Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem

Guidance Notes
Risk Evaluation Questionnaire
Intermediaries

October 2026

Document History

Version	Comments	Date
1.0	Initial version	30/10/2026

Back to Contents

Contents

Document History 2
Contents 3
1 Background and Scope 4
2 Timeline for Submitting the REQ 4
3 Requirement to provide information to the Central Bank 5
4 Mechanism for Submission of Returns 5
5 Where do I go if I need further information? 5
6 Where do I go if I have technical issues with the Portal? 5
7 Overview of the REQ and Information to be provided by Institutions 6
8 Instructions / Guidance Notes for Completing the REQ 6
8.0 Cover 7
8.1 General 8
8.2 Inherent Risk 14
8.3 Mitigation and Control 19
8.4 Physical Presence 46
8.5 Residence And Establishment 47
8.6 Beneficial Owner 48
8.7 Politically Exposed Person 49
8.8 Geography Of Funds Flow 50
9 Appendices 51
9.1 Definitions 51
9.2 Dropdowns 55

Back to Contents

1 Background and Scope

The Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (the CJA 2010) obliges credit and financial institutions (institutions) to put in place an effective, risk based Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) framework, which includes the application of a risk based approach, customer due diligence (CDD) measures, reporting of suspicious transactions, governance, policies and procedures, record keeping and training. There is also a legal obligation on 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 on 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 the 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 the Authority for Anti-Money Laundering and Countering the Financing of Terrorism (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's 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 REQ is due annually on March 24th.

The deadline for the first submission (in respect of reference date of 31 December 2026) is 24 March 2027. This is a hard deadline and no extensions will be granted.

Back to Contents

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

Each institution is required to submit to the Central Bank the information set out in Section 8 of this guidance. The REQ will be submitted in Excel and is available on the website to download and complete.

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

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_A14.xlsx

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A14 - the A14 Return code
- .xlsx 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.

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

Back to Contents

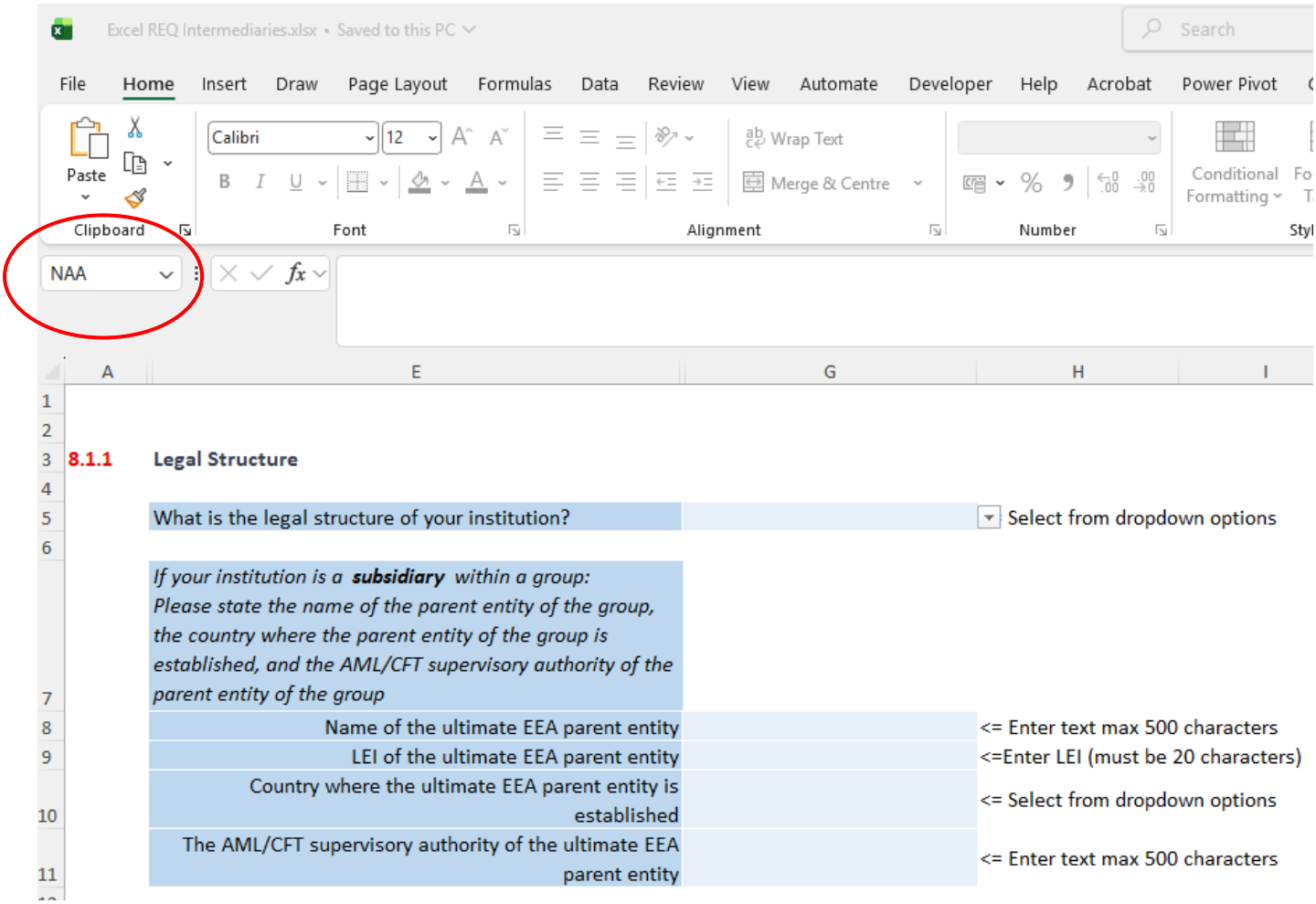
7 Overview of the REQ and Information to be provided by Institutions

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

Unless otherwise specified, only report data relating to business written from your Irish institution, including business conducted on a Freedom of Services (FOS) basis. Section 8.1.3 requires additional reporting of business conducted on a Freedom of Establishment (FOE) basis.

