



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Guidance Notes Risk Evaluation Questionnaire

Fund Depositories

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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.

The deadline for the first submission (in respect of reference date of 31 December 2026) is 30 March 2027. 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.
`<A08011 Identifier="ICA" EnumerationYesNo="Yes"></A08011>`
 rather than
`<A08011 Identifier="ICA" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:
`<?xml version="1.0" encoding="utf-8"?>`
`<Depositaries xmlns="http://www.centralbank.ie/Schemas/AML/2025/A08">`
`...`
`...`
`...`
`</Depositaries>`

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.

Naming convention

The file name must be of the form: CCCCCC_YYYYMMDD_A08.xml

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A08 - the A08 Return code
- .xml or .zip - the file extension

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: onlinereturns@centralbank.ie

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

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

If the legal structure of your institution is reported as "Parent_of_group" within the EEA or "Stand_alone_entity", it is required to report all information explicitly for Section 8.2.2 and Section 8.4.14 in an aggregated manner for all of the EEA business, including business written under the freedom of establishment and the freedom to provide services. Only the Irish institution data should be reported for the remainder of this REQ.

If the legal structure of your institution is reported as other than "Parent_of_group" or "Stand_alone_entity", only data related to the Irish institution are required.

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 8.5-8.10 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	Legal entity customers				
	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
KPF	KPG	KPH	KPI	KPJ	KPK
00	0	0	0	0	0

```
<A0805>
  <A08051 KPF="00" KPG="0" KPH="0" KPI="0" KPJ="0" KPK="0"></A08051>
</A0805>
```

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 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 KAR, KAS and KAT. 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.

```
<A0801B>
  <A08012 KAR="AT" KAS="215" KAT="150.19"></A08012>
  <A08012 KAR="BE" KAS="896" KAT="490.57"></A08012>
  <A08012 KAR="BG" KAS="348" KAT="637.83"></A08012>
  <A08012 KAR="CY" KAS="79" KAT="481.75"></A08012>
```

For this section each of the 30 EEA countries must be listed. For each EEA country, specify the total number of customers that reside in or are established in that EEA country and the total annual value of transactions (EUR) generated by these customers.

Select EEA Country
KAR
AT
BE
BG
CY

Customer Numbers	Total Transaction Value (EUR)
KAS	KAT
215	150.19
896	490.57
348	637.83
79	481.75

In Table Structure A, each enumeration option must not be repeated, e.g. KAR 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	A0801B	A08012
8.3.1 Inherent risk segment 1	A0802B	A08022
8.3.1 Inherent risk segment 2	A0802C	A08023
8.3.2 Inherent risk sector	A0802D	A08024
8.5 Physical Presence	A0804	A08041
8.6 Residence and Establishment	A0805	A08051
8.7 Beneficial Owner	A0806	A08061
8.8 Politically Exposed Person	A0807	A08071
8.9 Geography of Funds Flow	A0808	A08081
8.10 Transaction Monitoring	A0809	A08091

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, KAA 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).

```
<A0801A>
  <A08011 Identifier="KAA" EnumerationLegalStructure="Stand_alone_entity"></A08011>
  <A08011 Identifier="KAB" String500="Consultoria Lola"></A08011>
  <A08011 Identifier="KAC" LEI="F5WCUMTUM4RKZ1MAIE39"></A08011>
  <A08011 Identifier="KAD" EnumerationCountryEEANA="HR"></A08011>
  <A08011 Identifier="KAE" String500="Croatian National Bank"></A08011>
```

Legal Structure

What is the legal structure of your institution?

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 EEA parent entity of the group

LEI of the EEA parent entity of the group

Country where the EEA parent entity of the group is established

The AML/CFT supervisory authority of the EEA parent entity of the group

Stand_alone_entity

Consultoria Lola

F5WCUMTUM4RKZ1MAI39

HR

Croatian National Bank

In Table Structure B, each identifier/REF must not be repeated, e.g. KAA 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	A0801A	A08011
8.2.3 Statement Of Compliance	A0801A	A08011
8.3.1 Customer Segments	A0802A	A08021

8.3.2 Sector	A0802A	A08021
8.3.3 Intermediaries And Distribution Channels	A0802A	A08021
8.3.4 Remote Onboarding	A0802A	A08021
8.4.1 Business Wide Risk Assessment	A0803A	A08031
8.4.2 Policies And Procedures	A0803A	A08031
8.4.3 Offboarding	A0803A	A08031
8.4.4 Customer Due Diligence	A0803A	A08031
8.4.5 Mitigation And Control Transaction Monitoring	A0803A	A08031
8.4.6 Alerts	A0803A	A08031
8.4.7 Suspicious Transaction Reporting	A0803A	A08031
8.4.8 Sanctions Screening	A0803A	A08031
8.4.9 Outsourcing	A0803A	A08031
8.4.10 Training	A0803A	A08031
8.4.11 Compliance and Assurance Testing	A0803A	A08031
8.4.12 Audit	A0803A	A08031
8.4.13 Governance	A0803A	A08031
8.4.14 GroupAML	A0803A	A08031

Variable Names:

- Identifier: "REF" code.
- LEI: Legal Entity Identifier (20 characters).
- String100/500/2000: String with 100/500/2000 character limit. Only [ASCII printable characters](#) plus € and £ are allowed. Pre-defined XML entity references must be used. 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.

Special Characters

XML reserves five specific characters that can be seen in the table below. If these characters appear in your data, they must be 'escaped'.

For example, if your firm's name is 'Smith & Jones', the ampersand must be written as **&**; i.e., "Smith **&** Jones". If you don't do this, the XML structure will break, and the file will be rejected.

Pre-defined entity references:

English	Symbol (Entity References)	XML (predefined entity references)
less than	<	<
greater than	>	>
ampersand	&	&
apostrophe	'	'
quotation mark	"	"

8.1.3 Table Order

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

```
<!--General-->
<xs:element ref="A08:A0801A"/>
<!--General International Presence-->
<xs:element ref="A08:A0801B"/>
<!--Inherent Risk-->
<xs:element ref="A08:A0802A"/>
<!--Inherent Risk Segment 1-->
<xs:element ref="A08:A0802B"/>
<!--Inherent Risk Segment 2-->
<xs:element ref="A08:A0802C"/>
<!--Inherent Risk Sector-->
<xs:element ref="A08:A0802D"/>
<!--Mitigation And Control-->
<xs:element ref="A08:A0803A"/>
<!--Physical Presence-->
<xs:element ref="A08:A0804"/>
<!--Residence And Establishment-->
<xs:element ref="A08:A0805"/>
<!--Beneficial Owner-->
<xs:element ref="A08:A0806"/>
<!--Politically Exposed Person-->
<xs:element ref="A08:A0807"/>
<!--Geography Of Funds Flow-->
<xs:element ref="A08:A0808"/>
<!--Transaction Monitoring-->
<xs:element ref="A08:A0809"/>
```

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.

```
<A08011 Identifier="KAA" EnumerationLegalStructure="Branch_of_entity"></A08011>
```

REF	Field	Description
KAA	Legal Structure	What is the legal structure of your institution? Select from LegalStructure Variable name: EnumerationLegalStructure
KAB	Subsidiary - 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. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KAC	Subsidiary - 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. Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000
KAD	Subsidiary - 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. Select from CountriesEEANA Variable name: EnumerationCountryEEANA
KAE	Subsidiary - 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. If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A. 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. Variable name: String500

		Character limit: 500 characters If not applicable enter N/A
KAF	Subsidiary - 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. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KAG	Subsidiary - 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. Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000
KAH	Subsidiary - 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. Select from Country Variable name: EnumerationCountry
KAI	Subsidiary - 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. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KAJ	Branch - 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. Variable name: String500 Character limit: 500 characters

		If not applicable enter N/A
KAK	Branch - 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. Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000
KAL	Branch - 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. Select from CountriesEEANA Variable name: EnumerationCountryEEANA
KAM	Branch - 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. If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A. 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. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KAN	Branch - 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. Variable name: String500

		Character limit: 500 characters If not applicable enter N/A
KAO	Branch - 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. Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000
KAP	Branch - 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. Select from Country Variable name: EnumerationCountry
KAQ	Branch - 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. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

8.2.2 International Presence

For this section each of the 30 EEA countries must be listed. For each EEA country, specify the total number of customers that reside in or are established in that EEA country which your institution provides services to on a Freedom of Establishment or a Freedom of Services basis and the total annual value of transactions (EUR) generated by these customers.

