



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Guidance Notes Risk Evaluation Questionnaire

Fund Administrators

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Document History

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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 2 April 2027. This is a hard deadline, and no extensions will be granted.

Subsequent returns will be expected to be submitted annually on 2 April for reference date of 31 December of the preceding calendar year.

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.
`<A12011 Identifier="ICA" EnumerationYesNo="Yes"></A12011>`
 rather than
`<A12011 Identifier="ICA" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:
`<?xml version="1.0" encoding="utf-8"?>`
`<FundAdmin xmlns="http://www.centralbank.ie/Schemas/AML/2025/A12">`
`...`
`...`
`...`
`</FundAdmin>`

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_A12.xml

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A12 - the A12 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 Administrators. 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 investor risk ratings can use the ratings as at the reference date, even if investor 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	No. of natural person investors who are PEPs, their family members or persons known to be close associates	No. of your legal entity investors whose beneficial owners include at least 1 PEP, their family members or persons known to be close associates
LSY	LSZ	LTA
00	0	0

<A1207>

<A12071 LSY="00" LSZ="00" LTA="00"></A12071>

</A1207>

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 LAR, LAS and LAT. 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.

<A1201B>

```
<A12012 LAR="AT" LAS="628" LAT="734.72" LAU="0" LAV="0"></A12012>
<A12012 LAR="BE" LAS="197" LAT="703.45" LAU="0" LAV="0"></A12012>
<A12012 LAR="BG" LAS="593" LAT="578.87" LAU="0" LAV="0"></A12012>
<A12012 LAR="CY" LAS="479" LAT="78.91" LAU="0" LAV="0"></A12012>
```

For this section each of the 30 EEA countries must be listed. For each EEA country, specify the total number of investors that reside in or are established in that EEA country, who invest in a fund 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 investors.

Select EEA Country
LAR
AT
BE
BG
CY

FOE		FOS	
Investor Numbers	Total Transaction Value (EUR)	Investor Numbers	Total Transaction Value (EUR)
LAS	LAT	LAU	LAV
628	734.72	0	0.00
197	703.45	0	0.00
593	578.87	0	0.00
479	78.91	0	0.00

In Table Structure A, each enumeration option must not be repeated, e.g. LAR 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 General International Presence	A1201B	A12012
8.3.1 Inherent Risk Funds	A1201A	A12011
8.3.2 Inherent risk sector	A1202B	A12022
8.5 Physical Presence	A1204	A12041
8.6 Residence and Establishment	A1205	A12051
8.7 Beneficial Owner	A1206	A12061
8.8 Politically Exposed Person	A1207	A12071
8.9 Geography of Fund Flow	A1208	A12081
8.10 Transaction Monitoring	A1209	A12091

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, LAA 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).

```
<A1201A>
  <A12011 Identifier="LAA" EnumerationLegalStructure="Stand_alone_entity"></A12011>
  <A12011 Identifier="LAB" String500="Consultoria Lola"></A12011>
  <A12011 Identifier="LAC" LEI="F5WCUMTUM4RKZ1MAIE39"></A12011>
  <A12011 Identifier="LAD" EnumerationCountryEEANA="HR"></A12011>
  <A12011 Identifier="LAE" String500="Croatian National Bank"></A12011>
```

Legal Structure

What is the legal structure of your institution?	Stand_alone_entity
If your institution is a subsidiary within a group: Please state the name of the parent entity of the group, the country where the parent entity of the group is established, and the AML/CFT supervisory authority of the parent entity of the group	
Name of the EEA parent entity of the group	Consultoria Lola
LEI of the EEA parent entity of the group	F5WCUMTUM4RKZ1MAIE39
Country where the EEA parent entity of the group is established	HR
The AML/CFT supervisory authority of the EEA parent entity of the group	Croatian Central Bank

In Table Structure B, each identifier/REF must not be repeated, e.g. IAA 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	A1201A	A12011
8.2.3 Statement Of Compliance	A1201A	A12011
8.3.2 Sector	A1202A	A12021
8.3.7 Intermediaries And Distribution Channels	A1202A	A12021
8.4.1 Business Wide Risk Assessment	A1203A	A12031

8.4.2 Policies And Procedures	A1203A	A12031
8.4.3 Offboarding	A1203A	A12031
8.4.4 Customer Due Diligence	A1203A	A12031
8.4.5 Mitigation And Control Transaction Monitoring	A1203A	A12031
8.4.6 Alerts	A1203A	A12031
8.4.7 Suspicious Transaction Reporting	A1203A	A12031
8.4.8 Sanctions Screening	A1203A	A12031
8.4.9 Outsourcing	A1203A	A12031
8.4.10 Training	A1203A	A12031
8.4.11 Compliance and Assurance Testing	A1203A	A12031
8.4.12 Audit	A1203A	A12031
8.4.13 Governance	A1203A	A12031
8.4.14 GroupAML	A1203A	A12031

Variable Names:

- Identifier: "REF" code.
- LEI: Legal Entity Identifier (20 characters).
- String100/500/1000/2000: String with 100/500/1000/2000 character limit. Only [ASCII printable characters](#) plus € and £ 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="A12:A1201A"/>
<!--General International Presence-->
<xs:element ref="A12:A1201B"/>
<!--Inherent Risk Funds-->
<xs:element ref="A12:A1202A"/>
<!--Inherent Risk Sector-->
<xs:element ref="A12:A1202B"/>
<!--Inherent Risk-->
<xs:element ref="A12:A1202C"/>
<!--Mitigation And Control-->
<xs:element ref="A12:A1203A"/>
<!--Physical Presence-->
<xs:element ref="A12:A1204"/>
<!--Residence And Establishment-->
<xs:element ref="A12:A1205"/>
<!--Beneficial Owner-->
<xs:element ref="A12:A1206"/>
<!--Politically Exposed Person-->
<xs:element ref="A12:A1207"/>
<!--Geography Of Funds Flow-->
<xs:element ref="A12:A1208"/>
<!--Transaction Monitoring-->
<xs:element ref="A12:A1209"/>
```

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.

<A12011 Identifier="LAA" EnumerationLegalStructure="Stand_alone_entity"></A12011>

REF	Field	Description
LAA	Legal Structure	What is the legal structure of your institution? Select from LegalStructure Variable name: EnumerationLegalStructure
LAB	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
LAC	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
LAD	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
LAE	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 (Freedom of Establishment) 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
LAF	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
LAG	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
LAH	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
LAI	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
LAJ	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 (Freedom of Establishment). 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
LAK	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 (Freedom of Establishment). 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
LAL	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

		(Freedom of Establishment). 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
LAM	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 (Freedom of Establishment). 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
LAN	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
LAO	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
LAP	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
LAQ	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 investors that reside in or are established in that EEA country, who invest in a fund 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 investors.

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

<A12012 LAR="AT" LAS="98" LAT="10000.00" LAU="0" LAV="0.00" ></A12012>

REF	Field	Description
LAR	EEA Country	Select each EEA country using Alpha-2 country codes, EEACountries Data Type: EnumerationValue Select from CountriesEEA
LAS	EEA No. of Investors FOE	For each EEA country, enter the total number of investors that reside or are established in that EEA country in the preceding calendar year which your institution provides services to on a Freedom of Establishment basis Data Type: IntegerValue If not applicable enter 0
LAT	EEA Value of Transactions (EUR) FOE	For each EEA country, enter the total annual value of transactions (EUR) generated by these investors in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0
LAU	EEA No. of Investors FOS	For each EEA country, enter the total number of investors that reside or are established in that EEA country in the preceding calendar year which your institution provides services to on a Freedom of Services basis Data Type: IntegerValue

		If not applicable enter 0
LAV	EEA Value of Transactions (EUR) FOS	For each EEA country, enter the total annual value of transactions (EUR) generated by these investors 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.

<A12011 Identifier="LAW" EnumerationYesNo="Yes"></A12011>

REF	Field	Description
LAW	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
LAX	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
LAY	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
LAZ	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

LBA	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 Risk

8.3.1 Inherent Risk Funds

Answer the below for each fund your institution provides administration services to. For non-Irish domiciled funds, enter **any** unique integer in place of C-Code for the purposes of this REQ.

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

