



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Guidance Notes

Risk Evaluation Questionnaire

Payment Institutions & Electronic Money Institutions

June 2025

Document History

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1.0	CBI	Initial version	30/06/2025
1.1	CBI	Updates to: Section 8.4 (8.4.1; 8.4.3; 8.4.5; 8.4.14; 8.4.16)	21/07/2025
1.2	CBI	Sentence added to Section 8.1	20/08/2025
1.3	CBI	Broken link fixed Section 8.4.7 Minor wording change 8.4.14	17/09/2025

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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. Given the extended timeline for the first submission, the reference date for the first submission is 31 December 2024.

The deadline for the first submission (in respect of reference date of 31 December 2024) is 13 February 2026. This is a hard deadline and no extensions will be granted.

3 Requirement to provide information to the Central Bank

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

4 Mechanism for Submission of Returns

The XML (Extensible Markup Language) files for the 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. `<A02011 Identifier="CBM" EnumerationYesNo="Yes"></A02011>` rather than `<A02011 Identifier="CBM" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:

```
<?xml version="1.0" encoding="utf-8"?>
<PlandEMI xmlns="http://www.centralbank.ie/Schemas/AML/2025/A02">
...
...
...
</PlandEMI>
```

The completed REQ return file should be uploaded on the Portal at:

<https://www.centralbank.ie/regulation/central-bank-portal>

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

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

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

5 Where do I go if I need further information?

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

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

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

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

E-mail: portalsupport@centralbank.ie

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

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

8 Instructions / Guidance Notes for Completing the REQ

Instructions for each field are detailed below. Where applicable, definitions are in line with definitions in the CJA 20101 and Regulation (EU) 2024/1624 (the AML Regulation) and Directive (EU) 2024/1640 (the AML Directive).

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

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

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

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

- Integer Value: Enter 0
- Decimal Value: Enter 0
- Date Value: Enter 2000-01-01
- String Value: Enter N/A
- LEI: Enter 00000000000000000000
- EnumerationCountry: Select 00
- Other enumerations: Select N/A

If any of Sections 8.5-8.14 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 Customer Risk Assessment)				
	No. of institutions	No. of incoming transactions	Value of incoming transactions	No. of outgoing transactions	Value of outgoing transactions	No. of institutions	No. of incoming transactions	Value of incoming transactions	No. of outgoing transactions	Value of outgoing transactions
DBU	DBV	DBW	DBX	DBY	DBZ	DCA	DCB	DCC	DCD	DCE
00	0	0	0	0	0	0	0	0	0	0

<A0210>

<A02101 DBU="00" DBV="0" DBW="0" DBX="0" DBY="0" DBZ="0" DCA="0"
DCB="0" DCC="0" DCD="0" DCE="0"></A02101>

</A0210>

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. 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. Due to browser restrictions, this example has been uploaded as a text file, only XML submissions will be accepted.

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 CBO, CBP and CBQ. 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.

```
<A0201B>
  <A02012 CBO="AT" CBP="98.98" CBQ="988.99"></A02012>
  <A02012 CBO="BE" CBP="887.78" CBQ="6776.87"></A02012>
  <A02012 CBO="BG" CBP="78786.76" CBQ="7876.67"></A02012>
  <A02012 CBO="CY" CBP="787.87" CBQ="68768.79"></A02012>
</A0201B>
```

Select each EEA country and for each EEA country enter the Value of Transactions state if your institution operates on a FOE basis and/or on a FOS basis.

Select EEA Country
CBO
AT
BE
BG
CY

FOE	FOS
CBP	CBQ
98.98	988.99
887.79	6,776.87
78,786.76	7,876.67
787.87	68,768.79

In Table Structure A, each enumeration option must not be repeated, e.g. CBO 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	A0201B	A02012
8.3.1 Customer segments 1	A0202B	A02022
8.3.1 Customer segments 2	A0202C	A02023
8.3.1 Customer segments 3	A0202D	A02024
8.3.2 Sector	A0202E	A02025
8.3.19 Funding	A0202F	A02026
8.4.7 Mitigation And Control Alerts	A0203B	A02032
8.5 Physical Presence	A0204	A02041

8.6 Residence & Establishment	A0205	A02051
8.7 Beneficial Owners	A0206	A02061
8.8 Digital Accounts	A0207	A02071
8.9 Prepaid Cards And Vouchers	A0208	A02081
8.10 Merchant Acquiring	A0209	A02091
8.11 Correspondent Relationships	A0210	A02101
8.12 Money Remittance	A0211	A02111
8.13 Geography of Funds Flow	A0212	A02121
8.14 Transaction Monitoring	A0213	A02131

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, CAA 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).

```
<A0201A>
  <A02011 Identifier="CAA" EnumerationLegalStructure="Stand_alone_entity"></A02011>
  <A02011 Identifier="CAB" String500="Consultoria Lola"></A02011>
  <A02011 Identifier="CAC" LEI="F5WCUMTUM4RKZ1MAIE39"></A02011>
  <A02011 Identifier="CAD" EnumerationCountryEEANA="HR"></A02011>
  <A02011 Identifier="CAE" String500="frferffgeferfrgergergergerg"></A02011>
```

Section 1 - Legal Structure

What is the legal structure of your institution?	Stand_alone_entity
<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	Consultoria Lola
LEI of the EEA parent entity of the group	F5WCUMTUM4RKZ1MAIE39
Country where the EEA parent entity of the group is established	HR
The AML/CFT supervisory authority of the EEA parent entity of the group	frferffgeferfrgergergergerg

In Table Structure B, each identifier/REF must not be repeated, e.g. CAA 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	A0201A	A02011
8.2.2 Business Model	A0201A	A02011
8.2.4 Statement of Compliance	A0201A	A02011
8.3.1 Customer segments	A0202A	A02021
8.3.2 Sector	A0202A	A02021
8.3.3 Anonymity	A0202A	A02021

8.3.4 Merchant Acquiring	A0202A	A02021
8.3.5 Money Remittance	A0202A	A02021
8.3.6 E-Money	A0202A	A02021
8.3.7 Payment Accounts	A0202A	A02021
8.3.8 Currency Exchange	A0202A	A02021
8.3.9 Virtual IBAN Accounts	A0202A	A02021
8.3.10 Exchange crypto-fiat	A0202A	A02021
8.3.11 Exchange fiat-crypto	A0202A	A02021
8.3.12 Exchange crypto-crypto	A0202A	A02021
8.3.13 Transfer crypto-assets	A0202A	A02021
8.3.14 Custody of crypto assets	A0202A	A02021
8.3.15 Lending	A0202A	A02021
8.3.16 Correspondent Relationship	A0202A	A02021
8.3.17 Deposits and Withdrawals	A0202A	A02021
8.3.18 Crowdfunding	A0202A	A02021
8.3.20 Intermediaries and Distribution Channels	A0202A	A02021
8.3.21 Remote Onboarding	A0202A	A02021
8.4.1 Business Wide Risk Assessment	A0203A	A02031
8.4.2 Policies and Procedures	A0203A	A02031
8.4.3 Onboarding	A0203A	A02031
8.4.4 Offboarding	A0203A	A02031
8.4.5 Customer Due Diligence	A0203A	A02031
8.4.6 Transaction Monitoring	A0203A	A02031
8.4.8 Suspicious Alerts and Transaction Rejections	A0203A	A02031
8.4.9 Suspicious Transaction Reporting	A0203A	A02031
8.4.10 Sanctions Screening	A0203A	A02031
8.4.11 Outsourcing	A0203A	A02031
8.4.12 Education & Training	A0203A	A02031
8.4.13 Compliance & Assurance Testing	A0203A	A02031
8.4.14 Audit	A0203A	A02031
8.4.15 Internal controls and reporting systems	A0203A	A02031
8.4.16 Governance	A0203A	A02031
8.4.17 Compliance with Fund Transfers Regulation	A0203A	A02031

Variable Names:

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

Do not use variable names other than those defined.

Pre-defined entity references:

English	Symbol (Entity References)	XML (predefined entity references)
less than	<	<
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.

```
<xs:element ref="A02:A0201A"/> <!--General Table-->
<xs:element ref="A02:A0201B"/> <!--General InternationalPresence Table-->
<xs:element ref="A02:A0202A"/> <!--Inherent Risk Table-->
<xs:element ref="A02:A0202B"/> <!--Inherent Risk Segment Table 1-->
<xs:element ref="A02:A0202C"/> <!--Inherent Risk Segment Table 2-->
<xs:element ref="A02:A0202D"/> <!--Inherent Risk Segment Table 3-->
<xs:element ref="A02:A0202E"/> <!--Inherent Risk Sector Table-->
<xs:element ref="A02:A0202F"/> <!--Inherent Risk Funding Methods Table-->
<xs:element ref="A02:A0203A"/> <!--Mitigation and Control Table-->
<xs:element ref="A02:A0203B"/> <!--Mitigation and Control Alerts Table-->
<xs:element ref="A02:A0204"/> <!--Physical Presence Table -->
<xs:element ref="A02:A0205"/> <!--Residence and Establishment Table-->
<xs:element ref="A02:A0206"/> <!--PEP and BO Table-->
<xs:element ref="A02:A0207"/> <!--Digital Accounts Table-->
<xs:element ref="A02:A0208"/> <!--Prepaid Cards and Vouchers Table-->
<xs:element ref="A02:A0209"/> <!--Merchant Acquiring Table-->
<xs:element ref="A02:A0210"/> <!--Correspondent Relationship Table-->
<xs:element ref="A02:A0211"/> <!--Money Remittance Table-->
<xs:element ref="A02:A0212"/> <!--Geography of Funds Flow Table-->
<xs:element ref="A02:A0213"/> <!--Transaction Monitoring Table-->
```

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

8.2 General

8.2.1 Legal Structure

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

<A01011 Identifier="CAA" EnumerationLegalStructure="Stand_alone_entity"></A01011>

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

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

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

8.2.2 Business Model

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

<A02011 Identifier="CAR" String1000="abcdefghijklmnopqrstuvwxy123456789"></A02011>

REF	Field	Description
CAR	Business Activity Detail	Provide a brief summary of your institution's business model and activities. This should be kept high-level and specifically state anything that may impact how your institution manages your AML/CFT risks that are not already included in PSDActivity1-8. Character limit: 1000 characters. Variable Name: String1000
CAS	PSD Activity 1	For each of the listed activities as per Directive (EU) 2015/2366 (or PSD2), state whether or not your institution engages in business activities associated with the given PSD2 activity. Please select from Yes; No. Variable Name: EnumerationYesNo
CAT	PSD Activity 2	
CAU	PSD Activity 3	
CAV	PSD Activity 4	
CAW	PSD Activity 5	
CAX	PSD Activity 6	
CAY	PSD Activity 7	
CBA	PSD Activity Comment 1	If your institution has any specific features in its business activities that affect how it manages ML/TF risks, please provide a brief description (optional). If not applicable enter N/A. Character limit: 500 characters. Variable Name: String500
CBB	PSD Activity Comment 2	
CBC	PSD Activity Comment 3	
CBD	PSD Activity Comment 4	
CBE	PSD Activity Comment 5	
CBF	PSD Activity Comment 6	
CBG	PSD Activity Comment 7	
CBI	Does your institution provide integrated crypto-asset services?	State if your institution provides integrated crypto-asset services. Please select from Yes; No. Variable Name: EnumerationYesNo
CBJ	Integrated CASP Comment	If Yes, please leave additional comments if required (optional). If not applicable enter N/A. Character limit: 500 characters. Variable Name: String500
CBK	Does your institution partner for the provision of crypto-asset services?	State if your institution partners with other institutions, or have associated institution relationship, for the provision of crypto-asset services. Please select from Yes; No. Variable Name: EnumerationYesNo
CBL	Partnered CASP Comment	If Yes, please leave additional comments if required (optional). If not applicable enter N/A. Character limit: 500 characters. Variable Name: String500

8.2.3 International Presence

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

```
<A02011 Identifier="CBM" EnumerationYesNo="Yes"></A02011>
```

REF	Field	Description
CBM	Operate in EEA under FOE or FOS	State whether your institution operates within the EU/EEA based on Freedom of Establishment (FOE) and/or Freedom to Provide Services (FOS). Select from Yes; No. Variable Name: EnumerationYesNo
CBN	Established Outside EEA	State whether your institution operates outside the EU/EEA through subsidiaries, branches, representative offices, or other physical presence. Select from Yes; No. Variable Name: EnumerationYesNo

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

```
<A02012 CBO="AT" CBP="98.98" AAK="0"></A02012>
```

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

8.2.4 Statement of Compliance

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

<A02011 Identifier="CBR" EnumerationYesNo="Yes"></A02011>

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

8.3 Inherent Risk

8.3.1 Customer segments

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

Please note customers can come under more than one customer type and the sum of all customer types does not need to sum to the total number of customers. For example, a customer can be both a Natural Person and a High Risk customer.

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

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

```
<A02021 Identifier="CBW" IntegerValue="1000"></A02021>
```

REF	Field	Description
CBW	Active NP Customers	State the total number of active natural person customers as of 31 December of the preceding calendar year. Variable Name: IntegerValue
CBX	Active LE Customers	State the total number of active legal entity customers as of 31 December of the preceding calendar year. Variable Name: IntegerValue

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

```
<A02022 CBY="NP" CBZ="Overall_product_service" CCA="988" CCB="988" CCC="988.99"></A02022>
```

REF	Field	Description
CBY	Customer Segment Type 1	Select each customer type from CustomerSegment1 . Each customer segment must be selected. Note customers can fall in more than one customer segment. Every entry must specify a unique customer segment and product pairing along with the number of customers, transaction and their value. Complete one record per combination (there should be 40 combinations in total) Data Type: EnumerationValue
CBZ	Product Segment	Select each product/service from the list, including Overall_product_service. Note that customers can be provided with more than one product/service. Each product/service must be selected. Select from ProductServiceIncludingOverall Data Type: EnumerationValue
CCA	No. of Customers	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments and by customer type and specific products/services. If any customer type, product/service or combination of both is not applicable enter 0.

		Data Type: IntegerValue
CCB	No. of transactions	State the total number of transactions in the preceding calendar year by the corresponding customers. If any customer type, product/service or combination of both is not applicable enter 0. Data Type: IntegerValue
CCC	Total value	State the total value of transactions (EUR) in the preceding calendar year by the corresponding customers. If any customer type, product/service or combination of both is not applicable enter 0. Data Type: DecimalValue

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

<A02023 CCD="NP" CCE="100" CCF="1000" CCG="9888.99"></A02023>

REF	Field	Description
CCD	Customer Segment Type 2	Select each customer type from CustomerSegment2 . Note customers can fall in more than one customer segment. Each customer type must be selected. Data Type: EnumerationValue
CCE	No. of Customers	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments and by overall (mandatory). If any customer type, not applicable enter 0. Data Type: IntegerValue
CCF	No. of transactions	State the total number of transactions in the preceding calendar year by the corresponding customers. If any customer type, not applicable enter 0. Data Type: IntegerValue
CCG	Total Value	State the total value of transactions (EUR) in the preceding calendar year by the corresponding customers. If any customer type, not applicable enter 0. Data Type: DecimalValue

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

<A02024 CCH="NP" CCI="1000"></A02024>

REF	Field	Description
CCH	Customer Segment Type 3	Select specific CustomerSegment3 . Note customers can fall in more than one customer segment. Each customer type must be selected. Data Type: EnumerationValue
CCI	No. of Customers	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments and by overall. If any customer type, not applicable enter 0. Data Type: IntegerValue

8.3.2 Sector

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

<A02021 Identifier="DDL" IntegerValue="1000"></A02021>

REF	Field	Description
DDL	Total number of customers with high risk activities	Total number of customers with high risk activities that should include, at least, activities mentioned under Annex III of Regulation (EU) 2024/1624. Variable Name: IntegerValue

For customer data points please specify the total number of legal entity high risk customers who were [active customers](#) at 31 December of the preceding calendar year.

