field | Description |
|---|---|---|

| | | |
|---|---|---|
| BDE | Country | Select from dropdown list of Alpha-2 country codes, Country for each applicable country that had funds flow transmitted to it by your institution's customer using your institution's products or services in the preceding calendar year.<br><br>Data Type: EnumerationValue<br>If not applicable select 00 |
| BDF | Overall - No. of customers (Source) | Overall number of customers with incoming transactions from each country in the preceding calendar year.<br><br>Data Type: IntegerValue |
| BDG | Overall - No. of transactions (Source) | Overall number of incoming transactions from each country in the preceding calendar year.<br><br>Data Type: IntegerValue |
| BDH | Overall - Value of transactions (Source) | EUR Value of total incoming transactions from each country in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BDI | Overall - No. of customers (Destination) | Overall number of customers with outgoing transactions to each country in the preceding calendar year.<br><br>Data Type: IntegerValue |
| BDJ | Overall - No. of transactions (Destination) | Overall number of outgoing transactions to each country in the preceding calendar year.<br><br>Data Type: IntegerValue |
| BDK | Overall - Value of transactions (Destination) | EUR Value of total outgoing transactions to each country in the preceding calendar year.<br><br>Data Type: DecimalValue |
| BMH | of which High Risk - No. of customers (Source) | Overall number of customers with incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br><br>Data Type: IntegerValue |
| BMI | of which High Risk - No. of transactions (Source) | Overall number of incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br><br>Data Type: IntegerValue |
| BMJ | of which High Risk - Value of transactions (Source) | EUR Value of total incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br><br>Data Type: DecimalValue |
| BMK | of which High Risk - No. of customers (Destination) | Overall number of customers with outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. |

| | | Data Type: IntegerValue |
|---|---|---|
| **BDL** | of which High Risk - No. of transactions (Destination) | Number of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br><br>Data Type: IntegerValue |
| **BDM** | of which High Risk - Value of transactions (Destination) | EUR Value of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.<br><br>Data Type: DecimalValue |

For example, report as below if in the preceding calendar year your institution has:

- 85 customers who had 600 incoming transactions where the source of the fund flow was Ireland and 100 customers who had 12,500 outgoing transactions where the destination of the fund flow was Ireland. 3 of the customers with incoming transactions from Ireland were High Risk customers. 5 of the customers with outgoing transactions to Ireland were High Risk customers.
- 15 customers who had 912 incoming transactions where the source of the fund flow was Germany and 20 customers who had 1,800 outgoing transactions where the destination of the fund flow was Germany. 1 of the customers with incoming transactions from Germany was a High Risk customer. 2 of the customers with outgoing transactions to Germany were High Risk customers.
- No customers had incoming transactions from the United Kingdom and 3 customers had 6 outgoing transactions to the United Kingdom. 1 of the customers with outgoing transactions to the United Kingdom was a High Risk customer.
- 1 customer had 1 incoming transaction where the source of the funds flow was France, and no customers had outgoing transactions where the destination of the funds flow was France. This customer has not a High Risk customer.

| Country | Overall | | | | | | of which High Risk (per your Institution's Customer Risk Assessment) | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | No. of customers (Source) | No. of transactions (Source) | Value of transactions (Source) | No. of customers (Destination) | No. of transactions (Destination) | Value of transactions (Destination) | No. of customers (Source) | No. of transactions (Source) | Value of transactions (Source) | No. of customers (Destination) | No. of transactions (Destination) | Value of transactions (Destination) |
| BDE | BDF | BDG | BDH | BDI | BDJ | BDK | BMH | BMI | BMJ | BMK | BDL | BDM |
| IE | 85 | 600 | 741,534.00 | 100 | 12,500 | 123,456.00 | 3 | 26 | 247,178.00 | 5 | 3,125 | 280,864.12 |
| DE | 15 | 912 | 146,049.00 | 20 | 1,800 | 224,691.00 | 1 | 61 | 19,736.60 | 2 | 450 | 56,173.00 |
| GB | 0 | 0 | 0.00 | 3 | 6 | 1,248.00 | 0 | 0 | 0.00 | 1 | 1 | 500.00 |
| FR | 1 | 1 | 50.00 | 0 | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0 | 0.00 |

```xml
<A0111>
  <A01111 BDE="IE" BDF="85" BDG="600" BDH="741532" BDI="100" BDJ="12500" BDK="123456" BMH="3" BMI="26" BMJ="247178" BMK="5" BDL="3125" BDM="280864.12"></A01111>
  <A01111 BDE="DE" BDF="15" BDG="912" BDH="146049" BDI="20" BDJ="1800" BDK="224691" BMH="1" BMI="61" BMJ="19737.60" BMK="2" BDL="450" BDM="56173"></A01111>
  <A01111 BDE="GB" BDF="0" BDG="0" BDH="0" BDI="3" BDJ="6" BDK="1248" BMH="0" BMI="0" BMJ="0" BMK="1" BDL="1" BDM="500"></A01111>
  <A01111 BDE="FR" BDF="1" BDG="1" BDH="50" BDI="0" BDJ="0" BDK="0" BMH="0" BMI="0" BMJ="0" BMK="0" BDL="0" BDM="0"></A01111>
</A0111>
```