8 Instructions / Guidance Notes for Completing the REQ

Instructions for each field are detailed below. Each question has a corresponding 3 letter code, e.g. the first question, What is the legal structure of your institution? has the code NAA. These reference codes can be found in the "Name Box" in the top left corner of Excel. To search for a reference code in Excel use Ctrl + G.



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).

Please do not copy, paste, drag, or drop data into cells.

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

Back to Contents

All values should be entered as full Euro amounts. Where currency conversion is required for reported data or for thresholds of the items, reporting obliged entities should apply the following approach:

i. For data points reported as a stock at the end of the reference year, the applicable exchange rate should be the official exchange rate (e.g. the ECB exchange rate) published on 31 December of the reference year. If no official exchange rate is available on 31 December, reporting obliged entities should use the official rate published on 30 December, or the most recent preceding date for which an official rate is available.

ii. For data points reported as of a specific date during the reference year, reporting obliged entities should use the official exchange rate applicable on the date the transaction took place. If no official rate is available on that date, they should use the rate published on the most recent preceding date. By way of exception, where applying this approach would be excessively burdensome and the impact immaterial, reporting obliged entities may use the year-end exchange rate (in accordance with the method described in point 1) for such transactions or events.

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

In answering the questions please note customer refers to the policyholder.

Please do not include any personal customer information (such as customer names, contact details, account numbers or identification data) in the text entries.

Depending on the business model of your institution, not every question will be applicable, please follow the instructions as to whether a cell should be answered. 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 but requires an answer please use the below options:

- Numbers: Enter 0
- Dates: Enter 2000-01-01
- Texts: Enter N/A
- Country dropdown: Select Not applicable
- Other dropdowns: Select N/A

8.0 Cover

This tab displays the overall quality status of your workbook. It indicates whether the workbook is ready for submission, or if errors need to be fixed. Do not try to upload a file that states “Cannot be submitted – please fix errors”.

Please check the validations to the right of each question which will give details of any errors.

Back to Contents

A completed example of the REQ which is ready for submission is available on the website here in the Intermediaries zip file.

8.1 General

8.1.1 Legal Structure

REF	Field	Description
NAA	Legal Structure	What is the legal structure of your institution? Select from LegalStructure
NAB	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. This question should be left blank if your institution is not a subsidiary. Character limit: 500 characters
NAC	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. This question should be left blank if your institution is not a subsidiary. Character limit: 20 characters If applicable but LEI not available please enter 00000000000000000000
NAD	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. This question should be left blank if your institution is not a subsidiary. Select from CountriesEEA
NAE	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. This question should be left blank if your institution is not a subsidiary. 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 Freedom of Establishment is not part of an EEA (sub)group. Otherwise it is

Back to Contents

		the top entity of that EEA (sub)group. Character limit: 500 characters
NAF	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 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. This question should be left blank if your institution is not a branch. Character limit: 500 characters
NAG	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 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. This question should be left blank if your institution is not a branch. Character limit: 20 characters If applicable but LEI not available please enter 00000000000000000000
NAH	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 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. This question should be left blank if your institution is not a branch. Select from CountriesEEA
NAI	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 Freedom of

Back to Contents

		Establishment. This question should be left blank if your institution is not a branch. 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. Character limit: 500 characters
NAJ	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 or a branch within a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity. If not applicable leave blank. Character limit: 500 characters
NAK	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. If not applicable leave blank. Character limit: 20 characters If applicable but LEI not available please enter 00000000000000000000
NAL	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 member of a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity. If not applicable leave blank. Select from Country
NAM	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. This field is not required if the ultimate global parent entity is not regulated for AML/CFT purposes or if not applicable. If not applicable leave blank. Character limit: 500 characters

Back to Contents

8.1.2 Business Model

REF	Field	Description
NAN	Life Insurance Intermediary	Is your institution acting as an intermediary for any of the following products/services? - Life Insurance, i.e. all products (Protection, Pensions and Savings and Investments) provided by Life Insurance companies. Select from YesNo
NAO	Investment Intermediary	Is your institution acting as an intermediary for any of the following products/services? - Investment intermediary under the IIA Select from YesNo
NAP	Mortgage Intermediary	Is your institution acting as an intermediary for any of the following products/services? - Mortgages Select from YesNo
NAQ	Credit Intermediary	Is your institution acting as an intermediary for any of the following products/services? - Credit Select from YesNo
NAR	Crowdfunding Intermediary	Is your institution acting as an intermediary for any of the following products/services? - Crowdfunding Select from YesNo
NAS	Tied Agent	Does your institution act under the responsibility of one or more insurance undertakings or intermediaries for the products which concern them respectively (Tied Agent)? Select from YesNo
NAT	Premium Collection	Does your institution collect client premiums? Select from YesNo

Back to Contents

8.1.3 International Presence

Per EEA country in which your institution and your branches operate on either an FOS or FOE basis, specify the total number of customers that reside or are established in that EEA country and the total annual value of transactions (EUR) generated by these customers.