For this section if the legal structure of your institution is reported as "Parent_of_group" within the EEA or "Stand_alone_entity", it is required to report all information in an aggregated manner for all of the EEA business, including business written under the freedom of establishment and the freedom to provide services. If the legal structure of your institution is reported as other than "Parent_of_group" or "Stand_alone_entity", only data related to the Irish institution are required.

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

<A08012 KAR="AT" KAS="215" KAT="150.19" KAU="100" KAV="2500.00"></A08012>

REF	Field	Description
KAR	EEA Country	Select each EEA country using Alpha-2 country codes, Data Type: EnumerationValue Select from CountriesEEA
KAS	EEA No. of Customers FOE	For each EEA country, enter the total number of customers that reside or are established in that EEA country in the preceding calendar year, that your firm provides services to on an Freedom of Establishment basis. Data Type: IntegerValue If not applicable enter 0
KAT	EEA Value of Transactions (EUR) FOE	For each EEA country, enter the total annual value of transactions (EUR) generated by these customers in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0
KAU	EEA No. of Customers FOS	For each EEA country, enter the total number of customers that reside or are established in that EEA country in the preceding calendar year, that your firm provides services to on an Freedom of Services basis. Data Type: IntegerValue If not applicable enter 0
KAV	EEA Value of Transactions (EUR) FOS	For each EEA country, enter the total annual value of transactions (EUR) generated by these customers in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0

8.2.3 Statement of Compliance

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

<A08011 Identifier="KAW" EnumerationYesNo="Yes"></A08011>

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

KAW	Compliance CJA	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? Select from YesNo Variable name: EnumerationYesNo
KAX	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. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KAY	Compliance Name	Name of the person signing this Statement of Compliance on behalf of the Institution Variable name: String100 Character limit: 100 characters If not applicable enter N/A
KAZ	Position Held	Position of the person signing this Statement of Compliance on behalf of the Institution Variable name: String100 Character limit: 100 characters If not applicable enter N/A
KBA	PCF	Is the person signing this Statement of Compliance on behalf of the firm approved by the Central Bank to a Pre-Approval Control Function (PCF) position? Select from YesNo Variable name: EnumerationYesNo

8.3 Inherent Risks

8.3.1 Customer Segments

For each customer type/customer segment, as per the enumeration lists provided, please specify each of the below, as at the reference date i.e. 31 December of the preceding calendar year, by customer segment and by overall (mandatory).

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 a Natural Person and a High Risk customer.

For the purposes of classifying a customer into a segment and where using a customer risk rating applies, please use the corresponding risk rating at 31 December of the preceding calendar year.

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

```
<A08021 Identifier="KBB" IntegerValue="747"></A08021>
```

REF	Field	Description
KBB	Active Legal Entity Customers	State the total number of active legal entity customers as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

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

```
<A08022 KBA="LE_PEP" KBB="154" KBC="982" KBD="630.17"></A08022>
```

REF	Field	Description
KBC	Customer Segment Type 1	Select each customer type from CustomerSegment1. Each customer segment must be selected. Note customers can fall in more than one customer segment. Every entry must specify a unique customer segment and product pairing along with the number of customers, transaction and their value. Complete one record per combination of customer and product segment Data Type: EnumerationValue Select from CustomerSegment1
KBD	No. of Customers Segment 1	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments and by customer type and specific products/services. Data Type: IntegerValue If not applicable enter 0
KBE	No. of transactions Segment 1	State the total number of transactions in the preceding calendar year by the corresponding customers.

		Data Type: IntegerValue If not applicable enter 0
KBF	Total Value Segment 1	State the total value of transactions (EUR) in the preceding calendar year by the corresponding customers. Data Type: DecimalValue If not applicable enter 0

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

```
<A08023 KBF="LE_not_categorised" KBG="583"></A08023>
```

REF	Field	Description
KBG	Customer Segment Type 2	Select specific CustomerSegment3. Note customers can fall in more than one customer segment. Each customer type must be selected. Data Type: EnumerationValue Select from CustomerSegment2
KBH	No. of Customers Segment 2	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments and by overall. Data Type: IntegerValue If not applicable enter 0

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

```
<A08021 Identifier="KBH" IntegerValue="856"></A08021>
```

REF	Field	Description
KBI	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. Variable name: IntegerValue If not applicable enter 0

8.3.2 Sector

For customer data points 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

```
<A08024 KBJ="Mining" KBJ="810"></A08024>
```

REF	Field	Description
KBJ	Sector	Select each sector from Sector. Note that customers can fall in more than one sector. Each sector must be selected. Data Type: EnumerationValue Select from Sector
KBK	Sector - 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. Data Type: IntegerValue If not applicable enter 0

8.3.3 Intermediaries and Distribution Channels

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

```
<A08021 Identifier="KBL" IntegerValue="103"></A08021>
```

REF	Field	Description
KBL	Intermediary Customer Proportion	Of the new customers introduced to your institution in the preceding calendar year, what number were introduced through a third party with which you have a relationship with regarding the provision of services? Variable name: IntegerValue If not applicable enter 0
KBM	Intermediary Non Designated	State the number of customers onboarded in the past year by third parties above that are not themselves obliged entities under Regulation (EU) 2024/1624 or national legislation

		Variable name: IntegerValue If not applicable enter 0
--	--	--

8.3.4 Remote Onboarding

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

```
<A08021 Identifier="KBN" PercentageValue="0.6"></A08021>
```

REF	Field	Description
KBN	Onboarding Remote NP Prop	What proportion of total customers were accepted via remote onboarding in the preceding calendar year? Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0

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.

```
<A08031 Identifier="KBO" EnumerationBWRAConducted="Yes"></A08031>
```

REF	Field	Description
KBO	BWRA Conducted	State whether your institution conducts a Business Wide Risk Assessment (BWRA) . Select from BWRAConducted Variable name: EnumerationBWRAConducted
KBP	BWRA Senior Management Approval	State whether Senior Management of your institution approved the latest version of the BWRA. Select from YesNo Variable name: EnumerationYesNo
KBQ	BWRA Last Approval Date	State the approval date of your institution's most recent BWRA in the format of YYYY-MM-DD.

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KBR	BWRA Review Frequency	Select the frequency of BWRA review by your institution. Select from Frequency Variable name: EnumerationFrequency
KBS	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KBT	BWRA Business Change Description	Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KBU	BWRA Money Laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KBV	BWRA Terrorist Financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KBW	BWRA Sanctions	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KBX	BWRA Corruption	State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA

KBY	BWRA Conflicts of Interest	State whether risks of conflicts of interests are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KBZ	BWRA Tax Evasion	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KCA	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCB	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCC	BWRA Cybercrime	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KCD	BWRA Market Abuse	State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KCE	BWRA Customer Groups	State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KCF	BWRA Geographies	State whether geographies are explicitly identified and assessed in your institution's most recent BWRA.