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

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

<A02025 CCJ="Gambling" CCK="10000"></A02025>

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

8.3.3 Anonymity

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

<A02021 Identifier="CCL" EnumerationYesNoNA="Yes"></A02021>

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

8.3.4 Merchant Acquiring

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

<A02021 Identifier="CCQ" EnumerationYesNo="Yes"></A02021>

REF	Field	Description
CCQ	Are merchant acquiring services provided	State whether your institution provides merchant acquiring services. Select from Yes; No. Variable Name: EnumerationYesNo
CCR	Are accounts offered in non-euro currencies	State whether your institution offers accounts in a currency other than the Euro. Select from Yes; No. Variable Name: EnumerationYesNo
CCS	List other currencies	If your institution offers accounts in a currency other than the EUR, specify the <u>currency</u> separated by semicolon (;) with no spaces either side. If not applicable enter N/A. Character limit: 500 characters Variable Name: String500
CCT	Point of sales via debit Card	State whether your institution processes payments via point of sale terminals through debit cards. Select from Yes; No. Variable Name: EnumerationYesNo
CCU	No. of merchants using POS via debit cards	If Yes to Point of sales via debit Card, state the total number of merchants availing of debit cards in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CCV	No. of transactions using POS via debit card	If Yes to Point of sales via debit Card, state the total number of transactions via debit cards in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CCW	Total value of transactions using POS via debit card	If Yes to Point of sales via debit Card, state the total value (EUR) of transactions via debit cards in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CCX	Point of sales via credit Card	State whether your institution processes payments via point of sale terminals through credit cards. If not applicable enter 0. Select from Yes; No. Variable Name: EnumerationYesNo
CCY	No. of merchants using POS via credit cards	If Yes to Point of sales via credit Card, state the total number of merchants availing of credit cards in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CCZ	No. of transactions using POS via credit card	If Yes to Point of sales via credit Card, state the total number of transactions via credit cards in the preceding calendar year. If not applicable enter 0.

CDA	Total value of transactions using POS via credit card	Variable Name: IntegerValue If Yes to Point of sales via credit Card, state the total value (EUR) of transactions via credit cards in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
------------	---	--

8.3.5 Money Remittance

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

<A02021 Identifier="CDB" EnumerationYesNo="Yes"></A02021>

REF	Field	Description
CDB	Money remittance provided	State whether your institution provides money remittance services. Select from Yes; No. Variable Name: EnumerationYesNo
CDC	No. of money remittance transactions	State the total number of money remittance transactions in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDD	Total value of money remittance transactions	State the total value (EUR) of money remittance transactions in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CDE	No. Money remittance transactions via agents	State the total number of money remittance transactions via agents in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDF	Total value of money remittance via agents	State the total value (EUR) of money remittance transactions via agents in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CDG	No. Of online money remittance transactions between businesses	State the total number of money remittance transactions using an online App from one business to another business, e.g., for the settlement of invoices, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDH	Value of online money remittance transactions between businesses	State the total value (EUR) of money remittance transactions using an online App from one business to another business, e.g., for the settlement of invoices, in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CDI	No. Money remittance transactions online between business and consumer	State the total number of money remittance transactions using an online App from one business to a consumer (or vice versa), in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDJ	Value of money remittance transactions between business and consumer	State the total value (EUR) of money remittance transactions using an online App from one business to a consumer (or vice versa), in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CDK	No. Of online money remittance transactions between consumers	State the total number of money remittance transactions using an online App from consumer to consumer, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDL	Value of online money remittance transactions between consumers	State the total value (EUR) of money remittance transactions using an online App from consumer to consumer, in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue

CDM	No. Of online inter-business Money remittance transactions in a different currency	State the total number of money remittance transactions in a different currency, e.g., EUR to USD, using on online App, from one business to another business, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDN	Value of online inter-business Money remittance transactions in a different currency	State the total value (EUR) of money remittance transactions in a different currency, e.g., EUR to USD, using on online App, from one business to another business, in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CDO	No of online money remittance transactions in a different currency between business and consumer	State the total number of money remittance transactions in a different currency, e.g., EUR to USD, using on online App, from a business to a consumer, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDP	v Value of online money remittance transactions in a different currency between business and consumer	State the total value (EUR) of money remittance transactions in a different currency, e.g., EUR to USD, using on online App, from a business to a consumer, in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CDQ	No of online money remittance transactions in a different currency between consumers	State the total number of money remittance transactions in a different currency, e.g., EUR to USD, using on online App, from consumer to consumer, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CDR	v Value of online money remittance transactions in a different currency between consumers	State the total value (EUR) of money remittance transactions in a different currency, e.g., EUR to USD, using on online App, from consumer to consumer, in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
DDC	No of incoming money remittance transactions above €1000	Total Number of money remittance transactions above €1,000 euro in the previous year (incoming). If not applicable enter 0. Variable Name: IntegerValue
DDD	No of outgoing money remittance transactions above €1000	Total Number of money remittance transactions above €1,000 euro in the previous year (outgoing). If not applicable enter 0. Variable Name: IntegerValue

8.3.6 E-Money

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

<A02021 Identifier="CDS" EnumerationYesNo="Yes"></A02021>

REF	Field	Description
CDS	EMoney provided	State whether your institution provides Electronic-Money services. Select from Yes; No. Variable Name: EnumerationYesNo
CDT	High or unlimited payments allowed	State whether your institution's Electronic-Money products allow for high-value or unlimited-value payments. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CDU	High or unlimited loading/redemption allowed	State whether your institution's Electronic-Money products allow for high-value or unlimited-value loading or redemption. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CDV	High or unlimited value cash withdrawal allowed	State whether your institution's Electronic-Money products allow for high-value or unlimited-value cash withdrawal. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CDW	High volume of payments allowed	State whether your institution's Electronic-Money products allow for high number of payments. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CDX	High number of loading/redemption allowed	State whether your institution's Electronic-Money products allow for high number of loading or redemption. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CDY	High number of cash withdrawals allowed	State whether your institution's Electronic-Money products allow for high number of cash withdrawal. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CDZ	Anonymous loading allowed	State whether your institution's Electronic-Money products can be loaded anonymously. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CEA	Funding allowed from unidentified 3 rd party	State whether your institution's Electronic-Money products can be funded with payments from unidentified third parties. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA

CEB	Funding via other emoney	State whether your institution's Electronic-Money products can be funded with other electronic-money products. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CEC	Transactions between people allowed	State whether your institution's Electronic-Money products allow for person to person transfers. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CED	Is payment method largely accepted	State whether your institution's Electronic-Money products are accepted as a means of payment by a large number of merchants or points of sale. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CEE	Are products designed specifically for high risk activities	State whether your institution's Electronic-Money products are designed specifically to be accepted as a means of payment by merchants dealing with goods and services associated with high risk of financial crimes, e.g., online gambling. Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CEF	Products designed to be used by non-customers	State whether your institution's Electronic-Money products are designed to be used by persons other than the customer, e.g., certain partner card products (but not low-value prepaid cards). Select from Yes; No; N/A Variable Name: EnumerationYesNoNA
CEG	Number of digital accounts (DA)	State the total number of digital accounts/wallets as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEH	Total Number Prepaid Card (PC)	State the total number of prepaid cards & vouchers as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEI	Single Use Number DA	State the total number of digital accounts/wallets that are for single use (i.e., non-reloadable) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEJ	Single Use Number PC	State the total number of prepaid cards & vouchers that are for single use (i.e., non-reloadable) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEK	Reloadable Number DA	State the total number of digital accounts/wallets that are reloadable (i.e., may be used repeatedly, once loaded with funds) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue

CEL	Reloadable Number PC	State the total number of prepaid cards & vouchers that are reloadable (i.e., may be used repeatedly, once loaded with funds) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEM	Fixed Use Number DA	State the total number of digital accounts/wallets that are for fixed use (e.g., tied merchant relationship) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEN	Fixed Use Number PC	State the total number of prepaid cards & vouchers that are for fixed use (e.g., tied merchant relationship) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEO	Multi Use Number DA	State the total number of digital accounts/wallets that are multi-use/multi-product enabled (e.g., retail purchase, value transfer, cash extraction) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEP	Multi Use Number PC	State the total number of prepaid cards & vouchers that are multi-use/multi-product enabled (e.g., retail purchase, value transfer, cash extraction) in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEQ	SEPA Number DA	State the total number of digital accounts/wallets that are SEPA enabled, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CER	SEPA Number PC	State the total number of prepaid cards & vouchers that are SEPA enabled, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CES	ATM Number DA	State the total number of digital accounts/wallets that are ATM enabled, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CET	ATM Number PC	State the total number of prepaid cards & vouchers that are ATM enabled, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEU	Euro Number DA	State the total number of digital accounts/wallets that are for Euro transaction only (i.e., cannot transact in other currencies), in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEV	Euro Number PC	State the total number of prepaid cards & vouchers that are for Euro transaction only (i.e., cannot transact in other currencies), in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEW	Multi Currency Number DA	State the total number of digital accounts/wallets that allow for multicurrency transactions, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CEX	Multi Currency Number PC	State the total number of prepaid cards & vouchers that allow for multicurrency transactions, in the preceding calendar year. If not applicable enter 0.

		Variable Name: IntegerValue
CEY	Cross-Border Number DA	State the total number of digital accounts/wallets that allow for cross-border transactions, in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CEZ	Cross-Border Number PC	State the total number of prepaid cards & vouchers that allow for cross-border transactions, in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFA	Irish IBAN Number DA	State the total number of digital accounts/wallets that have Irish IBAN only, in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFB	Irish IBAN Number PC	State the total number of prepaid cards & vouchers that have Irish IBAN only, in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFC	Multi-Country Number DA	State the total number of digital accounts/wallets that have multi-jurisdictional IBAN, in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFD	Multi-Country Number PC	State the total number of prepaid cards & vouchers that have multi-jurisdictional IBAN, in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFE	Virtual IBAN Number DA	State the total number of digital accounts/wallets that have virtual IBAN (i.e., multiple virtual IBANs are generated associated with a single “master” account), in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFF	Virtual IBAN Number PC	State the total number of prepaid cards & vouchers that have virtual IBAN (i.e., multiple virtual IBANs are generated associated with a single “master” account), in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFG	Allow Credit Number DA	State the total number of digital accounts/wallets that allow for credit drawings (Credit Draw means a loan made by the Credit Bank pursuant to the Credit Agreement or a disbursement made by the Credit Bank under a letter of credit issued pursuant to the Credit Agreement), in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CFH	Allow Credit Number PC	State the total number of prepaid cards & vouchers that allow for credit drawings (Credit Draw means a loan made by the Credit Bank pursuant to the Credit Agreement or a disbursement made by the Credit Bank under a letter of credit issued pursuant to the Credit Agreement), in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue

CFI	Single Nominated Number DA	State the total number of digital accounts/wallets that have single nominated user only, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFJ	Single Nominated Number PC	State the total number of prepaid cards & vouchers that have single nominated user only, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFK	Multi-Nominated Number DA	State the total number of digital accounts/wallets that have multiple nominated users (e.g., joint accounts), in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFL	Multi-Nominated Number PC	State the total number of prepaid cards & vouchers that have multiple nominated users (e.g., joint accounts), in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFM	MFA Number DA	State the total number of digital accounts/wallets that contain end-user verification demand (e.g., multi-factor authentication), in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFN	MFA Number PC	State the total number of prepaid cards & vouchers that contain end-user verification demand (e.g., multi-factor authentication), in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFO	No. Emoney transactions by non-identified customers	State the total number of E-Money transactions by non-identified customers in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFP	Value of emoney transactions by non-identified customers	State the total value (EUR) of E-Money transactions by non-identified customers in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CFQ	Total value PC	State the total value (EUR) of prepaid cards & vouchers issued by your institution in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CFR	Number of customers with more than 3 PC	State the total number of customers using prepaid cards & vouchers with more than 3 prepaid cards & voucher, in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue

8.3.7 Payment Accounts

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

```
<A02021 Identifier="CFS" IntegerValue="100"></A02021>
```

REF	Field	Description
CFS	No. Payment Accounts	Number of payment accounts. If not applicable enter 0. Variable Name: IntegerValue
CFT	Total value inward transactions	Total Value (EUR) of incoming transactions in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CFU	No. Inward transactions	Number of incoming transactions in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CFV	Total value outward transaction	Total Value (EUR) of outgoing transactions in the preceding calendar year. If not applicable enter 0. Variable Name: DecimalValue
CFW	No. Outward transactions	Number of outgoing transactions in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue

8.3.8 Currency Exchange

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

```
<A02021 Identifier="DDE" IntegerValue="400"></A02021>
```

REF	Field	Description
DDE	Cash FX Number of Transactions Sell	Total Number (No.) of Currency Cash Exchange Transactions If not applicable enter 0. Variable name: IntegerValue
DDF	Cash FX Number of Transactions Buy	Total Number (No.) of Currency Cash Exchange Transactions. If not applicable enter 0. Variable name: IntegerValue
DDG	Cash FX Number of Transactions 1000 or more Sell	Total Number (No.) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0. Variable name: IntegerValue
DDH	Cash FX Number of Transactions 1000 or more Buy	Total Number (No.) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0. Variable name: IntegerValue
DDI	Cash FX High Value Buy	Total Value (EUR) of Currency Cash Exchange Transactions (sell) If not applicable enter 0.

DDJ	Cash FX High Value Sell	Variable name: DecimalValue
		Total Value (EUR) of Currency Cash Exchange Transactions (buy) If not applicable enter 0.
DDK	Cash FX Cash Total Value	Variable name: DecimalValue
		Total Value (EUR) of transactions cash-to-cash carried out during the preceding calendar year. If not applicable enter 0.
		Variable name: DecimalValue

8.3.9 Virtual IBAN Accounts

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

<A02021 Identifier="CFX" EnumerationYesNo="No"></A02021>

REF	Field	Description
CFX	IBAN Own Name	Does your institution provide the facility to its customers to map a range of virtual IBANs against an IBAN-identifiable master account held in their name? Select from YesNo Variable name: EnumerationYesNo
CFY	IBAN Own Name Number of Transactions	Report the total number of master accounts provided with virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution. If not applicable enter 0. Variable name: IntegerValue
CFZ	IBAN Entity Name	Does your institution offer its customers virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution? Select from YesNo Variable name: EnumerationYesNo
CGA	IBAN Entity Name Number of Transactions	State the total number of master accounts provided with virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution. If not applicable enter 0. Variable name: IntegerValue
CGB	IBAN Transactions In Number of Transactions	Number of transactions on Virtual IBANs (incoming) in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue
CGC	IBAN Value In	Total Value (EUR) of transactions on Virtual IBANs (incoming) in the preceding calendar year. If not applicable enter 0. Variable name: DecimalValue
CGD	IBAN Transactions Out Number of Transactions	Number of transactions on Virtual IBANs (outgoing) in the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue
CGE	IBAN Value Out	Total Value (EUR) of transactions on Virtual IBANs (outgoing) in the preceding calendar year. If not applicable enter 0. Variable name: DecimalValue
CGF	IBAN Reissued	Total Number of re-issued IBANs. If not applicable enter 0.