REF	Field	Description
NAU	EEA Country	List of EEA countries. Per EEA country in which your institution and your branches operate on either an FOS or FOE basis, specify the total number of customers that reside or are established in that EEA country and the total annual value of transactions (EUR) generated by these customers. Note: Template will be rejected if at least one EEA country does not include a value (including 0 for a NIL return - i.e. no FOS or FOE business)
NAV	FOE No. of Customers	For each EEA country in which your institution operates on an FOE basis, enter the total number of customers that reside or are established in that EEA country in the preceding calendar year. If not applicable enter 0 for at least one line.
NAW	FOE Value of Transactions (EUR)	For each EEA country in which your institution operates on an FOE basis, enter the total annual value of transactions (EUR) generated by these customers in the preceding calendar year. If not applicable enter 0 for at least one line.
NAX	FOS No. of Customers	For each EEA country in which your institution and your branches operate on an FOS basis, enter the total number of customers that reside or are established in that EEA country in the preceding calendar year. If not applicable enter 0 for at least one line.
NAY	FOS Value of Transactions (EUR)	For each EEA country in which your institution and your branches operate on an FOS basis, enter the total annual value of transactions (EUR) generated by these customers in the preceding calendar year. If not applicable enter 0 for at least one line.

Back to Contents

8.1.4 Statement Of Compliance

REF	Field	Description
NAZ	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
NBA	Reason for Non Compliance	If the answer is No to the Statement of Compliance above, please provide a brief summary of material non-compliance. Character limit: 500 characters If not applicable enter N/A
NBB	Compliance Name	Name of the person signing this Statement of Compliance on behalf of the Institution. This must be answered. Character limit: 100 characters
NBC	Position Held	Position of the person signing this Statement of Compliance on behalf of the Institution. This must be answered. Character limit: 100 characters
NBD	PCF	Has the person signing this Statement of Compliance on behalf of the firm been approved by the Central Bank to a Pre-Approval Control Function (PCF) position? Select from YesNo

Back to Contents

8.2 Inherent Risk

8.2.1 Customer Segments

For each customer type listed please specify the number of customers as at the reference date i.e. 31 December of the preceding calendar year. Please note customers can come under more than one customer type, and the sum of all customer types does not need to sum to the total number of customers. For example, a customer can be counted under both Natural Person and a customer with cross border transactions involving non-EEA countries.

REF	Field	Description
NBE	Customer Types	Different customer segments - note customers can fall in more than one customer segment.
	Natural Persons	Natural person customers (i.e., personal customers, retail customers)
	Legal Entity	Legal entity customers (i.e., non-personal customers, legal persons and/or other entities and/or legal structures and/or arrangements)
	Natural Persons with total assets under management over a value of at least EUR 5,000,000 AND with total assets over a value of at least EUR 50,000,000	Natural persons with total assets under management over a value of at least EUR 5,000,000 and with total assets over a value of at least EUR 50,000,000. In cases where the policyholder is a legal entity and the insured person is a natural person (for instance, in the case of group contracts), insured persons are to be considered customers even if they are not the policyholder. For contracts which have two policyholders, both should be considered. The amount should not be divided.
	Customers with requests from the Financial Intelligence Unit (FIU)	Customers with requests from the Financial Intelligence Unit (FIU)
	Wealth management customers	Wealth management customers
	Customers with complex structures	Customers with a complex structure
	Customers with cross border transactions involving non-EEA countries	Customers with at least one transaction over EUR 250 from/to a non-EEA country. i.e. "*for example if you are a life insurance intermediary transactions are gross premiums written/claims received/paid from/to non-EEA countries, if different from the country of residence of the policyholder*".
NBF	Number of Customers	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segment. If not applicable enter 0

Back to Contents

REF	Field	Description
NBG	Total number of customers with high-risk activities	Total number of customers with high-risk activities that should include, at least, activities mentioned under Annex III of Regulation (EU) 2024/1624. If not applicable enter 0
NBY	Total number of customers active customers	Total number of customers with at least one transaction in the previous year. Life Insurance policies should not be included. If you only act as a Life Insurance Intermediary please enter 0 If not applicable enter 0

8.2.2 Balance Sheet

REF	Field	Description
NBT	Balance Sheet Assets	Total value of assets held or under management as at 31st of December of the preceding calendar year If not applicable enter 0

8.2.3 Cash transactions

REF	Field	Description
NBH	Cash In Transactions	Number of cash inwards transactions in the previous year (premiums) If not applicable enter 0
NBI	Cash In Value	Total Value (EUR) of cash inwards transactions in the previous year (premiums) If not applicable enter 0
NBJ	Cash Out Transactions	Number of cash outwards transactions in the previous year (claims/surrenders) If not applicable enter 0

Back to Contents

NBK	Cash Out Value	Total Value (EUR) of cash outwards transactions in the previous year (claims/surrenders) If not applicable enter 0
NBL	Cash Customers over 20000	Total Number of natural persons totalling cash transactions over 20 000 EUR during the previous year If not applicable enter 0

8.2.4 Intermediaries and Distribution Channels

REF	Field	Description
NBM	Intermediary No AML	Number of new customers onboarded in the preceding calendar year by third parties not directly subject to AML/CTF supervision. If not applicable enter 0
NBN	Intermediary Customers	The number of new customers onboarded through a Third Party in the preceding calendar year. Third Party here refers to someone outside of your intermediary or the insurance company, for example an intermediary of your intermediary. If not applicable enter 0

8.2.5 Remote Onboarding

REF	Field	Description
NBO	Onboarding Remote NP Prop	State the number of Natural Person customers accepted via remote onboarding in the preceding calendar year. If not applicable enter 0
NBP	Onboarding Remote LE Prop	State the number of Legal Entity customers accepted via remote onboarding in the preceding calendar year. If not applicable enter 0