```
<A12021 LBB="12345" LBC="DE" LBD="10" LBE="20" LBF="15" LBG="9" LBH="6" LBI="100" LBJ="97" LBK="66" LBL="54" LBM="18" LBN="22" LBO="33" LBP="57"></A12021>
```

REF	Field	Description
LBB	Fund C-Code	Enter the C-Code of each umbrella / stand-alone fund which you provide administration services to. e.g. for C-Code of C12345, enter 12345. For non-Irish domiciled funds, enter any unique integer in place of C-Code. Data Type: IntegerValue If not applicable enter 0
LBC	Fund Country of Domicile	Enter the <u>country</u> of domicile of the fund Data Type: EnumerationValue Select from <u>Country</u>
LBD	Fund Number of Active Investors	State the number of <u>active</u> investors in the Fund Data Type: IntegerValue If not applicable enter 0
LBE	Fund Number of High Risk Investors	State the number of investors in the fund that have <u>high risk activities</u> Data Type: IntegerValue If not applicable enter 0

LBF	Fund Number of Investors with nonEEA Transactions	State the number of investors in the fund that have cross border transactions involving non-EEA countries Data Type: IntegerValue If not applicable enter 0
LBG	Fund Number of Investors with Requests from FIU	State the number of investors in the fund which have requests relating to them from the FIU Data Type: IntegerValue If not applicable enter 0
LBH	Fund Number of New Investors in Preceding Calendar Year	State the number of new investors in the fund in the preceding calendar year Data Type: IntegerValue If not applicable enter 0
LBI	Fund Number of Natural Person Investors	State the total number of Natural Person (NP) investors in the fund Data Type: IntegerValue If not applicable enter 0
LBJ	Fund Number of Natural Person PEP Investors	Of the natural person investors in the fund, how many of them are Politically Exposed Persons (PEPs) Data Type: IntegerValue If not applicable enter 0
LBK	Fund Number of Natural Person High Risk Investors	Of the natural person investors in the fund, how many of them are rated high risk as per CDD/Customer Risk Assessment Processes Data Type: IntegerValue If not applicable enter 0
LBL	Fund Number of Legal Entity Investors	State the total number of Legal Entity (LE) investors in the fund Data Type: IntegerValue If not applicable enter 0
LBM	Fund Number of Legal Entity Investors with BOs which are PEP	Of the legal entity investors in the fund, how many have at least one Beneficial Owner that is a Politically Exposed Person (PEP), their family members or people known to be close associates. Data Type: IntegerValue

		If not applicable enter 0
LBN	Fund Number of Legal Entity High Risk Investors	Of the legal entity investors in the fund how many of these are rated high risk as per your institutions CDD processes Data Type: IntegerValue If not applicable enter 0
LBO	Fund Number of Legal Entities with Complex Structure	Of the legal entity investors in the fund, state how many have a complex ownership structure Data Type: IntegerValue If not applicable enter 0
LBP	Fund Number of Legal Entities with nonEEA BOs	Of the legal entity investors in the fund, how many have one or more Beneficial Owners resident in non-EEA countries Data Type: IntegerValue If not applicable enter 0

8.3.2 Inherent Risk Sector

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

```
<A12022 LBQ="Mining" LBR="366"></A12022>
```

REF	Field	Description
LBQ	Sector	Select each sector from Sector list. Note that investors can fall in more than one sector. Each sector must be selected. Data Type: EnumerationValue Select from Sector
LBR	Sector - No. of High Risk Legal Entity Investors	For each specific Sector , specify the total number of legal entity high risk active investors at 31 December of the preceding calendar year 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.

<A12023 Identifier="LBS" IntegerValue="965"></A12023>

REF	Field	Description
LBS	Third Party Reliance	Does your institution place reliance on third parties as defined in Section 6 of AMLR? Select from YesNo Variable name: EnumerationYesNo
LBT	No. Third Party Reliance Arrangements	State the total number of third party reliance arrangements in place Variable name: IntegerValue If not applicable enter 0
LBU	No. Investors Covered By Third Party Reliance	State the total number of investors covered under your institutions third party reliance arrangements Variable name: IntegerValue If not applicable enter 0

8.4 Mitigation and Control

8.4.1 Business Wide Risk Assessment

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

<A12031 Identifier="LBV" EnumerationBWRAConducted="No"></A12031>

REF	Field	Description
LBV	BWRA Conducted Investor	State whether your institution conducts a Business Wide Risk Assessment (BWRA). Select from BWRAConducted Variable name: EnumerationBWRAConducted
LBW	BWRA Senior Management Approval Investor	State whether Senior Management of your institution approved the latest version of the BWRA . Select from YesNo Variable name: EnumerationYesNo
LBX	BWRA Last Approval Date Investor	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
LBY	BWRA Review Frequency Investor	Select the frequency of BWRA review by your institution. Select from Frequency Variable name: EnumerationFrequency
LBZ	BWRA Business Change Investor	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
LCA	BWRA Business Change Description Investor	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
LCB	BWRA Money Laundering Investor	State whether risks of money laundering with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCC	BWRA Terrorist Financing Investor	State whether risks of terrorist financing with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCD	BWRA Sanctions Investor	State whether risks of circumvention of sanctions regulations with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCE	BWRA Corruption Investor	State whether risks of corruption (bribery) with regard to investors are explicitly identified and assessed in your institution's most recent BWRA.

		Select from YesNoNA Variable name: EnumerationYesNoNA
LCF	BWRA Conflicts of Interest Investor	State whether risks of conflicts of interests with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCG	BWRA Tax Evasion Investor	State whether risks of evasion of tax regulations with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCH	BWRA Internal Fraud Investor	State whether risks of internal fraud and embezzlement (by employees/management of your institution) with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCI	BWRA External Fraud Investor	State whether risks of external fraud and embezzlement with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCJ	BWRA Cybercrime Investor	State whether risks of cybercrime/ransomware with regard to investors are explicitly identified and assessed in your most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCK	BWRA Market Abuse Investor	State whether risks of market abuse with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA

LCL	BWRA Customer Groups Investor	State whether investor groups/segments are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCM	BWRA Geographies Investor	State whether geographies with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCN	BWRA Product Groups Investor	State whether product groups (e.g. certain products and services) with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCO	BWRA Distribution Channel Investor	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCP	BWRA Crypto Investor	State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have with regard to investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCQ	BWRA Risk Other Investor	State whether risks of other areas with regard to Investors are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCR	BWRA Risk Other Detail Investor	If Yes to BWRA Risk Other Investor, 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
LCS	BWRA Money laundering - Fund	State whether risks of money laundering with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCT	BWRA Terrorist financing - Fund	State whether risks of terrorist financing with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCU	BWRA Circumvention of sanctions regulations - Fund	State whether risks of circumvention of sanctions regulations with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCV	BWRA Corruption (bribery) - Fund	State whether risks of corruption (bribery) with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCW	BWRA Conflicts of interests - Fund	State whether risks of conflicts of interests with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCX	BWRA Evasion of tax regulations - Fund	State whether risks of evasion of tax regulations with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCY	BWRA Internal fraud and embezzlement - Fund	State whether risks of internal fraud and embezzlement (by employees/management of your institution) with regard to funds are explicitly identified and assessed in your institution's

		most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LCZ	BWRA External fraud and embezzlement - Fund	State whether risks of external fraud and embezzlement with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDA	BWRA Cybercrime/ Ransomware - Fund	State whether risks of cybercrime/ransomware with regard to funds are explicitly identified and assessed in your most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDB	BWRA Market abuse - Fund	State whether risks of market abuse with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDC	BWRA Customer groups - Fund	State whether fund groups/segments are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDD	BWRA Geographies - Fund	State whether geographies with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDE	BWRA Product groups - Fund	State whether product groups (e.g. certain products and services) with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDF	BWRA Distribution channels - Fund	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.)

		with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDG	BWRA Cryptos - Fund	State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have with regard to funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDH	BWRA Risk Other Fund	State whether risks of other areas with regard to Funds are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
LDI	BWRA Risk Other Detail Fund	If Yes to BWRA Risk Other Fund, 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
LDJ	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
LDK	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
LDL	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
LDM	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
LDN	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
LDO	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
LDP	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

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

<A12031 Identifier="LDQ" DateValue="2009-02-07"></A12031>

REF	Field	Description
LDQ	Pol & Proc - Customer onboarding - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for 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
LDR	Pol & Proc - Ongoing monitoring - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to

		Investors for ongoing monitoring of business relationships. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LDS	Pol & Proc - Customer Offboarding - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for 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
LDT	Pol & Proc - Politically Exposed Persons - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for Politically Exposed Persons (PEPs). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LDU	Pol & Proc - High risk customers - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to high risk Investors. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LDV	Pol & Proc - Transaction monitoring - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, investor risk review in result of positive alerts, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LDW	Pol & Proc - Suspicious transaction reporting - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors 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

LDX	Pol & Proc - Evasion of tax regulations - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for evasion of tax regulations (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
LDY	Pol & Proc - Bribery - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for bribery (e.g. monitoring and reporting of bribery instances). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LDZ	Pol & Proc - Conflicts of interest - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for conflicts of interest. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LEA	Pol & Proc - Fraud within or outside the organisation - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors for fraud within or outside your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LEB	Pol & Proc - Sanctions screening - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors 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
LEC	Pol & Proc - Sanction hits handling - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to Investors 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
LED	Pol & Proc - Sanction hits reporting - Investor	Enter the date when your institution's management approved the last version of policies and procedures with regard to

		Investors 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
LEE	Pol & Proc - Treating and reporting of ML/TF & Financial Sanctions incidents - Investor	Enter the date when your institution’s management approved the last version of policies and procedures with regard to Investors 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
LEF	Pol & Proc - Training - Investor	Enter the date when your institution’s management approved the last version of policies and procedures with regard to Investors 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
LEG	Pol & Proc - Geographic Risk Factors - Investor	Enter the date when your institution’s management approved the last version of policies and procedures with regard to Investors 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
LEH	Pol & Proc - AML/CFT Record Keeping - Investor	Enter the date when your institution’s management approved the last version of policies and procedures with regard to Investors 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
LEI	Pol & Proc - Business wide risk assessment process - Investor	Enter the date when your institution’s management approved the last version of policies and procedures with regard to Investors to support business wide risk assessment processes. Variable name: DateValue

		Format YYYY-MM-DD If not applicable enter 2000-01-01
LEJ	Pol & Proc - Customer risk assessment process - Investor	Enter the date when your institution's management approved the last version of policies and procedures to support investor risk assessment processes. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LEK	Pol & Proc - Customer onboarding - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for 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
LEL	Pol & Proc - Ongoing monitoring - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for ongoing monitoring of business relationships. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LEM	Pol & Proc - Customer Offboarding - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for 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
LEN	Pol & Proc - Politically Exposed Persons - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for Politically Exposed Persons (PEPs). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LEO	Pol & Proc - High risk customers - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to high risk Funds. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

LEP	Pol & Proc - Transaction monitoring - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, fund risk review in result of positive alerts, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LEQ	Pol & Proc - Suspicious transaction reporting - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LER	Pol & Proc - Evasion of tax regulations - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for evasion of tax regulations (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
LES	Pol & Proc - Bribery - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for bribery (e.g. monitoring and reporting of bribery instances). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LET	Pol & Proc - Conflicts of interest - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for conflicts of interest. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LEU	Pol & Proc - Fraud within or outside the organisation - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds for fraud within or outside your institution. Variable name: DateValue

		Format YYYY-MM-DD If not applicable enter 2000-01-01
LEV	Pol & Proc - Sanctions screening - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LEW	Pol & Proc - Sanction hits handling - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LEX	Pol & Proc - Sanction hits reporting - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LEY	Pol & Proc - Treating and reporting of ML/TF & Financial Sanctions incidents - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LEZ	Pol & Proc - Training - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LFA	Pol & Proc - Geographic Risk Factors - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LFB	Pol & Proc - AML/CFT Record Keeping - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds 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
LFC	Pol & Proc - Business wide risk assessment process - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds to support business wide risk assessment processes. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LFD	Pol & Proc - Customer risk assessment process - Fund	Enter the date when your institution's management approved the last version of policies and procedures with regard to Funds risk assessment processes. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LFE	Pol & Proc - Whistleblowing - Institution Level	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
LFF	Pol & Proc - Compliance function - Institution Level	Enter the date when your institution's management approved the last version of policies, procedures and resourcing for the compliance function so it operates to an acceptable standard. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LFG	Pol & Proc - Internal Audit/Assurance Testing - Institution Level	Enter the date when your institution's management approved the last version of policies, 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
LFH	Pol & Proc - Separation of functions (Three Lines of Defence) - Institution Level	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
LFI	Pol & Proc - Legislation changes/regulatory guidance - Institution Level	Enter the date when your institution's management approved the last version of policies, 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
LFJ	Pol & Proc - Review Frequency - Institution Level	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.