		Select from YesNoNA Variable name: EnumerationYesNoNA
KCG	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCH	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCI	BWRA Crypto	State whether <u>cryptos</u> 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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCJ	BWRA Risk Other	State whether risks of other areas are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KCK	BWRA Risk Other Detail	If Yes to BWRARiskOther, please describe the areas that explicitly cited and considered in your most recent BWRA. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KCL	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. Select from YesNoNA Variable name: EnumerationYesNoNA

KCM	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCN	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCO	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCP	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCQ	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCR	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCS	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.

		Select from YesNoNA Variable name: EnumerationYesNoNA
KCT	Other Risk Assessment Process - Cybercrime/ Ransomware	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KCU	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCV	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCW	Other Risk Assessment Process - Geographies	State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
KCX	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KCY	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. Select from YesNoNA Variable name: EnumerationYesNoNA

KCZ	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. Select from YesNoNA Variable name: EnumerationYesNoNA
KDA	BWRA Risk Appetite	State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite. Select from YesNoNA Variable name: EnumerationYesNoNA
KDB	BWRA Policy Procedure	State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures. Select from YesNoNA Variable name: EnumerationYesNoNA
KDC	BWRA Product Service	State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services. Select from YesNoNA Variable name: EnumerationYesNoNA
KDD	BWRA Transaction Monitoring	State whether the outcomes of the BWRA were used for setting scenarios and rules for transaction monitoring. Select from YesNoNA Variable name: EnumerationYesNoNA
KDE	BWRA Process Other	State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities. Select from YesNoNA Variable name: EnumerationYesNoNA
KDF	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. Variable name: String500 Character limit: 500 characters

		If not applicable enter N/A
KDG	Risk App Formulated	State whether your institution formulates a ML/TF risk appetite. Select from YesNo Variable name: EnumerationYesNo

8.4.2 Policies and Procedures

State the date when the relevant documents were last formally approved by the [management body](#) 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.

<A08031 Identifier="KDH" DateValue="2022-11-11"></A08031>

REF	Field	Description
KDH	Pol & Proc - 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.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDI	Pol & Proc - 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). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDJ	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDK	Pol & Proc - 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.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDL	Pol & Proc - Politically Exposed Persons	Enter the date when your institution's management approved the last version of policies and procedures for Politically Exposed Persons (PEPs). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDM	Pol & Proc - High risk customers	Enter the date when your institution's management approved the last version of policies and procedures for high risk customers. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDN	Pol & Proc - 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.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDO	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDP	Pol & Proc - 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.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

KDQ	Pol & Proc - 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). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDR	Pol & Proc - Conflicts of interest	Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDS	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDT	Pol & Proc - 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). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDU	Pol & Proc - 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). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDV	Pol & Proc - 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 completed and reported to the Central Bank Sanctions Team as required). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

KDW	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDX	Pol & Proc - Whistleblowing	Enter the date when your institution's management approved the last version of policies and procedures for whistleblowing. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDY	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KDZ	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KEA	Pol & Proc - 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). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KEB	Pol & Proc - 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). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KEC	Pol & Proc - 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.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KED	Pol & Proc - 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 Format YYYY-MM-DD If not applicable enter 2000-01-01
KEE	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KEF	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KEG	Pol & Proc - 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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KEH	Pol & Proc - Review Frequency	Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures. Select from Frequency Variable name: EnumerationFrequency

8.4.3 Offboarding

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

```
<A08031 Identifier="KEI" IntegerValue="333"></A08031>
```

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

KEI	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 concerns. Variable name: IntegerValue If not applicable enter 0
KEJ	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 Variable name: IntegerValue If not applicable enter 0
KEK	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. Variable name: IntegerValue If not applicable enter 0
KEL	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. Variable name: IntegerValue If not applicable enter 0
KEM	Customer Offboarding Number HR	State the total number of customers rated high risk as per your institution's customer risk assessment prior to offboarding, whose business relationships with your institution were terminated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

8.4.4 Customer Due Diligence

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

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

```
<A08031 Identifier="KEN" EnumerationCDD="No"></A08031>
```

REF	Field	Description
KEN	Identity Verification LE	State whether the identity of legal entity customers is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
KEO	Identity Verification BO LE	State whether the identity of the beneficial owner of legal entity customers is established and verified prior to providing services. Select from CDD Variable name: EnumerationCDD
KEP	Ownership Structure Identified LE	State whether ownership and/or control structure is identified for legal entity customers prior to providing services. Select from CDD Variable name: EnumerationCDD
KEQ	Nature Of Relationship LE	State whether the purpose and intended nature of the business relationship is established prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD
KER	Source Of Funds LE	State whether source/origin of the funds/assets is identified prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD
KES	Customer Rep Identified LE	State whether a customer's representative is identified prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD
KET	CDD Review LE	State whether your institution periodically reviews its customers' risk profiles for legal entity customers. Select from YesNo Variable name: EnumerationYesNo
KEU	CDD Review LE Low	If Yes to CDD Review LE, state the Frequency of these reviews for low-risk legal entity customers.

		Select from Frequency Variable name: EnumerationFrequency
KEV	CDD Review LE Medium	If Yes to CDD Review LE, state the Frequency of these reviews for medium-risk legal entity customers. Select from Frequency Variable name: EnumerationFrequency
KEW	CDD Review LE High	If Yes to CDD Review LE, state the Frequency of these reviews for high-risk legal entity customers. Select from Frequency Variable name: EnumerationFrequency
KEX	CDD Review LE Unacceptable	If Yes to CDD Review LE, state the Frequency of these reviews for unacceptable-risk legal entity customers (e.g. yet to be exited). Select from Frequency Variable name: EnumerationFrequency
KEY	CDD CRA Update	Date when your institution last updated the Customer Risk Assessment Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KEZ	CDD Low Customer	Number of customers per ML/TF risk category (low risk). If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then, Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
KFA	CDD Medium-Low Customer	Number of customers per ML/TF risk category (medium-low risk).

		If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then, Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
KFB	CDD MH Customer	Number of customers per ML/TF risk category (medium-high risk). If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then, Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
KFC	CDD High Customer	Number of customers per ML/TF risk category (high-risk). If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then, Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0

KFD	CDD customers Due LE	Number of legal entity customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. Variable name: IntegerValue If not applicable enter 0
KFE	CDD customers Reviewed LE	Number of legal entity customers for whom customer information was reviewed and updated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
KFF	Backlog Prop LE Total	Specify the proportion of backlogs of all legal entity customers. Variable name: DecimalValue If not applicable enter 0
KFG	Backlog Prop LE High	Specify the proportion of backlogs of high-risk legal entity customers. Variable name: DecimalValue If not applicable enter 0
KFH	Backlog Prop LE Unacceptable	Specify the proportion of backlog made up of unacceptable-risk legal entity customers (e.g. yet to be exited). Variable name: DecimalValue If not applicable enter 0
KFI	Concrete Timelines LE	State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for legal entities. Select from YesNoNA Variable name: EnumerationYesNoNA
KFJ	No Ident Total	What proportion of total active customers have no CDD documentation/information. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KFK	No Ident High	What proportion of high risk active customers have no CDD documentation/information.

		Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KFL	No Ident PEP	What proportion of active customers who have PEP risk identified have no CDD documentation/information Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KFM	Incomplete Total	Specify the proportion of total active customers with incomplete CDD documentation over the overall active customers. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KFN	Incomplete High	Specify the proportion of high-risk active customers with incomplete CDD documentation over the overall active customers. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KFO	Incomplete PEP	Specify the proportion 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. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KFP	CDD BO not Identified	Number of customers that are legal entities /trusts whose beneficial owners have not been identified. Variable name: IntegerValue If not applicable enter 0
KFQ	CDD BO not Verified HR	Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified Variable name: IntegerValue

		If not applicable enter 0
KFR	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). Variable name: IntegerValue If not applicable enter 0
KFS	Customer Data not in Line With Article 20	Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR. Note that this data point will not be assessed until the Regulation (EU) 2024/1624 applies from 10 July 2027. For submissions with reference dates before this Regulation applies, this data point can be answered as 0 or any integer value. Variable name: IntegerValue If not applicable enter 0
KFT	Customer Number Without Risk Profile	State the number of customers of your institution who have not had a ML/TF risk profile created (this should exclude any customers with whom the obliged entity does not have a business relationship) Variable name: IntegerValue If not applicable enter 0

8.4.5 Transaction Monitoring

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

<A08031 Identifier="KFU" EnumerationYesNoNA="Yes"></A08031>

REF	Field	Description
KFU	TM Profile	Does your institution draw up a transaction profile for customers at the initiation of services? Select from YesNoNA Variable name: EnumerationYesNoNA
KFV	TM Profile Review	What is the frequency of review of the transaction profile? Select from Frequency Variable name: EnumerationFrequency

KFW	TM Profile Number Transactions	Does your institution include number of transactions in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
KFX	TM Profile Value of Aggregated Transactions	Does your institution include the value of total transactions in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
KFY	TM Profile Value of Single Transactions	Does your institution include the value of single transactions in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
KFZ	TM Profile Counterparties	Does your institution include counterparties in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
KGA	TM Profile Geographies	Does your institution include geographies in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
KGB	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? Select from YesNoNA Variable name: EnumerationYesNoNA
KGC	TM Profile Banks	Does your institution include banks involved in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
KGD	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?

		Select from YesNoNA Variable name: EnumerationYesNoNA
KGE	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? Select from YesNoNA Variable name: EnumerationYesNoNA
KGF	TM Alert Value of Single 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 single transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
KGG	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? Select from YesNoNA Variable name: EnumerationYesNoNA
KGH	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? Select from YesNoNA Variable name: EnumerationYesNoNA
KGI	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? Select from YesNoNA Variable name: EnumerationYesNoNA
KGJ	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?

		Select from YesNoNA Variable name: EnumerationYesNoNA
KGK	TM How Monitor	State whether your institution monitors transactions and how this is done. Select from MonitoringApproach Variable name: EnumerationMonitoringApproach
KGL	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? Select from ModelValidation Variable name: EnumerationModelValidation
KGM	TM AI	Does your institution use artificial intelligence technology in its transaction monitoring process? Select from YesNoNA Variable name: EnumerationYesNoNA
KGN	TM Rule	Does your institution use rules as part of its transaction monitoring process? Select from YesNoNA Variable name: EnumerationYesNoNA
KGO	TM High Risk Geographies	Does your institution have rules in its transaction monitoring process with respect to high risk geographies? Select from YesNoNA Variable name: EnumerationYesNoNA
KGP	TM Offshore Jurisdictions	Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions? Select from YesNoNA Variable name: EnumerationYesNoNA
KGQ	TM BR Customer Segments	Does your institution have rules in its transaction monitoring process with respect to Customer Segments? Customer segments can be any internal definition of customer groupings, retail or corporate customers, risk levels, associated sector, high value customer etc.

		Select from YesNoNA Variable name: EnumerationYesNoNA
KGR	TM Sectors	Does your institution have transaction monitoring rules which consider risks associated with specific sectors? Select from YesNoNA Variable name: EnumerationYesNoNA
KGS	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 ? Select from YesNoNA Variable name: EnumerationYesNoNA
KG T	TM Cash	Does your institution have rules in its transaction monitoring process with respect to cash transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
KG U	TM Text	Are transaction description fields / bodies of text considered in any of the rules your institution has in its transaction monitoring system Select from YesNoNA Variable name: EnumerationYesNoNA
KG V	TM Complex	Does your institution have rules in its transaction monitoring process with respect to complex structures ? Select from YesNoNA Variable name: EnumerationYesNoNA
KG W	TM Banks	Does your institution have rules in its transaction monitoring process with respect to what banks / payment institutions are involved in transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
KG X	TM Other	Other than those mentioned above, are there any other factors/topics/patterns/risks your institution considers as part of their rules?

		Select from YesNoNA Variable name: EnumerationYesNoNA
KGY	TM Other Detail	Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KGZ	TM Review	Does your institution periodically review its rules in its transaction monitoring process? Select from YesNoNA Variable name: EnumerationYesNoNA
KHA	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KHB	TM Review Latest Changes	Did the most recent review lead to any changes in rules? Select from YesNoNA Variable name: EnumerationYesNoNA
KHC	TM Real Time or Post Event	State whether detection of (possible) suspicious financial transactions takes place in real-time or post-event. 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 Variable name: EnumerationDetectionTime
KHD	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? *Information as referred to in Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto assets.

		Variable name: IntegerValue If not applicable enter 0
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8.4.6 Alerts

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

<A08031 Identifier="KHE" IntegerValue="592"></A08031>

REF	Field	Description
KHE	Rule Count - Automated	How many rules were in place in your institution's automated transaction monitoring system in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
KHF	Total Alert Count - Automated	How many <u>alerts</u> were generated by the automated transaction monitoring system in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
KHG	Percent Alerts - Automated	What is the proportion of automated transaction monitoring <u>alerts</u> to total transactions? Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KHH	Alerts Investigated - Automated	How many automated <u>alerts</u> were investigated by an AML/transaction monitoring staff member? Variable name: IntegerValue If not applicable enter 0
KHI	Alerts Escalated - Automated	How many automated <u>alerts</u> were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? Variable name: IntegerValue If not applicable enter 0
KHJ	Alert Investigated FP - Automated	How many automated <u>alerts</u> were closed as false positives following investigation? Variable name: IntegerValue

		If not applicable enter 0
KHK	Rule Count Manual	How many rules were in place in your institution's manual transaction monitoring process in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
KHL	Total Alert Count - Manual	How many alerts were generated by the manual transaction monitoring process in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
KHM	Percent Alerts - Manual	What is the proportion of manual transaction monitoring alerts to total transactions? Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KHN	Alerts Investigated - Manual	How many manual alerts were investigated by an AML/transaction monitoring staff member? Investigated refers to an initial check to indicate if a transaction monitoring alert is worth sending to investigators/compliance. Variable name: IntegerValue If not applicable enter 0
KHO	Alerts Escalated - Manual	How many manual alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? Variable name: IntegerValue If not applicable enter 0
KHP	Alert Investigated FP - Manual	How many manual alerts were closed as false positives following investigation? A false positive is an alert which results in no Suspicious Transaction Report (STR) being filed. Variable name: IntegerValue If not applicable enter 0
KHQ	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. Variable name: IntegerValue

		If not applicable enter 0
KHR	Alert Backlog - Automated	At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
KHS	Alert Mean Time To Close - 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? Variable name: DecimalValue If not applicable enter 0
KHT	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 Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KHU	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 Variable name: IntegerValue If not applicable enter 0
KHV	Alert Backlog - Manual	At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
KHW	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? Variable name: DecimalValue

		If not applicable enter 0
KHX	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. Variable name: DecimalValue If not applicable enter 0

8.4.7 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.