## 8.13 Transaction Monitoring

For each Transaction Monitoring rule/model in your institution's process, state the name of the rule/model, give a very brief description (see example below), specify the number of alerts for this rule/model, the number of true positive alerts, and the number of false positive alerts. All rules/models should be included, even those with no alerts in the preceding calendar year.

A rule/model/business rule is any process, manual or automated, designed to detect a specific transactional behaviour(s), scenario or typology which could by itself, or as a group of alerts, could be escalated for investigation and a possible Suspicious Transaction Report (see examples below).

A true positive transaction monitoring alert is any alert that by itself, or as a group of alerts, was escalated to a Suspicious Transaction Report filing. All other alerts, which were closed without an STR filing are considered false positives. An alert which was triggered but was not investigated/closed at 31 December of the preceding calendar year should be counted as an alert but not as a true positive or as a false positive.

| Rule Name / ID | High Level Rule / Model Description | Number of Transaction Monitoring Alerts for Rule/Model | Number of True Positive Alerts for Rule/Model | Number of False Positive Alerts for Rule/Model |
|---|---|---|---|---|
| R001_Foreign_Cash | Rule which detects significant cash deposit and subsequent risky international transaction | 25 | 2 | 23 |
| R002_Incoming_Smurfing | Detects large number of incoming small transactions from different sources, contrary to expected behaviour for customer segment | 0 | 0 | 0 |

### Table Structure A – XML only requires REFs, e.g.

<A0221 BDR="DKUHDKJHDKHDFSA" BDS="UKHDKJHDKJ" BDT="20" BDU="1000" BDV="30"></A0221>

| REF | Field | Description |
|---|---|---|
| BDR | Rule Name / ID | Unique Internal Rule ID. Please complete for each rule.<br><br>Free text with character limit: 500 characters.<br>Data Type: StringValue |
| BDS | High Level Rule / Model Description | High-level description of each Rule / Model.<br><br>Free text with character limit: 2000 characters.<br>Data Type: StringValue |
| BDT | Number of Transaction Monitoring Alerts for Rule/Model | Number of Transaction Monitoring Alerts for Rule/Model **(Preceding Calendar Year)**<br><br>Data Type: IntegerValue |
| BDU | Number of True Positive Alerts for Rule/Model | Number of True Positive Alerts for Rule/Model **(Preceding Calendar Year)**<br><br>Data Type: IntegerValue |
| BDV | Number of False Positive Alerts for Rule/Model | Number of False Positive Alerts for Rule/Model **(Preceding Calendar Year)**<br><br>Data Type: IntegerValue |