```
<A12031 Identifier="LFK" IntegerValue="505"></A12031>
```

REF	Field	Description
LFK	Investor Offboarding Number	State the total number of investors that were terminated in the preceding calendar year due to AML/CFT/FS concerns. Variable name: IntegerValue If not applicable enter 0
LFL	Investor Offboarding Number ML	State the total number of investors that were terminated in the preceding calendar year due to money laundering or related risks/concerns Variable name: IntegerValue If not applicable enter 0
LFM	Investor Offboarding Number TF	State the total number of investors that were terminated in the preceding calendar year due to terrorist financing or related risks/concerns.

		Variable name: IntegerValue If not applicable enter 0
LFN	Investor Offboarding Number FS	State the total number of investors that were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. Variable name: IntegerValue If not applicable enter 0
LFO	Investor Offboarding Number HR	State the total number of investors rated high risk (as per your institution's investor risk assessment prior to offboarding), that were terminated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LFP	Fund Offboarding Number	State the total number of funds that were terminated in the preceding calendar year due to AML/CFT/FS/fraud concerns. Variable name: IntegerValue If not applicable enter 0
LFQ	Fund Offboarding Number ML	State the total number of funds that were terminated in the preceding calendar year due to money laundering or related risks/concerns Variable name: IntegerValue If not applicable enter 0
LFR	Fund Offboarding Number TF	State the total number of funds that were terminated in the preceding calendar year due to terrorist financing or related risks/concerns. Variable name: IntegerValue If not applicable enter 0
LFS	Fund Offboarding Number FS	State the total number of funds that were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. Variable name: IntegerValue If not applicable enter 0
LFT	Fund Offboarding Number HR	State the total number of funds rated high risk (as per your institution's fund risk assessment prior to offboarding), that 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.