		Variable name: IntegerValue
CGG	IBAN Number Reissued	Total Number of re-issued IBANs where the end-user is not a customer of the institution. If not applicable enter 0.
		Variable name: IntegerValue

8.3.10 Exchange crypto-fiat

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

<A02021 Identifier="CGH" DecimalValue="40000.0"></A02021>

REF	Field	Description
CGH	Crypto Fiat Value	Total amount (EUR) crypto-fiat in the previous year. If not applicable enter 0. Variable name: DecimalValue
CGI	Crypto Fiat Trans number	Total number of transactions crypto-fiat in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGJ	Crypto Fiat Customers	Number of customers using this type of service in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGK	Crypto Fiat To Unhosted	Total number of transactions crypto-fiat to unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGL	Crypto Fiat From Unhosted	Total number of transactions crypto-fiat from unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue

8.3.11 Exchange fiat-crypto

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

<A02021 Identifier="CGM" DecimalValue="40000.0"></A02021>

REF	Field	Description
CGM	Fiat Crypto Value	Total amount (EUR) fiat-crypto in the previous year. If not applicable enter 0. Variable name: DecimalValue
CGN	Fiat Crypto Transaction Numbers	Total number of transactions fiat-crypto in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGO	Fiat Crypto Customers	Number of customers using this type of service in the previous year. If not applicable enter 0.

		Variable name: IntegerValue
CGP	Fiat Crypto To Unhosted	Total number of transactions fiat-crypto to unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGQ	Fiat Crypto From Unhosted	Total number of transactions fiat-crypto from unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue

8.3.12 Exchange crypto-crypto

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

<A02021 Identifier="CGR" DecimalValue="40000.0"></A02021>

REF	Field	Description
CGR	Crypto Crypto Value	Total amount (EUR) crypto-crypto in the previous year. If not applicable enter 0. Variable name: DecimalValue
CGS	Crypto Crypto Customers	Number of customers using this type of service in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGT	Crypto Crypto To Unhosted	Total number of transactions crypto-crypto to unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGU	Crypto Crypto From Unhosted	Total number of transactions crypto-crypto from unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue

8.3.13 Transfer crypto-assets

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

<A02021 Identifier="CGV" DecimalValue="40000.0"></A02021>

REF	Field	Description
CGV	Transfer Crypto Value	Total amount (EUR) that customers transferred in the previous year. If not applicable enter 0. Variable name: DecimalValue
CGW	Transfer Crypto Customers	Number of customers using this type of service in the previous year. If not applicable enter 0. Variable name: IntegerValue

CGX	Transfer Crypto To Unhosted	Total number of transactions to unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue
CGY	Transfer Crypto From Unhosted	Total number of transactions from unhosted wallets in the previous year. If not applicable enter 0. Variable name: IntegerValue

8.3.14 Custody of crypto assets

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

```
<A02021 Identifier="CGZ" IntegerValue="400"></A02021>
```

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

8.3.15 Lending

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

```
<A02021 Identifier="CHB" IntegerValue="6000"></A02021>
```

REF	Field	Description
CHB	Outstanding loans - Number	Total Number of outstanding loans. If not applicable enter 0. Variable name: IntegerValue
CHC	Loans granted during the preceding calendar year - Number	Total Number of loans granted during the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue
CHD	Outstanding asset backed loans with cash collateral - Number	Total Number of outstanding asset backed loans with cash collateral. If not applicable enter 0. Variable name: IntegerValue
CHE	Loan repayments during the preceding calendar year - Number	Total Number of loan repayments during the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue
CHF	Prematurely repaid loans during	Total Number of prematurely repaid loans during the preceding calendar year. If not applicable enter 0.

	the preceding calendar year - Number	Variable name: IntegerValue
CHG	Loan repayments from non-EEA countries during the preceding calendar year - Number	Total Number of loan repayments from non-EEA countries during the preceding calendar year. If not applicable enter 0. Variable name: IntegerValue
CHH	Lending Granted No Associated Product	Total Number of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service. If not applicable enter 0. Variable name: IntegerValue
CHI	Outstanding loans - Value	Total Value (EUR) of outstanding loans. If not applicable enter 0. Variable name: DecimalValue
CHJ	Loans granted during the preceding calendar year - Value	Total Value (EUR) of loans granted during the preceding calendar year. If not applicable enter 0. Variable name: DecimalValue
CHK	Outstanding asset backed loans with cash collateral - Value	Total Value (EUR) of outstanding asset backed loans with cash collateral. If not applicable enter 0. Variable name: DecimalValue
CHL	Loan repayments during the preceding calendar year - Value	Total Value (EUR) of loan repayments during the preceding calendar year. If not applicable enter 0. Variable name: DecimalValue
CHM	Prematurely repaid loans during the preceding calendar year - Value	Total Value (EUR) of prematurely repaid loans during the preceding calendar year. If not applicable enter 0. Variable name: DecimalValue
CHN	Loan repayments from non-EEA countries during the preceding calendar year - Value	Total Value (EUR) of loan repayments from non-EEA countries during the preceding calendar year. If not applicable enter 0. Variable name: DecimalValue
CHO	Lending Granted No Product Value	Total Value (EUR) of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service. If not applicable enter 0. Variable name: DecimalValue

8.3.16 Correspondent Relationship

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

<A02021 Identifier="CHP" DecimalValue="40000.0"></A02021>

REF	Field	Description
CHP	Respondent PTA In Value	Total Value (EUR) of correspondent service transactions on <u>payable-through accounts</u> in the preceding calendar year (incoming). If not applicable enter 0. Variable name: DecimalValue
CHQ	Respondent PTA Out Value	Total Value (EUR) of correspondent service transactions on <u>payable-through accounts</u> in the preceding calendar year (outgoing). If not applicable enter 0. Variable name: DecimalValue
CHR	Respondent Nested Account In	Total Value (EUR) of correspondent service transactions going through <u>nested accounts</u> in the preceding calendar year (incoming). If not applicable enter 0. Variable name: DecimalValue
CHS	Respondent Nested Account Out	Total Value (EUR) of correspondent service transactions going through nested accounts in the preceding calendar year (outgoing) , where nested account refers to an account where a financial institution (the nested financial institution) gains indirect access to services by transacting through another financial institution's (the respondent institution) correspondent account. If not applicable enter 0. Variable name: DecimalValue

8.3.17 Deposits and Withdrawals

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

<A02021 Identifier="CHT" DecimalValue="5764"></A02021>

REF	Field	Description
CHT	Cash NP Deposits Number of Transactions	Deposits (by natural persons): Cash - Total Number (No.) of Transactions. If not applicable enter 0. Variable name: IntegerValue
CHU	Cash NP Deposits Value	Deposits (by natural persons): Cash - Total Value (EUR) of Transactions. If not applicable enter 0. Variable name: DecimalValue
CHV	Cash NP Deposits Number of Transactions 10000 or more	Deposits (by natural persons): Cash - Total Number (No.) of Transactions amounting to €10,000 or more. If not applicable enter 0. Variable name: IntegerValue
CHW	Cash NP Deposits Value 10000 or more	Deposits (by natural persons): Cash - Total Value (EUR) of Transactions amounting to €10,000 or more If not applicable enter 0.

		Variable name: DecimalValue
CHX	Cash NP Deposits Highest	Deposits (by natural persons): Cash - Highest Value (EUR) single transaction. If not applicable enter 0. Variable name: DecimalValue
CHY	Cash LE Deposits Number of Transactions	Deposits (by legal entities): Cash - Total Number (No.) of Transactions. If not applicable enter 0. Variable name: IntegerValue
CHZ	Cash LE Deposits Value	Deposits (by legal entities): Cash - Total Value (EUR) of Transactions. If not applicable enter 0. Variable name: DecimalValue
CIA	Cash LE Deposits Number of Transactions 10000 or more	Deposits (by legal entities): Cash - Total Number (No.) of Transactions amounting to €10,000 or more If not applicable enter 0. Variable name: IntegerValue
CIB	Cash LE Deposits Value 10000 or more	Deposits (by legal entities): Cash - Total Value (EUR) of Transactions amounting to €10,000 or more If not applicable enter 0. Variable name: DecimalValue
CIC	Cash LE Deposits Highest	Deposits (by legal entities): Cash - Highest Value (EUR) per type of transaction. If not applicable enter 0. Variable name: DecimalValue
CID	Cash NP Withdraw Number of Transactions	Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions. If not applicable enter 0. Variable name: IntegerValue
CIE	Cash NP Withdraw Value	Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions. If not applicable enter 0. Variable name: DecimalValue
CIF	Cash NP Withdraw Number of Transactions 10000 or more	Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions amounting to €10,000 or more If not applicable enter 0. Variable name: IntegerValue
CIG	Cash NP Withdraw Value 10000 or more	Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions amounting to €10,000 or more If not applicable enter 0. Variable name: DecimalValue
CIH	Cash NP Withdraw Highest	Withdrawals (by natural persons): Cash - Highest Value (EUR) per type of transaction. If not applicable enter 0. Variable name: DecimalValue
CII	Cash LE Withdrawals Number of Transactions	Withdrawals (by legal entities): Cash - Total Number (No.) of Transactions. If not applicable enter 0. Variable name: IntegerValue
CIJ	Cash LE Withdrawals Value	Withdrawals (by legal entities): Cash - Total Value (EUR) of Transactions. If not applicable enter 0. Variable name: DecimalValue

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

8.3.18 Crowdfunding

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

<A02021 Identifier="CIO" DecimalValue="20000.0"></A02021>

REF	Field	Description
CIO	Crowdfunding Value	Total Value (EUR) of funding projects in the previous year. If not applicable enter 0. Variable name: DecimalValue
CIP	Crowdfunding Projects	Total Number of projects being funded in the previous year. If not applicable enter 0. Variable name: IntegerValue
CIQ	Crowdfunding Donor HRJ	Total Number of donors from high-risk countries. If not applicable enter 0. Variable name: IntegerValue
CIR	Crowdfunding Projects HRJ	Total Number of projects where the owner is from a high-risk country. If not applicable enter 0. Variable name: IntegerValue
CIS	Crowdfunding Charity	Total Number of projects funded for philanthropic purposes in the previous year. If not applicable enter 0. Variable name: IntegerValue

8.3.19 Funding Methods / Payment Instruments

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

<A02026 CIT="Funding_cash" CIU="100" CIV="27000.50"></A02025>

This section gathers total numbers and values (EUR) of transactions in the preceding calendar year, by [funding methods/payment instruments](#) and products/services.

Note that transactions of a specific product/service can be facilitated by more than one funding method/payment instrument.

REF	Field	Description
CIT	Funding method	Select each FundingMethodPaymentInstrument . Each method must be selected. Data Type: EnumerationValue
CIU	No. Of transactions	For a specific funding method/ payment instrument, state the total number of transactions by active customers availing of a specific product/service in the preceding calendar year. A customer may avail of multiple methods. If not applicable enter 0. Data Type: IntegerValue
CIV	Total value of transactions	For specific funding method/ payment instrument, state the total value of transactions (EUR) by active customers availing of a specific product/service in the preceding calendar year. A customer may avail of multiple methods. If not applicable enter 0. Data Type: DecimalValue

8.3.20 Intermediaries and Distribution Channels

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

<A02021 Identifier="CIW" EnumerationYesNo="Yes"></A02021>

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

8.3.21 Remote Onboarding

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

<A02021 Identifier="CJC" EnumerationFunding="0.67"></A02021>

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

8.4 Mitigation & Control

8.4.1 Business Wide Risk Assessment

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

<A02031 Identifier="CJG" EnumerationBWRAConducted="Yes"></A02031>

This section gathers information in relation to your institution's [business wide risk assessment](#) ('BWRA').

REF	Field	Description
CJG	BWRA Conducted	State whether your institution conducts a Business Wide Risk Assessment (BWRA). Select from BWRAConducted Variable Name: EnumerationBWRAConducted
CJH	BWRA Senior Management Approval	State whether Senior Management of your institution approved the latest version of the BWRA. Select from: Yes; No Variable Name: EnumerationYesNo
CJI	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
CJJ	BWRA Review Frequency	Select the frequency of BWRA review by your institution. Select from Frequency Variable Name: EnumerationFrequency
CJK	BWRA Business Change	State whether the most recent BWRA review identified any areas for improvement or changes such as to your institution's policies, procedures, oversight measures, or risk appetite. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJL	BWRA Business Change Description	Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made. If not applicable enter N/A. Character limit: 500 characters Variable Name: String500
CJM	BWRA Money Laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJN	BWRA Terrorist Financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA. Select from : Yes; No; N/A Variable Name: EnumerationYesNoNA

CJO	BWRA Sanctions	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJP	BWRA Corruption	State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJQ	BWRA Conflicts of Interest	State whether risks of conflicts of interests are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJR	BWRA Tax Evasion	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJS	BWRA Internal Fraud	State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJT	BWRA External Fraud	State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJU	BWRA Cybercrime	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJV	BWRA Market Abuse	State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJW	BWRA Customer Groups	State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJX	BWRA Geographies	State whether geographies are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A

		Variable Name: EnumerationYesNoNA
CJY	BWRA Product Groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CJZ	BWRA Distribution Channel	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKA	BWRA Crypto	State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKB	BWRA Risk Other	State whether risks of other areas are explicitly identified and assessed in your institution's most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKC	BWRA Risk Other Detail	If Yes to BWRA Risk Other, please describe the areas that were explicitly identified and assessed in your institution's most recent BWRA. If not applicable enter N/A. List the areas separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable name: String500
CKD	Other Risk Assessment Process - Money laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKE	Other Risk Assessment Process - Terrorist financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKF	Other Risk Assessment Process - Circumvention of sanctions regulations	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA

CKG	Other Risk Assessment Process - Corruption (bribery)	State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKH	Other Risk Assessment Process - Conflicts of interests	State whether risks of conflicts of interests are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKI	Other Risk Assessment Process - Evasion of tax regulations	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKJ	Other Risk Assessment Process - Internal fraud and embezzlement (by employees/management of your institution)	State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKK	Other Risk Assessment Process - External fraud and embezzlement (by customers or other business relations)	State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKL	Other Risk Assessment Process - Cybercrime/ Ransomware	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKM	Other Risk Assessment Process - Market abuse	State whether risks of market abuse are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKN	Other Risk Assessment Process - Customer groups	State whether customer groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CKO	Other Risk Assessment Process - Geographies	State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A

		Variable Name: EnumerationYesNoNA
CKP	Other Risk Assessment Process - Product groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKQ	Other Risk Assessment Process - Distribution channels	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKR	Other Risk Assessment Process - Cryptos	State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKS	BWRA Risk Appetite	State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKT	BWRA Policy Procedure	State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKU	BWRA Product Service	State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKV	BWRA Transaction Monitoring	State whether the outcomes of the BWRA were used for setting scenarios and rules for transaction monitoring. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKW	BWRA Process Other	State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities. Select from: Yes; No; N/A
		Variable Name: EnumerationYesNoNA
CKX	BWRA Process Other Detail	If Yes to BWRA Process Other, briefly describe the other processes and activities in which your institution uses the outcomes of the BWRA. If not applicable enter N/A. List the processes separated by semicolon (;) with no spaces either side.