# 9 Appendices

## 9.1 Definitions

| Phrase | Definition |
|---|---|
| Active customer | The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into, or who has at least one transaction initiated by the customer even if it is a periodic/automatic transaction, in the preceding calendar year but excludes any transactions which pertain to fee payments, services charges or similar. |
| AML/CFT regulated customers | All persons or entities of a similar nature to those listed in Article 3 of Regulation (EU) 2424/1624, including those that do not fall within the scope of Regulation (EU) 2024/1624 due to their non-EU status |
| Asset backed loan | A loan in relation to which an asset is pledged, or given as a collateral, to the lender to protect the lender against the borrower's failure to reimburse the funds, and cash collateral is a collateral which at least partially consists of cash or an account on which cash is deposited as per the definition of cash under Article 2(1)(a) of Regulation (EU) 2018/1672: 'cash' means: (i) currency; (ii) bearer-negotiable instruments; (iii) commodities used as highly-liquid stores of value; (iv) prepaid cards. |
| Assets under custody | Assets for which the institution provides safekeeping and administration services (cf. MiFID II - Annex I, Section B - Ancillary services) and final investor refers to the end client or individual who ultimately owns and benefits from the investments, as opposed to intermediaries or entities managing or holding the assets on behalf of others |
| Assets under management | Assets which are either under the scope of a portfolio management mandate or under the scope of an investment advice mandate |
| Beneficial owner | As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership through ownership interest or control as referred to in Article 52 and Article 53 of Regulation (EU) 2024/1624. |
| Business relationship | As per Article 2(1), point (19), of Regulation (EU) 2024/1624. |
| Business Wide Risk Assessment | As per Article 10 of Regulation (EU) 2024/1624. |
| Cash-intensive business | A cash-intensive business is a business that primarily operates with cash transactions rather than electronic or credit payments. These businesses often handle a large volume of cash relative to their overall revenue, for example: Hospitality and Leisure Automotive and Transportation Retail and Consumer Goods Health and Personal Care Crafts and Trades Art, Luxury, and Collectibles Services and Education |
| Charity | Charitable organisation as defined in the Charities Act 2009. |
| Complex business structure | The term complex structure (such as a long holding chain with use of front companies, or a lack of transparency) refers to an ownership structure that is comprised of two or more layers of ownership which often includes (but is not limited to) foundations, charities, non-profit organisations, offshore vehicles trusts, or other legal arrangements including bearer shares and nominee |

| | |
|---|---|
| | shareholding. Any additional internal definition of complex structure is also acceptable here. |
| **Correspondent relationship** | As per Article 2(1), point (22), of Regulation (EU) 2024/1624. |
| **Credit institution** | (a) As per Article 2(1), point (5), of Regulation (EU) 2024/1624, or<br>(b) An Post in respect of any activity that it carries out, whether as principal or agent, that would render it, or a principal for whom it is an agent, a credit institution as a result of the application of (a) |
| **Critical-rated actions** | Deficiencies that suggest the existence of one or more material weaknesses in the obliged entity's AML/CFT policies, systems and controls, identified by the internal auditor, external auditor or the supervisor.<br>A material weakness is a weakness that has or will likely have a high impact on the compliance with AML/CFT regulatory requirements. The impact should be assessed based on the severity, duration and repetitiveness of the deficiency. |
| **Crypto Asset Service Provider** | As per Article 2(1), point (9), of Regulation (EU) 2024/1624. |
| **Crypto risks** | Risks related to e.g. customers trading in cryptos, but also risks related to your institution's activities in this area. |
| **Crypto-asset** | As per Article 2(1), point (7), of Regulation (EU) 2024/1624. |
| **Crypto-asset services** | As per Article 2(1), point (8), of Regulation (EU) 2024/1624. |
| **Crypto token** | A crypto token is a digital asset created on a blockchain that can represent ownership, rights, or access to a specific asset, service, or utility within a blockchain ecosystem. |
| **Customer** | The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into or who has a transaction initiated by the customers even if it is a periodic/automatic transaction, in accordance with Article 19(1) of Regulation (EU) 2024/1624. |
| **Customer Representative** | A customer representative is an individual authorised to act on behalf of the customer in managing their financial affairs, and is responsible for acting in the best interests of the customer and following their instructions. |
| **Depositary Services** | The Depositary institutions typically offers custodian and fiduciary services to both Irish and non-Irish regulated funds. Custodian services includes the safeguarding of assets of the customer/fund in question by controlling the monies the fund has to buy or sell securities or bonds for the fund. Fiduciary services includes the depository institutions reviewing the client's/fund's activities to ensure that the fund complies with relevant legislation and the prospectus requirements of the fund. This service is often referred to as Trustee Services |
| **Distributed ledger** | As per Article 3(1), point (2), of Regulation (EU) 2023/1114. |
| **Electronic money** | As per Article 2(1), point (17), of Regulation (EU) 2024/1624. |
| **E-Money Digital Accounts/Wallets** | Digital accounts/wallets are an online payment tool. The account/wallet stores value(s) which may include multiple currencies and/or crypto and enables customers to make and receive online payments. |
| **Factoring** | A form of finance which is secured by way of assignment or purchase of receivables. |
| **False positive alert** | A false positive alert is a transaction monitoring alert which was automatically closed by a system without escalation or an escalated alert which was closed by an analyst as not being worthy of an STR. If the alert is a collection of several alerts then all of these alerts are considered to be false positives. |
| **Family members** | As per Article 2(1), point (35), of Regulation (EU) 2024/1624. |

