



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Guidance Notes

Risk Evaluation Questionnaire

Life Insurance

April 2026

Document History

Version	Comments	Date
1.0	Initial version	17/02/2026
1.1	<ul style="list-style-type: none">Section 8.2.2 now excludes business written by freedom of establishment.Question HSF updated from number of “BOs of LE customers that are PEPs” to “Number of LE customers with at least 1 BO that is a PEP”	29/04/2026

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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 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 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 deadline for the first submission (in respect of reference date of 31 December 2025) is 11 September 2026. This is a hard deadline and no extensions will be granted.

3 Requirement to provide information to the Central Bank

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

4 Mechanism for Submission of Returns

The XML (Extensible Markup Language) files for the REQ 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. `<A05011 Identifier="HAY" EnumerationYesNo="Yes"></A05011>` rather than `<A05011 Identifier="HAY" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:

```
<?xml version="1.0" encoding="utf-8"?>
<LifeInsurance xmlns="http://www.centralbank.ie/Schemas/AML/2025/A05">
...
...
...
</LifeInsurance>
```

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_A05.xml

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A05 - the A05 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 Life Insurance institutions. Each institution must use the XSD schema specific to its sector. If the institution is part of a group with multiple institutions regulated by the Central Bank, then each individual institution must submit a REQ.

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 8.4.16 in an aggregated manner for all of your institution's EEA entities. Only the Irish institution data should be reported for the remainder of this REQ.

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

8 Instructions / Guidance Notes for Completing the REQ

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

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

All values should be entered in full 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.

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

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 0000000000000000000000
- EnumerationCountry: Select 00
- Other enumerations: Select N/A

If any of Sections 8.5-8.8 are not applicable to your institution then enter one line of non-applicable values, i.e. Select 00 from Country and enter zeros for the rest of the fields, e.g.

Country	Overall				of which High Risk (per your Institution's Customer Risk Assessment)			
	No. of transactions (Source)	Value of transactions (Source)	No. of transactions (Destination)	Value of transactions (Destination)	No. of transactions (Source)	Value of transactions (Source)	No. of transactions (Destination)	Value of transactions (Destination)
HSG	HSJ	HSI	HSJ	HSK	HSL	HSM	HSN	HSO
00	0	0.00	0	0.00	0	0.00	0	0.00

<A0507>

<A05071 HSG="00" HSH="0" HSI="0" HSJ="0" HSK="0" HSL="0" HSM="0" HSN="0" HSO="0"></A05071>

</A0507>

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.

Note that both Table Structure A and Table Structure B may exist in the same section to be completed. For example, this is the case for Section 8.3.1.

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

8.1.1 Table Structure A

In this example, three different “REFs” are needed, meaning HAR, HAS and HAT. 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.

```
<A0501B>
  <A05012 HAR="AT" HAS="330" HAT="237.54"></A05012>
  <A05012 HAR="BE" HAS="22" HAT="430.90"></A05012>
  <A05012 HAR="BG" HAS="201" HAT="323.47"></A05012>
  <A05012 HAR="CY" HAS="510" HAT="683.01"></A05012>
```

Per EEA country in which your institution operates on an FOE or FOS 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.

Select EEA Country
HAR
AT
BE
BG
CY

No. of Customers	Value of Transactions (EUR)
HAS	HAT
330	237.54
22	430.9
201	323.47
510	683.01

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

The following tables have Table Structure A:

Guidance Section	Tab_Code	Table_Code
8.2.3 International Presence	A0501B	A05012
8.3.1 Customer segments	A0502B	A05022
8.3.2 Sector	A0502C	A05023
8.4.8 Suspicious Alerts and Transaction Rejections	A0503B	A05032
8.5 Physical Presence	A0504	A05041
8.6 Residence and Establishment	A0505	A05051
8.7 Politically Exposed Person	A0506	A05061
8.8 Geography of Funds Flow	A0507	A05071
8.9 Transaction Monitoring	A0508	A05081

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, HAA 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).

```
<A0501A>
  <A05011 Identifier="HAA" EnumerationLegalStructure="Subsidiary_within_group"></A05011>
  <A05011 Identifier="HAB" String500="Company A"></A05011>
  <A05011 Identifier="HAC" LEI="E2I8T7DMYWZPWGECWBW9"></A05011>
  <A05011 Identifier="HAD" EnumerationCountryEEANA="CZ"></A05011>
  <A05011 Identifier="HAE" String500="Insurance Authority of Czechia"></A05011>
```

What is the legal structure of your institution?	Subsidiary_within_group
<i>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</i>	
Name of the EEA parent entity of the group	Company A
LEI of the EEA parent entity of the group	E2I8T7DMYWZPWGECWBW9
Country where the EEA parent entity of the group is established	CZ
The AML/CFT supervisory authority of the EEA parent entity of the group	Insurance Authority of Czechia

In Table Structure B, each identifier/REF must not be repeated, e.g. HAA 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	A0501A	A05011
8.2.3 Statement of Compliance	A0501A	A05011
8.3.2 Sector	A0502A	A05021
8.3.3 Life Insurance	A0502A	A05021
8.3.4 Cash Transactions	A0502A	A05021
8.3.5 Intermediaries and Distribution Channels	A0502A	A05021
8.3.6 Remote Onboarding	A0502A	A05021
8.4.1 Business Wide Risk Assessment	A0503A	A05031
8.4.2 Policies and Procedures	A0503A	A05031
8.4.3 Onboarding	A0503A	A05031
8.4.4 Offboarding	A0503A	A05031
8.4.5 Customer Due Diligence	A0503A	A05031
8.4.6 Transaction Monitoring	A0503A	A05031
8.4.7 Alerts (in the preceding calendar year)	A0503A	A05031
8.4.9 Suspicious Transaction Reporting	A0503A	A05031
8.4.10 Sanctions Screening	A0503A	A05031

8.4.11 Outsourcing	A0503A	A05031
8.4.12 Education and Training	A0503A	A05031
8.4.13 Compliance and Assurance Testing	A0503A	A05031
8.4.14 Audit	A0503A	A05031
8.4.15 Governance	A0503A	A05031
8.4.16 Group-Wide AML/CFT Framework	A0503A	A05031

Variable Names:

- Identifier: "REF" code.
- LEI: Legal Entity Identifier (20 characters).
- String100/500/1000/2000: String with 100/500/1000/2000 character limit. Only [ASCII printable characters](#) plus € and £ allowed. Pre-defined XML entity references as below 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 do not 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 in order for it to be accepted.

```
<!--General-->
<xs:element ref="A05:A0501A"/>
<!--General International Presence-->
<xs:element ref="A05:A0501B"/>
<!--Inherent Risk-->
<xs:element ref="A05:A0502A"/>
<!--Inherent Risk Segment-->
<xs:element ref="A05:A0502B"/>
<!--Inherent Risk Sector-->
<xs:element ref="A05:A0502C"/>
<!--Mitigation And Control-->
<xs:element ref="A05:A0503A"/>
<!--Mitigation And Control Alerts-->
<xs:element ref="A05:A0503B"/>
<!--Physical Presence-->
<xs:element ref="A05:A0504"/>
<!--Residence And Establishment-->
<xs:element ref="A05:A0505"/>
<!--Politically Exposed Person-->
<xs:element ref="A05:A0506"/>
<!--Geography Of Funds Flow-->
<xs:element ref="A05:A0507"/>
<!--Transaction Monitoring-->
<xs:element ref="A05:A0508"/>
```

Any XML file submitted which is in any other order other than that detailed above will result in the submission being rejected. Note that Table Structure A and B may both exist within one section.

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.

<A05011 Identifier="HAA" EnumerationLegalStructure="Branch_of_entity"></A05011>

REF	Field	Description
HAA	Legal Structure	<p>What is the legal structure of your institution?</p> <p>Select from LegalStructure</p> <p>Variable name: EnumerationLegalStructure</p>
HAB	Subsidiary - Name of the ultimate EEA parent entity	<p>Enter the statutory name of your ultimate European Economic Area (EEA) parent entity if your institution is a subsidiary within a group.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
HAC	Subsidiary - LEI of the ultimate EEA parent entity	<p>Enter the Legal Entity Identifier (LEI) of your institution's ultimate EEA parent if your institution is a subsidiary within a group.</p> <p>Variable name: LEI</p> <p>Character limit: 20 characters</p> <p>If not applicable or LEI not available please enter 00000000000000000000</p>
HAD	Subsidiary - Country where the ultimate EEA parent entity is established	<p>Select the country where the ultimate EEA parent of the group is established if your institution is a subsidiary within a group.</p> <p>Select from CountriesEEANA</p> <p>Variable name: EnumerationCountryEEANA</p>
HAE	Subsidiary - The AML/CFT supervisory authority of the ultimate EEA parent entity	<p>Enter the AML/CFT supervisory authority of the ultimate EEA parent entity if your institution is a subsidiary within a group.</p> <p>If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A.</p>

		<p>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 the top entity of that EEA (sub)group.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HAF	Subsidiary - Name of the global parent entity of the group	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HAG	Subsidiary - LEI of the global parent entity of the group	<p>Enter the Legal Entity Identifier (LEI) of your institution's ultimate global parent entity if your institution is a subsidiary within a group.</p> <p>Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000</p>
HAH	Subsidiary - Country where the global parent entity of the group is established	<p>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.</p> <p>Select from Country Variable name: EnumerationCountry</p>
HAI	Subsidiary - The AML/CFT supervisory	Enter the AML/CFT supervisory authority for your institution's ultimate global parent entity if your

	authority of the global parent entity of the group	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HAI	Branch - Name of the ultimate EEA parent entity	<p>Enter the legal name of your ultimate European Economic Area (EEA) parent entity if your institution is a branch of an EEA institution which is passporting into Ireland under FOE. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HAK	Branch - LEI of the ultimate EEA parent entity	<p>Enter the Legal Entity Identifier (LEI) of your ultimate EEA parent entity if your institution is a branch of an EEA institution which is passporting into Ireland under FOE. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.</p> <p>Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000</p>
HAL	Branch - Country where the ultimate EEA parent entity is established	<p>Select the country where the ultimate European parent entity of the group is established if your institution is a branch of an EEA institution which is passporting into Ireland under FOE. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not</p>