		Character limit: 500 characters Variable Name: String500
CKY	Risk App Formulated	State whether your institution formulates a ML/TF risk appetite. Select from: Yes; No Variable Name: EnumerationYesNo

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) is 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.

<A02031 Identifier="CKZ" DateValue="2024-06-30"></A02031>

REF	Field	Description
CKZ	Customer onboarding	Enter the date when your institution's management approved the last version of policies and procedures for customer onboarding (e.g. steps to be taken in setting up an account, or requirements before being able to transact, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLA	Ongoing Customer Due Diligence	Enter the date when your institution's management approved the last version of policies and procedures for customer review (e.g. the frequency of review on high risk customers). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLB	Ongoing monitoring of business relationships	Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of business relationships. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLC	Customer Offboarding	Enter the date when your institution's management approved the last version of policies and procedures for customer offboarding (e.g. closing an account, offboarding due to AML/CFT concerns, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLD	Politically Exposed Persons	Enter the date when your institution's management approved the last version of policies and procedures for Politically Exposed Persons (PEPs). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLE	High risk customers	Enter the date when your institution's management approved the last version of policies and procedures for high risk customers. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLF	Transaction monitoring	Enter the date when your institution's management approved the last version of policies and procedures for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, customer risk review in result of positive alerts, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

CLG	Suspicious transaction reporting	Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process. This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the conducts of your institution's business to both Revenue and the FIU of any STR generated within your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLH	Evasion of tax regulations	Enter the date when your institution's management approved the last version of policies and procedures for evasion of tax regulations by customers (e.g. closing an account, offboarding due to AML/CFT concerns, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLI	Bribery	Enter the date when your institution's management approved the last version of policies and procedures for bribery (e.g. monitoring and reporting of bribery instances). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLJ	Conflicts of interest	Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLK	Fraud within or outside the organisation	Enter the date when your institution's management approved the last version of policies and procedures for fraud within or outside your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLL	Sanctions screening	Enter the date when your institution's management approved the last version of policies and procedures for sanctions screening (e.g. monitoring and detecting instances of financial sanctions evasion). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLM	Sanction hits handling	Enter the date when your institution's management approved the last version of policies and procedures for sanction hits handling (e.g. escalating, recording, and investigating instances of financial sanctions evasion). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLN	Sanction hits reporting	Enter the date when your institution's management approved the last version of policies and procedures for sanction hits reporting (e.g. in the case of a sanction "hit", the Sanctions Return Form is correctly completed and reported to the Central Bank Sanctions Team as required). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLO	Treating and reporting of ML/TF & Financial Sanctions incidents	Enter the date when your institution's management approved the last version of policies and procedures for identification, investigation and where required, reporting of potential instances of money laundering, terrorist financing, and confirmed financial sanctions evasion matches.

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLP	Whistleblowing	Enter the date when your institution's management approved the last version of policies and procedures for whistleblowing. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLQ	Compliance function	Enter the date when your institution's management approved the last version of policies and procedures and resourcing the compliance function so it operates to an acceptable standard. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLR	Internal Audit/Assurance Testing	Enter the date when your institution's management approved the last version of policies and procedures and resourcing for the internal audit or assurance testing so it operates to an acceptable standard. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLS	Separation of functions (Three Lines of Defence)	Enter the date when your institution's management approved the last version of policies and procedures for separation of functions (i.e. Three Lines of Defence). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLT	Training	Enter the date when your institution's management approved the last version of policies and procedures for training (e.g. staff members of your institution complete relevant required training). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLU	Geographic Risk Factors	Enter the date when your institution's management approved the last version of policies and procedures for geographic risk factors (e.g. business activity in high risk jurisdictions, enhanced customer due diligence due to geographic risk, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLV	AML/CFT Record Keeping	Enter the date when your institution's management approved the last version of policies and procedures for record keeping (e.g. provisions in Section 55 of the CJA 2010). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLW	Business wide risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support business wide risk assessment processes. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLX	Customer risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support customer risk assessment processes. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CLY	Correspondent relationships	Enter the date when your institution's management approved the last version of policies and procedures for Correspondent relationships Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

CLZ	Legislation changes/regulatory guidance	Enter the date when your institution's management approved the last version of policies and procedures and internal processes on foot of legislative changes/regulatory guidance. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CMA	Review Frequency	Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures. Select from Frequency Variable Name: EnumerationFrequency

8.4.3 Onboarding

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

<A02031 Identifier="CMB" EnumerationYesNo="Yes"></A02031>

REF	Field	Description
CMB	Internet / Email - Natural person customers	State whether your institution offers onboarding via Internet/Email for natural person customers. Select from: Yes; No Variable Name: EnumerationYesNo
CMC	App - Natural person customers	State whether your institution offers onboarding via mobile app for natural person customers. Select from: Yes; No Variable Name: EnumerationYesNo
CMD	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: Yes; No Variable Name: EnumerationYesNo
CME	Third party - Natural person customers	State whether your institution offers onboarding via third party for natural person customers. Select from: Yes; No Variable Name: EnumerationYesNo
CMF	Other - Natural person customers	State whether your institution offers onboarding via other options for natural person customers. Select from: Yes; No Variable Name: EnumerationYesNo
CMG	Onboarding Other Details Natural person customers	If Yes to Other - Natural person customers, specify other onboarding not applicable enter N/A. List the other onboarding options available to natural persons separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CMH	Internet / Email - Legal entity customers	State whether your institution offer onboarding via Internet/Email for legal entity customers. Select from: Yes; No Variable Name: EnumerationYesNo
CMI	App - Legal entity customers	State whether your institution offer onboarding via mobile app for legal entity customers. Select from: Yes; No Variable Name: EnumerationYesNo

CMJ	Counter/Desk i.e. face to face - Legal entity customers	State whether your institution offer onboarding via counter/desk (i.e. face to face) for legal entity customers. Select from: Yes; No Variable Name: EnumerationYesNo
CMK	Third party - Legal entity customers	State whether your institution offer onboarding via third party for legal entity customers. Select from: Yes; No Variable Name: EnumerationYesNo
CML	Other - Legal entity customers	State whether your institution offer onboarding via other options for legal entity customers. Select from: Yes; No Variable Name: EnumerationYesNo
CMM	Onboarding Other Details Legal entity customers	If Yes to Other - Legal entity customers, specify other onboarding options. If not applicable enter N/A. List the other onboarding options available to legal entities separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CMN	Remote Data	State whether your institution has policies and procedures in place defining which data is considered adequate for correctly establishing and verifying a customer's identity for the remote onboarding process (i.e. options excluding counter/desk). Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMO	Purpose Questions	State whether the onboarding process includes specific questions aimed at identifying the intended purpose and nature of the business relationship. Select from: Yes; No Variable Name: EnumerationYesNo N/A indicates that the institution does not offer remote onboarding.
CMP	Purpose Questions Specify	If Yes to Purpose Questions, briefly specify the subject matter of these questions. List the subject matter of these questions asked separated by semicolon (;) with no spaces either side. If not applicable enter N/A.

		Character limit: 500 characters. Variable Name: String500
CMQ	Excluded Customer	State whether your institution has specific customer groups that may not be remotely onboarded. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMR	Excluded Customer Specify	If Yes to Excluded Customer, briefly specify these customer groups. If not applicable enter N/A. List the specific customer groups separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CMS	Verify Irish Transfer NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from an Irish bank account in the customer's own name. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMT	Verify Foreign Transfer NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from a foreign bank account in the customer's own name. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMU	Verify Upload Photo NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via uploading a photo or photocopy of the customer's ID document. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMV	Verify Person Photo NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via scan of ID document and image of the customer to be authenticated by a natural person.

		Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMW	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: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMX	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: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMY	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: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CMZ	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: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNA	Verify other Human intervention NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other methods of human intervention not listed above. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA

		N/A indicates that the institution does not offer remote onboarding.
CNB	Other Human intervention NP Detail	If Yes to Verify other Human Intervention NP, briefly describe the other human intervention (natural person customer). If not applicable enter N/A. List the other methods of human intervention used separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CNC	Verify Other NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other procedures. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CND	Other NP Detail	If Yes to Verify Other NP, briefly specify the other procedures (natural person customer). If not applicable enter N/A. List the other methods used separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CNE	Verify Other Human Intervention Legal entity customer	In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other human intervention not listed above. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNF	Other Human intervention Legal entity customer Detail	If Yes to Verify Other Human Intervention Legal entity customer, briefly describe the method of other human intervention (legal entity customer). If not applicable enter N/A. List the other methods of human intervention used separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CNG	Verify Other Legal entity customer	In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other procedures. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA

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

		Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNN	Verify At Desk Representatives	In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via verification of the representative's identity at the counter/desk. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNO	Verify other Human intervention Representatives	In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via other human intervention not listed above. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNP	Other Human intervention Representatives Detail	If Yes to Verify other Human intervention Representatives, briefly describe the method of other human intervention (representatives). If not applicable enter N/A. List the other methods of human intervention used separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CNQ	Verify Other Representatives	In your institution's remote onboarding process, state whether your institution verifies representative identity with other procedures. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNR	Other Representatives Detail	If Yes to Verify Other Representative, briefly specify the other procedures (representatives). If not applicable enter N/A. List the methods of identity verification used separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CNS	Verify Human intervention BO	In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other human intervention.

		Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNT	Other Human Intervention BO Detail	If Yes to Verify Human Intervention BO, briefly describe the method of other human intervention (beneficial owners). If not applicable enter N/A. List the methods of other human intervention used separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CNU	Verify Other BO	In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other procedures. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA N/A indicates that the institution does not offer remote onboarding.
CNV	Other BO Detail	If Yes to Verify Other BO, briefly specify the other procedures (beneficial owners). If not applicable enter N/A. List the other methods of identity verification separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500

8.4.4 Offboarding

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

<A02031 Identifier="CNW" IntegerValue="1231"></A02031>

REF	Field	Description
CNW	Customer Offboarding Number	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS/fraud concerns. If not applicable enter 0. Variable Name: IntegerValue
CNX	Customer Offboarding Number ML	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns. If not applicable enter 0. Variable Name: IntegerValue
CNY	Customer Offboarding Number TF	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns. If not applicable enter 0. Variable Name: IntegerValue
CNZ	Customer Offboarding Number FS	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. If not applicable enter 0. Variable Name: IntegerValue
COA	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. If not applicable enter 0. Variable Name: IntegerValue

8.4.5 Customer Due Diligence

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

```
<A02031 Identifier="COB" EnumerationCDD="Yes_in_all_cases"></A02031>
```

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 customer risk ratings, alignment to this classification on a best effort basis is acceptable.

In the instance where your institution uses in-between values, please use the driving level, e.g.

High(-) -> High

Low(+) -> Low

REF	Field	Description
COB	Identity Verification NP	State whether the identity of natural person customers or legal entity customers is verified prior to providing services. Select from CDD Variable Name: EnumerationCDD
COC	Identity Verification LE	
COD	Identity Verification BO LE	State whether the identity of the beneficial owner of legal entity customers is established and verified prior to providing services. Select from CDD Variable Name: EnumerationCDD
COE	Ownership Structure Identified LE	State whether ownership and/or control structure is identified for legal entity customers prior to providing services. Select from CDD Variable Name: EnumerationCDD
COF	Nature Of Relationship NP	State whether the purpose and intended nature of the business relationship is established prior to providing services to natural person customers or legal entity customers. Select from CDD Variable Name: EnumerationCDD
COG	Nature Of Relationship LE	
COH	Source Of Funds NP	State whether source/origin of the funds/assets is identified prior to providing services to natural person customers or legal entity customers. Select from CDD Variable Name: EnumerationCDD
COI	Source Of Funds LE	
COJ	Customer Rep Identified NP	State whether a customer's representative is identified prior to providing services to natural person customers or legal entity customers. Select from CDD Variable Name: EnumerationCDD
COL	Customer Rep Identified LE	
COM	Tax Motive Identified NP	State whether tax motives are identified prior to providing services to natural person customers or legal entity customers. Select from CDD Variable Name: EnumerationCDD
CON	Tax Motive Identified LE	
COO	Geos Identified NP	State whether geographies involved are identified prior to providing services to natural person customers or legal entity customers. Select from CDD Variable Name: EnumerationCDD
COP	Geos Identified LE	
COQ	Group Activities LE	State whether intragroup activities (such as activities among entities within a group which are non-transactional in nature) are identified prior to providing services to legal entity customers. Select from CDD Variable Name: EnumerationCDD
COR	Group Transactions LE	State whether intragroup transactions (such as transactions among entities within a group) are identified prior to providing services to legal entity customers.

		Select from CDD Variable Name: EnumerationCDD
COS	CDD Review NP	State whether your institution periodically reviews its customers' risk profiles for natural person or legal entity customers.
COT	CDD Review LE	
COU	CDD Review NP Low	Select from: Yes; No Variable Name: EnumerationYesNo If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for low-risk natural person or legal entity customers.
COV	CDD Review LE Low	
		Select from Frequency Variable Name: EnumerationFrequency
COW	CDD Review NP Medium	If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for medium-risk natural person or legal entity customers.
COX	CDD Review LE Medium	
		Select from Frequency Variable Name: EnumerationFrequency
COY	CDD Review NP High	If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for high-risk natural person or legal entity customers.
COZ	CDD Review LE High	
		Select from Frequency Variable Name: EnumerationFrequency
CPA	CDD Review NP PEP	State the Frequency of these reviews for customers who are politically exposed persons, their family members or persons that are close associates. Select from Frequency Variable Name: EnumerationFrequency
CPB	CDD Review NP Unacceptable	If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for unacceptable-risk natural person or legal entity customers (e.g. yet to be exited). Select from Frequency Variable Name: EnumerationFrequency
CPC	CDD Review LE Unacceptable	
CPD	CDD CRA Update	Date when your institution assessed the need to update the Customer Risk Assessment for the last time Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CPE	CDD Low Customer	Number of customers per ML/TF risk category (low risk). If not applicable enter 0. Variable Name: IntegerValue
CPF	CDD Medium-Low Customer	Number of customers per ML/TF risk category (medium-low risk). If not applicable enter 0. Variable Name: IntegerValue
CPG	CDD MH Customer	Number of customers per ML/TF risk category (medium-high risk). If not applicable enter 0. Variable Name: IntegerValue
CPH	CDD High Customer	Number of customers per ML/TF risk category (high-risk). If not applicable enter 0. Variable Name: IntegerValue
CPI	CDD customers Due NP	

CPJ	CDD customers Due LE	Number of customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. If not applicable enter 0. Variable Name: IntegerValue
CPK	CDD customers Reviewed NP	Number of customers for whom customer information was reviewed and updated in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CPL	CDD customers Reviewed LE	
CPM	Backlog Prop NP Total	Specify the proportion of backlogs of all natural person or legal entity customers. Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue. Input 0 if no there is no backlog.
CPN	Backlog Prop LE Total	
CPO	Backlog Prop NP High	Of the customer reviews in the backlog, specify the proportion of these that are high risk customers. Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue. Input 0 if no there is no backlog.
CPP	Backlog Prop LE High	
CPQ	Backlog Prop NP PEP	Specify the proportion of backlogs of customers who are politically exposed persons, their family members or persons to be close associates. Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue. Input 0 if no there is no backlog.
CPR	Backlog Prop NP Unacceptabl	Specify the proportion of backlog made up of unacceptable-risk natural person or legal entity customers (e.g. yet to be exited). Enter the proportion as a decimal, e.g. enter 4.7% as 0.047. Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue. Input 0 if no there is no backlog.
CPS	Backlog Prop LE Unacceptabl	
CPT	Concrete Timelines NP	State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CPU	Concrete Timelines LE	
CPV	No Ident Total	What proportion of total active customers have no CDD documentation/information. If not applicable enter 0. Variable Name: PercentageValue Enter the proportion as a decimal, e.g. enter 4.7% as 0.047
CPW	No Ident High	What proportion of high risk active customers have no CDD documentation/information. If not applicable enter 0. Variable Name: PercentageValue Enter the proportion as a decimal, e.g. enter 4.7% as 0.047
CPX	No Ident PEP	What proportion of active customers who are PEPs have no CDD documentation/information. If not applicable enter 0. Variable Name: PercentageValue Enter the proportion as a decimal, e.g. enter 4.7% as 0.047

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

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

8.4.6 Transaction Monitoring

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

<A02031 Identifier="CQH" EnumerationYesNoNA="Yes"></A02031>

REF	Field	Description
CQH	TM Profile	Does your institution draw up a transaction profile for customers at the initiation of services? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CQI	TM Profile Review	What is the frequency of review of the transaction profile? Select from Frequency Variable Name: EnumerationFrequency
CQJ	TM Profile Number Transactions	Does your institution include number of transactions in an expected transactions profile? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no profile is created please select N/A
CQK	TM Profile Value of Aggregate Transactions	Does your institution include the value of total transactions in an expected transactions profile? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no profile is created please select N/A
CQL	TM Profile Value of Single Transactions	Does your institution include the value of single transactions in an expected transactions profile? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no profile is created please select N/A
CQM	TM Profile Counterparties	Does your institution include counterparties in an expected transactions profile? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no profile is created please select N/A
CQN	TM Profile Geographies	Does your institution include geographies in an expected transactions profile? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no profile is created please select N/A
CQO	TM Profile Group Transactions	Does your institution include intra-group transactions in an expected transactions profile, i.e. do you include the expected movement of customer funds between their group companies?

		Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no profile is created please select N/A
CQP	TM Profile Banks	Does your institution include banks involved in an expected transactions profile? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no profile is created please select N/A
CQQ	TM Alert Number of Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If not applicable please select N/A
CQR	TM Alert Value of Aggregated Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If not applicable please select N/A
CQS	TM Alert Value of Single Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of single transactions? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If not applicable please select N/A
CQT	TM Alert Counterparties	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If not applicable please select N/A
CQU	TM Alert Geographies	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If not applicable please select N/A

CQV	TM Alert Group Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual intra-group transactions? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If not applicable please select N/A
CQW	TM Alert Banks	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual banks/payment institutions involved? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If not applicable please select N/A
CQX	TM How Monitor	State whether your institution monitors transactions and how this is done. Select from: MonitoringApproach Variable Name: EnumerationMonitoringApproach
CQY	TM Model Validation	Are formal steps taken after creating the rules for an automated transaction monitoring system in which the rules are tested for appropriateness and efficacy? Select from: ModelValidation Variable Name: EnumerationModelValidation Select N/A if transaction monitoring is conducted manually or no transaction monitoring is in place
CQZ	TM AI	Does your institution use artificial intelligence technology in its transaction monitoring process? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no transaction monitoring in place please select N/A
CRA	TM Rule	Does your institution use rules as part of its transaction monitoring process? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If no transaction monitoring in place please select N/A
CRB	TM High Risk Geographies	Does your institution have rules in its transaction monitoring process with respect to high risk geographies? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRC	TM Offshore Jurisdictions	Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions?

		Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRD	TM BR Customer Segments	Does your institution have rules in its transaction monitoring process with respect to Customer Segments? Customer segments can be any internal definition of customer groupings, retail or corporate customers, risk levels, associated sector, high value customer etc. Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRE	TM Sectors	Does your institution have rules in its transaction monitoring process with respect to Sectors? Does your institution risk rate various sectors and apply this information to transaction monitoring rules? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRF	TM PEP	Are there rules or conditions in your institution's transaction monitoring system to account for risk associate with PEPs and PEP close associates? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRG	TM Cash	Does your institution have rules in its transaction monitoring process with respect to cash transactions? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRH	TM Text	Are transaction description fields / bodies of text considered in any of the rules your institution has in its transaction monitoring system Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRI	TM Complex	Does your institution have rules in its transaction monitoring process with respect to complex structures? See definition of complex structure Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA

		If you answered No to TMBusinessRule please select N/A
CRJ	TM Banks	Does your institution have rules in its transaction monitoring process with respect to what banks / payment institutions are involved in transactions? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRK	TM Other	Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their rules? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRL	TM Other Detail	Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system. If not applicable enter N/A. Character limit: 500 characters Variable Name: String500
CRM	TM Review	Does your institution periodically review its rules in its transaction monitoring process? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRN	TM Review Latest	Please give completion date of the review. If a repeating review process is in place, please give the most recent date for a rule which has been reviewed. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CRO	TM Review Latest Changes	Did the most recent review lead to any changes in rules? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
CRP	TM Real Time or Post Event	State whether detection of (possible) suspicious financial transactions takes place in real-time or post-event. In this context, real-time detection means monitoring which is carried out live and can react to transactions as they take place as opposed to post-event detection which is done in batches at certain points in time after the transactions take place. Select from: DetectionTime Variable Name: EnumerationDetectionTime
CRQ	TM Insufficient Info	How many transactions did your institution reject on the basis of insufficient information* about the payer or the payee in the preceding calendar year? If not applicable enter 0.

		*Information as referred to in Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto assets. Variable Name: IntegerValue
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8.4.7 Alerts (in the preceding calendar year)

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

<A02031 Identifier="CRR" IntegerValue="120"></A02031>

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

		Variable Name: IntegerValue
CRZ	Percent Alerts - Manual	What is the proportion of manual transaction monitoring alerts to total transactions? If not applicable enter 0. Please enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable Name: PercentageValue
CSA	Alerts Investigated - Manual	How many manual alerts were investigated by an AML/transaction monitoring staff member? If not applicable enter 0. Investigated refers to an initial check to indicate if a transaction monitoring alert is worth sending to investigators/compliance. Variable Name: IntegerValue
CSB	Alerts Escalated - Manual	How many manual alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? If not applicable enter 0. Variable Name: IntegerValue
CSC	Alert Investigated FP - Manual	How many manual alerts were closed as false positives following investigation? If not applicable enter 0. A false positive is an alert which results in no Suspicious Transaction Report (STR) being filed. Variable Name: IntegerValue
CSD	Alert TP Review - Automated	How many true positive alerts (STR filed from automated alerts) led to a review of the customer's risk, CDD or otherwise. If not applicable enter 0. Variable Name: IntegerValue
CSE	Alert Backlog - Automated	At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed? If not applicable enter 0. Variable Name: IntegerValue
CSF	Alert Mean Time To Close TP - Automated	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for automated alerts), from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0. Variable Name: DecimalValue
CSG	Alert Max Time To Close TP - Automated	Over the course of the preceding calendar year, what was the maximum time to close an alert in days (account for automated alerts) which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0. Variable Name: IntegerValue

CSH	Alert Ratio STR - Automated	If automated system: Ratio between number of STRs and number of alerts. This corresponds to the number of alerts generated by the automated systems and the number of STRs resulting from alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) of Regulation (EU) 2024/1624. This excludes alerts of systems exclusively meant to detect transaction subject to targeted financial sanctions. If not applicable enter 0. Variable name: PercentageValue
CSI	Alert TP Review - Manual	How many true positive alerts (STR filed from manual alerts) led to a review of the customer's risk, CDD or otherwise. If not applicable enter 0. Variable name: IntegerValue
CSJ	Alert Backlog - Manual	At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed? If not applicable enter 0. Variable Name: IntegerValue
CSK	Alert Mean Time To Close TP – Manual	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for manual alerts), from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0. Variable Name: DecimalValue
CSL	Alert Max Time To Close TP – Manual	Over the course of the preceding calendar year, what was the maximum time to close an alert (account for manual alerts) which resulted in a Suspicious Transaction Report (STR) filing? Measured in days, e.g. 1.5 for 1.5 days If not applicable enter 0. Variable Name: DecimalValue
CSM	Alert Trans Excess - Manual	If manual system, does the annual number of transactions exceed the number of transactions that the institution can manually process? Select from: Yes; No; N/A Variable Name: EnumerationYesNoNA
CSN	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. If not applicable enter 0. Variable Name: DecimalValue

8.4.8 Suspicious Alerts and Transaction Rejections

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

```
<A02032 CSO="Alert_ml" CSP=" Money_remittance" CSQ="12" CSR="8"></A02032>
```

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

Every entry must specify a unique [AlertType](#) and [ProductService](#) pairing along with the number of alerts and Number of rejections. Complete one record per combination (must be 25 combinations in total)

REF	Field	Description
CSO	Alert Type	Select specific suspicious AlertType . Data Type: EnumerationValue
CSP	Product/Service	Select specific ProductService provided by your institution. Data Type: EnumerationValue
CSQ	Transaction Alert Number	For a specific suspicious alert type and a specific product/service, state the total number of transaction alerts generated in the preceding calendar year. If not applicable enter 0. Data Type: IntegerValue
CSR	Transaction Reject Number	For a specific suspicious alert type and a specific product/service, state the total number of transaction alerts rejected in the preceding calendar year. If not applicable enter 0. Data Type: IntegerValue

8.4.9 Suspicious Transaction Reporting

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

<A02031 Identifier="CSS" EnumerationYesNo="Yes"></A02031>

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.

REF	Field	Description
CSS	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
CST	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CSU	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CSV	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. If not applicable enter 0. Variable Name: IntegerValue
CSW	FIU Number STs Bribe	State the total number of suspicious transactions contained in STRs based on bribery/corruption reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CSX	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. If not applicable enter 0. Variable Name: IntegerValue
CSY	FIU Number STs HT	State the total number of suspicious transactions contained in STRs based on human trafficking reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CSZ	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. If not applicable enter 0. Variable Name: IntegerValue
CTA	FIU Number STs LWE	State the total number of suspicious transactions contained in STRs based on left wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CTB	FIU Number STR MS	State the total number of suspicious transaction reports (STRs) based on migrant smuggling reported to the FIU in the preceding calendar year. If not applicable enter 0.

		Variable Name: IntegerValue
CTC	FIU Number STs MS	State the total number of suspicious transactions contained in STRs based on migrant smuggling reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTD	FIU Number STR ML	State the total number of suspicious transaction reports (STRs) based on money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTE	FIU Number STs ML	State the total number of suspicious transactions contained in STRs based on money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTF	FIU Number STR PEP	State the total number of suspicious transaction reports (STRs) based on politically exposed person reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTG	FIU Number STs PEP	State the total number of suspicious transactions contained in STRs based on politically exposed person reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTH	FIU Number STR RWE	State the total number of suspicious transaction reports (STRs) based on right wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTI	FIU Number STs RWE	State the total number of suspicious transactions contained in STRs based on right wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTJ	FIU Number STR Sanctions	State the total number of suspicious transaction reports (STRs) based on sanctions list match reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTK	FIU Number STs Sanctions	State the total number of suspicious transactions contained in STRs based on sanctions list match reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTL	FIU Number STR SE	State the total number of suspicious transaction reports (STRs) based on sexual exploitation reported to the FIU in the preceding calendar year. If not applicable enter 0.

		Variable Name: IntegerValue
CTM	FIU Number STs SE	State the total number of suspicious transactions contained in STRs based on sexual exploitation reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTN	FIU Number STR SWF	State the total number of suspicious transaction reports (STRs) based on social welfare fraud reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTO	FIU Number STs SWF	State the total number of suspicious transactions contained in STRs based on social welfare fraud reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTP	FIU Number STR TE	State the total number of suspicious transaction reports (STRs) based on tax evasion reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTQ	FIU Number STs TE	State the total number of suspicious transactions contained in STRs based on tax evasion reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTR	FIU Number STR TF	State the total number of suspicious transaction reports (STRs) based on terrorist financing reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTS	FIU Number STs TF	State the total number of suspicious transactions contained in STRs based on terrorist financing reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTT	FIU Number STR TBML	State the total number of suspicious transaction reports (STRs) based on trade based money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTU	FIU Number STs TBML	State the total number of suspicious transactions contained in STRs based on trade based money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CTV	FIU Days to Report	Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the preceding calendar year. If not applicable enter 0.

CTW	FIU Report Before Transaction	Variable Name: DecimalValue
		Number of STRs submitted to the FIU before the completion of the transaction during the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue

8.4.10 Sanctions Screening

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

<A02031 Identifier="CTX" EnumerationYesNo="Yes"></A02031>

REF	Field	Description
CTX	Sanctions Prior To Service	State whether your institution verifies, prior to providing services, whether or not customers or potential customers and their beneficial owners are included on sanction list. Select from: YesNo Variable Name: EnumerationYesNo
CTY	Sanction Average Hours	Average number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools. If not applicable enter 0. Variable Name: DecimalValue
CTZ	Sanction Max Hours	Maximum number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools. If not applicable enter 0. Variable Name: DecimalValue
CUA	Sanction EU	Specify if customers and beneficial owners are checked against EU sanctions lists. Select from: Yes; No Variable Name: EnumerationYesNo
CUB	Sanction National List	Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from: Yes; No Variable Name: EnumerationYesNo
CUC	Sanction UN	Specify if customers and beneficial owners are checked against UN sanctions lists. Select from: Yes; No Variable Name: EnumerationYesNo
CUD	Sanction Other	Specify if customers and beneficial owners are checked against any other sanctions lists. Select from: Yes; No Variable Name: EnumerationYesNo
CUE	Sanction Other Specify	If your institution uses any other sanctions lists not mentioned above please specify. If not applicable enter N/A. List the sanction lists used separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CUF	Sanction Transact Check	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when executing a transaction. Select from: Yes; No Variable Name: EnumerationYesNo
CUG	Sanction List Update	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when sanctions listing updated. Select from Yes; No Variable Name: EnumerationYesNo
CUH	Sanction Periodic Customer	At and after the start of service provision, state whether your institution periodically checks whether customers are included on sanctions lists.

		Select from: Yes; No Variable Name: EnumerationYesNo
CUI	Sanction Periodic Customer Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for customers. If not applicable enter 0. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. Variable Name: IntegerValue
CUJ	Sanction Periodic BO	At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to non-high risk customers are included on sanctions lists. Select from: Yes;No Variable Name: EnumerationYesNo
CUK	Sanction Periodic BO Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for beneficial owners connected to non-high risk customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. Variable Name: IntegerValue
CUL	Sanction Periodic Rep	At and after the start of service provision, state whether your institution periodically checks whether representatives connected to non-high risk customers are included on sanctions lists. Select from: Yes; No Variable Name: EnumerationYesNo
CUM	Sanction Periodic Rep Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for representatives connected to non-high risk customers. If not applicable enter 0. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. Variable Name: IntegerValue
CUN	Sanction Total Hits	State the number of actual hits that the sanctions list screening delivered in the preceding calendar year. If not applicable enter 0. In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list Variable Name: IntegerValue
CUO	Sanction Total Hits Value	State the total value (EUR) of frozen assets recorded in relation to those hits that the sanctions list screening delivered in the preceding calendar year. If not applicable enter 0. In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list. In the case of currency conversions, conversion at time of transaction or exchange rate as of 31 December of the preceding calendar year is acceptable. Variable Name: DecimalValue

8.4.11 Outsourcing

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

<A02031 Identifier="CUP" EnumerationOutsource="No"></A02031>

In this section, outsourcing refers to outsourcing to a third party or through intragroup outsourcing.