```
<A12031 Identifier="LFU" EnumerationCDD="Yes_in_all_cases"></A12031>
```

REF	Field	Description
LFU	Identity Verification - Investor	State whether the identity of investors is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
LFV	Identity Verification BO - Investor	State whether the identity of beneficial owners of investors is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
LFW	Nature Of Relationship - Investor	State whether the purpose and intended nature of the business relationship is established prior to providing services to investors Select from CDD Variable name: EnumerationCDD
LFX	Source Of Funds - Investor	State whether source/origin of the funds/assets is identified prior to providing services to investors Select from CDD Variable name: EnumerationCDD
LFY	Customer Rep Identified - Investor	State whether an investor's representative is identified prior to providing services to investors. Select from CDD Variable name: EnumerationCDD
LFZ	Geos Identified - Investor	State whether geographies involved are identified prior to providing services to investors.

		Select from CDD Variable name: EnumerationCDD
LGA	Identity Verification - Fund	State whether the identity of funds is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
LGB	Identity Verification BO - Fund	State whether the identity of the beneficial owner of funds is established and verified prior to providing services. Select from CDD Variable name: EnumerationCDD
LGC	Ownership Structure Identified - Fund	State whether ownership and/or control structure is identified for funds prior to providing services. Select from CDD Variable name: EnumerationCDD
LGD	Nature Of Relationship - Fund	State whether the purpose and intended nature of the business relationship is established prior to providing services to funds. Select from CDD Variable name: EnumerationCDD
LGE	Source Of Funds - Fund	State whether source/origin of the funds/assets is identified prior to providing services to funds. Select from CDD Variable name: EnumerationCDD
LGF	Customer Rep Identified - Fund	State whether representatives are identified prior to providing services to funds. Select from CDD Variable name: EnumerationCDD
LGG	CDD Review Investor	State whether your institution periodically reviews its risk profiles for investors. Select from YesNo Variable name: EnumerationYesNo

LGH	CDD Review Fund	State whether your institution periodically reviews its risk profiles for funds. Select from YesNo Variable name: EnumerationYesNo
LGI	CDD Review Investor Low	If Yes to CDD Review Investor, state the Frequency of these reviews for low-risk investors. Select from Frequency Variable name: EnumerationFrequency
LJJ	CDD Review Investor Medium	If Yes to CDD Review Investor, state the Frequency of these reviews for medium-risk investors. Select from Frequency Variable name: EnumerationFrequency
LKK	CDD Review Investor High	If Yes to CDD Review Investor, state the Frequency of these reviews for high-risk investors. Select from Frequency Variable name: EnumerationFrequency
LGL	CDD Review Investor PEP	State the Frequency of these reviews for investors who are politically exposed persons, their family members or persons that are close associates. Select from Frequency Variable name: EnumerationFrequency
LGM	CDD Review Investor Unacceptable	If Yes to CDD Review Investor, state the Frequency of these reviews for unacceptable-risk investors (e.g. yet to be exited). Select from Frequency Variable name: EnumerationFrequency
LGN	CDD Review Fund Low	If Yes to CDD Review Fund, state the Frequency of these reviews for low-risk funds. Select from Frequency Variable name: EnumerationFrequency
LGO	CDD Review Fund Medium	If Yes to CDD Review Fund, state the Frequency of these reviews for medium-risk funds. Select from Frequency

		Variable name: EnumerationFrequency
LGP	CDD Review Fund High	If Yes to CDD Review Fund, state the Frequency of these reviews for high-risk funds. Select from Frequency Variable name: EnumerationFrequency
LGQ	CDD Review Fund PEP	State the Frequency of these reviews for funds who have politically exposed person risks identified. Select from Frequency Variable name: EnumerationFrequency
LGR	CDD Review Fund Unacceptable	If Yes to CDD Review Fund, state the Frequency of these reviews for unacceptable-risk funds (e.g. yet to be exited). Select from Frequency Variable name: EnumerationFrequency
LGS	CDD CRA Update Investor	Date when your institution last updated the Customer Risk Assessment for Investors Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LGT	CDD CRA Update Fund	Date when your institution last updated the Customer Risk Assessment for Funds Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LGU	CDD Low Investor	Number of total Investors 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
LGV	CDD Medium-Low Investor	Number of total investors 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
LGW	CDD MH Investor	Number of total investors 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
LGX	CDD High Investor	Number of total investors 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
LGY	CDD Low Fund	Number of total funds 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
LGZ	CDD Medium-Low Fund	Number of total funds 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
LHA	CDD MH Fund	Number of total funds 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
LHB	CDD High Fund	Number of total funds 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
LHC	CDD customers Due Investor	Number of investors for whom updates of information/documentation were due in the preceding calendar year, in accordance with your institution's policies and procedures. Variable name: IntegerValue If not applicable enter 0
LHD	CDD customers Reviewed Investor	Number of investors for whom information/documentation was reviewed and updated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LHE	CDD customers Due Fund	Number of funds for whom updates of information/documentation were due in the preceding calendar year, in accordance with your institution's policies and procedures. Variable name: IntegerValue If not applicable enter 0

LHF	CDD customers Reviewed Fund	Number of funds for whom information/documentation was reviewed and updated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LHG	Backlog Prop Investor Total	Specify the proportion of backlogs of all investors. Variable name: DecimalValue If not applicable enter 0
LHH	Backlog Prop Investor High	Specify the proportion of backlogs of high-risk investors. Variable name: DecimalValue If not applicable enter 0
LHI	Backlog Prop Investor PEP	Specify the proportion of backlogs of investors who are politically exposed persons, their family members or persons to be close associates. Variable name: DecimalValue If not applicable enter 0
LHJ	Backlog Prop Investor Unacceptable	Specify the proportion of backlog made up of unacceptable-risk natural person investors (e.g. yet to be exited). Variable name: DecimalValue If not applicable enter 0
LHK	Backlog Prop Fund Total	Specify the proportion of backlogs of all funds. Variable name: DecimalValue If not applicable enter 0
LHL	Backlog Prop Fund High	Specify the proportion of backlogs of high-risk funds. Variable name: DecimalValue If not applicable enter 0
LHM	Backlog Prop Fund PEP	Specify the proportion of backlogs of funds who have PEP risk identified. Variable name: DecimalValue If not applicable enter 0
LHN	Backlog Prop Fund Unacceptable	Specify the proportion of backlog made up of unacceptable-risk funds (e.g. yet to be exited).

		Variable name: DecimalValue If not applicable enter 0
LHO	Concrete Timelines Investor	State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for investors. Select from YesNoNA Variable name: EnumerationYesNoNA
LHP	Concrete Timelines Fund	State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for funds. Select from YesNoNA Variable name: EnumerationYesNoNA
LHQ	No Ident Total Investor	What proportion of total investors 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
LHR	No Ident High Investor	What proportion of high risk investors 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
LHS	No Ident PEP Investor	What proportion of investors who are PEPs 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
LHT	Incomplete Total Fund	Specify the proportion of total funds with no identification and verification documentation. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0

LHU	Incomplete High Fund	Specify the proportion of high-risk funds with no identification and verification documentation. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LHV	Incomplete PEP Fund	Specify the proportion of funds with PEP risk identified, who have no identification and verification documentation Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LHW	CDD BO not Identified	Number of investors that are legal entities /trusts whose beneficial owners have not been identified. Variable name: IntegerValue If not applicable enter 0
LHX	CDD BO not Verified	Number of investors 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
LHY	Investor Data not in Line With Article 20	Number of investors 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
LHZ	Investor Number Without Risk Profile	State the number of investors of your institution who have not had a ML/TF risk profile created Variable name: IntegerValue If not applicable enter 0
LIA	Fund Data not in Line With Article 20	Number of funds 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
LIB	Fund Number Without Risk Profile	State the number of funds of your institution who have not had a ML/TF risk profile created 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.

<A12031 Identifier="LIC" EnumerationYesNoNA="No"></A12031>

REF	Field	Description
LIC	TM Profile Investor	Does your institution draw up a transaction profile for investors at the initiation of services? Select from YesNoNA Variable name: EnumerationYesNoNA
LID	TM Profile Review Investor	What is the frequency of review of the transaction profile? Select from Frequency Variable name: EnumerationFrequency
LIE	TM Profile Funds	Does your institution draw up a transaction profile for funds at the initiation of services? Select from YesNoNA Variable name: EnumerationYesNoNA
LIF	TM Profile Review Funds	What is the frequency of review of the transaction profile? Select from Frequency Variable name: EnumerationFrequency
LIG	TM Profile Number Transactions Investor	If your transaction monitoring system for investors is automatic, can it generate alerts in case of inconsistencies

		between the expected transaction profile relating to the investor and the actual number of transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIH	TM Profile Value of Aggregated Transactions Investor	If your transaction monitoring system for investors is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the investor and the actual value of aggregated transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LII	TM Profile Value of Single Transactions Investor	If your transaction monitoring system for investors is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the investor and the actual value of single transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIJ	TM Profile Counterparties Investor	If your transaction monitoring system for investors is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the investor and the actual counterparties? Select from YesNoNA Variable name: EnumerationYesNoNA
LIK	TM Profile Geographies Investor	If your transaction monitoring system for investors is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the investor and the actual geographies? Select from YesNoNA Variable name: EnumerationYesNoNA
LIL	TM Profile Group Transactions Investor	If your transaction monitoring system for investors is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the investor and the actual intra-group transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIM	TM Profile Banks Investor	If your transaction monitoring system for investors is automatic, can it generate alerts in case of inconsistencies

		between the expected transaction profile relating to the investor and the actual banks/payment institutions involved? Select from YesNoNA Variable name: EnumerationYesNoNA
LIN	TM Alert Number of Transactions Funds	If your transaction monitoring system for funds is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the fund and the actual number of transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIO	TM Alert Value of Aggregated Transactions Funds	If your transaction monitoring system for funds is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the fund and the actual value of aggregated transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIP	TM Alert Value of Single Transactions Funds	If your transaction monitoring system for funds is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the fund and the actual value of single transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIQ	TM Alert Counterparties Funds	If your transaction monitoring system for funds is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the fund and the actual counterparties? Select from YesNoNA Variable name: EnumerationYesNoNA
LIR	TM Alert Geographies Funds	If your transaction monitoring system for funds is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the fund and the actual geographies? Select from YesNoNA Variable name: EnumerationYesNoNA
LIS	TM Alert Group Transactions Funds	If your transaction monitoring system for funds is automatic, can it generate alerts in case of inconsistencies between the

		expected transaction profile relating to the fund and the actual intra-group transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIT	TM Alert Banks Funds	If your transaction monitoring system for funds is automatic, can it generate alerts in case of inconsistencies between the expected transaction profile relating to the fund and the actual banks/payment institutions involved? Select from YesNoNA Variable name: EnumerationYesNoNA
LIU	TM How Monitor Investor	State whether your institution monitors transactions for Investors and how this is done. Select from MonitoringApproach Variable name: EnumerationMonitoringApproach
LIV	TM Model Validation Investor	Are formal steps taken after creating the rules for an automated transaction monitoring system for investors in which the rules are tested for appropriateness and efficacy? Select from ModelValidation Variable name: EnumerationModelValidation
LIW	TM AI Investor	Does your institution use artificial intelligence (including machine learning) technology in its transaction monitoring process for investors? Select from YesNoNA Variable name: EnumerationYesNoNA
LIX	TM Rule Investor	Does your institution use rules as part of its transaction monitoring process for investors? Select from YesNoNA Variable name: EnumerationYesNoNA
LIY	TM How Monitor Funds	State whether your institution monitors transactions for funds and how this is done. Select from MonitoringApproach Variable name: EnumerationMonitoringApproach

LIZ	TM Model Validation Funds	Are formal steps taken after creating the rules for an automated transaction monitoring system for funds in which the rules are tested for appropriateness and efficacy? Select from ModelValidation Variable name: EnumerationModelValidation
LJA	TM AI Funds	Does your institution use artificial intelligence (including machine learning) technology in its transaction monitoring process for funds? Select from YesNoNA Variable name: EnumerationYesNoNA
LIB	TM Rule Funds	Does your institution use rules as part of its transaction monitoring process for funds? Select from YesNoNA Variable name: EnumerationYesNoNA
LIC	TM High Risk Geographies Investor	Does your institution have rules in its transaction monitoring process with respect to high risk geographies? Select from YesNoNA Variable name: EnumerationYesNoNA
LID	TM Offshore Jurisdictions Investor	Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions? Select from YesNoNA Variable name: EnumerationYesNoNA
LIE	TM BR Customer Segments Investor	Does your institution have rules in its transaction monitoring process with respect to investor Segments? Investor segments can be any internal definition of investor groupings, retail or corporate investors, risk levels, associated sector, high value investor etc. Select from YesNoNA Variable name: EnumerationYesNoNA
LIF	TM Sectors Investor	Does your institution have transaction monitoring rules which take into account risks associated with specific sectors? Select from YesNoNA

		Variable name: EnumerationYesNoNA
LJG	TM PEP Investor	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
LJH	TM Other High Risk Investors	Does your institution have transaction monitoring rules which take into account other high risk investor types? Select from YesNoNA Variable name: EnumerationYesNoNA
LJI	TM Other Investor	Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their rules for investors? Select from YesNoNA Variable name: EnumerationYesNoNA
LJJ	TM Other Detail Investor	Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system for investors. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
LJK	TM High Risk Geographies Funds	Does your institution have rules in its transaction monitoring process with respect to high risk geographies? Select from YesNoNA Variable name: EnumerationYesNoNA
LJL	TM Offshore Jurisdictions Funds	Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions? Select from YesNoNA Variable name: EnumerationYesNoNA
LJM	TM PEP Funds	Are there rules or conditions in your institution's transaction monitoring system to account for risks associate to Funds with identified PEP risks? Select from YesNoNA

		Variable name: EnumerationYesNoNA
LJN	TM Other High Risk Funds	Does your institution have transaction monitoring rules which take into account other high risk fund types? Select from YesNoNA Variable name: EnumerationYesNoNA
LJO	TM Other Funds	Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their rules for funds? Select from YesNoNA Variable name: EnumerationYesNoNA
LJP	TM Other Detail Funds	Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system for funds. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
LJQ	TM Review Investor	Does your institution periodically review its rules in its transaction monitoring process for investors? Select from YesNoNA Variable name: EnumerationYesNoNA
LJR	TM Review Latest Investor	Please give completion date of the review. If a repeating review process is in place, please give the most recent date when a rules for investors was reviewed. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LJS	TM Review Latest Changes Investor	Did the most recent review lead to any changes in rules for investors? Select from YesNoNA Variable name: EnumerationYesNoNA
LJT	TM Real Time or Post Event Investor	State whether detection of (possible) suspicious financial transactions of investors 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
LJU	TM Review Funds	Does your institution periodically review its rules in its transaction monitoring process for funds? Select from YesNoNA Variable name: EnumerationYesNoNA
LJV	TMBR Review Latest Funds	Please give completion date of the review. If a repeating review process is in place, please give the most recent date when a rules for funds was reviewed. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LJW	TMBR Review Latest Changes Funds	Did the most recent review lead to any changes in rules for funds? Select from YesNoNA Variable name: EnumerationYesNoNA
LJX	TM Real Time Post Event Funds	State whether detection of (possible) suspicious financial transactions for funds 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
LJY	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

8.4.6 Alerts

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