		<p>part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group.</p> <p>Select from CountriesEEANA</p> <p>Variable name: EnumerationCountryEEANA</p>
HAM	Branch - The AML/CFT supervisory authority of the ultimate EEA parent entity	<p>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.</p> <p>If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A.</p> <p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HAN	Branch - Name of the global parent entity	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HAO	Branch - LEI of the global parent entity	<p>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.</p> <p>Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter</p>

		00000000000000000000
HAP	Branch - Country where the global parent entity is established	<p>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.</p> <p>Select from Country</p> <p>Variable name: EnumerationCountry</p>
HAQ	Branch - The AML/CFT supervisory authority of the global parent entity	<p>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.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>

8.2.2 EEA International Presence

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

For this section if the legal structure of your institution is reported as "Parent_of_group" within the EEA or "Stand_alone_entity", it is required to report all information in an aggregated manner for all of your institution's EEA entities for business written under 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.

```
<A05012 HAR="AT" HAS="26" HAT="45.61"></A05012>
```

REF	Field	Description
HAR	EEA Country	<p>Select each EEA country from CountriesEEA</p> <p>Data Type: EnumerationValue</p>

		Select from CountriesEEA
HAS	EEA No. of Customers	<p>For each EEA country, enter the total number of customers that reside or are established in that EEA country in the preceding calendar year.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
HAT	EEA Value of Transactions (EUR)	<p>For each EEA country, enter the total annual value of transactions (EUR) generated by these customers in the preceding calendar year.</p> <p>Data Type: DecimalValue If not applicable enter 0</p>

8.2.3 Statement Of Compliance

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

<A05011 Identifier="HAU" EnumerationYesNo="Yes"></A05011>

REF	Field	Description
HAU	Compliance CJA	<p>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?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HAV	Reason for Non Compliance	<p>If the answer is No to the Statement of Compliance above, please provide a brief summary of material non-compliance.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
HAW	Compliance Name	<p>Name of the person signing this Statement of Compliance on behalf of the Institution</p> <p>Variable name: String100 Character limit: 100 characters If not applicable enter N/A</p>
HAX	Position Held	<p>Position of the person signing this Statement of Compliance on behalf of the Institution</p> <p>Variable name: String100 Character limit: 100 characters If not applicable enter N/A</p>
HAY	PCF	<p>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?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>

8.3 Inherent Risk

8.3.1 Customer Segments

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

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

```
<A05022 HAZ="NP" HBA="786"></A05022>
```

REF	Field	Description
HAZ	Customer Segment Type	<p>Select each customer type from CustomerSegment. Each customer segment must be selected. Note customers can fall in more than one customer segment.</p>

		<p>Every entry must specify a unique customer segment and product pairing along with the number of customers, transactions, and their value.</p> <p>Complete one record per combination of customer and product segment</p> <p>Data Type: EnumerationValue Select from CustomerSegment</p>
HBA	No. of Customers Segment	<p>As of 31 December of the preceding calendar year, state the total numbers of customers by customer segment.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

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

<A05021 Identifier="HBB" IntegerValue="302"></A05021>

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

8.3.2 Sector

Please specify the total number of [legal entity](#) high risk customers at 31 December of the preceding calendar year.

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

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

<A05023 HBC="Mining" HBD="978"></A05023>

REF	Field	Description
HBC	Sector	Select each sector from Sector . Note that customers can fall in more than one sector. Each sector must be

		<p>selected.</p> <p>Data Type: EnumerationValue Select from Sector</p>
HBD	Sector - No. of High Risk Customers	<p>For each specific Sector, specify the total number of legal entity high risk customers at 31 December of the preceding calendar year to which your institution provides services that are active in the sectors listed.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

8.3.3 Life Insurance

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

<A05021 Identifier="HBE" IntegerValue="587"></A05021>

REF	Field	Description
HBE	Protection No. Low Risk	<p>Number of protection policies that meet the AMLA definition for low risk contracts at the end of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HBF	Pension No. Low Risk	<p>Number of investment policies, that are pensions, that meet the AMLA definition for low risk contracts at the end of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HBG	Not Pension No. Low Risk	<p>Number of investment policies, that are not pensions, that meet the AMLA definition for low risk contracts at the end of the preceding calendar year</p> <p>Variable name: IntegerValue</p>

		If not applicable enter 0
HBH	Protection No. of Contracts	<p>Number of protection contracts at the end of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HBI	Pension No. of Contracts	<p>Number of investment contracts, that are pensions, at the end of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HBJ	Not Pension No. of Contracts	<p>Number of investment contracts, that are not pensions, at the end of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HBK	Personalised Portfolio GWP	<p>Gross Written Premium in the preceding calendar year for Highly Personalised Portfolio Bonds</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
HBL	Personalised Portfolio Policies	<p>Number of Highly Personalised Portfolio Bond policies at the end of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HBM	Personalised Portfolio No. Surrender Option	<p>Number of Highly Personalised Portfolio Bond policies at the end of the preceding calendar year which have a surrender option</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HBN	Personalised Portfolio Surrender Value	<u>Surrender Value</u> of Highly Personalised Portfolio Bond at the end of the preceding calendar year

		<p>Variable name: DecimalValue</p> <p>If not applicable enter 0</p>
HBO	Personalised Portfolio No. Low Risk	<p>Number of Highly Personalised Portfolio Bond policies that meet the AMLA definition for low risk contracts at the end of the preceding calendar year</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HBP	Personalised Portfolio GWP to Intermediary	<p>Gross Written Premium paid to Intermediary for Highly Personalised Portfolio Bond policies in the preceding calendar year</p> <p>Variable name: DecimalValue</p> <p>If not applicable enter 0</p>
HBQ	Customers more than 5 investment policies	<p>Number of customers with more than 5 investment policies</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HBR	No. of Investment Policies Reassigned	<p>Number of Investment Policies assigned from one policyholder to another in year (excluding assignments related to borrowings)</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HBS	Value of Investment Policies Reassigned	<p>EUR Value of Investment Policies assigned from one policyholder to another in year (excluding assignments related to borrowings)</p> <p>Variable name: DecimalValue</p> <p>If not applicable enter 0</p>

8.3.4 Cash Transactions

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

<A05021 Identifier="HBT" IntegerValue="105"></A05021>

REF	Field	Description
HBT	Cash In Transactions	Number of cash inwards transactions in the previous year (premiums) Variable name: IntegerValue If not applicable enter 0
HBU	Cash In Value	Total Value (EUR) of cash inwards transactions in the previous year (premiums) Variable name: DecimalValue If not applicable enter 0
HBV	Cash Out Transactions	Number of cash outwards transactions in the previous year (claims/surrenders) Variable name: IntegerValue If not applicable enter 0
HBW	Cash Out Value	Total Value (EUR) of cash outwards transactions in the previous year (claims/surrenders) Variable name: DecimalValue If not applicable enter 0
HBX	Cash Customers over 20000	Total Number of natural persons totalling cash transactions over 20 000 EUR during the previous year Variable name: IntegerValue If not applicable enter 0

8.3.5 Intermediaries and Distribution Channels

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

<A05021 Identifier="HBY" EnumerationYesNo="No"></A05021>

REF	Field	Description
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HBY	Intermediary Used	<p>Does your institution use intermediaries in the provision of services to your customers?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HBZ	Intermediary Total Number	<p>State the total number of intermediaries that your institution has a relationship as of 31 December of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HCA	Intermediary Non Designated	<p>State the number of the intermediaries above that are not themselves obliged entities under Regulation (EU) 2024/1624 or national legislation</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HCB	Intermediary No AML	<p>The number of new customers onboarded in the preceding calendar year by intermediaries that are not themselves obliged entities under Regulation (EU) 2024/1624 or national legislation</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HCC	Intermediary Customers	<p>The number of new customers onboarded through an intermediary in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

8.3.6 Remote Onboarding

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

<A05021 Identifier="HCD" IntegerValue="590"></A05021>

REF	Field	Description
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HCD	Onboarding Remote NP	State the number of new customers, who are Natural Persons, accepted via remote onboarding in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HCE	Onboarding Remote LE	State the number of new customers, which are Legal Entities , accepted via remote onboarding in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

8.4 Mitigation And Control

8.4.1 Business Wide Risk Assessment

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

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

```
<A05031 Identifier="HCH" EnumerationBWRAConducted="Exemption_applies"></A05031>
```

REF	Field	Description
HCH	BWRA Conducted	State whether your institution conducts a Business Wide Risk Assessment (BWRA). Select from BWRAConducted Variable name: EnumerationBWRAConducted
HCI	BWRA Senior Management Approval	State whether Senior Management of your institution approved the latest version of the BWRA. Select from YesNo Variable name: EnumerationYesNo
HCI	BWRA Last Approval Date	State the approval date of your institution's most recent BWRA in the format of YYYY-MM-DD. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-

		01-01
HCK	BWRA Review Frequency	<p>Select the frequency of BWRA review by your institution.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HCL	BWRA Business Change	<p>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.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HCM	BWRA Business Change Description	<p>Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HCN	BWRA Money Laundering	<p>State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HCO	BWRA Terrorist Financing	<p>State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HCP	BWRA Sanctions	<p>State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA.</p>

		<p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HCQ	BWRA Corruption	<p>State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HCR	BWRA Conflicts of Interest	<p>State whether risks of conflicts of interest are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HCS	BWRA Tax Evasion	<p>State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HCT	BWRA Internal Fraud	<p>State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HCU	BWRA External Fraud	<p>State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>