Back to Contents

8.2.6 Products and Services

REF	Field	Description
NBQ	Protection No. Low Risk	Number of protection policies that are classified as low risk contracts at the end of the preceding calendar year If not applicable enter 0
NBR	Protection No. of Contracts	Number of protection contracts at the end of the preceding calendar year If not applicable enter 0
NBS	Protection GWP	Gross written premium (GWP) of protection contracts in the preceding calendar year If not applicable enter 0
NBU	Protection GWP Third Party	GWP paid to a third party in respect of protection contracts in the preceding calendar year. Third Party here refers to an intermediary of your intermediary, e.g. a wholesale broker. Do not include GWP paid directly to the insurer. If not applicable enter 0
NBV	Pension No. Low Risk	Number of pension policies that are classified as low risk contracts at the end of the preceding calendar year If not applicable enter 0
NBW	Pension No. of Contracts	Number of pension policies, that are pensions, at the end of the preceding calendar year If not applicable enter 0
NBX	Pension GWP	GWP of pension policies in the preceding calendar year If not applicable enter 0
NBZ	Pension GWP Third Party	GWP paid to a third party in respect of pension policies in the preceding calendar year. Third Party here refers to an intermediary of your intermediary, e.g. a wholesale broker. Do not include GWP paid directly to the insurer. If not applicable enter 0

Back to Contents

NCA	Savings No. Low Risk	Number of savings and investment policies that are classified as low risk contracts at the end of the preceding calendar year If not applicable enter 0
NCB	Savings No. of Contracts	Number of savings and investment policies at the end of the preceding calendar year If not applicable enter 0
NCC	Savings GWP	GWP of savings and investment policies in the preceding calendar year If not applicable enter 0
NCE	Savings GWP Third Party	GWP paid to a third party in respect of savings and investment policies, that are not pensions, in the preceding calendar year. Third Party here refers to an intermediary of your intermediary, e.g. a wholesale broker. Do not include GWP paid directly to the insurer. If not applicable enter 0
NCF	Wealth Management Conducted	State whether the entity offered wealth management at any point during the preceding calendar year. Select from YesNo

Back to Contents

8.3 Mitigation and Control

8.3.1 Business Wide Risk Assessment

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

REF	Field	Description
NCG	BWRA Conducted	State whether your institution conducts a Business Wide Risk Assessment (BWRA). Select from YesNo
NCH	BWRA Senior Management Approval	State whether Senior Management of your institution approved the latest version of the BWRA. Select from YesNoNA
NCI	BWRA Last Approval Date	State the approval date of your institution's most recent BWRA in the format of YYYY-MM-DD. Format YYYY-MM-DD If not applicable enter 2000-01-01
NCJ	BWRA Money Laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
NCK	BWRA Terrorist Financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
NCL	BWRA Sanctions	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
NCM	BWRA Customer Groups	State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
NCN	BWRA Geographies	State whether geographies are explicitly identified and assessed in your institution's most recent BWRA.

Back to Contents

		Select from YesNoNA
NCO	BWRA Product Groups	State whether product groups (e.g. certain products and services) are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
NCP	BWRA Distribution Channel	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations, and associated risks, etc.) are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
NCQ	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
NCR	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

8.3.2 Policies and Procedures

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

REF	Field	Description
NCS	Pol & Proc - Customer Due Diligence	Enter the date when your institution's management approved the last version of policies and procedures for initial and on-going customer due diligence. Format YYYY-MM-DD If not applicable enter 2000-01-01
NCT	Pol & Proc -Transaction & Business relationship Monitoring	Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of transactions and business relationships.

Back to Contents

		Format YYYY-MM-DD If not applicable enter 2000-01-01
NCU	Pol & Proc - compliance with financial sanctions	Enter the date when your institution's management approved the last version of policies and procedures for ensure compliance with financial sanctions regulations. Format YYYY-MM-DD If not applicable enter 2000-01-01
NCV	Pol & Proc - Politically Exposed Persons	Enter the date when your institution's management approved the last version of policies and procedures for Politically Exposed Persons (PEPs). Format YYYY-MM-DD If not applicable enter 2000-01-01
NCW	Pol & Proc - Suspicious transaction reporting	Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process. This means clearly laid out steps to facilitate the identification, escalation, and reporting of any suspicions of ML/TF, formed in the conducts of your institution's business to both Revenue and the FIU of any STR generated within your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
NCX	Pol & Proc - Training	Enter the date when your institution's management approved the last version of policies and procedures for training (e.g. staff members of your institution complete relevant required training). Format YYYY-MM-DD If not applicable enter 2000-01-01
NCY	Pol & Proc - AML/CFT Record Keeping	Enter the date when your institution's management approved the last version of policies and procedures for record keeping (e.g. provisions in Section 55 of the CJA 2010). Format YYYY-MM-DD If not applicable enter 2000-01-01
NCZ	Pol & Proc - Business wide risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support business wide risk assessment processes. Format YYYY-MM-DD If not applicable enter 2000-01-01
NDA	Pol & Proc - Customer risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support customer risk assessment processes.

Back to Contents

		Format YYYY-MM-DD If not applicable enter 2000-01-01
NDB	Pol & Proc - Review Frequency	Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures. Select from Frequency

Back to Contents

8.3.3 Onboarding

REF	Field	Description
NDC	Onboarding - Counter/Desk i.e. face to face – Natural person customers	State whether your institution offers onboarding via counter/desk (i.e. face to face) for natural person customers. Select from YesNo
NDD	Onboarding - Counter/Desk i.e. face to face - Legal entity customers	State whether your institution offers onboarding via counter/desk (i.e. face to face) for legal entity customers. Select from YesNo
NDE	Onboarding - Other - Natural person customers	State whether your institution offers onboarding via other options for natural person customers. Select from YesNo
NDF	Onboarding - Other - Legal entity customers	State whether your institution offers onboarding via other options for legal entity customers. Select from YesNo

8.3.4 Offboarding

REF	Field	Description
NDG	Customer Offboarding Number	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS concerns. If not applicable enter 0