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<A08031 Identifier="KHY" EnumerationYesNo="No"></A08031>
```

REF	Field	Description
KHY	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. Select from YesNo Variable name: EnumerationYesNo
KHZ	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
KIA	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. Variable name: IntegerValue If not applicable enter 0
KIB	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. Variable name: IntegerValue If not applicable enter 0

KIC	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. Variable name: IntegerValue If not applicable enter 0
KID	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. Variable name: IntegerValue If not applicable enter 0
KIE	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. Variable name: IntegerValue If not applicable enter 0
KIF	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. Variable name: IntegerValue If not applicable enter 0
KIG	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. Variable name: IntegerValue If not applicable enter 0
KIH	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. Variable name: IntegerValue If not applicable enter 0
KII	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. Variable name: IntegerValue

		If not applicable enter 0
KIJ	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. Variable name: IntegerValue If not applicable enter 0
KIK	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. Variable name: IntegerValue If not applicable enter 0
KIL	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. Variable name: IntegerValue If not applicable enter 0
KIM	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. Variable name: IntegerValue If not applicable enter 0
KIN	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
KIO	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. Variable name: IntegerValue If not applicable enter 0
KIP	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.

		Variable name: IntegerValue If not applicable enter 0
KIQ	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. Variable name: IntegerValue If not applicable enter 0
KIR	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 Variable name: IntegerValue If not applicable enter 0
KIS	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. Variable name: IntegerValue If not applicable enter 0
KIT	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. Variable name: IntegerValue If not applicable enter 0
KIU	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. Variable name: IntegerValue If not applicable enter 0
KIV	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. Variable name: IntegerValue If not applicable enter 0
KIW	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. Variable name: IntegerValue If not applicable enter 0
KIX	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. Variable name: IntegerValue If not applicable enter 0
KIY	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. Variable name: IntegerValue If not applicable enter 0
KIZ	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. Variable name: IntegerValue If not applicable enter 0
KJA	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. Variable name: IntegerValue If not applicable enter 0
KJB	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. Variable name: DecimalValue If not applicable enter 0

8.4.8 Sanctions Screening

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

<A08031 Identifier="KJC" DecimalValue="57.15"></A08031>

REF	Field	Description
KJC	Sanction Max Hours	Maximum number of hours between the publication of the Targeted Financial Sanctions by the authorities and the implementation of these changes in the institution's screening tools. Variable name: DecimalValue If not applicable enter 0
KJD	Sanction EU	Specify if customers and beneficial owners are checked against EU sanctions lists. Select from YesNo Variable name: EnumerationYesNo
KJE	Sanction National List	Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo Variable name: EnumerationYesNo
KJF	Sanction UN	Specify if customers and beneficial owners are checked against UN sanctions lists. Select from YesNo Variable name: EnumerationYesNo
KJG	Sanction Other	Specify if customers and beneficial owners are checked against any other sanctions lists Select from YesNo Variable name: EnumerationYesNo
KJH	Sanction Other Specify	If your institution uses any other sanctions lists not mentioned above please specify Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KJI	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. Select from YesNo

		Variable name: EnumerationYesNo
KJJ	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. Select from YesNo Variable name: EnumerationYesNo
KJK	Sanction Periodic Customer	At the start of service provision and afterwards, state whether your institution periodically checks whether customers are included on sanctions lists. Select from YesNo Variable name: EnumerationYesNo
KJL	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. Select from YesNo Variable name: EnumerationYesNo
KJM	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. Select from YesNo Variable name: EnumerationYesNo
KJN	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. Variable name: IntegerValue If not applicable enter 0
KJO	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. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4.

		Variable name: IntegerValue If not applicable enter 0
KJP	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. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. Variable name: IntegerValue If not applicable enter 0
KJQ	Sanction Total Hits	State the number of actual hits that the sanctions list screening delivered in the preceding calendar year. In this context "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list Variable name: IntegerValue If not applicable enter 0
KJR	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. 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. Variable name: DecimalValue If not applicable enter 0

8.4.9 Outsourcing

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

<A08031 Identifier="KJS" EnumerationOutsource="No_but_concrete_plans_to_outsource_in_future"></A08031>

REF	Field	Description
KJS	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). Select from Outsource

		Variable name: EnumerationOutsource
KJT	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). Select from Outsource Variable name: EnumerationOutsource
KJU	Outsource TM	State whether transaction monitoring has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
KJV	Outsource Alert Processing	State whether alerts processing has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
KJW	Outsource STR Reporting	State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
KJX	Outsource Sanction Screen	State whether sanctions screening has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
KJY	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). Select from Outsource Variable name: EnumerationOutsource
KJZ	Outsource Training	State whether AML/CFT training has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource

KKa	Outsource PEP	State whether PEP detection has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
KKb	Outsource Compliance	State whether compliance monitoring checks have been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
KKc	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). Select from Outsource Variable name: EnumerationOutsource
KKd	Outsource Other AMLCFT Specify	If Yes to Outsource Other AML CFT, specify the other processes. List the other outsourced elements of your AML/CFT processes separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KKe	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). To calculate the percentage, obliged entities should apply the following process: Denominator: number of tasks (customer due diligence, training, transaction monitoring, etc.) that are at least partly outsourced. Numerator: number of such tasks for which one or more written outsourcing agreement covering all outsourced aspects is in place. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KKf	Outsource Compliance Assessed	Has your institution assessed outsource provider's compliance with the requirements in the preceding calendar year

		Select from YesNoNA Variable name: EnumerationYesNoNA
KKG	Outsource Assess Report Obligation	State whether your institution ensures outsource provider compliance with the requirements via reporting obligation. Select from YesNoNA Variable name: EnumerationYesNoNA
KKH	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). Select from YesNoNA Variable name: EnumerationYesNoNA
KKI	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). Select from YesNoNA Variable name: EnumerationYesNoNA
KKJ	Outsource Assess Other	State, if there are any other processes your institution has in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. Select from YesNoNA Variable name: EnumerationYesNoNA
KKK	Other Outsource Compliance Check Approaches	Detail which other processes your institution has in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KKL	Outsource Tasks to High Risk Third Countries	State the existence of AML/CFT tasks outsourced to an external service provider located in high risk third country (excluding outsourcing to other entities of the group located in high risk third countries) Select from YesNoNA

		Variable name: EnumerationYesNoNA
KKM	Outsource Tasks to High Risk Third Countries Within Group	State whether the existence of AML/CFT tasks outsourced to an external service provider located in high risk third country is part of the group structure of your institution Select from YesNoNA Variable name: EnumerationYesNoNA

8.4.10 Education and Training

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

<A08031 Identifier="KKN" PercentageValue="0.9"></A08031>

REF	Field	Description
KKN	Non-AML/CFT specialist staff - % Staff coverage	State the proportion of non-AML/CFT specialist staff (customer facing staff, executive directors) who have attended training in the preceding calendar year with regard to financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KKO	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. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KKP	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. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KKQ	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. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047

		If not applicable enter 0
KKR	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. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KKS	Staff Numbers	Enter the total number of full-time equivalent employees employed by the institution. Variable name: IntegerValue If not applicable enter 0

8.4.11 Compliance and 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.