HCV	BWRA Cybercrime	<p>State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HCW	BWRA Market Abuse	<p>State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HCX	BWRA Customer Groups	<p>State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HCY	BWRA Geographies	<p>State whether geographies are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HCZ	BWRA Product Groups	<p>State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDA	BWRA Distribution Channel	<p>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.</p> <p>Select from YesNoNA</p>

		Variable name: EnumerationYesNoNA
HDB	BWRA Crypto	<p>State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDC	BWRA Risk Other	<p>State whether risks of other areas are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDD	BWRA Risk Other Detail	<p>If Yes to BWRARiskOther, please describe the areas that explicitly cited and considered in your most recent BWRA.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HDE	Other Risk Assessment Process - Money laundering	<p>State whether risks of money laundering are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDF	Other Risk Assessment Process - Terrorist financing	<p>State whether risks of terrorist financing are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

HDG	Other Risk Assessment Process - Circumvention of sanctions regulations	<p>State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDH	Other Risk Assessment Process - Corruption (bribery)	<p>State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDI	Other Risk Assessment Process - Conflicts of interest	<p>State whether risks of conflicts of interest are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDJ	Other Risk Assessment Process - Evasion of tax regulations	<p>State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDK	Other Risk Assessment Process - Internal fraud and embezzlement (by employees/management of your institution)	<p>State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDL	Other Risk Assessment Process - External fraud and embezzlement (by	<p>State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in</p>

	customers or other business relations)	<p>your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDM	Other Risk Assessment Process - Cybercrime/Ransomware	<p>State whether risks of cybercrime/ransomware are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDN	Other Risk Assessment Process - Market abuse	<p>State whether risks of market abuse are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDO	Other Risk Assessment Process - Customer groups	<p>State whether customer groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDP	Other Risk Assessment Process - Geographies	<p>State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDQ	Other Risk Assessment Process - Product groups	<p>State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA</p>

		Variable name: EnumerationYesNoNA
HDR	Other Risk Assessment Process - Distribution channels	<p>State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations, and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDS	Other Risk Assessment Process - Cryptos	<p>State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDT	BWRA Risk Appetite	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDU	BWRA Policy Procedure	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDV	BWRA Product Service	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

HDW	BWRA Transaction Monitoring	<p>State whether the outcomes of the BWRA were used for setting scenarios and rules for transaction monitoring.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDX	BWRA Process Other	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HDY	BWRA Process Other Detail	<p>If Yes to BWRA Process Other, briefly describe the other processes and activities in which your institution uses the outcomes of the BWRA.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HDZ	Risk App Formulated	<p>State whether your institution formulates a ML/TF risk appetite.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>

8.4.2 Policies and Procedures

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

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

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<A05031 Identifier="HEA" DateValue="2024-01-17"></A05031>
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REF	Field	Description
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HEA	Pol & Proc - Customer onboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer onboarding (e.g. steps to be taken in setting up an account, or requirements before being able to transact, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEB	Pol & Proc - Ongoing Customer Due Diligence	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer review (e.g. the frequency of review on high risk customers).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEC	Pol & Proc - Ongoing monitoring of business relationships	<p>Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of business relationships.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HED	Pol & Proc - Customer Offboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer offboarding (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEE	Pol & Proc - Politically Exposed Persons	<p>Enter the date when your institution's management approved the last version of policies and procedures for <u>Politically Exposed Persons</u> (PEPs).</p> <p>Variable name: DateValue</p>

		Format YYYY-MM-DD If not applicable enter 2000-01-01
HEF	Pol & Proc - High risk customers	<p>Enter the date when your institution's management approved the last version of policies and procedures for high risk customers.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEG	Pol & Proc - Transaction monitoring	<p>Enter the date when your institution's management approved the last version of policies and procedures for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, customer risk review in result of positive alerts, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEH	Pol & Proc - Suspicious transaction reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process.</p> <p>This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the conduct of your institution's business to both Revenue and the FIU of any STR generated within your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEI	Pol & Proc - Evasion of tax regulations	<p>Enter the date when your institution's management approved the last version of policies and procedures for evasion of tax regulations by customers (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p>

		<p>Variable name: DateValue</p> <p>Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEJ	Pol & Proc - Bribery	<p>Enter the date when your institution's management approved the last version of policies and procedures for bribery (e.g. monitoring and reporting of bribery instances).</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEK	Pol & Proc - Conflicts of interest	<p>Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEL	Pol & Proc - Fraud within or outside the organisation	<p>Enter the date when your institution's management approved the last version of policies and procedures for fraud within or outside your institution.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEM	Pol & Proc - Sanctions screening	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanctions screening (e.g. monitoring and detecting instances of financial sanctions evasion).</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEN	Pol & Proc - Sanction hits handling	<p>Enter the date when your institution's management approved the last version of policies and procedures</p>

		<p>for sanction hits handling (e.g. escalating, recording, and investigating instances of financial sanctions evasion).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEO	Pol & Proc - Sanction hits reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanction hits reporting (e.g. in the case of a sanction "hit", the Sanctions Return Form is correctly completed and reported to the Central Bank Sanctions Team as required).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEP	Pol & Proc - Treating and reporting of ML/TF & Financial Sanctions incidents	<p>Enter the date when your institution's management approved the last version of policies and procedures for identification, investigation and where required, reporting of potential instances of money laundering, terrorist financing, and confirmed financial sanctions evasion matches.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEQ	Pol & Proc - Whistleblowing	<p>Enter the date when your institution's management approved the last version of policies and procedures for whistleblowing.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HER	Pol & Proc - Compliance function	<p>Enter the date when your institution's management approved the last version of policies, procedures and resourcing for the compliance function so it operates</p>

		<p>to an acceptable standard.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HES	Pol & Proc - Internal Audit/Assurance Testing	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HET	Pol & Proc - Separation of functions (Three Lines of Defence)	<p>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).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEU	Pol & Proc - Training	<p>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).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEV	Pol & Proc - Geographic Risk Factors	<p>Enter the date when your institution's management approved the last version of policies and procedures for geographic risk factors (e.g. business activity in high risk jurisdictions, enhanced customer due diligence due to geographic risk, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-</p>

		01-01
HEW	Pol & Proc - AML/CFT Record Keeping	<p>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).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEX	Pol & Proc - Business wide risk assessment process	<p>Enter the date when your institution's management approved the last version of policies and procedures to support the business wide risk assessment process.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEY	Pol & Proc - Customer risk assessment process	<p>Enter the date when your institution's management approved the last version of policies and procedures to support customer risk assessment processes.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HEZ	Pol & Proc - Legislation changes/regulatory guidance	<p>Enter the date when your institution's management approved the last version of policies and procedures and internal processes on foot of legislative changes/regulatory guidance.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HFA	Pol & Proc - Review Frequency	Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures.

		Select from Frequency Variable name: EnumerationFrequency
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8.4.3 Onboarding

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

<A05031 Identifier="HFB" EnumerationYesNo="Yes"></A05031>

REF	Field	Description
HFB	Onboarding - Internet / Email - Natural person customers	State whether your institution offers onboarding via Internet/Email for natural person customers. Select from YesNo Variable name: EnumerationYesNo
HFC	Onboarding - App - Natural person customers	State whether your institution offers onboarding via mobile app for natural person customers. Select from YesNo Variable name: EnumerationYesNo
HFD	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 Variable name: EnumerationYesNo
HFE	Onboarding - Third party - Natural person customers	State whether your institution offers onboarding via third party for natural person customers. Select from YesNo Variable name: EnumerationYesNo
HFF	Onboarding - Other - Natural person customers	State whether your institution offers onboarding via other options for natural person customers. Select from YesNo Variable name: EnumerationYesNo

HFG	Onboarding - Onboarding Other Details Natural person customers	<p>If Yes to Other - Natural person customers, specify other onboarding options. List the other onboarding options available to natural persons separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HFH	Onboarding - Internet / Email - Legal entity customers	<p>State whether your institution offer onboarding via Internet/Email for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HFI	Onboarding - App - Legal entity customers	<p>State whether your institution offer onboarding via mobile app for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HFJ	Onboarding - Counter/Desk i.e. face to face - Legal entity customers	<p>State whether your institution offer onboarding via counter/desk (i.e. face to face) for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HFK	Onboarding - Third party - Legal entity customers	<p>State whether your institution offer onboarding via third party for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HFL	Onboarding - Other - Legal entity customers	<p>State whether your institution offer onboarding via other options for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>

HFM	Onboarding - Onboarding Other Details Legal entity customers	<p>If Yes to Other - Legal entity customers, specify other onboarding options. List the other onboarding options available to legal entities separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HFN	Onboarding - Remote Data	<p>State whether your institution has policies and procedures in place defining which data is considered adequate for correctly establishing and verifying a customer's identity for the remote onboarding process (i.e. options excluding counter/desk).</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HFO	Onboarding - Purpose Questions	<p>State whether the onboarding process includes policies and procedures that facilitate the identification of the intended purpose and nature of the business relationship.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HFP	Onboarding - Purpose Questions Specify	<p>If Yes to Purpose Questions, briefly specify the subject matter of these questions.</p> <p>List the subject matter of these questions asked separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HFQ	Onboarding - Excluded Customer	<p>State whether your institution has specific customer groups that may not be remotely onboarded.</p> <p>Select from YesNoNA</p>

		Variable name: EnumerationYesNoNA
HFR	Onboarding - Excluded Customer Specify	<p>If Yes to Excluded Customer, briefly specify these customer groups.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HFS	Onboarding - Verify Irish Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from an Irish bank account in the customer's own name.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HFT	Onboarding - Verify Foreign Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from a foreign bank account in the customer's own name.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HFU	Onboarding - Verify Upload Photo NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via uploading a photo or photocopy of the customer's ID document.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HFV	Onboarding - Verify Person Photo NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via scan of ID document and image of the customer to be authenticated by a natural person.</p>

		Select from YesNoNA Variable name: EnumerationYesNoNA
HFW	Onboarding - Verify Upload Doc NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity with uploading a photo of a bank account statement, payslip, or other documents with the customer's proof of address. Select from YesNoNA Variable name: EnumerationYesNoNA
HFX	Onboarding - Verify Chip Doc NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a scan of an ID documents with a chip device. Select from YesNoNA Variable name: EnumerationYesNoNA
HFY	Onboarding - Verify Passport NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via request for passport details in an online application form. Select from YesNoNA Variable name: EnumerationYesNoNA
HFZ	Onboarding - Verify At Desk NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via verification of the customer's identity at the counter/desk. Select from YesNoNA Variable name: EnumerationYesNoNA
HGA	Onboarding - Verify other Human intervention NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other methods of <u>human intervention</u> not listed above.