| | |
|---|---|
| **Financial institution** | As per Article 2(1), point (6), of Regulation (EU) 2024/1624. |
| **Funds Transfer Regulation** | Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015, as supplemented by S.I. No. 608/2017 (EU) |
| **Group** | As per Article 2(1), point (41), of Regulation (EU) 2024/1624. |
| **High risk country** | Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163. |
| **Hit (in sanctions screening)** | In this context, "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list. |
| **Human intervention** | As mentioned in EBA/GL/2022/15 – Guidelines on use of Remote Onboarding Solutions under Article 13(1) of Directive (EU) 2015/849. |
| **Intermediary** | This includes brokers, agents, intermediaries and all other contracted third parties which constitute a link in the chain of service provision to your customers, or in the execution of customer transactions. This concerns intermediaries with which your institution has entered into an agreement. |
| **Investment Services** | Investment Services are any activity or service listed in Section A of annex 1 of MiFID II |
| **Legal entity** | Legal persons or other legal arrangement. |
| **Legal arrangement** | As per Article 2(1), point (32), of Regulation (EU) 2024/1624. |
| **Management body** | As per Article 2(1), point (37), point (38), and point (39), of Regulation (EU) 2024/1624. |
| **Maritime Finance** | Financing for maritime assets |
| **Merchant acquiring** | Handling a merchant's account so that they can accept credit or debit card payments and settlement of payments into a merchant's account. |
| **Merchant Services** | Similar to payment institutions whereby the credit institutions facilitate the merchant's customer transactions. |
| **Money laundering** | As per Article 2(1), of Regulation (EU) 2024/1624. |
| **Money remittance** | As per Article 4(21), of Directive (EU) 2015/2366. |
| **Nested account** | An account where a financial institution (the nested financial institution) gains indirect access to services by transacting through another financial institution's (the respondent institution) correspondent account |
| **New customer** | Natural persons or legal entities with whom a business relationship is entered into in the preceding calendar year. |
| **Occasional transaction** | As defined under Section 24 of the CJA 2010. |
| **Onboarded physically** | Onboarding face-to-face where the customer is physical present, that is, in the same physical location as the institution or a persona acting on the institution's behalf. |
| **Offshore jurisdiction** | For the purposes of this REQ the term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency. |
| **Payable-through account** | A correspondent account that is used directly by third parties to transact business on their own behalf. |
| **Payment institution** | As per Article 4(4), of Directive (EU) 2015/2366. |
| **Payment instrument** | As per Article 4(14), of Directive (EU) 2015/2366. |
| **Payment transaction** | As per Article 4(5), of Directive (EU) 2015/2366. |
| **Person known to be a close associate** | As per Article 2(1), point (36), of Regulation (EU) 2024/1624. |
| **Politically Exposed Person (PEP)** | As per Article 2(1), point (34), of Regulation (EU) 2024/1624. |

| | |
|---|---|
| **Pooled Account** | A bank account opened by a customer, for example a financial institution, legal practitioner or notary, for holding their clients' money. The clients' money will be commingled, but clients will not be able directly to instruct the bank to carry out transactions. |
| **Prepaid Cards/Vouchers** | As per Article 2(1), point (f), of Regulation (EU) 2018/1672. |
| **Professional clients** | As per Article 4(1), point 10, of Directive (EU) 2014/65 |
| **Proliferation financing** | The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations. |
| **Remote onboarding** | Onboarding other than face-to-face at a physical location. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include: mobile app registration, Internet sign-up, email, over the phone etc. |
| **Residual risk** | The level of risk that remains after mitigation. |
| **Retail clients** | As per Article 4(1), point 11, of Directive (EU) 2014/65 |
| **Risk appetite** | The level of risk a firm is prepared to accept. |
| **Safe deposit box rental** | Safe deposit boxes in a secured location where items can be stored for safe-keeping. |
| **Sanctions regulation** | As per Article 2(1), point (49), point (50), and point (51), of Regulation (EU) 2024/1624. |
| **Securities Services** | Facilitating their customers in the purchase, selling or management of securities such as bonds, mortgage backed securities, or money market products. Typical products and services are believed to be own account trading and traditional corporate banking activities and involves securities which are generally electronically traded on regulated markets and settled via regulated electronic settlement systems such as Clearstream and Euroclear. All payments to settlement systems are via regulated credit and financial institutions. |
| **Self-hosted address** | As per Article 3, point (20), of Regulation (EU) 2023/1113. |
| **Senior management** | As per Article 2(1), point (40), of Regulation (EU) 2024/1624. |
| **Shell institution/bank** | As per Article 2(1), point (23), of Regulation (EU) 2024/1624. |
| **Subaccount** | A subaccount is a secondary account that is linked to a primary account and used to track specific transactions or to segregate funds for a particular purpose. A subaccount does not stand alone and is always linked to a primary account |
| **Terrorist financing** | As per Article 2(1), point (2), of Regulation (EU) 2024/1624. |
| **Third country** | As per Article 2(1), point (21), of Regulation (EU) 2024/1624. |
| **Trade finance** | Financing of international goods and services trade transactions on behalf of customers importing into or exporting from Ireland. Examples of trade finance activities are: letters of credit, open account facilities, trade credit insurance and import/export collection and guarantees. |
| **Transaction monitoring alert** | We define a Transaction Monitoring Alert as one or more transactions which triggers of collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst. |