```
<A08031 Identifier="KKT" DateValue="2014-12-12"></A08031>
```

REF	Field	Description
KKT	Compliance SEBWRA	State the most recent date when the structure and effectiveness of your institution's <u>business-wide risk assessment</u> was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KKU	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KKV	Compliance Verification	State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution.

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KKW	Compliance Sanctions	State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KKX	Compliance Resources	State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KKY	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KKZ	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLA	Compliance TM	State the most recent date when the transaction monitoring process was assessed by the compliance. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLB	Compliance STR	State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLC	Compliance Records	State the most recent date when record keeping policies and procedures were assessed by the compliance function.

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLD	Compliance TPDD	State the most recent date when outsourcing arrangements were assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLE	Compliance Other	State whether any other financial crime topics or processes were assessed by the compliance function in the preceding calendar year Select from YesNo Variable name: EnumerationYesNo
KLF	Compliance Other Specify	Specify the other financial crime topics or processes that were tested or monitored by the compliance function in your institution in the preceding calendar year. Provide a list of topics or processes separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLG	Compliance BWRA Descript	Briefly describe any material findings/potential breaches identified from the last assessment of your institution's business-wide risk assessment. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLH	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. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters

		If not applicable enter N/A
KLI	Compliance Verification Descript	Briefly describe any material findings/potential breaches identified from the last assessment of identification and identity verification procedures. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLJ	Compliance Sanctions Descript	Briefly describe any material findings/potential breaches identified from the last assessment of compliance with sanctions regulations. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLK	Compliance Resources Descript	Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLL	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. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

KLM	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. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLN	Compliance TM Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the transaction monitoring process. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLO	Compliance STR Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the suspicious transaction reporting process. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLP	Compliance Records Descript	Briefly describe any material findings/potential breaches identified from the last assessment of record keeping policies and procedures. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLQ	Compliance TPDD Descript	Briefly describe any material findings/potential breaches identified from the last assessment of outsourcing arrangements.

		Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLR	Compliance Other Process Descript	If it is Yes to ComplianceOther, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KLS	Compliance to Senior Management	State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management. Select from Frequency Variable name: EnumerationFrequency
KLT	Compliance to Board	State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board. Select from Frequency Variable name: EnumerationFrequency
KLU	Compliance AML Staff	Number of dedicated AML/CFT compliance staff (in Full Time Equivalent). Variable name: IntegerValue If not applicable enter 0

8.4.12 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.

```
<A08031 Identifier="KLV" DateValue="2036-04-21"></A08031>
```

REF	Field	Description
KLV	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLW	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLX	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLY	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KLZ	Audit Resources	State the most recent date when resources dedicated to AML/CFT were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KMA	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KMB	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KMC	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KMD	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KME	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KMF	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. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
KMG	Audit Other	State whether other financial crime processes were subject to an internal audit by your institution or assessed by an external expert. Select from YesNo Variable name: EnumerationYesNo
KMH	Audit Other Specify	If Yes to Audit Other, briefly specify the other processes that were subject to an internal audit by your institution or assessed by an external expert. Provide a list of other processes separated by semicolon (;) with no spaces either side.

		Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMI	Audit BWRA Descript	If Yes to Audit BWRA, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMJ	Audit Training Descript	If Yes to Audit Training, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMK	Audit Verification Descript	If Yes to Audit Verification, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KML	Audit Sanctions Descript	If Yes to Audit Sanctions, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMM	Audit Resources Descript	If Yes to Audit Resources, briefly describe any material findings/potential breaches identified.

		Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMN	Audit Organisation Descript	If Yes to Audit Organisation, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMO	Audit CDD Descript	If Yes to Audit CDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMP	Audit TM Descript	If Yes to Audit TM, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMQ	Audit STR Descript	If Yes to Audit STR, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

KMR	Audit Records Descript	If Yes to Audit Records, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMS	Audit TPDD Descript	If Yes to Audit TPDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMT	Audit Other Process Descript	If other financial crime topics were assessed by the Internal Audit function, then describe any material findings/potential breaches identified. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KMU	Audit to Senior Management	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management. Select from Frequency Variable name: EnumerationFrequency
KMV	Audit to Board	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board. Select from Frequency Variable name: EnumerationFrequency
KMW	NCA ML	State whether a foreign supervisory authority issued findings regarding your institution's anti-money laundering framework in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo

KMX	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. Select from YesNo Variable name: EnumerationYesNo
KMY	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
KMZ	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. Select from YesNo Variable name: EnumerationYesNo
KNA	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. Select from YesNo Variable name: EnumerationYesNo
KNB	NCA Other Specify	If Yes to NCA Other, briefly specify Provide a list of other topics separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KNC	NCA ML Descript	If Yes to NCA ML, briefly describe the findings/gaps identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

KND	NCA TF Descript	If Yes to NCA TF, briefly describe the findings/gaps identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KNE	NCA Sanctions Descript	If Yes to NCA Sanctions, briefly describe the findings/gaps identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KNF	NCA Corruption Descript	If Yes to NCA Corruption, briefly describe the findings/gaps identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
KNG	NCA Other Descript	If Yes to NCA Other, briefly describe the findings/gaps identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

8.4.13 Governance

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

```
<A08031 Identifier="KNH" EnumerationFrequency="Every_6_months"></A08031>
```

REF	Field	Description
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KNH	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. Select from Frequency Variable name: EnumerationFrequency
KNI	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. Select from Frequency Variable name: EnumerationFrequency
KNJ	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. Select from Frequency Variable name: EnumerationFrequency
KNK	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. Select from Frequency Variable name: EnumerationFrequency
KNL	Money Laundering Board	State the Frequency that money laundering is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency
KNM	Terrorist Financing Board	State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency
KNN	Sanction Circumvent Board	State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency

KNO	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. Select from Frequency Variable name: EnumerationFrequency
KNP	Designated Responsibility	State whether your institution appointed a member of senior management with primary responsibility for implementing, managing and overseeing your institution's compliance with its AML/CFT obligations as required under Section 54(8) of the CJA 2010 Select from YesNo Variable name: EnumerationYesNo
KNQ	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? Select from YesNo Variable name: EnumerationYesNo
KNR	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? Select from Frequency Variable name: EnumerationFrequency
KNS	Reported Shortcomings	State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
KNT	Shortcomings Recovery	Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken. Select from YesNoNA Variable name: EnumerationYesNoNA
KNU	Shortcomings Recovery Details	If Yes to Shortcomings Recovery, briefly describe the reported AML/CFT shortcomings and remediation measures taken.

		Provide a list of shortcomings and recovery measures in pairs, with each pair separated by semicolon (;) with no spaces either side. i.e. <shortcoming1><recovery1>;<shortcoming2><recovery2>; etc. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
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8.4.14 Group-wide AML/CFT Framework

This section is applicable if your institution is the EEA [parent entity](#) within a group structure. If your institution is not an EEA parent entity, please enter 0 for each answer in this section.

Group entities in this section refers to entities that are part of the group as defined in Article 2(41) and (42) of Regulation (EU) 2024/1624, including non-EU obliged entities. Entities of the group that are not obliged entities should be excluded from the scope.

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

<A08031 Identifier="KNV" PercentageValue="0.7"></A08031>

REF	Field	Description
KNV	Groupwide AML CDD	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of CDD in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KNW	Groupwide AML Monitoring	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Ongoing Monitoring in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KNX	Groupwide AML STRs	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of STRs in the preceding calendar year

		Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KNY	Groupwide AML High Risk Customers	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Identity and Transaction Level Information on High Risk Customers in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KNZ	Groupwide Deficiencies	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Deficiencies in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KOA	Groupwide Jurisdiction AML Review	If your institution is the parent entity within a group structure, state the proportion of jurisdictions in which the group is established that were covered by reviews (which included access to customer and transaction level data) performed by the group AML Compliance function during the preceding three calendar years Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
KOB	Groupwide Deficiencies Identified by NCA EEA	If your institution is the parent entity within a group structure, state the number of EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
KOC	Groupwide Deficiencies Identified by NCA non-EEA	If your institution is the parent entity within a group structure, state the number of non-EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year

		Variable name: IntegerValue If not applicable enter 0
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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