REF	Field	Description
CUP	Outsource CDD Onboarding	State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUQ	Outsource CDD Review	State whether CDD periodic customer review (e.g. recurring process of reviewing customer CDD status/documentation/risk) has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUR	Outsource TM	State whether transaction monitoring has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUS	Outsource Alert Processing	State whether alerts processing has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUT	Outsource STR Reporting	State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUU	Outsource Sanction Screen	State whether sanctions screening has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUW	Outsource CDM	State whether customer data management (e.g. external storage, management and handling of customer data) has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUX	Outsource Training	State whether AML/CFT training has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUY	Outsource PEP	State whether PEP detection has been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CUZ	Outsource Compliance	State whether compliance monitoring checks have been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CVA	Outsource Other AMLCFT	State whether other processes related to risk management with regard to AML/CFT/proliferation financing have been outsourced to third parties (including within the Group). Select from Outsource Variable Name: EnumerationOutsource
CVB	Outsource Other AMLCFT Specify	If Yes to Outsource Other AML CFT, specify the other processes. List the other outsourced elements of your AML/CFT processes separated by semicolon (;) with no spaces either side. If not applicable enter N/A.

		Character limit: 500 characters Variable Name: String500
CVC	Outsource Provider Compliance Requirements	State the proportion of outsourced AML/CFT tasks where your institution incorporates compliance requirements with respect to financial crime legislation within its outsourcing agreements (e.g. Criminal Justice Act). If not applicable enter 0. To calculate the percentage, obliged entities should apply the following process: Denominator: number of tasks (customer due diligence, training, transaction monitoring, etc.) that are at least partly outsourced. Numerator: number of such tasks for which one or more written outsourcing agreement covering all outsourced aspects is in place. Variable Name: PercentageValue Enter the proportion as a decimal, e.g. enter 4.7% as 0.047
CVD	Outsource Assess Report Obligation	State whether your institution ensures outsource provider compliance with the requirements via reporting obligation. Select from: Yes;No;N/A Variable name: EnumerationYesNoNA
CVE	Outsource Assess Training	State whether your institution ensures outsource provider compliance with the requirements via training (e.g. ensure outsource providers are sufficiently trained in topics relating to the compliance requirements). Select from: Yes;No;N/A Variable name: EnumerationYesNoNA
CVF	Outsource Assess Audit Rights	State whether your institution ensures outsource provider compliance with the requirements via audit rights (e.g. retain rights to audit the outsource providers). Select from: Yes;No;N/A Variable name: EnumerationYesNoNA
CVG	Outsource Assess Other	Please state, if any, which other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. If not applicable enter N/A. List the processes separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500

8.4.12 Education & Training

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

<A02031 Identifier="CVH" IntegerValue="3"></A02031>

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

		Variable Name: PercentageValue
CVP	Board members & non-executive directors - % Staff coverage	State the proportion of members of Board members and non-executive directors who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0. Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable Name: PercentageValue
CVQ	Other - % Staff coverage	State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0. Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable Name: PercentageValue
CVR	Training Test	State the proportion of staff or trainees for whom at least one training was validated by a test. If not applicable enter 0. Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable Name: PercentageValue
CVS	Staff Numbers	Enter the total number of full-time equivalent employees employed by the institution. If not applicable enter 0. Variable Name: IntegerValue

8.4.13 Compliance & Assurance Testing

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

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

<A02031 Identifier="CVT" DateValue="2024-10-21"></A02031>

REF	Field	Description
CVT	Compliance SEBWRA	State the most recent date when the structure and effectiveness of your institution's <u>business-wide risk assessment</u> was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CVU	Compliance Training	State the most recent date when AML/CFT-related awareness-raising and staff training measures were assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CVV	Compliance Verification	State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CVW	Compliance Sanctions	State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CVX	Compliance Resources	State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CVY	Compliance Organisation	State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CVZ	Compliance CDD	State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

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

		Character limit: 500 characters. Variable name: String500
CWJ	Compliance Sanctions Descript	Briefly describe any material findings/potential breaches identified from the last assessment of compliance with sanctions regulations. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable name: String500
CWK	Compliance Resources Descript	Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable name: String500
CWL	Compliance Organisation Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the organisation of the AML/CFT system, governance and reporting to management bodies. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable name: String500
CWM	Compliance CDD Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of customers in a business relationship. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable name: String500
CWN	Compliance TM Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the transaction monitoring process. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable name: String500
CWO	Compliance STR Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the suspicious transaction reporting process. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable name: String500
CWP	Compliance Records Descript	Briefly describe any material findings/potential breaches identified from the last assessment of record keeping policies and procedures. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable name: String500

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

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.

<A02031 Identifier="CWV" DateValue="2024-11-23"></A02031>

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

		Format YYYY-MM-DD If not applicable enter 2000-01-01
CXC	Audit TM	State the most recent date when the transaction monitoring process was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CXD	Audit STR	State the most recent date when the suspicious transactions reporting process was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CXE	Audit Records	State the most recent date when record keeping policies and procedures were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CXF	Audit TPDD	State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CXG	Audit Other	State whether other financial crime processes were subject to an internal audit by your institution or assessed by an external expert. Select from YesNo Variable name: EnumerationYesNo
CXH	Audit Other Specify	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. If not applicable enter N/A. Provide a list of other processes separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXI	Audit BWRA Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CXJ	Audit Training Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXK	Audit Verification Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A.

		Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXL	Audit Sanctions Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXM	Audit Resources Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters. Variable Name: String500
CXN	Audit Organisation Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXO	Audit CDD Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXP	Audit TM Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXQ	Audit STR Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable Name: String500
CXR	Audit Records Descript	Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.

CXS	Audit TPDD Descript	Character limit: 500 characters Variable Name: String500 Briefly describe any material findings/potential breaches identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.
CXT	Audit Other Process Descript	Character limit: 500 characters Variable Name: String500 If other financial crime topics were assessed by the Internal Audit function, then describe any material findings/potential breaches identified. If not applicable enter N/A. Character limit: 500 characters Variable name: String500
CXU	Audit to Senior Management	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management. Select from Frequency Variable Name: EnumerationFrequency
CXV	Audit to Board	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board. Select from Frequency Variable Name: EnumerationFrequency
CXW	NCA ML	State whether a foreign supervisory authority issued findings regarding your institution's anti-money laundering framework in the preceding calendar year. Select from: Yes; No Variable Name: EnumerationYesNo
CXX	NCA TF	State whether a foreign supervisory authority issued findings regarding your institution's countering the financing of terrorism framework in the preceding calendar year. Select from: Yes; No Variable Name: EnumerationYesNo
CXY	NCA FTR	State whether a foreign supervisory authority issued findings on your institution's compliance with Funds Transfer Regulation in the preceding calendar year. Select from: Yes; No Variable Name: EnumerationYesNo
CXZ	NCA Sanctions	State whether a foreign supervisory authority issued findings on your institution's prevention of circumvention of sanctions framework in the preceding calendar year. Select from: Yes; No Variable Name: EnumerationYesNo
CYA	NCA Corruption	State whether a foreign supervisory authority issued findings on your institution's management of anti-corruption (bribery) and prevention of conflicts of interests frameworks in the preceding calendar year. Select from: Yes; No Variable Name: EnumerationYesNo

CYB	NCA Other	State whether a foreign supervisory authority issued findings on your institution's preventative frameworks with regard to other financial crime areas in the preceding calendar year. Select from: Yes; No Variable Name: EnumerationYesNo
CYC	NCA Other Specify	If Yes to NCA Other, briefly specify Provide a list of other topics separated by semicolon (;) with no spaces either side. If not applicable enter N/A. Character limit: 500 characters Variable name: String500
CYD	NCA ML Descript	If Yes to NCA ML, briefly describe the findings/gaps identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable name: String500
CYE	NCA TF Descript	If Yes to NCA TF, briefly describe the findings/gaps identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable name: String500
CYF	NCA FTR Descript	If Yes to NCA FTR, briefly describe the findings/gaps identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable name: String500
CYG	NCA Sanctions Descript	If Yes to NCA Sanctions, briefly describe the findings/gaps identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable name: String500
CYH	NCA Corruption Descript	If Yes to NCA Corruption, briefly describe the findings/gaps identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters Variable name: String500
CYI	NCA Other Descript	If Yes to NCA Other, briefly describe the findings/gaps identified. If not applicable enter N/A. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.

Character limit: 500 characters Variable Name: String500

8.4.15 Internal controls and reporting systems

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

<A02031 Identifier="CYJ" DateValue="2024-12-10"></A02031>

REF	Field	Description
CYJ	Report Improve	State the most recent date when reports on the areas where the operation of AML&CFT controls should be implemented or improved and suggested improvements were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYK	Report Compliance Action	State the most recent date when reports on compliance monitoring actions and a plan of activities of AML/CFT compliance officer were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYL	Report Remedial	State the most recent date when a progress report of any significant remedial programmes were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYM	Report Compliance Adequacy	State the most recent date when reports on adequacy of the human and technical resources in the AML/CFT compliance function were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYN	Report BWRA Findings	State the most recent date when reports on the main findings of the business-wide ML/TF risk assessment were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYO	Report Profiling Change	State the most recent date when reports on the changes in the methodology for assessing customer risk profiles were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYP	Report Customers	State the most recent date when reports on the classification of customers by risk category were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

CYQ	Report ST Data	State the most recent date when reports on statistical data on unusual and suspicious transaction were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYR	Report Audit	State the most recent date when reports on AML/CFT related findings of internal and external audits were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYS	Report Training	State the most recent date when reports on AML/CFT training activities and plan were submitted to your institution's senior management. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
CYT	Compliance Total Outstand	State the total number of actions outstanding, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CYU	Compliance Critical Outstand	State the number of critical-rated actions outstanding, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CYV	Compliance High Outstand	State the number of high-rated actions outstanding, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CYW	Compliance Total Overdue > 6 Months	State the total number of actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CYX	Compliance Critical Overdue > 6 Months	State the number of critical-rated actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue
CYY	Compliance High Overdue > 6 Months	State the number of high-rated actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year. If not applicable enter 0. Variable Name: IntegerValue

8.4.16 Governance

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

<A02031 Identifier="CYZ" EnumerationFrequency="Quarterly"></A02031>

REF	Field	Description
CYZ	Money Laundering Senior Management	State the Frequency that money laundering is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable Name: EnumerationFrequency
CZA	Terrorist Financing Senior Management	State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable Name: EnumerationFrequency
CZB	FTR Senior Management	State the Frequency that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable Name: EnumerationFrequency
CZC	Sanction Circumvent Senior Management	State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable Name: EnumerationFrequency
CZD	Corruption Senior Management	State the Frequency that corruption (bribery) and conflicts of interests is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable Name: EnumerationFrequency
CZE	Money Laundering Board	State the Frequency that money laundering is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable Name: EnumerationFrequency
CZF	Terrorist Financing Board	State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable Name: EnumerationFrequency
CZG	FTR Board	State the Frequency that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable Name: EnumerationFrequency
CZH	Sanction Circumvent Board	State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Board meetings.

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

8.4.17 Compliance with Fund Transfers Regulation

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

<A02031 Identifier="CZP" IntegerValue="230"></A02031>

REF	Field	Description
CZP	FTR Out Missing Info	Number of outbound transfers for which requests were received from a counterparty in the transfer chain for information that is missing,

		incomplete or provided using inadmissible characters in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CZQ	FTR Outbound	Total number of outbound transfers in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CZR	FTR Outbound Reject	Enter the proportion of outbound transfers rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters in the preceding calendar year. If not applicable enter 0.
		Please enter the proportion as a decimal, e.g. enter 4.7% as 0.047
		Variable Name: PercentageValue
CZS	FTR Counter Fail	Number of repeatedly failing counterparties flagged to the supervisor in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue
CZT	FTR Counter Total	Total number of counterparties of outbound and inbound transfers in the preceding calendar year. If not applicable enter 0.
		Variable Name: IntegerValue

8.5 Physical Presence

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

```
<A02041 CZU="IE" CZV="10000" CZW="10000" CZX="10000" CZY="10000" CZZ="10000" DAA="10000"
DAB="10000"></A02041>
```

The questions below concern the institution being active through subsidiaries, branches, representative offices, or other physical presence.

Please state the number of subsidiaries, branches, representative offices, and other physical presence broken down by country code.

REF	Field	Description
CZU	Country	Select from the list of Alpha-2 country codes, Country for each applicable country where the institution has subsidiaries, branches, agents, distributors, representative offices, and participating interests Data Type: EnumerationValue If not applicable select 00
CZV	No. of subsidiaries	Number of subsidiaries in each country. Data Type: IntegerValue
CZW	No. of branches	Number of branches in each country Data Type: IntegerValue
CZX	No. of representative offices	Number of representative offices in each country Data Type: IntegerValue
CZY	No. of other physical presences	Number of other physical presence in each country Data Type: IntegerValue
CZZ	No. of agents	Number of agents in each country Data Type: IntegerValue
DAA	No. of distributors	Number of distributors in each country Data Type: IntegerValue
DAB	Number of white labelling partners	Number of white labelling partners in each country, where white labelling refers to a business arrangement where a product or service is provided by one company but is offered to customers by another company, regulated or non-regulated, under its own brand Data Type: IntegerValue

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

Country	No. of subsidiaries CZV	No. of branches CZW	No. of representative offices CZX	No. of other physical presences CZY	No. of agents CZZ	No. of distributors DAA	No. of white labelling partners DAB
GB	1	0	0	0	0	0	0
FR	0	1	0	0	0	0	0

```
<A0204>
```

```
<A02041 CZU="GB" CZV="1" CZW="0" CZX="0" CZY="0" CZZ="0" DAA="0" DAB="0"></A02041>
```

```
<A02041 CZU="FR" CZV="0" CZW="1" CZX="0" CZY="0" CZZ="0" DAA="0" DAB="0"></A02041>
```

```
</A0204>
```

8.6 Residence & Establishment

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

<A02051 DAC="IE" DAD="10000" DAE="10000" DAF="10000" DAG="10000" DAH="10000" DAI="10000" DAJ="10000" DAK="10000" DAL="10000"></A02051>

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.