Back to Contents

8.3.5 Customer Due Diligence

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

REF	Field	Description
NDH	CDD Review NP	State whether your institution periodically reviews its customers' risk profiles for natural person customers. Select from CDD
NDI	CDD Review LE	State whether your institution periodically reviews its customers' risk profiles for legal entity customers. Select from CDD
NDJ	CDD CRA Update	Date when your institution last updated the Customer Risk Assessment Format YYYY-MM-DD If not applicable enter 2000-01-01
NDK	CDD Low Customer	Number of total customers per ML/TF risk category (low 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 If not applicable enter 0
NDL	CDD Medium-Low Customer	Number of total customers per ML/TF risk category (medium-low 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 If not applicable enter 0
NDM	CDD MH Customer	Number of total customers per ML/TF risk category (medium-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

Back to Contents

		High risk -> Medium-high risk Ultra/very high risk -> High risk If not applicable enter 0
NDN	CDD High Customer	Number of total customers per ML/TF risk category (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 If not applicable enter 0
NDO	CDD customers Due NP	Number of natural person customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. If not applicable enter 0
NDP	CDD customers Due LE	Number of legal entity customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. If not applicable enter 0
NDQ	CDD customers Reviewed NP	Number of natural person customers for whom customer information was reviewed and updated in the preceding calendar year. If not applicable enter 0
NDR	CDD customers Reviewed LE	Number of legal entity customers for whom customer information was reviewed and updated in the preceding calendar year. If not applicable enter 0
NDS	No Identification Total	What proportion of total active customers have no CDD documentation/information? Number of customers without identification and verification documentation/ information. If not applicable enter 0
NDT	CDD BO not Identified	Number of customers that are legal entities /trusts whose beneficial owners have not been identified.

Back to Contents

		If not applicable enter 0
NDU	CDD BO not Verified HR	Number of customers that are legal entities/trusts whose beneficial ownership has been identified, but the identity of whom has not been verified If not applicable enter 0
NDV	Customer Data not in Line With Article 20	Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR. Note that this data point will not be assessed until the Regulation (EU) 2024/1624 applies from 10 July 2027. For submissions with reference dates before this Regulation applies, this data point can be answered as 0 or any integer value. If not applicable enter 0
NDW	Customer Number Without Risk Profile	State the number of customers of your institution who have not had a ML/TF risk profile created (this should exclude any customers with whom the obliged entity does not have a business relationship) If not applicable enter 0

8.3.6 Transaction Monitoring

REF	Field	Description
NDX	TM How Monitor	State whether your institution monitors transactions and how this is done. Select from MonitoringApproach
NDY	TM Alert Number of Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions? This question is not required if “No_transaction_monitoring” or “Yes, manually” chosen for NDX

Back to Contents

		Select from YesNo
NDZ	TM Alert Value of Aggregated Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions? This question is not required if "No_transaction_monitoring" or "Yes, manually" chosen for NDX Select from YesNo
NEA	TM Alert Value of Single Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of single transactions? This question is not required if "No_transaction_monitoring" or "Yes, manually" chosen for NDX Select from YesNo
NEB	TM Alert Counterparties	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties? This question is not required if "No_transaction_monitoring" or "Yes, manually" chosen for NDX Select from YesNo
NEC	TM Alert Geographies	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies? This question is not required if "No_transaction_monitoring" or "Yes, manually" chosen for NDX Select from YesNo

Back to Contents

8.3.7 Alerts

REF	Field	Description
NED	Alert Backlog - Automated	At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed? If not applicable enter 0
NEE	Alert Backlog - Manual	At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed? If not applicable enter 0
NEF	Alert Mean Time To Close - Automated	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for automated alerts only), from the initial alert generation? If not applicable enter 0
NEG	Alert Mean Time To Close TP – Manual	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for manual alerts only), from the initial alert generation? If not applicable enter 0
NEH	Alert Ratio STR - Automated	If automated system: Ratio between number of STRs and number of alerts. This corresponds to the number of alerts generated by the automated systems and the number of STRs resulting from alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) of Regulation (EU) 2024/1624. This excludes alerts of systems exclusively meant to detect transaction subject to targeted financial sanctions. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
NEI	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. If not applicable enter 0

Back to Contents

8.3.8 Suspicious Transaction Reporting

REF	Field	Description
NEJ	Registered FIU	State whether your institution is registered with the Financial Intelligence Unit (FIU) GoAML system and with Revenue for the purposes of reporting STRs. Select from YesNo
NEK	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. If not applicable enter 0
NEL	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year. If not applicable enter 0
NEM	FIU Days to Report	Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the preceding calendar year. If not applicable enter 0

8.3.9 Sanctions Screening

REF	Field	Description
NEN	Sanctions Prior To Service	State whether your institution verifies, prior to providing services, whether or not customers or potential customers and their beneficial owners are included on sanction list. Select from YesNo
NEO	Sanction Max Hours	Maximum number of hours between the publication of the Targeted Financial Sanction by the authorities and the implementation of these changes in the institution's screening tools.

Back to Contents

		If not applicable enter 0
NEP	Sanction EU	Specify if customers and beneficial owners are checked against EU sanctions lists. Select from YesNo
NEQ	Sanction National List	Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo
NER	Sanction UN	Specify if customers and beneficial owners are checked against UN sanctions lists. Select from YesNo
NES	Sanction Other	Specify if customers and beneficial owners are checked against any other sanctions lists Select from YesNo
NET	Sanction Other Specify	If your institution uses any other sanctions lists not mentioned above please specify Character limit: 500 characters If not applicable leave blank.
NEU	Sanction Transact Check	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when executing a transaction. Select from YesNo
NEV	Sanction List Update	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when the sanctions listing is updated. Select from YesNo
NEW	Sanction Periodic Customer	At the start of service provision and afterwards, state whether your institution periodically checks whether customers are included on sanctions lists.