|  | E.g. 1: A rule is in place which detects large deposits of cash anomalous to customer behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating if the investigator files a STR report this is considered a True Positive Alert, otherwise we consider it a False Positive Alert.<br><br>E.g. 2: A scenario is in place to detect fast-moving transactions to high risk geographies. One model/rule detects placement of risky funds and another detects fast movement of these funds to a high risk destination. Both of these models/rules identify behaviour creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this we consider it a True Positive Alert for both rules/models, otherwise we consider it a False Positive Alert for both rules/models. |
|---|---|
| **Transaction monitoring rule/model** | A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system. |
| **Transaction profile/ transaction monitoring profile** | Any recorded measure of expected transactional behaviour for customers. |
| **Transaction Monitoring Rule** | We define rules as non-AI based, pre-defined logical decision rules often following "IF-THEN", "IF-ELSE", "WHEN" patterns etc. |
| **Treasury Services** | Cash and Liquidity Management Services provided to non-retail entities. |
| **True positive alert** | A true positive alert is a transaction monitoring alert which was escalated and led to the filing of an STR. If an STR is collection of several alerts all of these alerts are considered to be true positive alerts. |
| **Trust or company service provider** | As per Article 2(1), point (11), of Regulation (EU) 2024/1624. |
| **Virtual IBAN** | An identifier causing payments to be redirected to a payment account identified by an IBAN different from that identifier. |
| **Wealth management** | As per EBA/GL/2021/02, wealth management is the provision of banking and other financial services to high-net-worth individuals and their family or businesses. It is also known as private banking. Clients of wealth management firms can expect dedicated relationship management staff to provide tailored service covering, for example, banking (e.g., current accounts, mortgages and foreign exchange), investment management and advice, fiduciary services, safe custody, insurance, family office services, tax and estate planning and associated facilities, including legal support. |

## 9.2  Enumerations

### AlertType

| Identifier | Description |
|---|---|
| Alert_ML | Money laundering |
| Alert_total | All risks |
| Alert_SR | Sanctions regulations |
| Alert_fraud | Fraud |
| Alert_TF | Terrorist financing |

### BWRAConducted

| Identifier | Description |
|---|---|
| Yes | Yes |
| No | No |
| Exemption_applies | Exemption applies from having in place the BWRA in accordance with Article 10(3) Regulation (EU) 2024/1620 |

### CDD

| Identifier |
|---|
| Yes_in_all_cases |
| Yes_only_in_enhanced_CDD_cases |
| No |

### LegalStructure

| Identifier |
|---|
| Stand_alone_entity |
| Parent_of_group |
| Subsidiary_within_group |
| Branch_of_entity |

### Country

ISO Alpha-2 country codes: https://www.iso.org/iso-3166-country-codes.html

### CustomerType

All customer types below should be *Active customer*

| Identifier | Description |
|---|---|
| NP_physcially_on | Natural Persons who were *Onboarded physically* (in person) |
| NP_remotely_on | Natural Persons who were subject to *Remote onboarding* |
| NP_not_categorised | Natural Persons who have not received a Customer Due Diligence (CDD) risk rating |
| NP_blocked | Natural Persons whose business relationship were/are due to be terminated by the institution due to AML/CFT concerns/issues. |