		<p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HGB	Onboarding - Other Human intervention NP Detail	<p>If Yes to Verify other Human Intervention NP, briefly describe the method of other human intervention (natural person customer). List the other methods of human intervention used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HGC	Onboarding - Verify Other NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other procedures.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HGD	Onboarding - Other NP Detail	<p>If Yes to Verify Other NP, briefly specify the other procedures (natural person customer) separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HGE	Onboarding - Verify Other Human Intervention Legal entity customer	<p>In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other human intervention not listed above.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HGF	Onboarding - Other Human intervention Legal entity customer Detail	<p>If Yes to Verify Other Human Intervention Legal entity customer, briefly describe the method of other human intervention (legal entity customer) separated by semicolon (;) with no spaces either</p>

		<p>side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HGG	Onboarding - Verify Other Legal entity customer	<p>In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGH	Onboarding - Other Legal entity customer Detail	<p>If Yes to Verify Other Legal entity customer, briefly specify the other procedures (legal entity customer) separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HGI	Onboarding - Verify Upload Photo Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo or photocopy of the customer representative's ID document.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGJ	Onboarding - Verify Person Photo Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via scan of ID document and image of the customer representative to be authenticated by a natural person.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

HGK	Onboarding - Verify Upload Doc Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo of a bank account statement, payslip, or other documents with the representative's proof of address.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGL	Onboarding - Verify Chip Doc Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies representative identity via a scan of an ID document with a chip device.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGM	Onboarding - Verify Passport Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via request for passport details in an online application form.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGN	Onboarding - Verify At Desk Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via verification of the representative's identity at the counter/desk.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGO	Onboarding - Verify other Human intervention Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via other human intervention not listed above.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

HGP	Onboarding - Other Human intervention Representatives Detail	<p>If Yes to Verify other Human intervention Representatives, briefly describe the methods of other human intervention (representatives) separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HGQ	Onboarding - Verify Other Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies representative identity with other procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGR	Onboarding - Other Representatives Detail	<p>If Yes to Verify Other Representative, briefly specify the other procedures (representatives) separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HGS	Onboarding - Verify Human intervention BO	<p>In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other human intervention.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGT	Onboarding - Other Human Intervention BO Detail	<p>If Yes to Verify Human Intervention BO, briefly describe the methods of other human intervention (beneficial owners) separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>

HGU	Onboarding - Verify Other BO	<p>In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HGV	Onboarding - Other BO Detail	<p>If Yes to Verify Other BO, briefly specify the other procedures (beneficial owners) separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>

8.4.4 Offboarding

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

```
<A05031 Identifier="HGW" IntegerValue="888"></A05031>
```

REF	Field	Description
HGW	Customer Offboarding Number	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS/fraud concerns.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HGX	Customer Offboarding Number ML	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HGY	Customer Offboarding Number TF	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns.</p>

		Variable name: IntegerValue If not applicable enter 0
HGZ	Customer Offboarding Number FS	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. Variable name: IntegerValue If not applicable enter 0
HHA	Customer Offboarding Number HR	State the total number of customers rated high risk as per your institution's customer risk assessment prior to offboarding, whose business relationships with your institution were terminated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

8.4.5 Customer Due Diligence

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

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

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

```
<A05031 Identifier="HHB" EnumerationCDD="No"></A05031>
```

REF	Field	Description
HHB	Identity Verification NP	State whether the identity of natural person customers is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
HHC	Nature Of Relationship NP	State whether the purpose and intended nature of the business relationship is established prior to providing services to natural person customers

		<p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHD	Source Of Funds NP	<p>State whether source/origin of the funds/assets is identified prior to providing services to natural person customers</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHE	Customer Rep Identified NP	<p>State whether a customer's representative is identified prior to providing services to natural person customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHF	Tax Motive Identified NP	<p>State whether tax motives are identified prior to providing services to natural person customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHG	Geos Identified NP	<p>State whether geographies involved are identified prior to providing services to natural person customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHH	Identity Verification LE	<p>State whether the identity of legal entity customers is verified prior to providing services.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHI	Identity Verification BO LE	<p>State whether the identity of the beneficial owner of legal entity customers is established and verified prior to providing services.</p>

		<p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHJ	Ownership Structure Identified LE	<p>State whether ownership and/or control structure is identified for legal entity customers prior to providing services.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHK	Nature Of Relationship LE	<p>State whether the purpose and intended nature of the business relationship is established prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHL	Source Of Funds LE	<p>State whether source/origin of the funds/assets is identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHM	Customer Rep Identified LE	<p>State whether a customer's representative is identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHN	Tax Motive Identified LE	<p>State whether tax motives are identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHO	Geos Identified LE	<p>State whether geographies involved are identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p>

		Variable name: EnumerationCDD
HHP	Group Activities LE	<p>State whether intragroup activities (such as activities among entities within a group which are non-transactional in nature) are identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHQ	Group Transactions LE	<p>State whether intragroup transactions (such as transactions among entities within a group) are identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHR	Trust Beneficial Owner LE	<p>Are applications by a trust checked against the relevant trust's beneficial ownership register or the Central Register of Beneficial Ownership of trusts?</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
HHS	CDD Review NP	<p>State whether your institution periodically reviews its customers' risk profiles for natural person.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
HHT	CDD Review LE	<p>State whether your institution periodically reviews its customers' risk profiles for legal entity customers.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
HHU	CDD Review NP Low	<p>If Yes to CDD Review NP, state the Frequency of these reviews for low-risk natural person customers.</p> <p>Select from Frequency</p>

		Variable name: EnumerationFrequency
HHV	CDD Review NP Medium	<p>If Yes to CDD Review NP, state the Frequency of these reviews for medium-risk natural person customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
HHW	CDD Review NP High	<p>If Yes to CDD Review NP, state the Frequency of these reviews for high-risk natural person customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
HHX	CDD Review NP PEP	<p>State the Frequency of these reviews for customers who are politically exposed persons, their family members or persons that are close associates.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
HHY	CDD Review NP Unacceptable	<p>If Yes to CDD Review NP, state the Frequency of these reviews for unacceptable-risk natural person customers (e.g. yet to be exited).</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
HHZ	CDD Review LE Low	<p>If Yes to CDD Review LE, state the Frequency of these reviews for low-risk legal entity customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
HIA	CDD Review LE Medium	<p>If Yes to CDD Review LE, state the Frequency of these reviews for medium-risk legal entity customers.</p> <p>Select from Frequency</p>

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

		If not applicable enter 0
HIG	CDD MH Customer	<p>Number of customers per ML/TF risk category (medium-high risk).</p> <p>If your institution uses three risk categories, you may enter 0 for medium-high risk.</p> <p>If your institution uses five risk categories then</p> <p>Low risk -> Low risk</p> <p>Medium-low risk -> Low risk</p> <p>Medium-high risk -> Medium-low risk</p> <p>High risk -> Medium-high risk</p> <p>Ultra/very high risk -> High risk</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HIH	CDD High Customer	<p>Number of customers per ML/TF risk category (high-risk).</p> <p>If your institution uses five risk categories then</p> <p>Low risk -> Low risk</p> <p>Medium-low risk -> Low risk</p> <p>Medium-high risk -> Medium-low risk</p> <p>High risk -> Medium-high risk</p> <p>Ultra/very high risk -> High risk</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HII	CDD customers Due NP	<p>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.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HIJ	CDD customers Reviewed NP	<p>Number of natural person customers for whom customer information was reviewed and updated in the preceding calendar year.</p>

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HIK	CDD customers Due LE	<p>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.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HIL	CDD customers Reviewed LE	<p>Number of legal entity customers for whom customer information was reviewed and updated in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HIM	Backlog Prop NP Total	<p>Specify the proportion of backlogs of all natural person customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HIN	Backlog Prop NP High	<p>Specify the proportion of backlogs of high-risk natural person customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HIO	Backlog Prop NP PEP	<p>Specify the proportion of backlogs of customers who are <u>politically exposed persons</u>, their family members, or persons to be close associates.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>

HIP	Backlog Prop NP Unacceptable	<p>Specify the proportion of backlog made up of unacceptable-risk natural person customers (e.g. yet to be exited).</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
HIQ	Backlog Prop LE Total	<p>Specify the proportion of backlogs of all legal entity customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
HIR	Backlog Prop LE High	<p>Specify the proportion of backlogs of high-risk legal entity customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
HIS	Backlog Prop LE Unacceptable	<p>Specify the proportion of backlog made up of unacceptable-risk legal entity customers (e.g. yet to be exited).</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
HIT	Concrete Timelines NP	<p>State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for natural persons.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HIU	Concrete Timelines LE	<p>State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for legal entities.</p>

		<p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HIV	No Ident Total	<p>What proportion of total customers have no CDD documentation/information.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HIW	No Ident High	<p>What proportion of high risk customers have no CDD documentation/information.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HIX	No Ident PEP	<p>What proportion of customers who are <u>PEPs</u> have no CDD documentation/information</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HIY	Incomplete Total	<p>Specify the proportion of total customers with incomplete CDD documentation over the overall customers.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HIZ	Incomplete High	<p>Specify the proportion of high-risk customers with incomplete CDD documentation over the overall customers.</p> <p>Variable name: PercentageValue</p>