REF	Field	Description
DAC	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 If not applicable select 00
DAD	Natural person customers – Total Number	Natural person customers – Total Data Type: IntegerValue
DAE	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
DAF	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
DAG	Natural person customers – No. of which are PEPs	Natural person customers - Number of which are PEPs, their family members or persons known to be close associates. Data Type: IntegerValue
DAH	Legal entity customers – Total Number	Legal entity customers – Total Data Type: IntegerValue
DAI	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
DAJ	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
DAK	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
DAL	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

For example:

1. Your institution has 4 total natural person customers residing in the UK
 - a. 2 of which are new customers
 - b. 2 of which are PEP
 - c. 1 of which is rated high risk
2. Your institution has 4 total legal entity customers established in the UK
 - a. 1 of which is a new customer
 - b. 1 of which is rated high risk
 - c. 1 of which has a UBO residing in a non-EEA country
 - d. 1 of which has PEP risk identified in its customer profile

Country	Natural person customers				Legal entity customers				
	Total No.	No. of which are New Customers	No. of which are High Risk	No. of which are PEPs, their family members or persons known to be close associates	Total No.	No. of which are New Customers	No. of which are High Risk	No. of which are with at least one beneficial owner residing in non-EEA countries	No. of which have PEP Risk Identified
DAC	DAD	DAE	DAF	DAG	DAH	DAI	DAJ	DAK	DAL
GB	4	2	1	2	4	1	2	1	1

<A0205>

<A02051 DAC="GB" DAD="4" DAE="2" DAF="1" DAG="2" DAH="4" DAI="1" DAJ="2" DAK="1" DAL="1"></A02051>

<A0205>

8.7 Beneficial Owners

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

<A02061 DAM="IE" DAN="10000" DAO="10000"></A02061>

The questions below concern the Beneficial Owners (BOs) in relation to your institution's legal entity customer base as of 31 December of the preceding calendar year.

Please specify per country, the number of your legal entity customers' BOs, and of which are PEPs, their family members or persons known to be close associates, who reside in that country.

REF	Field	Description
DAM	Country	Select from the list of Alpha-2 country codes, <u>Country</u> for each applicable country that has a PEP or legal entity BO residing in that country. Data Type: EnumerationValue If not applicable select 00
DAN	Number of beneficial owners	Number of beneficial owners of your legal entity customers residing in the country. Data Type: IntegerValue
DAO	No. of which are PEPs	Number of beneficial owners that are PEPs, their family members or persons known to be close associates residing in the country. Data Type: IntegerValue

For example, if 4 of your legal entity customers' BOs reside in the UK and 2 of them are PEPs, their family members or persons known to be close associates, report as below.

Country	Your legal entity customers' BOs	
	Total No.	No. of which are PEPs, their family members or persons known to be close associates
GB	4	2

<A0206>

<A02061 DAM="GB" DAN="4" DAO="2"></A02061>

<A0206>

8.8 Digital Accounts

The questions below concern the electronic money service of digital accounts/wallets provided by your institution. Digital accounts/wallets are an online payment tool. The account/wallet securely stores value(s) which may include multiple currencies and/or crypto and enables customers to make and receive online payments.

For each country, based on the residence of natural person customers or the establishment of legal entity customers, please state the total account balance as of 31 December of the preceding calendar year and the total numbers and values (EUR) of up-load transactions as well as pay-out transactions in the preceding calendar year.

Additionally, specify the total account balance as of 31 December of the preceding calendar year and the total numbers and values (EUR) of up-load transactions as well as pay-out transactions in the preceding calendar year in relation to your high risk customers per your customer risk assessment as of 31 December of the preceding calendar year, who reside or establish in that country.

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

```
<A02071 DAP="IE" DAQ="10000.0" DAR="10000"
DAS="10000.0" DAT="10000" DAU="10000.0" DAV="10000.0" DAW="10000" DAX="10000.0" DAY="10000" DAZ="1000.0"></A02071>
```

REF	Field	Description
DAP	Country	Select from dropdown list of Alpha-2 country codes for each applicable country in which your customers reside or establish. Data Type: EnumerationValue If not applicable select 00
DAQ	Total balance digital accounts	Total value of account balance (EUR) for your institution's customers in that country as of 31 December of the past calendar year. Data Type: DecimalValue
DAR	Total number of up-load transactions	Total number of up-load transactions by your institution's customers in that country in the preceding calendar year. Data Type: IntegerValue
DAS	Total value of up-load transactions	Total value of up-load transactions (EUR) by your institution's customers in that country in the preceding calendar year. Data Type: DecimalValue
DAT	Total number of pay-out transactions	Total number of pay-out transactions to your institution's customers in that country in the preceding calendar year. Data Type: IntegerValue
DAU	Total value of payout transactions	Total value of pay-out transactions (EUR) to your institution's customers in that country in the preceding calendar year. Data Type: DecimalValue
DAV	Total balance digital accounts of high risk customers	Total value of account balance (EUR) for your institution's high risk customers in that country as of 31 December of the preceding calendar year.

		Data Type: DecimalValue
DAW	Total number of up-load transactions by high risk customers	Total number of up-load transactions by your institution's high risk customers in that country in the preceding calendar year. Data Type: IntegerValue
DAX	Total value of up-load transactions by high risk customers	Total value of up-load transactions (EUR) by your institution's high risk customers in that country in the preceding calendar year. Data Type: DecimalValue
DAY	Total number of pay-out transactions by high risk customers	Total number of pay-out transactions to your institution's high risk customers in that country in the preceding calendar year. Data Type: IntegerValue
DAZ	Total value of payout transactions by high risk customers	Total value of pay-out transactions (EUR) to your institution's high risk customers in that country in the preceding calendar year. Data Type: DecimalValue

8.9 Prepaid Cards & Vouchers

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

```
<A02081 DBA="IE" DBB="100.0" DBC="1000" DBD="100.0" DBE="100" DBF="100.0" DBG="1000.0" DBH="1000" DBI="1000.0" DBJ="1000" DBK="1000.0"></A02081>
```

The questions below concern the prepaid cards and vouchers issued by your institution. Cards & vouchers are preloaded with e-money, allowing the customer to spend the value loaded on the card either online or at points of sale. These can be reloadable or non-reloadable.

For each country, based on the residence of natural person customers or the establishment of legal entity customers, please state the total card/voucher balance as of 31 December of the preceding calendar year and the total numbers and values (EUR) of up-load transactions as well as pay-out transactions in the preceding calendar year.

Additionally, specify the total card/voucher balance as of 31 December of the preceding calendar year and the total numbers and values (EUR) of up-load transactions as well as pay-out transactions in the preceding calendar year in relation to your high risk customers per your customer risk assessment as of 31 December of the preceding calendar year, who reside or establish in that country.

REF	Field	Description
DBA	Country	Select from dropdown list of Alpha-2 country codes for each applicable country in which your customers reside or establish. Data Type: EnumerationValue If not applicable select 00
DBB	Total balance of cards and vouchers	Total value of card/voucher balance (EUR) for your institution's customers in that country as of 31 December of the preceding calendar year. Data Type: DecimalValue
DBC	Total number of up-load transactions	Total number of up-load transactions by your institution's customers in that country in the preceding calendar year. Data Type: IntegerValue
DBD	Total value of up-load transactions	Total value of up-load transactions (EUR) by your institution's customers in that country in the preceding calendar year. Data Type: DecimalValue
DBE	Total number of pay-out transactions	Total number of pay-out transactions to your institution's customers in that country in the preceding calendar year. Data Type: IntegerValue
DBF	Total value of pay-out transactions	Total value of pay-out transactions (EUR) to your institution's customers in that country in the preceding calendar year. Data Type: DecimalValue

DBG	Total balance digital accounts of high risk customers	Total value of card/voucher balance (EUR) for your institution's high risk customers in that country as of 31 December of the preceding calendar year. Data Type: DecimalValue
DBH	Total number of up-load transactions by high risk customers	Total number of up-load transactions by your institution's high risk customers in that country in the preceding calendar year. Data Type: IntegerValue
DBI	Total value of up-load transactions by high risk customers	Total value of up-load transactions (EUR) by your institution's high risk customers in that country in the preceding calendar year. Data Type: DecimalValue
DBJ	Total number of pay-out transactions by high risk customers	Total number of pay-out transactions to your institution's high risk customers in that country in the preceding calendar year. Data Type: IntegerValue
DBK	Total value of pay-out transactions by high risk customers	Total value of pay-out transactions (EUR) to your institution's high risk customers in that country in the preceding calendar year. Data Type: DecimalValue

8.10 Merchant Acquiring

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

```
<A02091 DBL="IE" DBM="100" DBN="1000.0"
DBO="100" DBP="100.0" DBQ="100" DBR="1000.0" DBS="1000" DBT="1000.0"></A02091>
```

The questions below concern merchant acquiring services provided by your institution. Merchant acquiring has the meaning of providing businesses and individuals with the tools and requirements to accept credit cards, debit cards, and other forms of electronic payment for transactions to take place.

For each country, based on the residence of natural person customers or the establishment of legal entity customers, please state the total numbers and values (EUR) of payment transactions as well as refund transactions in the preceding calendar year.

Additionally, specify the total numbers and values (EUR) of payment transactions as well as refund transactions in the preceding calendar year in relation to your high risk customers per your customer risk assessment as of 31 December of the preceding calendar year, who reside or establish in that country.

REF	Field	Description
DBL	Country	Select from dropdown list of Alpha-2 country codes for each applicable country in which your customers reside or establish. Data Type: EnumerationValue

		If not applicable select 00
DBM	Overall number of payments	Total number of payment transactions by your institution's customers in that country in the preceding calendar year. Data Type: IntegerValue
DBN	Overall value of payments	Total value of payment transactions (EUR) by your institution's customers in that country in the preceding calendar year. Data Type: DecimalValue
DBO	Overall number of refunds	Total number of refund transactions to your institution's customers in that country in the preceding calendar year. Data Type: IntegerValue
DBP	Overall value of refunds	Total value of refund transactions (EUR) to your institution's customers in that country in the preceding calendar year. Data Type: DecimalValue
DBQ	Overall number of payments by high risk customers	Total number of payment transactions by your institution's high risk customers in that country in the preceding calendar year. Data Type: IntegerValue
DBR	Overall value of payments by high risk customers	Total value of payment transactions (EUR) by your institution's high risk customers in that country in the preceding calendar year. Data Type: DecimalValue
DBS	Overall number of refunds by high risk customers	Total number of refund transactions to your institution's high risk customers in that country in the preceding calendar year. Data Type: IntegerValue
DBT	Overall value of refunds by high risk customers	Total value of refund transactions (EUR) to your high risk customers in that country in the preceding calendar year. Data Type: DecimalValue

8.11 Correspondent Relationship

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

```
<A02101 DBU="IE" DBV="100" DBW="1000"
```

```
DBX="100.0" DBY="100" DBZ="100" DCA="1000" DCB="1000" DCC="1000.0" DCD="1000" DCE="1000.0"></A02101>
```

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

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

REF	Field	Description
DBU	Country	Select from dropdown list of Alpha-2 country codes, <u>Country</u> for each applicable country that had institutions to which your institution provides correspondent services in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions with a correspondent relationship. Data Type: EnumerationValue If not applicable select 00
DBV	Overall - No. of respondent institutions	Overall number of respondent institutions to which your institution provides correspondent services, in the preceding calendar year. Data Type: IntegerValue
DBW	Overall - No. of incoming transactions	Overall number of incoming transactions for institutions to which your institution provides correspondent services in the preceding calendar year. Data Type: IntegerValue
DBX	Overall - Value of incoming transactions	EUR Value of total incoming transactions for institutions to which your institution provides correspondent services in the preceding calendar year. Data Type: DecimalValue
DBY	Overall - No. of outgoing transactions	Overall number of total outgoing transactions for institutions to which your institution provides correspondent services in the preceding calendar year. Data Type: IntegerValue
DBZ	Overall - Value of outgoing transactions	EUR Value of total outgoing transactions for institutions to which your institution provides correspondent services in the preceding calendar year. Data Type: DecimalValue
DCA	of which High Risk - No. of respondent institutions	Number of High Risk respondent institutions , per your institution's customer risk profiling), to which your institution provides correspondent services in the preceding calendar year. Data Type: IntegerValue
DCB	of which High Risk - No. of incoming transactions	Number of incoming transactions for Institutions to which your institution provides correspondent services in the preceding calendar year for High Risk Customers, per your institution's customer risk assessment). Data Type: IntegerValue

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

8.12 Money Remittance

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

<A02111 DCF="IE" DCG="100" DCH="1000.0" DCI="100" DCJ="100.0"></A02111>

The questions below concern the [money remittance](#) services provided by your institution.

For each country, based on the residence of natural person customers or the establishment of legal entity customers, please state the total numbers and values (EUR) of money remittance transactions in the preceding calendar year.

Additionally, specify the total numbers and values (EUR) of money remittance transactions in the preceding calendar year in relation to your high risk customers per your customer risk assessment as of 31 December of the preceding calendar year, who reside or establish in that country.

REF	Field	Description
DCF	Country	Select from dropdown list of Alpha-2 country codes for each applicable country in which your customers reside or establish. Data Type: EnumerationValue If not applicable select 00
DCG	Overall no. of money remittance transactions	Total number of money remittance transactions by your institution's customers in that country in the preceding calendar year. Data Type: IntegerValue
DCH	Overall value of money remittance transactions	Total value of money remittance (EUR) transactions by your institution's customers in that country in the preceding calendar year. Data Type: DecimalValue
DCI	Overall no. of money remittance transactions by high risk customers	Total number of money remittance transactions by your institution's high risk customers in that country in the preceding calendar year. Data Type: IntegerValue

DCJ	Overall value of money remittance transactions by high risk customers	Total value of money remittance transactions (EUR) by your institution's high risk customers in that country in the preceding calendar year. Data Type: DecimalValue
------------	---	---

8.13 Geography of Funds Flow

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

```
<A02121 DCK="IE" DCL="100" DCM="1000" DCN="100.0" DCO="100" DCP="100" DCQ="100.0" DCR="100" DCS="100" DCT="100.0" DCU="100" DCV="100" DCW="100.0"></A02121>
```

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

Specify by country for the source and destination of transmitted funds, total customer numbers, total transaction numbers and values (EUR) for specific countries in the preceding calendar year.

REF	Field	Description
DCK	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
DCL	Overall - No. of customers (Source)	Overall number of customers with incoming transactions from each country in the preceding calendar year. Data Type: IntegerValue
DCM	Overall - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year. Data Type: IntegerValue
DCN	Overall - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year. Data Type: DecimalValue
DCO	Overall - No. of customers (Destination)	Overall number of customers with outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue
DCP	Overall - No. of transactions (Destination)	Overall number of outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue
DCQ	Overall - Value of transactions (Destination)	EUR Value of total outgoing transactions to each country in the preceding calendar year.

		Data Type: DecimalValue
DCR	of which High Risk - No. of customers (Source)	Overall number of customers with incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue
DCS	of which High Risk - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue
DCT	of which High Risk - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: DecimalValue
DCU	of which High Risk - No. of customers (Destination)	Overall number of customers with outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue
DCV	of which High Risk - No. of transactions (Destination)	Number of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue
DCW	of which High Risk - Value of transactions (Destination)	EUR Value of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: DecimalValue

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

- 85 customers who had 600 incoming transactions where the source of the fund flow was Ireland and 100 customers who had 12,500 outgoing transactions where the destination of the fund flow was Ireland. 3 of the customers with incoming transactions from Ireland were High Risk customers. 5 of the customers with outgoing transactions to Ireland were High Risk customers.
- 15 customers who had 912 incoming transactions where the source of the fund flow was Germany and 20 customers who had 1,800 outgoing transactions where the destination of the fund flow was Germany. 1 of the customers with incoming transactions from Germany was a High Risk customer. 2 of the customers with outgoing transactions to Germany were High Risk customers.

- No customers had incoming transactions from the United Kingdom and 3 customers had 6 outgoing transactions to the United Kingdom. 1 of the customers with outgoing transactions to the United Kingdom was a High Risk customer.
- 1 customer had 1 incoming transaction where the source of the funds flow was France, and no customers had outgoing transactions where the destination of the funds flow was France. This customer was not a High Risk customer.