Back to Contents

		Select from YesNo
NEX	Sanction Periodic Customer Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0
NEY	Sanction Periodic BO	At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to customers are included on sanctions lists. Select from YesNo
NEZ	Sanction Periodic BO Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for beneficial owners connected to customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0
NFA	Sanction Periodic Rep	At and after the start of service provision, state whether your institution periodically checks whether representatives connected to customers are included on sanctions lists. Select from YesNo
NFB	Sanction Periodic Rep Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for representatives connected to customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0
NFC	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 If not applicable enter 0
NFD	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

Back to Contents

		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. If not applicable enter 0

8.3.10 Outsourcing

REF	Field	Description
NFE	Outsource CDD Onboarding	State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group). Select from Outsource
NFF	Outsource CDD Review	State whether CDD periodic customer review (e.g. recurring process of reviewing customer CDD status/documentation/risk) has been outsourced to third parties (including within the Group). Select from Outsource
NFG	Outsource CDD Article 20	State whether the CDD measures as detailed in Article 20 AMLR are outsourced to third parties (including within the Group) Select from Outsource
NFH	Outsource TM	State whether transaction monitoring has been outsourced to third parties (including within the Group). Select from Outsource
NFI	Outsource STR Reporting	State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group). Select from Outsource

Back to Contents

NFJ	Outsource Sanction Screen	State whether sanctions screening has been outsourced to third parties (including within the Group). Select from Outsource
NFK	Outsource Training	State whether AML/CFT training has been outsourced to third parties (including within the Group). Select from Outsource
NFL	Outsource PEP	State whether PEP detection has been outsourced to third parties (including within the Group). Select from Outsource
NFM	Outsource Compliance	State whether compliance monitoring checks have been outsourced to third parties (including within the Group). Select from Outsource
NFN	Outsource Other AMLCFT	State whether other processes related to risk management with regard to AML/CFT/proliferation financing have been outsourced to third parties (including within the Group). Select from Outsource
NFO	Outsource Tasks to Third Countries	State the existence of AML/CFT tasks outsourced to an external service provider located in third country is not part of the group structure of your institution. Select from Outsource
NFP	Outsource Tasks to Third Countries Within Group	State the existence of AML/CFT tasks outsourced to an external service provider located in third country is part of the group structure of your institution. Select from Outsource

Back to Contents

8.3.11 Education & Training

REF	Field	Description
NFQ	Non-AML/CFT specialist staff - % Staff coverage	State the proportion of non-AML/CFT specialist staff (customer facing staff, executive directors) who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
NFR	AML Specialist staff - % Staff coverage	State the proportion of AML specialist staff who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
NFS	Agents and distributors - % Staff coverage	State the proportion of agents and distributors who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
NFT	Board members & non-executive directors - % Staff coverage	State the proportion of members of Board members and non-executive directors who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
NFU	Staff Numbers	Enter the total number of full-time equivalent employees employed by the institution. If not applicable enter 0

Back to Contents

8.3.12 Compliance and Assurance Testing

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

REF	Field	Description
NFV	Compliance SEBWRA	State the most recent date when the structure and effectiveness of your institution's business-wide risk assessment was assessed by the compliance function in your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
NFW	Compliance BWRA Descript	Briefly describe any material findings/potential breaches identified from the last assessment of your institution's business-wide risk assessment. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NFX	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. Format YYYY-MM-DD If not applicable enter 2000-01-01
NFY	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. Character limit: 500 characters If not applicable leave blank.
NFZ	Compliance Verification	State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGA	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.

Back to Contents

		Character limit: 500 characters If not applicable leave blank.
NGB	Compliance Sanctions	State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGC	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. Character limit: 500 characters If not applicable leave blank.
NGD	Compliance Resources	State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGE	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. Character limit: 500 characters If not applicable leave blank.
NGF	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. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGG	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. Character limit: 500 characters

Back to Contents

		If not applicable leave blank.
NGH	Compliance Risk Profile	State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGI	Compliance Profile Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of customers in a business relationship. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NGJ	Compliance TM	State the most recent date when the monitoring processes for transactions and business relationships were assessed by the compliance. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGK	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. Character limit: 500 characters If not applicable leave blank.
NGL	Compliance STR	State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGM	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. Character limit: 500 characters If not applicable leave blank.

Back to Contents

NGN	Compliance Records	State the most recent date when record keeping policies and procedures were assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGO	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. Character limit: 500 characters If not applicable leave blank.
NGP	Compliance Outsourcing	State the most recent date when outsourcing arrangements were assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
NGQ	Compliance Outsourcing 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. Character limit: 500 characters If not applicable leave blank.
NGR	Compliance to Senior Management	State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management. Select from FrequencyNA
NGS	Compliance to Board	State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board. Select from FrequencyNA
NGT	Compliance AML Staff	Number of dedicated AML/CFT compliance staff (in Full Time Equivalent). If not applicable enter 0

Back to Contents

8.3.13 Audit

State the dates when the various AML/CFT obligations/controls were last assessed by an internal audit or external expert. If there were any material findings or potential breaches found during these assessments, please, give a brief description of these material findings or potential breaches. Indicate the audit report signing date if available or end of the audit period. You may report its start in case of an ongoing audit at the reference date

REF	Field	Description
NGU	Audit Commissioned	Has your institution engaged an internal audit or an external expert to assess your institutions AML/CFT obligations /controls since 01 January 2020? Select from YesNo
NGV	Audit BWRA	State the most recent date when the structure and effectiveness of Business Wide Risk Assessment (BWRA) was subject to an internal audit by your institution or assessed by an external expert. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NGW	Audit BWRA Descript	If Yes to Audit BWRA, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NGX	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. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NGY	Audit Training Descript	If Yes to Audit Training, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters

Back to Contents

		If not applicable leave blank.
NGZ	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. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHA	Audit Verification Descript	If Yes to Audit Verification, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHB	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. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHC	Audit Sanctions Descript	If Yes to Audit Sanctions, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHD	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. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHE	Audit Resources Descript	If Yes to Audit Resources, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters

Back to Contents

		If not applicable leave blank.
NHF	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. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHG	Audit Organisation Descript	If Yes to Audit Organisation, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHH	Audit Risk Profile	State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was subject to an internal audit by your institution or assessed by an external expert. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHI	Audit Profile Descript	If Yes to Audit CDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHJ	Audit TM	State the most recent date when the monitoring processes for transactions and business relationships were subject to an internal audit by your institution or assessed by an external expert. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHK	Audit TM Descript	If Yes to Audit TM, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with

Back to Contents

		no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHL	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. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHM	Audit STR Descript	If Yes to Audit STR, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHN	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. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHO	Audit Records Descript	If Yes to Audit Records, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHP	Audit Outsourcing	State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert. Format YYYY-MM-DD If No answered to NGU you may leave blank, if Yes answered to NGU but this question is not applicable enter 2000-01-01
NHQ	Audit Outsourcing Descript	If Yes to Audit TPDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with

Back to Contents

		no spaces either side. Character limit: 500 characters If not applicable leave blank.
NHR	Audit to Senior Management	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management. Select from FrequencyNA If No answered to NGU you may leave blank.
NHS	Audit to Board	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board. Select from FrequencyNA If No answered to NGU you may leave blank.

8.3.14 Governance

REF	Field	Description
NHT	Designated Responsibility	State whether your institution appointed a member of senior management with primary responsibility for implementing, managing, and overseeing your institution's compliance with its AML/CFT obligations as required under Section 54(8) of the CJA 2010 Select from YesNoNA
NHU	Designated Compliance Officer	Has your institution appointed an individual at management level (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 YesNoNA
NHV	COR Frequency	State the Frequency that the Board has been presented with a report ('Compliance Officer Report') from the compliance officer on your institution's AML/CFT activities? Select from FrequencyNA If your entity does not have a Board then choose N/A

Back to Contents

NHW	Reported Shortcomings	State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year. Select from YesNoNA
NHX	Shortcomings Recovery	Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken. Select from YesNoNA
NHY	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. Character limit: 500 characters If not applicable enter N/A

8.3.15 Group-wide AML/CFT Framework

This section is applicable if your institution is the EEA parent entity within a group structure. If your institution is not an EEA parent entity, this section can be left blank.

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

REF	Field	Description
NHZ	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
NIA	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the

Back to Contents

		cell is formatted for this to then appear as 4.7%
NIB	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
NIC	Groupwide AML High-Risk Customers	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Identity and Transaction Level Information on high-risk customers in the preceding calendar year Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
NID	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
NIE	Groupwide Jurisdiction AML Review	If your institution is the parent entity within a group structure, state the proportion of jurisdictions in which the group is established that were covered by reviews (which included access to customer and transaction level data) performed by the group AML Compliance function during the preceding three calendar years Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
NIF	Groupwide Deficiencies Identified by NCA EEA	If your institution is the parent entity within a group structure, state the number of EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year
NIG	Groupwide Deficiencies Identified by NCA non-EEA	If your institution is the parent entity within a group structure, state the number of non-EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year

Back to Contents

8.4 Physical Presence

Please state the number of branches by country, and number of subsidiaries by country and total value of gross written premiums through insurance contracts issued through sub-intermediaries, broken down by country the sub-intermediaries are established. Only the applicable countries need to be completed.

REF	Field	Description
NIH	PP - Country	Select from the list of countries, Country, for each applicable country where the institution has subsidiaries, branches or sub-intermediaries. Select from Country At least one row must be completed. If not applicable response select country Not applicable and enter 0 in all columns for one row.
NII	No. of branches	Number of branches in each country. If not applicable enter 0
NIJ	No. of subsidiaries	Number of subsidiaries in each country If not applicable enter 0
NIK	Intermediary GWP	GWP for contracts issued through sub-intermediary established in that country If not applicable enter 0

Back to Contents

8.5 Residence And Establishment

The questions below concern the institution's overall customer base, new customers, and politically exposed persons, their family members or persons known to be close associates, as of 31 December of the preceding calendar year.

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

REF	Field	Description
NIL	RE - Country	Select from the list of countries, Country, for each applicable country that has natural persons residing or legal entities established in that country. At least one row must be completed. If not applicable response select country Not applicable and enter 0 in all columns for one row.
NIM	Natural person customers – Total Number	Natural person customers – Total If not applicable enter 0
NIN	Natural person customers – No. of which are New Customers	Natural person customers - Number of which are New Customers (Natural person customers with whom a business relationship was entered into in the preceding calendar year) If not applicable enter 0
NIO	Legal entity customers – Total Number	Legal entity customers – Total If not applicable enter 0
NIP	Legal entity customers - No. of which are New Customers	Legal entity customers - Number of which are New Customers (with whom a business relationship was entered into in the preceding calendar year) If not applicable enter 0
NIQ	Legal entity customers - No. with at least one beneficial owner residing in non-EEA countries	Legal entity customers - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence). If not applicable enter 0
NIR	Legal entity customers - No. of which have PEP Risk Identified	Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment If not applicable enter 0

Back to Contents

8.6 Beneficial Owner

The questions below concern the beneficial owners (BOs) in relation to your institution's customer base.

REF	Field	Description
NIS	BO - Country	Select from the list of countries, Country, for each applicable country that has a legal entity BO residing in that country. Select from Country At least one row must be completed. If not applicable response select country Not applicable and enter 0 in all columns for one row.
NIT	Number of beneficial owners	Number of beneficial owners of your legal entity customers residing in the country. If not applicable enter 0

Back to Contents

8.7 Politically Exposed Person

The questions below concern the institution's natural person customers who are PEPs, their family members or persons known to be close associates and the institution's legal entity customers whose beneficial owners (BOs) are PEPs, their family members or persons known to close associates.