```
<A12031 Identifier="LJZ" IntegerValue="107"></A12031>
```

REF	Field	Description
LJZ	Business Rule Count Investor	How many <u>rules</u> were in place in your institution's transaction monitoring system for investors in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
LKA	Total Alert Count Investor	How many <u>alerts</u> on Investors were generated by the transaction monitoring system in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
LKB	Percent Alerts Investor	What is the proportion of <u>transaction monitoring alerts</u> on investors to total transactions by investors? Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LKC	Alerts Investigated Investor	How many <u>alerts</u> on investors were investigated by an AML/transaction monitoring staff member? Variable name: IntegerValue If not applicable enter 0
LKD	Alerts Escalated Investor	How many <u>alerts</u> on investors were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? Variable name: IntegerValue If not applicable enter 0
LKE	Alert Investigated FPIInvestor	How many <u>alerts</u> on investors were closed as <u>false positives</u> following investigation? Variable name: IntegerValue If not applicable enter 0
LKF	Alert TPReview Investor	How many <u>true positive alerts</u> on investors (STR filed from alerts) led to a review of the investor's risk, CDD or otherwise.

		Variable name: IntegerValue If not applicable enter 0
LKG	Alert Backlog Investor	At 31 December of the preceding calendar year, how many automated alerts on investors from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
LKH	Alert Mean Time To Close Investor	Over the course of the preceding calendar year, what was the average time in days to close an alert on an investor, from the initial alert generation? Variable name: DecimalValue If not applicable enter 0
LKI	Alert Backlog Manual Investor	At 31 December of the preceding calendar year, how many alerts on investors (manual alerts only) from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
LKJ	Alert Mean Time To Close TPMManual Investor	Over the course of the preceding calendar year, what was the average time in days to close a manual alert on an investor, from the initial alert generation? Variable name: DecimalValue If not applicable enter 0
LKK	Business Rule Count Funds	How many rules were in place in your institution's transaction monitoring process for funds in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
LKL	Total Alert Count Funds	How many alerts were generated by the transaction monitoring process for funds in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
LKM	Percent Alerts Funds	What is the proportion of transaction monitoring alerts for funds compared to their total transactions?

		Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LKN	Alerts Investigated Funds	How many alerts on funds 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
LKO	Alerts Escalated Funds	How many alerts on funds were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? Variable name: IntegerValue If not applicable enter 0
LKP	Alert Investigated FPFunds	How many alerts on funds 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
LKQ	Alert TPReview Funds	How many true positive alerts (STR filed from alerts) led to a review of the funds risk, CDD or other risk documentation Variable name: IntegerValue If not applicable enter 0
LKR	Alert Backlog Funds	At 31 December of the preceding calendar year, how many alerts on funds from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
LKS	Alert Mean Time To Close Funds	Over the course of the preceding calendar year, what was the average time in days to close an alert on a fund, from the initial alert generation? Variable name: DecimalValue If not applicable enter 0
LKT	Alert Backlog Manual Funds	At 31 December of the preceding calendar year, how many manual alerts on funds from that year are still not closed?

		Variable name: IntegerValue If not applicable enter 0
LKU	Alert Mean Time To Close True Positive Manual Alert - Funds	Over the course of the preceding calendar year, what was the average time in days to close a manual alert on a fund, from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? Variable name: DecimalValue If not applicable enter 0

8.4.7 Suspicious Transaction Reporting

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