		<p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HJA	Incomplete PEP	<p>Specify the proportion of customers who are politically exposed persons, their family members or persons known to be close associates with incomplete CDD documentation over the overall customers.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HJB	CDD BO not Identified	<p>Number of customers that are legal entities /trusts whose beneficial owners have not been identified.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HJC	CDD BO not Verified HR	<p>Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HJD	CDD no Purpose	<p>Number of customers for whom no information on the purpose and intended nature of the business relationship has been obtained (excluding customers with whom your institution does not have a business relationship).</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HJE	Customer Data not in Line With Article 20	<p>Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR.</p>

		<p>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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HJF	Customer Number Without Risk Profile	<p>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)</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

8.4.6 Transaction Monitoring

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

<A05031 Identifier="HJG" EnumerationYesNoNA="Yes"></A05031>

REF	Field	Description
HJG	TM Profile	Does your institution draw up a transaction profile for customers at the initiation of services? Select from YesNoNA Variable name: EnumerationYesNoNA
HJH	TM Profile Review	What is the frequency of review of the transaction profile? Select from Frequency Variable name: EnumerationFrequency
HJI	TM Profile Number Transactions	Does your institution include number of transactions in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
HJJ	TM Profile Value of Aggregated Transactions	Does your institution include the value of total transactions in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
HJK	TM Profile Value of Single Transactions	Does your institution include the value of single transactions in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA
HJL	TM Profile Counterparties	Does your institution include counterparties in an expected transactions profile? Select from YesNoNA Variable name: EnumerationYesNoNA

HJM	TM Profile Geographies	<p>Does your institution include geographies in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJN	TM Profile Group Transactions	<p>Does your institution include intra-group transactions in an expected transactions profile, i.e. do you include the expected movement of customer funds between their group companies?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJO	TM Profile Banks	<p>Does your institution include banks or payment institutions involved in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJP	TM Alert Number of Transactions	<p>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?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJQ	TM Alert Value of Aggregated Transactions	<p>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?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJR	TM Alert Value of Single Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to</p>

		<p>the customer and the actual value of single transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJS	TM Alert Counterparties	<p>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?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJT	TM Alert Geographies	<p>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?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJU	TM Alert Group Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual intra-group transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJV	TM Alert Banks	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual banks/payment institutions involved?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

HJW	TM How Monitor	<p>State whether your institution monitors transactions and how this is done.</p> <p>Select from MonitoringApproach Variable name: EnumerationMonitoringApproach</p>
HJX	TM Model Validation	<p>Are formal steps taken after creating the rules for an automated transaction monitoring system in which the rules are tested for appropriateness and efficacy?</p> <p>Select from ModelValidation Variable name: EnumerationModelValidation</p>
HJY	TM AI	<p>Does your institution use artificial intelligence technology in its transaction monitoring process?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HJZ	TM Rule	<p>Does your institution use rules as part of its transaction monitoring process?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKA	TM High Risk Geographies	<p>Does your institution have rules in its transaction monitoring process with respect to high risk geographies?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKB	TM Offshore Jurisdictions	<p>Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKC	TM BR Customer Segments	<p>Does your institution have rules in its transaction monitoring process with respect to Customer</p>

		<p>Segments?</p> <p>Customer segments can be any internal definition of customer groupings, retail or corporate customers, risk levels, associated sector, high value customer etc.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKD	TM Sectors	<p>Does your institution have transaction monitoring rules which take into account risks associated with specific sectors?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKE	TM PEP	<p>Are there rules or conditions in your institution's transaction monitoring system to account for risk associate with PEPs and PEP close associates?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKF	TM Cash	<p>Does your institution have rules in its transaction monitoring process with respect to cash transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKG	TM Text	<p>Are transaction description fields / bodies of text considered in any of the rules your institution has in its transaction monitoring system</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKH	TM Complex	<p>Does your institution have rules in its transaction monitoring process with respect to complex structures?</p>

		<p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HKI	TM Banks	<p>Does your institution have rules in its transaction monitoring process with respect to what banks / payment institutions are involved in transactions?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HKJ	TM Other	<p>Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their rules?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HKK	TM Other Detail	<p>Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
HKL	TM Review	<p>Does your institution periodically review its rules in its transaction monitoring process?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HKM	TM Review Latest	<p>Please give completion date of the review. If a repeating review process is in place, please give the most recent date for a rule which has been reviewed.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD If not applicable enter 2000-01-01</p>

HKN	TM Review Latest Changes	<p>Did the most recent review lead to any changes in rules?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HKO	TM Real Time or Post Event	<p>State whether detection of (possible) suspicious financial transactions takes place in real-time or post-event.</p> <p>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.</p> <p>Select from DetectionTime Variable name: EnumerationDetectionTime</p>

8.4.7 Alerts

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

<A05031 Identifier="HKP" IntegerValue="360"></A05031>

REF	Field	Description
HKP	Rule Count - Automated	<p>How many rules were in place in your institution's automated transaction monitoring system in the preceding calendar year?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HKQ	Total Alert Count - Automated	<p>How many alerts were generated by the automated transaction monitoring system in the preceding calendar year?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HKR	Percent Alerts - Automated	<p>What is the proportion of automated transaction monitoring alerts to total transactions?</p>

		<p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HKS	Alerts Investigated - Automated	<p>How many automated alerts were investigated by an AML/transaction monitoring staff member?</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HKT	Alerts Escalated - Automated	<p>How many automated alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report?</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HKU	Alert Investigated FP - Automated	<p>How many automated alerts were closed as false positives following investigation?</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HKV	Rule Count Manual	<p>How many rules were in place in your institution's manual transaction monitoring process in the preceding calendar year?</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HKW	Total Alert Count - Manual	<p>How many alerts were generated by the manual transaction monitoring process in the preceding calendar year?</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HKX	Percent Alerts - Manual	<p>What is the proportion of manual transaction monitoring alerts to total transactions?</p>

		<p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HKY	Alerts Investigated - Manual	<p>How many manual alerts were investigated by an AML/transaction monitoring staff member?</p> <p>Investigated refers to an initial check to indicate if a transaction monitoring alert is worth sending to investigators/compliance.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HKZ	Alerts Escalated - Manual	<p>How many manual alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report?</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HLA	Alert Investigated FP - Manual	<p>How many manual alerts were closed as false positives following investigation? A false positive is an alert which results in no Suspicious Transaction Report (STR) being filed.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HLB	Alert TP Review - Automated	<p>How many true positive alerts (STR filed from automated alerts) led to a review of the customer's risk, CDD or otherwise.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HLC	Alert Backlog - Automated	<p>At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed?</p>

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HLD	Alert Mean Time To Close - Automated	<p>Over the course of the preceding calendar year, what was the average time in days to close a true positive alert (account for automated alerts only), from the initial alert generation?</p> <p>Variable name: DecimalValue</p> <p>If not applicable enter 0</p>
HLE	Alert Ratio STR - Automated	<p>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.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HLF	Alert TP Review - Manual	<p>How many true positive transaction monitoring alerts (STR filed from manual alerts) led to a review of the customer's risk, CDD or otherwise</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HLG	Alert Backlog - Manual	<p>At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed?</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>

HLH	Alert Mean Time To Close TP – Manual	Over the course of the preceding calendar year, what was the average time in days to close a true positive alert (account for manual alerts only), from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? Variable name: DecimalValue If not applicable enter 0
HLI	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. Variable name: DecimalValue If not applicable enter 0

8.4.8 Suspicious Alerts and Transaction Rejections

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

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

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

```
<A05032 HLJ="Alert_ML" HLK="831" HLL="435"></A05032>
```

REF	Field	Description
HLJ	Alert Type	Select each specific suspicious AlertType. Each AlertType must be selected. Data Type: EnumerationValue Select from AlertType
HLK	Transaction Alert Number	For a specific suspicious alert type, state the total number of transaction alerts generated in the preceding calendar year Data Type: IntegerValue If not applicable enter 0

HLL	Transaction Reject Number	<p>For a specific suspicious alert type, state the total number of transactions that were rejected in the preceding calendar year.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
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8.4.9 Suspicious Transaction Reporting

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

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

<A05031 Identifier="HLM" EnumerationYesNo="Yes"></A05031>

REF	Field	Description
HLM	Registered FIU	State whether your institution is registered with the Financial Intelligence Unit (FIU) GoAML system and with Revenue for the purposes of reporting STRs. Select from YesNo Variable name: EnumerationYesNo
HLN	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HLO	Number STR Bribe	State the total number of suspicious transaction reports (STRs) based on bribery/corruption reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HLP	FIU Number STR HT	State the total number of suspicious transaction reports (STRs) based on human trafficking reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HLQ	FIU Number STR LWE	State the total number of suspicious transaction reports (STRs) based on left wing extremism reported to the FIU in the preceding calendar year. Variable name: IntegerValue

		If not applicable enter 0
HLR	FIU Number STR MS	<p>State the total number of suspicious transaction reports (STRs) based on migrant smuggling reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HLS	FIU Number STR ML	<p>State the total number of suspicious transaction reports (STRs) based on money laundering reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HLT	FIU Number STR PEP	<p>State the total number of suspicious transaction reports (STRs) based on politically exposed person reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HLU	FIU Number STR RWE	<p>State the total number of suspicious transaction reports (STRs) based on right wing extremism reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HLV	FIU Number STR Sanctions	<p>State the total number of suspicious transaction reports (STRs) based on sanctions list match reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HLW	FIU Number STR SE	<p>State the total number of suspicious transaction reports (STRs) based on sexual exploitation reported to the FIU in the preceding calendar year.</p>

		Variable name: IntegerValue If not applicable enter 0
HLX	FIU Number STR SWF	State the total number of suspicious transaction reports (STRs) based on social welfare fraud reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HLY	FIU Number STR TE	State the total number of suspicious transaction reports (STRs) based on tax evasion reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HLZ	FIU Number STR TF	State the total number of suspicious transaction reports (STRs) based on terrorist financing reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HMA	FIU Number STR TBML	State the total number of suspicious transaction reports (STRs) based on trade based money laundering reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HMB	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
HMC	FIU Number STs Bribe	State the total number of suspicious transactions contained in STRs based on bribery/corruption