```
<A08041 KOB="00" KOC="24" KOD="165" KOE="473" KOF="738" KOG="154"></A08041>
```

REF	Field	Description
KOD	PP - 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 Data Type: EnumerationValue Select from Country
KOE	No. of subsidiaries	Number of subsidiaries in each country. Data Type: IntegerValue If not applicable enter 0
KOF	No. of branches	Number of branches in each country Data Type: IntegerValue If not applicable enter 0
KOG	No. of representative offices	Number of representative offices in each country Data Type: IntegerValue If not applicable enter 0
KOH	No. of other physical presences	Number of other physical presence in each country Data Type: IntegerValue If not applicable enter 0

KOI	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 Data Type: IntegerValue If not applicable enter 0
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8.6 Residence and 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

```
<A08051 KOH="00" KOI="282" KOJ="570" KOK="255" KOL="21" KOM="820"></A08051>
```

REF	Field	Description
KOJ	RE - 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. Data Type: EnumerationValue Select from Country
KOK	Legal entity customers – Total Number	Legal entity customers – Total Data Type: IntegerValue If not applicable enter 0
KOL	Legal entity customers - No. of which are New Customers	Legal entity customers - Number of which are New Customers (with whom a business relationship was entered into in the preceding calendar year) Data Type: IntegerValue If not applicable enter 0
KOM	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 Data Type: IntegerValue

		If not applicable enter 0
KON	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). Data Type: IntegerValue If not applicable enter 0
KOO	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 Data Type: IntegerValue If not applicable enter 0

8.7 Beneficial Owner

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.

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

```
<A08061 KON="00" KOO="974"></A08061>
```

REF	Field	Description
KOP	BO - Country	Select from the list of Alpha-2 country codes, Country for each applicable country that has a legal entity BO residing in that country. Data Type: EnumerationValue Select from Country
KOQ	Number of beneficial owners	Number of beneficial owners of your legal entity customers residing in the country. As per recital 125 AMLR, senior managing officials (SMOs) reported where no natural person is identifiable who ultimately owns or exerts control over an entity are not to be considered for the purposes of reporting this datapoint. Data Type: IntegerValue If not applicable enter 0

8.8 Politically Exposed Person

The questions below concern [Politically Exposed Persons](#) in your institution's customer base.

For the purposes of these questions, use the nationality of the PEPs.

In the instance of multi-citizenship/nationality, use the citizenship/nationality related to their prominent public function appointment.

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

```
<A08071 KOP="00" KOQ="310"></A08071>
```

REF	Field	Description
KOR	PEP - Country	Select from the list of Alpha-2 country codes, each country where the following applies: A natural person customer of your institution is a PEP and has nationality/citizenship in the specified country. Or, a beneficial owner of your legal entity customers is a PEP and has nationality/citizenship in the specified country. Data Type: EnumerationValue Select from Country
KOS	Number of BO PEPs	State the number of legal entity customers established in the given country who have at least one beneficial owner who is a PEP As per recital 125 AMLR, senior managing officials (SMOs) reported where no natural person is identifiable who ultimately owns or exerts control over an entity are not to be considered for the purposes of reporting this datapoint. Data Type: IntegerValue If not applicable enter 0

8.9 Geography of Funds Flow

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

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

In this section, detail only flows of funds handled by your institution in which the origin of the flow or the destination of the flow is Ireland.

i.e., if you're firm manages a flow originating in a foreign bank account and ending in a foreign bank account, that is not to be included here.

<A08081 KOR="00" KOS="331" KOT="332" KOU="184.54" KOV="231" KOW="105" KOX="577.42" KOY="601" KOZ="254" KPA="545.45" KPB="202" KPC="840" KPD="676.72"></A08081>

REF	Field	Description
KOT	Geography - 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 in the preceding calendar year. Data Type: EnumerationValue Select from Country
KOU	Overall - No. of customers (Source)	Overall number of customers with incoming transactions from each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
KOV	Overall - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
KOW	Overall - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0
KOX	Overall - No. of customers (Destination)	Overall number of customers with outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
KOY	Overall - No. of transactions (Destination)	Overall number of outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
KOZ	Overall - Value of transactions (Destination)	EUR Value of total outgoing transactions to each country in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0

KPA	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. Data Type: IntegerValue If not applicable enter 0
KPB	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. Data Type: IntegerValue If not applicable enter 0
KPC	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. Data Type: DecimalValue If not applicable enter 0
KPD	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 If not applicable enter 0
KPE	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. Data Type: IntegerValue If not applicable enter 0
KPF	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. Data Type: DecimalValue If not applicable enter 0

8.10 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.

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.

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