```
<A12031 Identifier="LKV" EnumerationYesNo="Yes"></A12031>
```

REF	Field	Description
LKV	Registered FIU	State whether your institution is registered with the Financial Intelligence Unit (FIU) GoAML system and with Revenue for the purposes of reporting suspicious transaction reports (STRs). Select from YesNo Variable name: EnumerationYesNo
LKW	FIU Num STR - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LKX	FIU Num STR Bribe - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on bribery/corruption reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LKY	FIU Num STR HT - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on human trafficking reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

LKZ	FIU Num STR LWE - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on left wing extremism reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLA	FIU Num STR MS - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on migrant smuggling reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLB	FIU Num STR ML - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on money laundering reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLC	FIU Num STR PEP - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on politically exposed person reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLD	FIU Num STR RWE - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on right wing extremism reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLE	FIU Num STR Sanctions - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on sanctions list match reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLF	FIU Num STR SE - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on sexual exploitation reported to the FIU in the preceding calendar year. Variable name: IntegerValue

		If not applicable enter 0
LLG	FIU Num STR SWF - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on social welfare fraud reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLH	FIU Num STR TE - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on tax evasion reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLI	FIU Num STR TF - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on terrorist financing reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLJ	FIU Num STR TBML - Investor	State the total number of suspicious transaction reports (STRs) generated by Investor activities based on trade based money laundering reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLK	FIU Num STR - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLL	FIU Num STR Bribe - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on bribery/corruption reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLM	FIU Num STR HT - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on human trafficking reported to the FIU in the preceding calendar year.

		Variable name: IntegerValue If not applicable enter 0
LLN	FIU Num STR LWE - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on left wing extremism reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLO	FIU Num STR MS - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on migrant smuggling reported to the FIU in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
LLP	FIU Num STR ML - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on money laundering reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLQ	FIU Num STR PEP - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on politically exposed person reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLR	FIU Num STR RWE - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on right wing extremism reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLS	FIU Num STR Sanctions - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on sanctions list match reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

LLT	FIU Num STR SE - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on sexual exploitation reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLU	FIU Num STR SWF - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on social welfare fraud reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLV	FIU Num STR TE - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on tax evasion reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLW	FIU Num STR TF - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on terrorist financing reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLX	FIU Num STR TBML - Funds	State the total number of suspicious transaction reports (STRs) generated by Fund activities based on trade based money laundering reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
LLY	FIU Days to Report	Across all monitoring systems, what was the 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.

<A12031 Identifier="LLZ" EnumerationYesNo="Yes"></A12031>

REF	Field	Description
LLZ	Sanctions Prior To Service Investor	State whether your institution verifies, prior to providing services, whether or not investors and their beneficial owners are included on sanction list. Select from YesNo Variable name: EnumerationYesNo
LMA	Sanction Max Hours Investor	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 for investors. Variable name: DecimalValue If not applicable enter 0
LMB	Sanctions Prior To Service Funds	State whether your institution verifies, prior to providing services, whether or not entities related to the Fund and their beneficial owners are included on sanction list. Select from YesNo Variable name: EnumerationYesNo
LMC	Sanction Max Hours Funds	Maximum number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools for funds. Variable name: DecimalValue If not applicable enter 0
LMD	Sanction EU Investor	Specify if investors and beneficial owners are checked against EU sanctions lists. Select from YesNo Variable name: EnumerationYesNo
LME	Sanction National List Investor	Specify if investors and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo Variable name: EnumerationYesNo
LMF	Sanction UN Investor	Specify if investors and beneficial owners are checked against UN sanctions lists.

		Select from YesNo Variable name: EnumerationYesNo
LMG	Sanction Other Investor	Specify if investors and beneficial owners are checked against any other sanctions lists Select from YesNo Variable name: EnumerationYesNo
LMH	Sanction Other Specify Investor	If your institution uses any other sanctions lists for investors not mentioned above please specify Variable name: String500 Character limit: 500 characters If not applicable enter N/A
LMI	Sanction EU Funds	Specify if entities related to funds are checked against EU sanctions lists. Select from YesNo Variable name: EnumerationYesNo
LMJ	Sanction National List Funds	Specify if entities related to funds are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo Variable name: EnumerationYesNo
LMK	Sanction UN Funds	Specify if entities related to funds are checked against UN sanctions lists. Select from YesNo Variable name: EnumerationYesNo
LML	Sanction Other Funds	Specify if entities related to funds are checked against any other sanctions lists Select from YesNo Variable name: EnumerationYesNo
LMM	Sanction Other Specify Funds	If your institution uses any other sanctions lists for funds not mentioned above please specify Variable name: String500 Character limit: 500 characters If not applicable enter N/A

LMN	Sanction Transact Check Investor	At and after the start of service provision, state whether your institution checks whether investors and their beneficial owners are included on sanctions lists when executing a transaction. Select from YesNo Variable name: EnumerationYesNo
LMO	Sanction List Update Investor	At and after the start of service provision, state whether your institution checks whether investors and their beneficial owners are included on sanctions lists when sanctions listing updated. Select from YesNo Variable name: EnumerationYesNo
LMP	Sanction Transact Check Funds	At and after the start of service provision, state whether your institution checks whether entities related to funds are included on sanctions lists when executing a transaction. Select from YesNo Variable name: EnumerationYesNo
LMQ	Sanction List Update Funds	At and after the start of service provision, state whether your institution checks whether entities related to funds are included on sanctions lists when sanctions listing updated. Select from YesNo Variable name: EnumerationYesNo
LMR	Sanction Periodic Cust Investor	At the start of service provision and afterwards, state whether your institution periodically checks whether investors are included on sanctions lists. Variable name: IntegerValue If not applicable enter 0
LMS	Sanction Periodic BO Investor	At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to investors are included on sanctions lists. Variable name: IntegerValue If not applicable enter 0
LMT	Sanction Periodic Rep Investor	At and after the start of service provision, state whether your institution periodically checks whether representatives connected to investors are included on sanctions lists.

		Variable name: IntegerValue If not applicable enter 0
LMU	Sanction Periodic Cust Funds	At the start of service provision and afterwards, state whether your institution periodically checks whether funds are included on sanctions lists. Variable name: IntegerValue If not applicable enter 0
LMV	Sanction Periodic BO Funds	At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to funds are included on sanctions lists. Variable name: IntegerValue If not applicable enter 0
LMW	Sanction Periodic Rep Funds	At and after the start of service provision, state whether your institution periodically checks whether representatives connected to funds are included on sanctions lists. Variable name: IntegerValue If not applicable enter 0
LMX	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
LMY	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.