		<p>reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMD	FIU Number STs HT	<p>State the total number of suspicious transactions contained in STRs based on human trafficking reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HME	FIU Number STs LWE	<p>State the total number of suspicious transactions contained in STRs based on left wing extremism reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMF	FIU Number STs MS	<p>State the total number of suspicious transactions contained in STRs based on migrant smuggling reported to the FIU in the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMG	FIU Number STs ML	<p>State the total number of suspicious transactions contained in STRs based on money laundering reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMH	FIU Number STs PEP	<p>State the total number of suspicious transactions contained in STRs based on politically exposed person reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

HMI	FIU Number STs RWE	<p>State the total number of suspicious transactions contained in STRs based on right wing extremism reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMJ	FIU Number STs Sanctions	<p>State the total number of suspicious transactions contained in STRs based on sanctions list match reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMK	FIU Number STs SE	<p>State the total number of suspicious transactions contained in STRs based on sexual exploitation reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HML	FIU Number STs SWF	<p>State the total number of suspicious transactions contained in STRs based on social welfare fraud reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMM	FIU Number STs TE	<p>State the total number of suspicious transactions contained in STRs based on tax evasion reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMN	FIU Number STs TF	<p>State the total number of suspicious transactions contained in STRs based on terrorist financing reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p>

		If not applicable enter 0
HMO	FIU Number STs TBML	<p>State the total number of suspicious transactions contained in STRs based on trade based money laundering reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HMP	FIU Days to Report	<p>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.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>

8.4.10 Sanctions Screening

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

<A05031 Identifier="HMQ" EnumerationYesNo="No"></A05031>

REF	Field	Description
HMQ	Sanctions Prior To Service	<p>State whether your institution verifies, prior to providing services, whether or not customers or potential customers and their beneficial owners are included on sanction lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HMR	Sanction Max Hours	<p>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.</p> <p>Variable name: DecimalValue</p>

		If not applicable enter 0
HMS	Sanction EU	<p>Specify if customers and beneficial owners are checked against EU sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HMT	Sanction National List	<p>Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC).</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HMU	Sanction UN	<p>Specify if customers and beneficial owners are checked against UN sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HMV	Sanction Other	<p>Specify if customers and beneficial owners are checked against any other sanctions lists</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HMW	Sanction Other Specify	<p>If your institution uses any other sanctions lists not mentioned above please specify</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HMX	Sanction Transact Check	<p>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.</p> <p>Select from YesNo</p>

		Variable name: EnumerationYesNo
HMY	Sanction List Update	<p>At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when sanctions listing updated.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HNC	Sanction Periodic Customer Frequency	<p>State the frequency (number of checks per calendar year) that your institution periodically checks whether customers are included on sanctions lists.</p> <p>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HND	Sanction Periodic BO Frequency	<p>State the frequency (number of checks per calendar year) that your institution periodically checks whether beneficial owners connected to customers are included on sanctions lists.</p> <p>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
HNE	Sanction Periodic Rep Frequency	<p>State the frequency (number of checks per calendar year) that your institution periodically checks whether representatives connected to customers are included on sanctions lists.</p> <p>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4.</p>

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HNF	Sanction Total Hits	<p>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</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HNG	Sanction Total Hits Value	<p>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.</p> <p>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.</p> <p>Variable name: DecimalValue</p> <p>If not applicable enter 0</p>

8.4.11 Outsourcing

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

<A05031 Identifier="HNH" EnumerationOutsource="No_but_concrete_plans_to_source_in_future"></A05031>

REF	Field	Description
HNH	Outsource CDD Onboarding	<p>State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource</p> <p>Variable name: EnumerationOutsource</p>

HNI	Outsource CDD Review	<p>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).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
HNJ	Outsource TM	<p>State whether transaction monitoring has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
HNK	Outsource Alert Processing	<p>State whether alerts processing has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
HNL	Outsource STR Reporting	<p>State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
HNM	Outsource Sanction Screen	<p>State whether sanctions screening has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
HNN	Outsource CDM	<p>State whether customer data management (e.g. external storage, management, and handling of customer data) has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource</p>

		Variable name: EnumerationOutsource
HNO	Outsource Training	<p>State whether AML/CFT training has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource</p> <p>Variable name: EnumerationOutsource</p>
HNP	Outsource PEP	<p>State whether PEP detection has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource</p> <p>Variable name: EnumerationOutsource</p>
HNQ	Outsource Compliance	<p>State whether compliance monitoring checks have been outsourced to third parties (including within the Group).</p> <p>Select from Outsource</p> <p>Variable name: EnumerationOutsource</p>
HNR	Outsource Other AMLCFT	<p>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).</p> <p>Select from Outsource</p> <p>Variable name: EnumerationOutsource</p>
HNS	Outsource Other AMLCFT Specify	<p>If Yes to Outsource Other AML CFT, specify the other processes.</p> <p>List the other outsourced elements of your AML/CFT processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>

HNT	Outsource Provider Compliance Requirements	<p>State the proportion of outsourced AML/CFT arrangements where your institution incorporates compliance requirements with respect to financial crime legislation within its outsourcing agreements (e.g. CJA 2010).</p> <p>To calculate the percentage, obliged entities should apply the following process:</p> <p>Denominator: number of tasks (customer due diligence, training, transaction monitoring, etc.) that are at least partly outsourced.</p> <p>Numerator: number of such tasks for which one or more written outsourcing agreement covering all outsourced aspects is in place.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
HNU	Outsource Assess Report Obligation	<p>State whether your institution ensures outsource provider compliance with the requirements via reporting obligation.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HNV	Outsource Assess Training	<p>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).</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
HNW	Outsource Assess Audit Rights	<p>State whether your institution ensures outsource provider compliance with the requirements via audit rights (e.g. retain rights to audit the outsource providers).</p> <p>Select from YesNoNA</p>

		Variable name: EnumerationYesNoNA
HNX	Outsource Assess Other	<p>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.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HNH	Outsource Tasks to High Risk Third Countries	<p>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)</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HNZ	Outsource Tasks to High Risk Third Countries Within Group	<p>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</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

8.4.12 Education and Training

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

<A05031 Identifier="HOA" PercentageValue="0.6"></A05031>

REF	Field	Description
HOA	Non-AML/CFT specialist staff - % Staff coverage	<p>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.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>

		If not applicable enter 0
HOB	AML Specialist staff - % Staff coverage	<p>State the proportion of AML specialist staff who have attended training in the preceding calendar year with regard to financial crime.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HOC	Agents and distributors - % Staff coverage	<p>State the proportion of agents and distributors who have attended training in the preceding calendar year with regard to financial crime.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HOD	Board members & non-executive directors - % Staff coverage	<p>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.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HOE	Other - % Staff coverage	<p>State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with regard to financial crime.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>

HOF	Staff Numbers	<p>Enter the total number of full-time equivalent employees employed by the institution.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
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8.4.13 Compliance and Assurance Testing

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

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

<A05031 Identifier="HOG" DateValue="2021-11-25"></A05031>

REF	Field	Description
HOG	Compliance SEBWRA	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOH	Compliance Training	<p>State the most recent date when AML/CFT-related awareness-raising and staff training measures were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOI	Compliance Verification	<p>State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-</p>

		01-01
HOJ	Compliance Sanctions	<p>State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOK	Compliance Resources	<p>State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOL	Compliance Organisation	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOM	Compliance CDD	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HON	Compliance TM	<p>State the most recent date when the transaction monitoring process was assessed by the compliance.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-</p>

		01-01
HOO	Compliance STR	<p>State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOP	Compliance Records	<p>State the most recent date when record keeping policies and procedures were assessed by the compliance function.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOQ	Compliance TPDD	<p>State the most recent date when outsourcing arrangements were assessed by the compliance function.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HOR	Compliance Other	<p>State whether any other financial crime topics or processes were assessed by the compliance function in the preceding calendar year</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HOS	Compliance Other Specify	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
HOT	Compliance BWRA Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HOU	Compliance Training Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HOV	Compliance Verification Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HOW	Compliance Sanctions Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
HOX	Compliance Resources Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HOY	Compliance Organisation Descript	<p>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.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HOZ	Compliance CDD Descript	<p>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.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HPA	Compliance TM Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the transaction monitoring process.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p>

		<p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
HPB	Compliance STR Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the suspicious transaction reporting process.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
HPC	Compliance Records Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of record keeping policies and procedures.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
HPD	Compliance TPDD Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of outsourcing arrangements.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
HPE	Compliance Other Process Descript	<p>If it is Yes to ComplianceOther, briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p>

		If not applicable enter N/A
HPF	Compliance to Senior Management	<p>State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HPG	Compliance to Board	<p>State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HPH	Compliance AML Staff	<p>Number of dedicated AML/CFT compliance staff (in Full Time Equivalent).</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

8.4.14 Audit

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

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

```
<A05031 Identifier="HPI" DateValue="2029-12-11"></A05031>
```

REF	Field	Description
HPI	Audit BWRA	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>

HPJ	Audit Training	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPK	Audit Verification	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPL	Audit Sanctions	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPM	Audit Resources	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPN	Audit Organisation	<p>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.</p> <p>Provide a list of findings/gaps separated by</p>

		<p>semicolon (;) with no spaces either side.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPO	Audit CDD	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPP	Audit TM	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPQ	Audit STR	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPR	Audit Records	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>

HPS	Audit TPDD	<p>State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
HPT	Audit Other	<p>State whether other financial crime processes were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HPU	Audit Other Specify	<p>If Yes to Audit Other, briefly specify the other processes that were was 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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HPV	Audit BWRA Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HPW	Audit Training Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
HPX	Audit Verification Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HPY	Audit Sanctions Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HPZ	Audit Resources Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQA	Audit Organisation Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQB	Audit CDD Descript	<p>If Yes to Audit CDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by</p>