```
<A08091 KPE="5UQJGna4MDLY" KPF="KuHeeqQ00Zbw" KPG="702" KPH="995" KPI="35"></A08091>
```

REF	Field	Description
KPG	Rule Name / ID	Unique Internal Rule ID. Please complete for each rule. Data Type: StringValue Character limit: 500 characters If not applicable enter N/A
KPH	High Level Rule / Model Description	High-level description of each Rule / Model. Data Type: StringValue Character limit: 2000 characters If not applicable enter N/A
KPI	Number of Transaction Monitoring Alerts for Rule/Model	Number of Transaction Monitoring Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
KPJ	Number of True Positive Alerts for Rule/Model	Number of True Positive Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0

KPK	Number of False Positive Alerts for Rule/Model	Number of False Positive Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
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9 Appendices

9.1 Definitions

Term	Interpretation
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) 2024/1624, including those that do not fall within the scope of Regulation (EU) 2024/1624 due to their non-EU status
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	As per Article 2(1), point (43), 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
Complex 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 more than two 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 (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)
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 with whom a business relationship is entered into or who has a transaction effected.
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.
Intermediary/Third Party	This includes brokers, agents, distributors, 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 person 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 (32), of Regulation (EU) 2024/1624.
New customer	Natural persons or legal entities with whom a business relationship is entered into in the preceding calendar year.
ML/TF risk	The impact and likelihood of ML/TF taking place.
Money laundering	As per Article 2(1), of Regulation (EU) 2024/1624.
Money remittance	As per Article 4(21), of Directive (EU) 2015/2366.

Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
Parent entity	As per Article 2(42) of Regulation (EU) 2024/1624.
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.
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 where the customer is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the customer's identity is being verified via video-link or similar technological means such as 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.
Rule (in transaction monitoring)	A rule in this context means a rule/model/business rule/transaction monitoring rule as anything, manual or automated, designed to detect a specific transactional behaviour(s), scenario or typology which can by itself, or as a group of alerts, could be escalated for investigation and possible Suspicious Transaction Report. These are non-AI based logical decision rules often following "IF-THEN", "IF-ELSE", "WHEN" patterns etc.
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.
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.
Transaction monitoring alert	In this context a Transaction Monitoring Alert means one or more transactions which triggers or 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. 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 profile in this context has the meaning of any measure of expected transactional behaviour for customers.
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.

9.2 Enumerations

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

CDD

Identifier	Description
Yes_in_all_cases	Yes – All cases
Yes_only_in_enhanced_CDD_cases	Yes – Enhanced Due Diligence Cases only
No	No

Country

Alpha-2 code as per the [ISO 3166](#) plus XK – Kosovo and 00 to indicate not applicable

CustomerSegment1

Identifier	Description
LE	Legal entity customers (i.e., non-personal customers, legal persons and/or other entities and/or legal structures and/or arrangements)
LE_PEP	Legal entity customers with PEP risk identified
LE_high	Legal entity customers with High (or closest internal rating, e.g., Ultra High) customer risk rating
Complex	Customers with a complex structure
Cash_intensive	Legal entity customers that operate in cash-intensive businesses
LE_blocked	Legal entity customers that have been blocked/curtailed pending exit due to AML/CFT concerns

CustomerSegment2

Identifier	Description
LE_not_categorised	Legal entity customers without customer risk rating

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.)
Shell_institution	Legal entity customers that are shell institutions
CASP	Legal entity customers that are crypto-asset service providers
Credit_institution	Legal entity customers that are credit institutions
Financial_institution	Legal entity customers that are financial institutions
Government_body	Legal entity customers that are government bodies
SPV	Legal entity customers that are special purpose vehicles
Cust_non_EEA	Customers with at least one transaction over 250 euros from/to a non-EEA country in the previous year
Cust_FIU	Customers with information requests from the FIU

BWRAConducted

Identifier
Yes
No
Exemption_applies

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

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
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

LegalStructure

Identifier	Description
Stand_alone_entity	Stand-alone entity

Parent_of_group	Parent of a group
Subsidiary_within_group	Subsidiary within a group
Branch_of_entity	Branch of an entity

MonitoringApproach

Identifier	Description
Yes_manually	Yes, manually
Yes_automatically	Yes, automatically
Yes_manually_and_automatically	Yes, manually and automatically
No_transaction_monitoring	No, there is no transaction monitoring

Outsource

Identifier	Description
No	No
No_but_concrete_plans_to_outsource_in_future	No, but we have concrete plans to do this in the future
Yes_entities_within_group	Yes, to the parent/entities within the group to which my entity belongs
Yes_completely_or_partially_to_non_group_entities	Yes, completely or partially outsourced to non-group entities

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. Stockbrokers 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) Suggested NACE Codes: B.5, B.7, B.8, B.9 Suggested NAICS Codes: 212 Suggested GICS Codes: 15104010, 15104020, 15104025, 15104050, 10102050 Alternatively Appropriate Internal Classification
Oil_gas	Oil & Gas (onshore & offshore)

	Suggested NACE Codes: B.6 Suggested NAICS Codes: 2111 Suggested GICS Codes: 10101010, 10101020, 10102010, 10102020, 10102030, 10102040 Alternatively Appropriate Internal Classification
Energy	Power/Energy (Production & Distribution) Suggested NACE Codes: D.35.11, D.35.12, D.35.13, D.35.14 Suggested NAICS Codes: 2211 Suggested GICS Codes: 5510 Alternatively Appropriate Internal Classification
Defence	Defence Industry, Military Goods (manufacturing, wholesale and retail) Suggested NACE Codes: 0.84.22, C.25.4 Suggested NAICS Codes: 92811 Suggested GICS Codes: 20101010 Alternatively Appropriate Internal Classification
Precious_metal	Precious Metals, Stones and Jewellery Traders Suggested NACE Codes: G.46.72, G.47.77 Suggested NAICS Codes: 42394 Suggested GICS Codes: 15104030, 15104040, 15104045, 25203010 Alternatively Appropriate Internal Classification
Art_dealer	Art Dealers Suggested NACE Codes: G.47.78 Suggested NAICS Codes: 45992 Suggested GICS Codes: 25504040 Alternatively Appropriate Internal Classification
Crypto	Virtual Assets/ Crypto Currency Suggested NACE Codes:

	<i>Not Available</i> Suggested NAICS Codes: 523160 Suggested GICS Codes: <i>Not Available</i> Alternatively Appropriate Internal Classification
Gambling	Gambling Suggested NACE Codes: R.92.0 Suggested NAICS Codes: 7132 Suggested GICS Codes: 25301010 Alternatively Appropriate Internal Classification
Construction	Construction Suggested NACE Codes: F Suggested NAICS Codes: 23 Suggested GICS Codes: 201030 Alternatively Appropriate Internal Classification
Real_estate	Real Estate Suggested NACE Codes: L.68 Suggested NAICS Codes: 531 Suggested GICS Codes: 6010 Alternatively Appropriate Internal Classification
TCSP	Trust or Company Service Providers Suggested NACE Codes: K.64.30 Suggested NAICS Codes: 52592 Suggested GICS Codes: 40201040* Alternatively Appropriate Internal Classification
Religion	Religious Institutions & Charities Suggested NACE Codes: S.94.91, Q.88.99

	Suggested NAICS Codes: 81311, 81321 Suggested GICS Codes: <i>Not Available</i> Alternatively Appropriate Internal Classification
Freight	Freight, Haulage & Shipping Suggested NACE Codes: H.49, H.50, H.51, H.52.2, H.53 Suggested NAICS Codes: 481, 482, 483, 484, 486, 488, 491, 492 Suggested GICS Codes: 20301010, 20303010, 20304030, 20305030, 20305010, 20305020 Alternatively Appropriate Internal Classification
Advisory	Advisory & Consultancy Services Suggested NACE Codes: M.70.22 Suggested NAICS Codes: 5416 Suggested GICS Codes: 20202020 Alternatively Appropriate Internal Classification
IP	Intellectual Property/ Patents Leasing Suggested NACE Codes: N.77.40 Suggested NAICS Codes: 53311 Suggested GICS Codes: <i>Not Available</i> Alternatively Appropriate Internal Classification
MTOPSP	Money Transfer Organisations/ Payment Service Providers Suggested NACE Codes: K66.19 Suggested NAICS Codes: 52232 Suggested GICS Codes: 40201060 Alternatively Appropriate Internal Classification
Pharm	Pharmaceuticals Suggested NACE Codes: C.21

	Suggested NAICS Codes: 3254 Suggested GICS Codes: 3520 Alternatively Appropriate Internal Classification
Scrap_dealer	Scrap Dealers Suggested NACE Codes: G.46.77 Suggested NAICS Codes: 42393 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Sale_motor	Sale of motor vehicles Suggested NACE Codes: G.45.11, G.45.19, G.45.4 Suggested NAICS Codes: 423110 Suggested GICS Codes: 25501010* Alternatively Appropriate Internal Classification
Sale_boat	Sale of boats Suggested NACE Codes: Not Available Suggested NAICS Codes: 441222 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Catering	Catering Suggested NACE Codes: I.56.21 Suggested NAICS Codes: 72232 Suggested GICS Codes: 25301040 Alternatively Appropriate Internal Classification
Crowdfunding	Crowdfunding Service Providers Suggested NACE Codes: S.94.99

	Suggested NAICS Codes: 813219 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Sport	Professional Sports Suggested NACE Codes: R.93.12, R.93.11 Suggested NAICS Codes: 71121 Suggested GICS Codes: 50202010 Alternatively Appropriate Internal Classification
Stockbroker	Stockbrokers and Traders/ Trading Platforms Suggested NACE Codes: K.66.11, K.66.12 Suggested NAICS Codes: 5231, 5232 Suggested GICS Codes: 40203020, 40203030 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.

ModelValidation

Identifier	Description
Yes_quantitatively	Yes, quantitative
Yes_qualitatively	Yes, qualitative
Yes_quantitatively_and_qualitatively	Yes, quantitative and qualitative
No	No
N/A	Transaction monitoring is conducted manually or no transaction monitoring in place

CountriesEEA

Identifier	Description
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark

EE	Estonia
ES	Spain
FI	Finland
FR	France
GR	Greece
HR	Croatia
HU	Hungary
IE	Ireland
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	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
ES	Spain
FI	Finland
FR	France
GR	Greece
HR	Croatia
HU	Hungary
IE	Ireland
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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