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| | |
|---|---|
| NP_suspended | Natural Persons have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.) |
| NP_5000000 | Natural persons that have total assets under management over a value of at least EUR 5,000,000 |
| NP_50000000 | Natural persons that have total assets over a value of at least EUR 50,000,000 |
| LE_physcially_on | Legal Entities that were *Onboarded physically* (in person) |
| LE_remotely_on | Legal Entities that were subject to *Remote onboarding* |
| LE_not_categorised | Legal Entities that have not received a customer risk rating (for any reason). |
| LE_blocked | Legal Entities that whose business relationship were/are due to be terminated by the institution due to AML/CFT concerns/issues. |
| LE_suspended | Legal Entities that have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.) |
| LE_SME | Legal Entities which are classified as Small/Medium enterprises (SMEs, as defined by the Department of Trade, Enterprise and Employment) |
| LE_corporate | Legal Entities that are corporate. |
| LE_TCSP | Legal Entities that used TCSP services in the preceding calendar year |
| Private_banking | Private Banking customers |
| Complex | Customers with a *Complex business structure* |
| Cash_intensive | Legal Entities that are classified as businesses which deal with a large amount of cash e.g. supermarkets, privately owned parking, laundromats, petrol stations, restaurants etc. |
| Shell_institution | *Shell institutions* |
| CASP | Legal Entities that are Crypto Asset Service Providers as defined under the MiCAR regulatory framework |
| Credit_institution | Legal Entities that are classified as a credit institution as defined by the Central Bank and Credit Institutions (Resolution) Act 2011. |
| Financial_institution | Legal Entities that are financial institutions |
| Government_body | Legal Entities that are present on the Central Statistics Office list of Public Sector Bodies for the preceding calendar year. |
| SPV | Legal Entities that are Irish Section 110 *Error! Reference source not found.*(SPV) or section 110 companies that qualify under Section 110 of the Irish Taxes Consolidation Act 1997. |
| NPO | Legal Entities that are non-profit organisations (NPOs) , which is a legal person or arrangement or organisation 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 "good works". |
| NPO_non_EEA | Legal Entities that are non-profit organisations (NPOs) with cross border inflows/outflows to/from non-EEA countries. |
| Cust_non_EEA | Customers with at least one transactions over EUR 250 from/to a non-EEA country in the preceding calendar year. |

## Frequency

| Identifier | Description |
|---|---|
| None | None |
| Ad_hoc | Ad hoc |
| Monthly | Monthly |
| Quarterly | Quarterly |
| Every_6_months | Every 6 months |
| Yearly | Yearly |
| 1_years-2_years | >1 years but <2 years |

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| | |
|---|---|
| 2_years-3_years | >2 years but <3 years |
| 3_years-4_years | >3 years but <4 years |
| 4_years-5_years | >4 years but <5 years |
| Only_every_5_years_or_less | only every 5 years or less frequent |

## ModelValidation

| Identifier |
|---|
| Yes_quantitatively |
| Yes_qualitatively |
| Yes_quantitatively_and_qualitatively |
| No |
| N/A |

## MonitoringApproach

| Identifier |
|---|
| Yes_manually |
| Yes_automatically |
| Yes_manually_and_automatically |
| No_transaction_monitoring |

## Outsource

| Identifier |
|---|
| No |
| No_but_concrete_plans_to_source_in_future |
| Yes_entities_within_group |
| Yes_completely_or_partially_to_non_group_entities |

## DetectionTime

| Identifier | Description |
|---|---|
| Real_time | Real time |
| Post_event | Post event |
| Real_time_and_post_event | Real time and Post event |
| No_detection | No detection |

## Sector

For sectors, if a code is at a high level it indicates to use all codes under that level. For example, Oil & Gas -> B.6 (this indicates NACE code B.6 and all subsequent, more granular codes, e.g. B.6.2, should be included) vs. Stock Brokers and Trades -> K.66.11 & K.66.12 exactly. These are guidelines for sector classifications; appropriate alternate internal classifications are acceptable.

* indicates a code which is broad in scope and best judgement from the institution is advised when using this code as categorisation e.g. *25501010 (GICS code)*