		<p>semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQC	Audit TM Descript	<p>If Yes to Audit TM, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQD	Audit STR Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQE	Audit Records Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQF	Audit TPDD Descript	<p>If Yes to Audit TPDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
HQG	Audit Other Process Descript	<p>If other financial crime topics were assessed by the Internal Audit function, then describe any material findings/potential breaches identified.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQH	Audit to Senior Management	<p>State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HQI	Audit to Board	<p>State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HQJ	NCA ML	<p>State whether a foreign supervisory authority issued findings regarding your institution's anti-money laundering framework in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HQK	NCA TF	<p>State whether a foreign supervisory authority issued findings regarding your institution's countering the financing of terrorism framework in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>

HQL	NCA Sanctions	<p>State whether a foreign supervisory authority issued findings on your institution's prevention of circumvention of sanctions framework in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HQM	NCA Corruption	<p>State whether a foreign supervisory authority issued findings on your institution's management of anti-corruption (bribery) and prevention of conflicts of interest frameworks in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HQN	NCA Other	<p>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.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HQO	NCA Other Specify	<p>If Yes to NCA Other, briefly specify Provide a list of other topics separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
HQP	NCA ML Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>

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

8.4.15 Governance

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

<A05031 Identifier="HQU" EnumerationFrequency="Every_6_months"></A05031>

REF	Field	Description
HQU	Money Laundering Senior Management	<p>State the Frequency that money laundering is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HQV	Terrorist Financing Senior Management	<p>State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HQW	Sanction Circumvent Senior Management	<p>State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HQX	Corruption Senior Management	<p>State the Frequency that corruption (bribery) and conflicts of interest is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HQY	Money Laundering Board	<p>State the Frequency that money laundering is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HQZ	Terrorist Financing Board	<p>State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency</p>

		Variable name: EnumerationFrequency
HRA	Sanction Circumvent Board	<p>State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HRB	Corruption Board	<p>State the Frequency that corruption (bribery) and conflicts of interest is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
HRC	Designated Responsibility	<p>Has your institution appointed a member of senior management with primary responsibility for implementing, managing, and overseeing your institutions' compliance with its AML/CFT obligations as required under Section 54(8) of the CJA 2010?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HRD	Designated Compliance Officer	<p>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?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HRE	COR Frequency	<p>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?</p> <p>Select from Frequency</p>

		Variable name: EnumerationFrequency
HRF	Reported Shortcomings	<p>State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
HRG	Shortcomings Recovery	<p>Where AML/CFT shortcomings were reported, state whether the report sets out the remediation measures undertaken.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
HRH	Shortcomings Recovery Details	<p>If Yes to Shortcomings Recovery, briefly describe the reported AML/CFT shortcomings and remediation measures taken.</p> <p>Provide a list of shortcomings and recovery measures in pairs, with each pair separated by semicolon (;) with no spaces either side.</p> <p>i.e. <shortcoming1><recovery1>;<shortcoming2><recovery2>; etc.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>

8.4.16 Group-Wide AML/CFT Framework

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

```
<A05031 Identifier="HRI" PercentageValue="0.4"></A05031>
<A05031 Identifier="HRJ" PercentageValue="0.3"></A05031>
```

REF	Field	Description
HRI	Groupwide AML CDD	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HRJ	Groupwide AML Monitoring	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HRK	Groupwide AML STRs	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>

HRL	Groupwide AML High Risk Customers	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HRM	Groupwide Deficiencies	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HRN	Groupwide Jurisdiction AML Review	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
HRO	Groupwide Deficiencies Identified by NCA EEA	<p>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</p>

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
HRP	<p>Groupwide Deficiencies Identified by NCA non-EEA</p>	<p>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</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>

8.5 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 intermediaries, broken down by country the intermediaries are established. Only the applicable countries need to be completed.

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

```
<A05041 HRQ="AS" HRR="132" HRS="270" HRT="624.26"></A05041>
```

REF	Field	Description
HRQ	PP - Country	Select from the list of Alpha-2 country codes, Country for each applicable country where the institution has subsidiaries and intermediaries Data Type: EnumerationValue Select from Country
HRR	No. of branches	Number of branches in each country. Data Type: IntegerValue If not applicable enter 0
HRS	No. of subsidiaries	Number of subsidiaries in each country. Data Type: IntegerValue If not applicable enter 0
HRT	Intermediary GWP	Total value of gross written premiums for contracts issued through an intermediary established in that country in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0

8.6 Residence and Establishment

The questions below concern the institution's overall customer base in terms of their classification based on customer risk rating, 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. Only the applicable countries need to be completed.

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

```
<A05051 HRU="IE" HRV="218" HRW="260" HRX="338" HRY="740" HRZ="724" HSA="836" HSB="962" HSC="424"></A05051>
```

REF	Field	Description
HRU	RE - Country	Select from the list of Alpha-2 country codes, Country for each applicable country that has natural persons residing or legal entities established in that country. Data Type: EnumerationValue Select from <u>Country</u>
HRV	Natural person customers – Total Number	Natural person customers – Total Data Type: IntegerValue If not applicable enter 0
HRW	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) Data Type: IntegerValue If not applicable enter 0
HRX	Natural person customers – No. of which are High Risk	Natural person customers - Number of which are High Risk according to institution's customer risk assessment Data Type: IntegerValue If not applicable enter 0
HRZ	Legal entity customers – Total Number	Legal entity customers – Total

		Data Type: IntegerValue If not applicable enter 0
HRZ	Legal entity customers - No. of which are New Customers	Legal entity customers - Number of which are New Customers (with whom a business relationship was entered into in the preceding calendar year) Data Type: IntegerValue If not applicable enter 0
HSA	Legal entity customers - No. of which are High Risk	Legal entity customers - Number of which are High Risk according to institution's customer risk profiling Data Type: IntegerValue If not applicable enter 0
HSB	Legal entity customers - No. with at least one beneficial owner residing in non-EEA countries	Legal entity customers - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence). Data Type: IntegerValue If not applicable enter 0
HSC	Legal entity customers - No. of which have PEP Risk Identified	Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment Data Type: IntegerValue If not applicable enter 0

8.7 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 be close associates, as of 31 December of the preceding calendar year.

Please specify per country in terms of nationality or citizenship, the number of your natural person customers who are PEPs, their family members or persons known to be close associates. In the instance of multi-citizenship/nationality, the country is specified based on the citizenship/nationality related to their prominent public function appointment.

Please specify per country in terms of establishment or registration, the number of your legal entity customers whose beneficial owners include at least one PEP, family member or person known to be a close associate. Only the applicable countries need to be completed.

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

<A05061 HSD="AF" HSE="794" HSF="308"></A05061>

REF	Field	Description
HSD	PEP - Country	<p>Select from the list of Alpha-2 country codes, each country where the following applies:</p> <p>A natural person customer of your institution is a PEP and has nationality/citizenship in the specified country.</p> <p>Or, a beneficial owner of your legal entity customers is a PEP and has nationality/citizenship in the specified country.</p> <p>Data Type: EnumerationValue Select from Country</p>
HSE	Number of NP PEPs	<p>State the number of natural person customers which are PEPs and have nationality/citizenship in the specified country</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
HSF	Number of LE BO PEPs	<p>State the number of your legal entity customers which have at least one beneficial owner who is a PEP, their family members or persons known to be a close associate.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

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 (Premiums) and exit points (Claims/Surrenders).

Specify by country in terms of the source and destination of funds flow, using drop-down options, customer numbers, total transaction numbers, and values (EUR) for that country for the prior calendar year. Only the applicable countries need to be completed.

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

```
<A05071 HSG="IE" HSH="204" HSI="229.45" HSJ="52" HSK="13.45" HSL="669" HSM="173.76" HSN="952" HSO="535.33"
></A05071>
```

REF	Field	Description
HSG	Geography - Country	Select from dropdown list of Alpha-2 country codes, Country for each applicable country that had funds flow transmitted to it by your institution's customer using your institution's products or services in the preceding calendar year. Data Type: EnumerationValue Select from Country
HSH	Overall - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
HSI	Overall - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0
HSJ	Overall - No. of transactions (Destination)	Overall number of outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0

HSK	Overall - Value of transactions (Destination)	<p>EUR Value of total outgoing transactions to each country in the preceding calendar year.</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
HSL	of which High Risk - No. of transactions (Source)	<p>Overall number of incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
HSM	of which High Risk - Value of transactions (Source)	<p>EUR Value of total incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
HSN	of which High Risk - No. of transactions (Destination)	<p>Number of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
HSO	of which High Risk - Value of transactions (Destination)	<p>EUR Value of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.</p> <p>Data Type: DecimalValue If not applicable enter 0</p>

8.9 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), and specify whether the rule is automated or manual. 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.

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

<A05081 HSP="R002_Early_Cancellations" HSQ="Surrenders incurring penalties" HSR="Automated"></A05081>

REF	Field	Description
HSP	Rule Name / ID	<p>Unique Internal Rule ID. Please complete for each rule.</p> <p>Data Type: StringValue Character limit: 500 characters If not applicable enter N/A</p>
HSQ	High Level Rule / Model Description	<p>High-level description of each Rule / Model.</p> <p>Data Type: StringValue Character limit: 2000 characters If not applicable enter N/A</p>
HSR	Is the rule automated or manual?	<p>Is the rule automated or manual?</p> <p>Data Type: EnumerationValue Select from MonitoringRuleSystem</p>

Rule Name / ID	High Level Rule / Model Description	Automated or manual?
HSS	HST	HSU
R002_Early_Cancellations	Surrenders incurring penalties	Automated

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	Assets which are either under the scope of a portfolio management mandate or under the scope of an investment advice mandate
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.
Cash intensive business	A cash-intensive business is a business that primarily operates with cash transactions rather than electronic or credit payments. These businesses often handle a large volume of cash relative to their overall revenue, for example: Hospitality and Leisure Automotive and Transportation Retail and Consumer Goods Health and Personal Care Crafts and Trades Art, Luxury, and Collectibles Services and Education
Complex structure	The term complex structure (such as a long holding chain with use of front companies, 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.
Credit institution	(a) As per Article 2(1), point (5), of Regulation (EU) 2024/1624, or (b) An Post in respect of any activity that it carries out, whether as principal or agent, that would render it, or a principal for whom it is an agent, a credit institution as a result of the application of (a)
Crypto-asset	As per Article 2(1), point (7), of Regulation (EU) 2024/1624.
Customer	The customer is the policyholder.