REF	Field	Description
NIU	PEP - Country	Select from the list of countries, each country where the following applies: A natural person customer of your institution 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 customers is a PEP (their family members, and people known to be close associates) and has nationality/citizenship in the specified country. Select from Country At least one row must be completed. If not applicable response select country Not applicable and enter 0 in all columns for one row.
NIV	Number of NP PEPs	State the number of natural person customers which are PEPs (their family members, and people known to be close associates) and have nationality/citizenship in the specified country If not applicable enter 0
NIW	Number of BO PEPs	State the number of legal entity customers which have at least one beneficial owner who is a PEP, family member or person known to be a close associate. If not applicable enter 0

Back to Contents

8.8 Geography Of Funds Flow

The questions below concern the source and destination of all funds flow transacted by your customers using your products or services,

i.e. entry points for funds collected by you (e.g. Premiums, credit repayments etc.) and exit points for funds paid by you (e.g. Claims/Surrenders, credit advances etc.)

This question is only for funds that are handled by your entity.

REF	Field	Description
NIX	Geography - Country	Select from dropdown list of countries, for each applicable country that had funds flow transmitted to it by your institution's customer using your institution's products or services in the preceding calendar year. At least one row must be completed. If not applicable response select country Not applicable and enter 0 in all columns for one row. Select from Country
NIY	Overall - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year. If not applicable enter 0
NIZ	Overall - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year. If not applicable enter 0
NJA	Overall - No. of transactions (Destination)	Overall number of outgoing transactions to each country in the preceding calendar year. If not applicable enter 0
NJB	Overall - Value of transactions (Destination)	EUR Value of total outgoing transactions to each country in the preceding calendar year. If not applicable enter 0

Back to Contents

9 Appendices

9.1 Definitions

Term	Interpretation
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
Assets under management	Surrender value of the policy. The surrender value should reflect the amount, defined contractually, paid to the policyholder in case of early termination of the contract (i.e., before it becomes payable by maturity or occurrence of the insured event, such as death), net of charges and policy loans. It includes surrender values guaranteed and not guaranteed.
Backlog	The number of customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures and for whom customer information was NOT reviewed and updated in the preceding calendar year.
Beneficial owner	As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership, through ownership interest or through control, as determined by Article 52 and Article 53 of Regulation (EU) 2024/1624.
Business relationship	As per Article 2(1), point (19), of Regulation (EU) 2024/1624.
Business Wide Risk Assessment	As per Article 10 of Regulation (EU) 2024/1624.
Cash	As per Article 2(1), point (43), of Regulation (EU) 2024/1624.
Complex structure	The term complex structure (such as a long holding chain with use of front companies, opaqueness 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.
Customer	The customer is the policyholder. In cases where the policyholder is a legal entity and the insured person is a natural person (for instance, in the case of group contracts), insured persons are to be considered customers even if they are not the policyholder. For contracts which have two policyholders, both should be considered. The amount should not be divided.
Customer Representative	A customer representative is an individual authorised to act on behalf of the customer in managing their financial affairs, and is responsible for acting in the best interests of the customer and following their instructions.
False positive alert	A false positive alert is a transaction monitoring alert which was automatically closed by a system without escalation or an escalated

Back to Contents

	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.
Group	As per Article 2(1), point (41), of Regulation (EU) 2024/1624.
High-risk country	Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163.
Hit (in sanctions screening)	In this context, "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.
Intermediary	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.
Legal entity	Legal person or other legal arrangement. Any customer that is not a natural person should be included in Legal Entity, including charities and partnerships.
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Low risk contracts	Life insurance contracts or products that meet any of the following conditions: (i) they cannot be redeemed, (ii) contracts merely covering death or certain disabilities or attacks on the physical integrity of the person (which often require medical evidence), which do not include an element of savings or investment, (iii) the annual premium is not above EUR 1 000 or the unique premium is not above EUR 2 500, (iv) contracts whose premiums remain below or equal to applicable tax-deductible ceiling
Management body	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
New customer	Natural persons or legal entities with whom a business relationship is entered into in the preceding calendar year.
ML/TF risk	The impact and likelihood of ML/TF taking place.
Money laundering	As per Article 2(1), of Regulation (EU) 2024/1624.
Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
Onboarded physically	Onboarding face-to-face where the customer is physical present, that is, in the same physical location as the institution or a persona acting on the institution's behalf.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Professional clients	As per Article 4(1), point 10, of Directive (EU) 2014/65
Proliferation financing	The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the

Back to Contents

	manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.
Remote onboarding	Onboarding other than face-to-face where the customer is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the customer's identity is being verified via video-link or similar technological means such as App registration, Internet sign-up, email, over the phone, etc.
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.
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.
Transaction	For life insurance intermediaries, transaction inward means gross written premium and a transaction outward means claims/surrenders/withdrawals.
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

Back to Contents

	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.
Wealth management	Wealth management encompasses all 'banking and other financial services to high-net worth individuals and their families or businesses', according to the ML/TF Risk Factor Guidelines (RFLGs), Guideline 12, EBA/GL/2021/02.

Back to Contents

9.2 Dropdowns

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

CDD

Identifier	Description
Yes_in_all_cases	Yes – All cases
Yes_for_investment_policies_only	Yes – for investment policies only
No	No

Country

Country list as per the ISO 3166 plus Kosovo and Not applicable.

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

Back to Contents

FrequencyNA

Identifier	Description
N/A	Not applicable
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
Not_outsourced	Not outsourced
Partially_outsourced	Partially outsourced
Totally_outsourced	Totally outsourced

Back to Contents

CountriesEEA

Austria
Belgium
Bulgaria
Cyprus
Czech Republic
Germany
Denmark
Estonia
Spain
Finland
France
Greece
Croatia
Hungary
Ireland
Iceland
Italy
Liechtenstein
Lithuania
Luxembourg
Latvia
Malta
Netherlands
Norway
Poland
Portugal
Romania
Sweden
Slovenia
Slovakia

Back to Contents

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