```
<A12031 Identifier="LMZ" EnumerationOutsource="Yes_completely_or_partially_to_non_group_entities"></A12031>
```

REF	Field	Description
LMZ	Outsource CDD Onboard Investor	State whether CDD investor acceptance (e.g. CDD activities related to investor onboarding checks) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNA	Outsource CDD Review Investor	State whether CDD periodic investor review (e.g. recurring process of reviewing investor CDD status/documentation/risk) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNB	Outsource TM Investor	State whether transaction monitoring for investors has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNC	Outsource Alert Proc Investor	State whether investor alerts processing has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LND	Outsource STR Reporting Investor	State whether reporting of investor's suspicious transactions has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNE	Outsource Sanction Screen Investor	State whether sanctions screening of investors has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource

LNF	Outsource CDM Investor	State whether investor data management (e.g. external storage, management and handling of investor data) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNG	Outsource Training Investor	State whether AML/CFT training regarding investors has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNH	Outsource PEP Investor	State whether investor PEP detection has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNI	Outscr Compliance Investor	State whether compliance monitoring checks regards investors have been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNJ	Outsource Other AML CFT Investor	State whether other processes related to investor 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
LNK	Outsource Other AML CFT Specify Investor	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
LNL	Outsource CDD Onboard Funds	State whether CDD fund acceptance (e.g. CDD activities related to fund onboarding checks) has been outsourced to third parties (including within the Group).

		Select from Outsource Variable name: EnumerationOutsource
LNМ	Outsource CDD Review Funds	State whether CDD periodic fund review (e.g. recurring process of reviewing fund CDD status/documentation/risk) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNN	Outsource TM Funds	State whether transaction monitoring for funds has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNO	Outsource Alert Proc Funds	State whether fund alerts processing has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNP	Outsource STR Reporting Funds	State whether reporting of fund's suspicious transactions has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNQ	Outsource Sanction Screen Funds	State whether sanctions screening of funds has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNR	Outsource CDM Funds	State whether fund data management (e.g. external storage, management and handling of fund data) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNS	Outsource Training Funds	State whether AML/CFT training regarding funds has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource

LNT	Outsource PEP Funds	State whether fund PEP detection has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNU	Outscr Compliance Funds	State whether compliance monitoring checks regards funds have been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
LNV	Outsource Other AML CFT Funds	State whether other processes related to fund 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
LNW	Outsource Other AML CFT Specify Funds	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
LNx	Outsource Provider Compl Reqs Investor	State the proportion of outsourced AML/CFT tasks related to Investors 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

LNK	Outsource Compliance Assess Investor	Has your institution assessed outsource provider's compliance (for outsourced tasks related to investors) with the requirements in the preceding calendar year Select from YesNoNA Variable name: EnumerationYesNoNA
LNZ	Outsource Provider Compl Reqs Funds	State the proportion of outsourced AML/CFT tasks related to funds, 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
LOA	Outsource Compliance Assess Funds	Has your institution assessed outsource provider's compliance (for outsourced tasks related to funds) with the requirements in the preceding calendar year Select from YesNoNA Variable name: EnumerationYesNoNA
LOB	Outsource Assess Report Obligation Investor	For outsourced tasks related to investors, state whether your institution ensures outsource provider compliance with the requirements via reporting obligation. Select from YesNoNA Variable name: EnumerationYesNoNA
LOC	Outsource Assess Training Investor	For outsourced tasks related to investors, 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

LOD	Outsource Assess Audit Rights Investor	For outsourced tasks related to investors, 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
LOE	Outsource Assess Other Investor	For outsourced tasks related to investors, state, if there are any other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. Select from YesNoNA Variable name: EnumerationYesNoNA
LOF	Outsource Assess Other Detail Investor	For outsourced tasks related to investors, detail which other processes your institution have 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
LOG	Outsource Assess Report Obligation Funds	For outsourced tasks related to funds, state whether your institution ensures outsource provider compliance with the requirements via reporting obligation. Select from YesNoNA Variable name: EnumerationYesNoNA
LOH	Outsource Assess Training Funds	For outsourced tasks related to funds, 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
LOI	Outsource Assess Audit Rights Funds	For outsourced tasks related to funds, 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
LOJ	Outsource Assess Other Funds	For outsourced tasks related to funds, state, if there are any other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. Select from YesNoNA Variable name: EnumerationYesNoNA
LOK	Outsource Assess Other Detail Funds	For outsourced tasks related to funds, detail which other processes your institution have 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
LOL	Outsource High Risk Third Country Investor	For outsourced tasks related to investors, 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
LOM	Outsource High Risk Third Group Investor	For outsourced tasks related to investors, 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
LON	Outsource High Risk Third Country Funds	For outsourced tasks related to funds, 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
LOO	Outsource High Risk Third Group Funds	For outsourced tasks related to funds, 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 & Training

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

<A12031 Identifier="LOP" PercentageValue="0.9"></A12031>

REF	Field	Description
LOP	Training Non AMLProp Investor	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 topics related to investors. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOQ	Training AML Prop Investor	State the proportion of AML specialist staff who have attended training in the preceding calendar year with regard to financial crime topics related to investors. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOR	Training Agents Prop Investor	State the proportion of agents and distributors who have attended training in the preceding calendar year with regard to financial crime topics related to investors. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOS	Training Board Prop Investor	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 topics related to investors. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOT	Training Other Prop Investor	State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with

		regard to financial crime topics related to investors. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOU	Training Non AML Prop Funds	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 topics related to funds. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOV	Training AML Prop Funds	State the proportion of AML specialist staff who have attended training in the preceding calendar year with regard to financial crime topics related to funds. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOW	Training Agents Prop Funds	State the proportion of agents and distributors who have attended training in the preceding calendar year with regard to financial crime topics related to funds. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOX	Training Board Prop Funds	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 topics related to funds. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
LOY	Training Other Prop Funds	State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with regard to financial crime topics related to funds. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0

LOZ	Staff Numbers	Enter the total number of full-time equivalent employees employed by the institution. Variable name: IntegerValue If not applicable enter 0
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8.4.11 Compliance and Assurance Testing

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

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<A12031 Identifier="LPA" DateValue="2016-09-30"></A12031>
```

REF	Field	Description
LPA	Compliance SE BWRA	State the most recent date when the structure and effectiveness of your institution's business-wide risk assessment was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LPB	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
LPC	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
LPD	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
LPE	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
LPG	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
LPG	Compliance CDD	State the most recent date when the determination of ML/TF risk profile of investors/funds was assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LPH	Compliance TM	State the most recent date when the monitoring processes for both transactions and business relationships were assessed by the compliance functions. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LPI	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
LPI	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
LPK	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
LPL	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
LPM	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
LPN	Compliance SE 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
LPO	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
LPP	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

LPQ	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
LPR	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
LPS	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
LPT	Compliance CDD Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of investors/funds. 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
LPU	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
LPV	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
LPW	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
LPX	Compliance TP-DD 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
LPY	Compliance Other Proc 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
LPZ	Compliance Ex Co	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
LQA	Compliance 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
LQB	Compliance AMLStaff	Number of dedicated AML/CFT compliance staff (in Full Time Equivalent). Variable name: IntegerValue If not applicable enter 0

8.4.12 Audit

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

```
<A12031 Identifier="LQC" DateValue="2039-11-29"></A12031>
```

REF	Field	Description
LQC	Audit SE 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
LQD	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

LQE	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
LQF	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
LQG	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
LQH	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. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
LQI	Audit CDD	State the most recent date when the determination of ML/TF risk profile of investors/funds 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
LQJ	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

LQK	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
LQL	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
LQM	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
LQN	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
LQO	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
LQP	Audit SE BWRA Description	Briefly describe any material findings/potential breaches of your institutions business-wide risk assessment, identified by and internal audit or an external expert. 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
LQQ	Audit Training Description	Briefly describe any material findings/potential breaches of AML/CFT-related awareness-raising and staff training measures identified by the internal audit in your institution or by an external expert. 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
LQR	Audit Verification Description	Briefly describe any material findings/potential breaches of identification and identity verification procedures identified by the internal audit in your institution or by an external expert. 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
LQS	Audit Sanctions Description	Briefly describe any material findings/potential breaches of compliance with sanctions regulations identified by the internal audit in your institution or by an external expert. 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
LQT	Audit Resources Description	Briefly describe any material findings/potential breaches of resources dedicated to AML/CFT identified by the internal audit in your institution or by an external expert. 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
LQU	Audit Organisation Description	Briefly describe any material findings/potential breaches of the organisation of the AML/CFT system, governance and reporting to management bodies identified by the internal audit in your institution or by an external expert.

		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
LQV	Audit CDD Description	Briefly describe any material findings/potential breaches of the determination of ML/TF risk profile of customers in a business relationship identified by the internal audit in your institution or by an external expert. 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
LQW	Audit TM Description	Briefly describe any material findings/potential breaches of the transaction monitoring process identified by the internal audit in your institution or by an external expert. 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
LQX	Audit STR Description	Briefly describe any material findings/potential breaches of the suspicious transaction reporting process identified by the internal audit in your institution or by an external expert. 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
LQY	Audit Records Description	Briefly describe any material findings/potential breaches of record keeping policies and procedures identified by the internal audit in your institution or by an external expert. 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
LQZ	Audit TP-DD Description	Briefly describe any material findings/potential breaches of outsourcing arrangements identified by the internal audit in your institution or by an external expert. 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
LRA	Audit Other Proc Description	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
LRB	Audit Ex Co	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management. Select from Frequency Variable name: EnumerationFrequency
LRC	Audit Board	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board. Select from Frequency Variable name: EnumerationFrequency
LRD	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
LRE	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

LRF	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
LRG	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
LRH	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
LRI	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
LRJ	NCA MLDescript	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
LRK	NCA TFDescript	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
LRL	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
LRM	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
LRN	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.

```
<A12031 Identifier="LRO" EnumerationFrequency="Yearly"></A12031>
```

REF	Field	Description
LRO	Money Laundering Ex Co	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

LRP	Terrorist Financing Ex Co	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
LRQ	Sanction Circumvent Ex Co	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
LRR	Corruption Ex Co	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
LRS	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
LRT	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
LRU	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
LRV	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