	<p>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.</p> <p>For contracts which have two policyholders, both should be considered. The amount should not be divided.</p>
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 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.
Human intervention	As mentioned in EBA/GL/2022/15 – Guidelines on use of Remote Onboarding Solutions under Article 13(1) of Directive (EU) 2015/849.
Intermediary	This includes brokers, agents, 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	<p>Legal person or other legal arrangement.</p> <p>Any customer that is not a natural person should be included in Legal Entity, including charities and partnerships.</p>
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Low risk contracts	<p>Life insurance contracts or products that meet any of the following conditions:</p> <ul style="list-style-type: none"> (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.
Payment institution	As per Article 4(4), of Directive (EU) 2015/2366.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Professional clients	As per Article 4(1), point 10, of Directive (EU) 2014/65
Proliferation financing	The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.
Remote onboarding	Onboarding other than face-to-face where the customer is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the customer's identity is being verified via video-link or similar technological means such as App registration, Internet sign-up, email, over the phone, etc.
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.
Shell institution/bank	As per Article 2(1), point (23), of Regulation (EU) 2024/1624.
Surrender value	The total amount of surrender value as mentioned in Article 185 (3)(f) of Directive 2009/138/EC, net of taxes. The surrender value should reflect the amount, defined contractually, to be 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.
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 the purpose of this REQ, transaction inward means gross written premium and a transaction outward means claims/surrenders/withdrawals.
Transaction monitoring alert	<p>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.</p> <p>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.</p> <p>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.</p>
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

AlertType

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

BWRAConducted

Identifier
Yes
No
Exemption_applies

CDD

Identifier	Description
Yes_in_all_cases	Yes – All cases
Yes_only_in_enhanced_CDD_cases	Yes – for investment policies only The enumeration will be updated to Yes – for investment policies in the Post UAT Hotfix
No	No

Country

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

CustomerSegment

Identifier	Description
NP	Natural person customers (i.e., personal customers, retail customers)
NP_not_categorised	Natural person customers without customer risk rating
NP_blocked	Natural person customers that have been blocked/curtailed pending exit due to AML/CFT concerns
NP_suspended	Natural Persons that have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.)
NP_wealth	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
LE	Legal entity customers (i.e., non-personal customers, legal persons and/or other entities and/or legal structures and/or arrangements)
LE_not_categorised	Legal entity customers without customer risk rating
LE_blocked	Legal entity customers that have been blocked/curtailed pending exit due to AML/CFT concerns
LE_suspended	Legal Entities that have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.)
LE_SME	Legal Entities which are classified as Small/Medium enterprises (SMEs, as defined by the Department of Trade, Enterprise, and Employment
LE_corporate	Legal Entities that are corporate.
LE_TCSP	Number of legal entity customers using TCSP services provided by your institution in the preceding calendar year
Cust_FIU	Customers with requests from the Financial Intelligence Unit (FIU)
Private_banking	Natural persons that fall under the definition of private banking (as defined in the EBA Risk Factor Guidelines)
Complex	Customers with a complex structure
Cash_intensive	Legal entity customers that operate in cash-intensive businesses
Shell_institution	Legal entity customers that are shell institutions
CASP	Legal entity customers that are crypto-asset service providers
Credit_institution	Legal entity customers that are credit institutions
Financial_institution	Legal entity customers that are financial institutions
Government_body	Legal entity customers that are government bodies
SPV	Legal entity customers that are special purpose vehicles
Cust_non_EEA	Customers with at least one transaction over EUR 250 from/to a non-EEA country

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

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

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

MonitoringRuleSystem

Identifier	Description
Automated	The rule is automated.
Manual	The rule is manual.

Outsource

Identifier	Description
No	No
No_but_concrete_plans_to_source_in_future	No, but we have concrete plans to do this in the future

Yes_entities_within_group	Yes, to the parent/entities within the group to which my entity belongs
Yes_completely_or_partially_to_non_group_entities	Yes, completely or partially outsourced to non-group entities

Sector

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

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

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

	<p>Suggested NACE Codes: 0.84.22, C.25.4</p> <p>Suggested NAICS Codes: 92811</p> <p>Suggested GICS Codes: 20101010</p> <p>Alternatively Appropriate Internal Classification</p>
Precious_metal	<p>Precious Metals, Stones, and Jewellery Traders</p> <p>Suggested NACE Codes: G.46.72, G.47.77</p> <p>Suggested NAICS Codes: 42394</p> <p>Suggested GICS Codes: 15104030, 15104040, 15104045, 25203010</p> <p>Alternatively Appropriate Internal Classification</p>
Art_dealer	<p>Art Dealers</p> <p>Suggested NACE Codes: G.47.78</p> <p>Suggested NAICS Codes: 45992</p> <p>Suggested GICS Codes: 25504040</p> <p>Alternatively Appropriate Internal Classification</p>
Crypto	<p>Virtual Assets/ Crypto Currency</p> <p>Suggested NACE Codes: <i>Not Available</i></p> <p>Suggested NAICS Codes: 523160</p> <p>Suggested GICS Codes: <i>Not Available</i></p> <p>Alternatively Appropriate Internal Classification</p>
Gambling	<p>Gambling</p> <p>Suggested NACE Codes: R.92.0</p> <p>Suggested NAICS Codes: 7132</p> <p>Suggested GICS Codes: 25301010</p> <p>Alternatively Appropriate Internal Classification</p>
Construction	<p>Construction</p> <p>Suggested NACE Codes:</p>

	<p>F</p> <p>Suggested NAICS Codes: 23</p> <p>Suggested GICS Codes: 201030</p> <p>Alternatively Appropriate Internal Classification</p>
Real_estate	<p>Real Estate</p> <p>Suggested NACE Codes: L.68</p> <p>Suggested NAICS Codes: 531</p> <p>Suggested GICS Codes: 6010</p> <p>Alternatively Appropriate Internal Classification</p>
TCSP	<p><u>Trust or Company Service Providers</u></p> <p>Suggested NACE Codes: K.64.30</p> <p>Suggested NAICS Codes: 52592</p> <p>Suggested GICS Codes: 40201040*</p> <p>Alternatively Appropriate Internal Classification</p>
Religion	<p>Religious Institutions & Charities</p> <p>Suggested NACE Codes: S.94.91, Q.88.99</p> <p>Suggested NAICS Codes: 81311, 81321</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Freight	<p>Freight, Haulage & Shipping</p> <p>Suggested NACE Codes: H.49, H.50, H.51, H.52.2, H.53</p> <p>Suggested NAICS Codes: 481, 482, 483, 484, 486, 488, 491, 492</p> <p>Suggested GICS Codes: 20301010, 20303010, 20304030, 20305030, 20305010, 20305020</p> <p>Alternatively Appropriate Internal Classification</p>
Advisory	<p>Advisory & Consultancy Services</p> <p>Suggested NACE Codes:</p>

	<p>M.70.22</p> <p>Suggested NAICS Codes: 5416</p> <p>Suggested GICS Codes: 20202020</p> <p>Alternatively Appropriate Internal Classification</p>
IP	<p>Intellectual Property/ Patents Leasing</p> <p>Suggested NACE Codes: N.77.40</p> <p>Suggested NAICS Codes: 53311</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
MTOPSP	<p>Money Transfer Organisations/ Payment Service Providers</p> <p>Suggested NACE Codes: K66.19</p> <p>Suggested NAICS Codes: 52232</p> <p>Suggested GICS Codes: 40201060</p> <p>Alternatively Appropriate Internal Classification</p>
Pharm	<p>Pharmaceuticals</p> <p>Suggested NACE Codes: C.21</p> <p>Suggested NAICS Codes: 3254</p> <p>Suggested GICS Codes: 3520</p> <p>Alternatively Appropriate Internal Classification</p>
Scrap_dealer	<p>Scrap Dealers</p> <p>Suggested NACE Codes: G.46.77</p> <p>Suggested NAICS Codes: 42393</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Sale_motor	<p>Sale of motor vehicles</p> <p>Suggested NACE Codes: G.45.11, G.45.19, G.45.4</p>

	<p>Suggested NAICS Codes: 423110</p> <p>Suggested GICS Codes: 25501010*</p> <p>Alternatively Appropriate Internal Classification</p>
Sale_boat	<p>Sale of boats</p> <p>Suggested NACE Codes: Not Available</p> <p>Suggested NAICS Codes: 441222</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Catering	<p>Catering</p> <p>Suggested NACE Codes: I.56.21</p> <p>Suggested NAICS Codes: 72232</p> <p>Suggested GICS Codes: 25301040</p> <p>Alternatively Appropriate Internal Classification</p>
Crowdfunding	<p>Crowdfunding Service Providers</p> <p>Suggested NACE Codes: S.94.99</p> <p>Suggested NAICS Codes: 813219</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Sport	<p>Professional Sports</p> <p>Suggested NACE Codes: R.93.12, R.93.11</p> <p>Suggested NAICS Codes: 71121</p> <p>Suggested GICS Codes: 50202010</p> <p>Alternatively Appropriate Internal Classification</p>
Stockbroker	<p>Stockbrokers and Traders/ Trading Platforms</p> <p>Suggested NACE Codes: K.66.11, K.66.12</p>

	<p>Suggested NAICS Codes: 5231, 5232</p> <p>Suggested GICS Codes: 40203020, 40203030</p> <p>Alternatively Appropriate Internal Classification</p>
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.

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
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Eurosystem