| Identifier | Description |
|---|---|
| **Mining** | Mining (Raw materials & minerals)<br><br>Suggested NACE Codes:<br>*B.5, B.7, B.8, B.9*<br><br>Suggested NAICS Codes:<br>*212*<br><br>Suggested GICS Codes:<br>*15104010, 15104020, 15104025, 15104050, 10102050*<br><br>Alternatively Appropriate Internal Classification |
| **Oil_gas** | Oil & Gas (onshore & offshore)<br><br>Suggested NACE Codes:<br>*B.6*<br><br>Suggested NAICS Codes:<br>*2111*<br><br>Suggested GICS Codes:<br>*10101010, 10101020, 10102010, 10102020, 10102030, 10102040*<br><br>Alternatively Appropriate Internal Classification |
| **Energy** | Power/Energy (Production & Distribution)<br><br>Suggested NACE Codes:<br>*D.35.11, D.35.12, D.35.13, D.35.14*<br><br>Suggested NAICS Codes:<br>*2211*<br><br>Suggested GICS Codes:<br>*5510*<br><br>Alternatively Appropriate Internal Classification |
| **Defence** | Defence Industry, Military Goods (manufacturing, wholesale and retail)<br><br>Suggested NACE Codes:<br>*0.84.22, C.25.4*<br><br>Suggested NAICS Codes:<br>*92811*<br><br>Suggested GICS Codes:<br>*20101010*<br><br>Alternatively Appropriate Internal Classification |
| **Precious_metal** | Precious Metals, Stones and Jewellery Traders |

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|---|---|
| | Suggested NACE Codes:<br>*G.46.72, G.47.77*<br><br>Suggested NAICS Codes:<br>*42394*<br><br>Suggested GICS Codes:<br>*15104030, 15104040, 15104045, 25203010*<br><br>Alternatively Appropriate Internal Classification |
| **Art_dealer** | Art Dealers<br><br>Suggested NACE Codes:<br>*G.47.78*<br><br>Suggested NAICS Codes:<br>*45992*<br><br>Suggested GICS Codes:<br>*25504040*<br><br>Alternatively Appropriate Internal Classification |
| **Crypto** | Virtual Assets/ Crypto Currency<br><br>Suggested NACE Codes:<br>*Not Available*<br><br>Suggested NAICS Codes:<br>*523160*<br><br>Suggested GICS Codes:<br>*Not Available*<br><br>Alternatively Appropriate Internal Classification |
| **Gambling** | Gambling<br><br>Suggested NACE Codes:<br>*R.92.0*<br><br>Suggested NAICS Codes:<br>*7132*<br><br>Suggested GICS Codes:<br>*25301010*<br><br>Alternatively Appropriate Internal Classification |
| **Contruction** | Construction<br><br>Suggested NACE Codes:<br>*F*<br><br>Suggested NAICS Codes:<br>*23*<br><br>Suggested GICS Codes:<br>*201030*<br><br>Alternatively Appropriate Internal Classification |
| **Real_estate** | Real Estate<br><br>Suggested NACE Codes: |

| | |
|---|---|
| | *L.68*<br><br>Suggested NAICS Codes:<br>*531*<br><br>Suggested GICS Codes:<br>*6010*<br><br>Alternatively Appropriate Internal Classification |
| **TCSP** | Trust or Company Service Providers<br><br>Suggested NACE Codes:<br>*K.64.30*<br><br>Suggested NAICS Codes:<br>*52592*<br><br>Suggested GICS Codes:<br>*40201040\**<br><br>Alternatively Appropriate Internal Classification |
| **Religion** | Religious Institutions & Charities<br><br>Suggested NACE Codes:<br>*S.94.91, Q.88.99*<br><br>Suggested NAICS Codes:<br>*81311, 81321*<br><br>Suggested GICS Codes:<br>*Not Available*<br><br>Alternatively Appropriate Internal Classification |
| **Freight** | Freight, Haulage & Shipping<br><br>Suggested NACE Codes:<br>*H.49, H.50, H.51, H.52.2, H.53*<br><br>Suggested NAICS Codes:<br>*481, 482, 483, 484, 486, 488, 491, 492*<br><br>Suggested GICS Codes:<br>*20301010, 20303010, 20304030, 20305030, 20305010, 20305020*<br><br>Alternatively Appropriate Internal Classification |
| **Advisory** | Advisory & Consultancy Services<br><br>Suggested NACE Codes:<br>*M.70.22*<br><br>Suggested NAICS Codes:<br>*5416*<br><br>Suggested GICS Codes:<br>*20202020*<br><br>Alternatively Appropriate Internal Classification |
| **IP** | Intellectual Property/ Patents Leasing<br><br>Suggested NACE Codes: |