LRW	Designated Responsibility	State whether there is a designated board member with responsibility for AML/CFT compliance as required by the CJA 2010. Select from YesNo Variable name: EnumerationYesNo
LRX	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
LRY	CORFrequency	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
LRZ	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
LSA	Shortcomings Recovery	Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken. Select from YesNoNA Variable name: EnumerationYesNoNA
LSB	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
--	--	-----------------------------

8.4.14 Group-wide AML/CFT Framework

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

<A12031 Identifier="LSC" PercentageValue="1.0"></A12031>

REF	Field	Description
LSC	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
LSD	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
LSE	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
LSF	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 Investors/Funds 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

LSG	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
LSH	Groupwide Jurisdiction AMLReview	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 investor/fund 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
LSI	Groupwide Deficiencies 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
LSJ	Groupwide Deficiencies 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

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

```
<A12041 LSK="AF" LSL="686" LSM="184" LSN="714" LSO="477"></A12041>
```

REF	Field	Description
LSK	Physical 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
LSL	Num Subsidiaries	Number of subsidiaries in each country. Data Type: IntegerValue If not applicable enter 0
LSM	Num Representative	Number of representative offices in each country Data Type: IntegerValue If not applicable enter 0
LSN	Num Other	Number of other physical presence in each country Data Type: IntegerValue If not applicable enter 0
LSO	Num White Label	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 investors/funds by another company, regulated or non-regulated, under its own brand Data Type: IntegerValue If not applicable enter 0

8.6 Residence and Establishment

The questions below concern the residence and establishment of investors your institution's provides administration services to.

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

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

```
<A12051 LSP="AF" LSQ="2" LSR="283" LSS="990" LST="922" LSU="57" LSV="297" LSW="661" LSX="744"></A12051>
```

REF	Field	Description
LSP	Residence 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
LSQ	Natural Person Count	Natural person investors – Total Data Type: IntegerValue If not applicable enter 0
LSR	Natural Person Count New	Natural person investors - Number of which are New Investors (Natural person investors with whom a business relationship was entered into in the preceding calendar year) Data Type: IntegerValue If not applicable enter 0
LSS	Natural Person Count High	Natural person investors - Number of which are High Risk according to institution's investor risk assessment Data Type: IntegerValue If not applicable enter 0
LST	Legal Person Count	Legal entity investors – Total Data Type: IntegerValue If not applicable enter 0
LSU	Legal Person Count New	Legal entity investors - Number of which are New Investors (with whom a business relationship was entered into in the preceding calendar year) Data Type: IntegerValue If not applicable enter 0
LSV	Legal Person Count High	Legal entity investors - Number of which are High Risk according to institution's investor risk profiling Data Type: IntegerValue If not applicable enter 0
LSW	Legal Person Count BO non-EEA	Legal entity investors - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence). Data Type: IntegerValue If not applicable enter 0

LSX	Legal Person Count PEP	Legal entity investors – Count of legal entity investors where PEP risk identified Data Type: IntegerValue If not applicable enter 0
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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

```
<A12061 LSY="AL" LSZ="486"></A12061>
```

REF	Field	Description
LSY	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
LSZ	BO Count	Number of beneficial owners of your legal entity investors residing in the country. Data Type: IntegerValue If not applicable enter 0

8.8 Politically Exposed Person

The questions below concern [Politically Exposed Persons](#) in among investors your institution provides administration services for.

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

```
<A12071 LTA="AF" LTB="711" LTC="255"></A12071>
```

REF	Field	Description
LTA	PEP Country	Select from the list of Alpha-2 country codes, each country where the following applies: A natural person investor is a PEP (their family members, and people known to be close associates) and has nationality/citizenship in the specified country. Or, a beneficial owner of your legal entity investor is a PEP (their family members, and people known to be close associates) and has nationality/citizenship in the specified country. Data Type: EnumerationValue Select from Country
LTB	PEP Count NP	State the number of natural person investors which are PEPs (their family members, and people known to be close associates) and have nationality/citizenship in the specified country Data Type: IntegerValue If not applicable enter 0
LTC	PEP Count BO	State the number of beneficial owners of your legal entity investors which are PEPs (their family members, and people known to be close associates) and have nationality/citizenship in the specified country Data Type: IntegerValue If not applicable enter 0

8.9 Geography of Funds Flow

Specify by country the source and destination of funds flow, of investors you provide administration services to, and the associated total number of and value of these transactions.

For the purposes of this section, the only transactions of concern are transactions which your institution has oversight of and where the start-point or end-point is Ireland.

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

```
<A12081 LTD="AF" LTE="669" LTF="758" LTG="765.68" LTH="644" LTI="285" LTJ="566.41" LTK="418" LTL="898" LTM="479.05" LTN="13" LTO="818" LTP="711.17"></A12081>
```

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

LTD	Transaction 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 investors using your institution's products or services in the preceding calendar year. Data Type: EnumerationValue Select from Country
LTE	Source Investors	Overall number of investors with incoming transactions from each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
LTF	Source Transactions	Overall number of incoming transactions from each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
LTG	Source Value	EUR Value of total incoming transactions from each country in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0
LTH	Destination Investors	Overall number of investors with outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
LTI	Destination Transactions	Overall number of outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
LTJ	Destination Value	EUR Value of total outgoing transactions to each country in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0
LTK	Source Investors High	Overall number of investors with incoming transactions from each country in the preceding calendar year for High Risk Investors, per your institution's Investor risk assessment.

		Data Type: IntegerValue If not applicable enter 0
LTL	Source Transactions High	Overall number of incoming transactions from each country in the preceding calendar year for High Risk Investors, per your institution's Investor risk assessment. Data Type: IntegerValue If not applicable enter 0
LTM	Source Value High	EUR Value of total incoming transactions from each country in the preceding calendar year for High Risk Investors, per your institution's Investor risk assessment. Data Type: DecimalValue If not applicable enter 0
LTN	Destination Investor High	Overall number of investors with outgoing transactions to each country in the preceding calendar year for High Risk Investors, per your institution's Investor risk assessment. Data Type: IntegerValue If not applicable enter 0
LTO	Destination Transactions High	Number of outgoing transactions to each country in the preceding calendar year for High Risk Investors, per your institution's Investor risk assessment. Data Type: IntegerValue If not applicable enter 0
LTP	Destination Value High	EUR Value of outgoing transactions to each country in the preceding calendar year for High Risk Investors, per your institution's Investor 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

```
<A12091 LTQ="RkfVESJu7FF0" LTR="vtyN1oGCJrjo" LTS="142" LTT="637" LTU="278"></A12091>
```

REF	Field	Description
LTQ	Monitoring Rule	Unique Internal Rule identifier, name or similar. Please complete for each rule. Data Type: StringValue Character limit: 500 characters If not applicable enter N/A
LTR	Monitoring Rule Description	High-level description of each Rule / Model. Data Type: StringValue Character limit: 2000 characters If not applicable enter N/A
LTS	Monitoring Alerts	Number of Transaction Monitoring Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
LTT	Monitoring Alerts Positive	Number of True Positive Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
LTU	Monitoring Alerts False	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 investor	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.
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.
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 Activity	A 'high-risk activity' should include, at least, the activities mentioned under Annex III of the Regulation (EU) 2024/1624 (AMLR)
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	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.
Merchant acquiring	Handling a merchant's account so that they can accept credit or debit card payments and settlement of payments into a merchant's account.
Merchant Services	Similar to payment institutions whereby the credit institutions facilitate the merchant's customer transactions.
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.
Payable-through account	A correspondent account that is used directly by third parties to transact business on their own behalf.
Payment institution	As per Article 4(4), of Directive (EU) 2015/2366.
Payment instrument	As per Article 4(14), of Directive (EU) 2015/2366.
Payment transaction	As per Article 4(5), of Directive (EU) 2015/2366.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Pooled account	A bank account opened by a customer, for example a legal practitioner or notary, for holding their clients' money. The clients' money will be commingled, but clients will not be able directly to instruct the bank to carry out transactions.

Prepaid Cards/Vouchers	Cards & Vouchers are preloaded with e-money, allowing the customer to spend the value loaded on the card either online or at points of sale. These can be reloadable or non-reloadable.
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.
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.
Terrorist financing	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
Third country	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.
Trade finance	Financing of international goods and services trade transactions on behalf of customers importing into or exporting from Ireland. Examples of trade finance activities are: letters of credit, open account facilities, trade credit insurance and import/export collection and guarantees.
Transaction monitoring alert	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

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, to entities outside the group to which my entity belongs

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: Not Available 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:

	Not Available 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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