| | |
|---|---|
| | N.77.40<br><br>Suggested NAICS Codes:<br>53311<br><br>Suggested GICS Codes:<br>Not Available<br><br>Alternatively Appropriate Internal Classification |
| **MTOPSP** | Money Transfer Organisations/ Payment Service Providers<br><br>Suggested NACE Codes:<br>K66.19<br><br>Suggested NAICS Codes:<br>52232<br><br>Suggested GICS Codes:<br>40201060<br><br>Alternatively Appropriate Internal Classification |
| **Pharm** | Pharmaceuticals<br><br>Suggested NACE Codes:<br>C.21<br><br>Suggested NAICS Codes:<br>3254<br><br>Suggested GICS Codes:<br>3520<br><br>Alternatively Appropriate Internal Classification |
| **Scrap_dealer** | Scrap Dealers<br><br>Suggested NACE Codes:<br>G.46.77<br><br>Suggested NAICS Codes:<br>42393<br><br>Suggested GICS Codes:<br>Not Available<br><br>Alternatively Appropriate Internal Classification |
| **Sale_motor** | Sale of motor vehicles<br><br>Suggested NACE Codes:<br>G.45.11, G.45.19, G.45.4<br><br>Suggested NAICS Codes:<br>423110<br><br>Suggested GICS Codes:<br>25501010*<br><br>Alternatively Appropriate Internal Classification |
| **Sale_boat** | Sale of boats<br><br>Suggested NACE Codes:<br>Not Available |

| | |
|---|---|
| | Suggested NAICS Codes:<br>441222<br><br>Suggested GICS Codes:<br>Not Available<br><br>Alternatively Appropriate Internal Classification |
| **Catering** | Catering<br><br>Suggested NACE Codes:<br>I.56.21<br><br>Suggested NAICS Codes:<br>72232<br><br>Suggested GICS Codes:<br>25301040<br><br>Alternatively Appropriate Internal Classification |
| **Crowdfunding** | Crowdfunding Service Providers<br><br>Suggested NACE Codes:<br>S.94.99<br><br>Suggested NAICS Codes:<br>813219<br><br>Suggested GICS Codes:<br>Not Available<br><br>Alternatively Appropriate Internal Classification |
| **Sport** | Professional Sports<br><br>Suggested NACE Codes:<br>R.93.12, R.93.11<br><br>Suggested NAICS Codes:<br>71121<br><br>Suggested GICS Codes:<br>50202010<br><br>Alternatively Appropriate Internal Classification |
| **Stockbroker** | Stock Brokers and Traders/ Trading Platforms<br><br>Suggested NACE Codes:<br>K.66.11, K.66.12<br><br>Suggested NAICS Codes:<br>5231, 5232<br><br>Suggested GICS Codes:<br>40203020, 40203030<br><br>Alternatively Appropriate Internal Classification |
| **Financial_service** | All other financial services sectors not mentioned above. |
| **Other_high_risk** | Other High Risk activities as per your institutions Customer Risk Assessment. |
| **Other_sector** | All remaining other sectors not covered by the above. |

## YesNoNA

| Identifier | Description |
|---|---|
| Yes | Yes |
| No | No |
| N/A | Not applicable |

## YesNo

| Identifier |
|---|
| Yes |
| No |

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## CountriesEEA

| Identifier | Description |
|---|---|
| AT | Austria |
| BE | Belgium |
| BG | Bulgaria |
| CY | Cyprus |
| CZ | CzechRepublic |
| DE | Germany |
| DK | Denmark |
| EE | Estonia |
| ES | Spain |
| FI | Finland |
| FR | France |
| GR | Greece |
| HR | Croatia |
| HU | Hungary |
| IS | Iceland |
| IT | Italy |
| LI | Liechtenstein |
| LT | Lithuania |
| LU | Luxembourg |
| LV | Latvia |
| MT | Malta |
| NL | Netherlands |
| NO | Norway |
| PL | Poland |
| PT | Portugal |
| RO | Romania |
| SE | Sweden |
| SI | Slovenia |
| SK | Slovakia |

## CountriesEEANA

| Identifier | Description |
|---|---|
| 00 | Not applicable |
| AT | Austria |
| BE | Belgium |
| BG | Bulgaria |
| CY | Cyprus |
| CZ | CzechRepublic |
| DE | Germany |
| DK | Denmark |
| EE | Estonia |
| ES | Spain |
| FI | Finland |
| FR | France |

| GR | Greece |
|----|--------|
| HR | Croatia |
| HU | Hungary |
| IS | Iceland |
| IT | Italy |
| LI | Liechtenstein |
| LT | Lithuania |
| LU | Luxembourg |
| LV | Latvia |
| MT | Malta |
| NL | Netherlands |
| NO | Norway |
| PL | Poland |
| PT | Portugal |
| RO | Romania |
| SE | Sweden |
| SI | Slovenia |
| SK | Slovakia |

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