<A0212>

<A02121 DCK="IE" DCL="85" DCM="600" DCN="741532" DCO="100" DCP="12500" DCQ="123456"

Country	Overall (Incoming)			Overall (Outgoing)			of which High Risk (per your Institution's Customer Risk Assessment)					
	No. of customers (Source)	No. of transactions (Source)	Value of transactions (Source)	No. of customers (Destination)	No. of transactions (Destination)	Value of transactions (Destination)	No. of customers (Source)	No. of transactions (Source)	Value of transactions (Source)	No. of customers (Destination)	No. of transactions (Destination)	Value of transactions (Destination)
DCK	DCL	DCM	DCN	DCO	DCP	DCQ	DCR	DCS	DCT	DCU	DCV	DCW
IE	85	600	741,534	100	12,500	123,456	3	26	247,178	5	3,125	280,864
DE	15	912	146,049	20	1,800	224,691	1	61	19,737	2	450	56,173
GB	0	0	0	3	6	1,248	0	0	0	1	1	500
FR	1	1	50	0	0	0	0	0	0	0	0	0

DCR="3" DCS="26" DCT="247178" DCU="5" DCV="3125" DCW="280864.12"></A02121>

<A02121 DCK="DE" DCL="15" DCM="912" DCN="146049" DCO="20" DCP="1800" DCQ="224691"

DCR="1" DCS="61" DCT="19737.60" DCU="2" DCV="450" DCW="56173"></A02121>

<A02121 DCK="GB" DCL="0" DCM="0" DCN="0" DCO="3" DCP="6" DCQ="1248"

DCR="0" DCS="0" DCT="0" DCU="1" DCV="1" DCW="500"></A02121>

<A02121 DCK="FR" DCL="1" DCM="1" DCN="50" DCO="0" DCP="0" DCQ="0"

DCR="0" DCS="0" DCT="0" DCU="0" DCV="0" DCW="0"></A02121>

</A0212>

8.14 Transaction Monitoring

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

```
<A02131 DCX="R001_Foreign_cash" DCY="Sample rule description" DCZ="1000" DDA="750" DDB="250"></A02131>
```

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 the number of alerts of this rule/model, number of true positive alerts and number of false positive alerts. All rules should be included, even those with no alerts in the previous calendar year.

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

An alert is considered to be any instance of your institution's transaction monitoring system (manual or automated) identifying a potentially suspicious transaction or set of transactions as a result of manual review or from a rule/model/business rule mentioned above.

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

Rule Name / ID	High Level Rule / Model Description	Number of Transaction Monitoring Alerts for Rule/Model	Number of True Positive Alerts for Rule/Model	Number of False Positive Alerts for Rule/Model
R001_Foreign_Cash	Rule which detects significant cash deposit and subsequent risky international transaction	25	2	3
R002_Incoming_Smurfing	Detects large number of incoming small transactions from different sources, contrary to expected behaviour for customer segment	0	0	0

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

DDA	Number of True Positive Alerts for Rule/Model	Number of True Positive Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue
DDB	Number of False Positive Alerts for Rule/Model	Number of False Positive Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue

<A0213>

<A02131 DCX="R001_Foreign_cash" DCY="...rule description" DCZ="25" DDA="2" DDB="23"></A02131>

<A02131 DCX="R002_Incoming_Smurfing" DCY="...rule description" DCZ="0" DDA="0" DDB="0"></A02131>

</A0213>

9 Appendices

9.1 Definitions

Term	Interpretation
Active customer	The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into, or who has at least one transaction initiated by the customer even if it is a periodic/automatic transaction, in the preceding calendar year but excludes any transactions which pertain to fee payments, services charges or similar.
AML/CFT regulated customers	All persons or entities of a similar nature to those listed in Article 3 of Regulation (EU) 2424/1624, including those that do not fall within the scope of Regulation (EU) 2024/1624 due to their non-EU status
Asset backed loan	A loan in relation to which an asset is pledged, or given as a collateral, to the lender to protect the lender against the borrower's failure to reimburse the funds, and cash collateral is a collateral which at least partially consists of cash or an account on which cash is deposited as per the definition of cash under Article 2(1)(a) of Regulation (EU) 2018/1672: 'cash' means: (i) currency; (ii) bearer-negotiable instruments; (iii) commodities used as highly-liquid stores of value; (iv) prepaid cards.
Assets under custody	Assets for which your institution provides safekeeping and administration services (cf. MiFID II - Annex I, Section B - Ancillary services) and final investor refers to the end client or individual who ultimately owns and benefits from the investments, as opposed to intermediaries or entities managing or holding the assets on behalf of others
Assets under management	Assets which are either under the scope of a portfolio management mandate or under the scope of an investment advice mandate
Beneficial owner	As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership thorough ownership interest or control as referred to in Article 52 and Article 53 of Regulation (EU) 2024/1624.
Business relationship	As per Article 2(1), point (19), of Regulation (EU) 2024/1624.
Business Wide Risk Assessment	As per Article 10 of Regulation (EU) 2024/1624.
Cash	As per Article 2(1), point (43), of Regulation (EU) 2024/1624.
Cash intensive business	A cash-intensive business is a business that primarily operates with cash transactions rather than electronic or credit payments. These businesses often handle a large volume of cash relative to their overall revenue, for example: Hospitality and Leisure Automotive and Transportation Retail and Consumer Goods Health and Personal Care Crafts and Trades Art, Luxury, and Collectibles Services and Education
Charity	Charitable organisation as defined in the Charities Act 2009.

Complex structure	The term complex structure (such as a long holding chain with use of front companies, or a lack of transparency) refers to an ownership structure that is comprised of more than two layers of ownership which often includes (but is not limited to) foundations, charities, non-profit organisations, offshore vehicles trusts, or other legal arrangements including bearer shares and nominee shareholding. Any additional internal definition of complex structure is also acceptable here.
Correspondent relationship	As per Article 2(1), point (22), of Regulation (EU) 2024/1624.
Credit institution	(a) As per Article 2(1), point (5), of Regulation (EU) 2024/1624, or (b) An Post in respect of any activity that it carries out, whether as principal or agent, that would render it, or a principal for whom it is an agent, a credit institution as a result of the application of (a)
Crypto Asset Service Provider	As per Article 2(1), point (9), of Regulation (EU) 2024/1624.
Crypto risks	Risks related to e.g. customers trading in cryptos, but also risks related to your institution's activities in this area.
Crypto-asset	As per Article 2(1), point (7), of Regulation (EU) 2024/1624.
Crypto-asset services	As per Article 2(1), point (8), of Regulation (EU) 2024/1624.
Crypto token	A crypto token is a digital asset created on a blockchain that can represent ownership, rights, or access to a specific asset, service, or utility within a blockchain ecosystem.
Customer	The customer is the natural or legal person with whom a business relationship is entered into or who has a transaction effected.
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.
Depository Services	Offering custodian and fiduciary services to both Irish and non-Irish regulated funds. Custodian services include the safeguarding of assets of the customer/fund in question by controlling the monies the fund has to buy or sell securities or bonds for the fund. Fiduciary services include the depository firms reviewing the client's/fund's activities to ensure that the fund complies with relevant legislation and the prospectus requirements of the fund. This service is often referred to as Trustee Services.
Distributed ledger	As per Article 3(1), point (2), of Regulation (EU) 2023/1114.
Electronic money	As per Article 2(1), point (17), of Regulation (EU) 2024/1624.
E-Money Digital Accounts/Wallets	Digital accounts/wallets are an online payment tool. The account/wallet stores value(s) which may include multiple currencies and/or crypto and enables customers to make and receive online payments.
False positive alert	A false positive alert is a transaction monitoring alert which was automatically closed by a system without escalation or an escalated alert which was closed by an analyst as not being worthy of an STR. If the alert is a collection of several alerts then all of these alerts are considered to be false positives.
Family members	As per Article 2(1), point (35), of Regulation (EU) 2024/1624.

Financial institution	As per Article 2(1), point (6), of Regulation (EU) 2024/1624.
Funds Transfer Regulation	Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015, as supplemented by S.I. No. 608/2017 (EU)
Group	As per Article 2(1), point (41), of Regulation (EU) 2024/1624.
High risk country	Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163.
Hit (in sanctions screening)	In this context, “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.
Human intervention	As mentioned in EBA/GL/2022/15 – Guidelines on use of Remote Onboarding Solutions under Article 13(1) of Directive (EU) 2015/849.
Intermediary	This includes brokers, agents, distributors, intermediaries and all other contracted third parties which constitute a link in the chain of service provision to your customers, or in the execution of customer transactions. This concerns intermediaries with which your institution has entered into an agreement.
Investment Services	Investment Services are any activity or service listed in Section A of annex 1 of MiFID II
Legal entity	Legal person or other legal arrangement.
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Management body	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Maritime Finance	Financing for maritime assets
Merchant acquiring	Handling a merchant’s account so that they can accept credit or debit card payments and settlement of payments into a merchant’s account.
Merchant Services	Similar to payment institutions whereby the credit institutions facilitate the merchant’s customer transactions.
New customer	Natural persons or legal entities with whom a business relationship is entered into in the preceding calendar year.
ML/TF risk	The impact and likelihood of ML/TF taking place.
Money laundering	As per Article 2(1), of Regulation (EU) 2024/1624.
Money remittance	As per Article 4(21), of Directive (EU) 2015/2366.
Nested account	An account where a financial institution (the nested financial institution) gains indirect access to services by transacting through another financial institution’s (the respondent institution) correspondent account
Occasional transaction	As defined under Section 24 of the CJA 2010.
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.
Payable-through account	A correspondent account that is used directly by third parties to transact business on their own behalf.
Payment institution	As per Article 4(4), of Directive (EU) 2015/2366.
Payment instrument	As per Article 4(14), of Directive (EU) 2015/2366.

Payment transaction	As per Article 4(5), of Directive (EU) 2015/2366.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Pooled account	A bank account opened by a customer, for example a legal practitioner or notary, for holding their clients' money. The clients' money will be commingled, but clients will not be able directly to instruct the bank to carry out transactions.
Prepaid Cards/Vouchers	Cards & Vouchers are preloaded with e-money, allowing the customer to spend the value loaded on the card either online or at points of sale. These can be reloadable or non-reloadable.
Professional clients	As per Article 4(1), point 10, of Directive (EU) 2014/65
Proliferation financing	The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.
Remote onboarding	Onboarding other than face-to-face where the customer is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the customer's identity is being verified via video-link or similar technological means such as App registration, Internet sign-up, email, over the phone, etc.
Residual risk	The level of risk that remains after mitigation.
Retail clients	As per Article 4(1), point 11, of Directive (EU) 2014/65
Risk appetite	The level of risk a firm is prepared to accept.
Rule (in transaction monitoring)	A rule in this context means a rule/model/business rule/transaction monitoring rule as anything, manual or automated, designed to detect a specific transactional behaviour(s), scenario or typology which can by itself, or as a group of alerts, could be escalated for investigation and possible Suspicious Transaction Report. These are non-AI based logical decision rules often following "IF-THEN", "IF-ELSE", "WHEN" patterns etc.
Safe deposit box rental	Safe deposit boxes in a secured location where items can be stored for safe-keeping.
Sanctions regulation	As per Article 2(1), point (49), point (50), and point (51), of Regulation (EU) 2024/1624.
Securities Services	Facilitating their customers in the purchase, selling or management of securities such as bonds, mortgage backed securities, or money market products. Typical products and services are believed to be own account trading and traditional corporate banking activities and involves securities which are generally electronically traded on regulated markets and settled via regulated electronic settlement systems such as Clearstream and Euroclear. All payments to

	settlement systems are via regulated credit and financial institutions.
Self-hosted address	As per Article 3, point (20), of Regulation (EU) 2023/1113.
Senior management	As per Article 2(1), point (40), of Regulation (EU) 2024/1624.
Shell institution/bank	As per Article 2(1), point (23), of Regulation (EU) 2024/1624.
Terrorist financing	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
Third country	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.
Trade finance	Financing of international goods and services trade transactions on behalf of customers importing into or exporting from Ireland. Examples of trade finance activities are: letters of credit, open account facilities, trade credit insurance and import/export collection and guarantees.
Transaction monitoring alert	In this context a Transaction Monitoring Alert means one or more transactions which triggers or collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst. E.g. 1: A rule is in place which detects large deposits of cash anomalous to customer behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating, if the investigator files a STR report this is considered a True Positive Alert; otherwise we consider it a False Positive Alert. E.g. 2: A scenario is in place to detect fast-moving transactions to high risk geographies. One model/rule detects placement of risky funds and another detects fast movement of these funds to a high risk destination. Both of these models/rules identify behaviour creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this we consider it a True Positive Alert for both rules/models; otherwise we consider it a False Positive Alert for both rules/models.
Transaction monitoring rule/model	A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system.
Transaction profile	Transaction profile in this context has the meaning of any measure of expected transactional behaviour for customers.
Treasury Services	Cash and liquidity management services provided to legal (i.e., non-retail) entities.
True positive alert	A true positive alert is a transaction monitoring alert which was escalated and led to the filing of an STR. If an STR is collection of several alerts, all of these alerts are considered to be true positive alerts.
Trust or company service provider	As per Article 2(1), point (11), of Regulation (EU) 2024/1624.
Virtual IBAN	An identifier causing payments to be redirected to a payment account identified by an IBAN different from that identifier.

Wealth Management

As per EBA/GL/2021/02, wealth management is the provision of banking and other financial services to high-net-worth individuals and their family or businesses. It is also known as private banking. Clients of wealth management firms can expect dedicated relationship management staff to provide tailored service covering, for example, banking (e.g., current accounts, mortgages and foreign exchange), investment management and advice, fiduciary services, safe custody, insurance, family office services, tax and estate planning and associated facilities, including legal support.

9.2 Enumerations

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

AlertType

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

CDD

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

Country

Alpha-2 code as per the [ISO 3166](#).

Currency

Alphabetic code as per the [ISO 4217](#).

CustomerSegment1

Identifier	Description
NP	Natural person customers (i.e., personal customers, retail customers)
NP_PEP	Natural person customers that are politically exposed persons (PEPs), family members of PEPs or persons known to be a close associate.
NP_high	Natural person customers with High (or closest internal rating, e.g., Ultra High) customer risk rating
LE	Legal entity customers (i.e., non-personal customers, legal persons and/or other entities and/or legal structures and/or arrangements)
LE_PEP	Legal entity customers with PEP risk identified
LE_high	Legal entity customers with High (or closest internal rating, e.g., Ultra High) customer risk rating
Complex	Customers with a complex structure
Cash_intensive	Legal entity customers that operate in cash-intensive businesses

CustomerSegment2

Identifier	Description
NP_occas_trans	Natural person customers that have made occasional transactions
LE_occas_trans	Legal entity customers that have made occasional transactions
NP_blocked	Natural person customers that have been blocked/curtailed pending exit due to AML/CFT concerns
LE_blocked	Legal entity customers that have been blocked/curtailed pending exit due to AML/CFT concerns

CustomerSegment3

Identifier	Description
NP_not_categorised	Natural person customers without customer risk rating
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.)
LE_not_categorised	Legal entity customers without customer risk rating
LE_suspended	Legal Entities that have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.)
Shell_institution	Legal entity customers that are shell institutions
CASP	Legal entity customers that are crypto-asset service providers
Credit_institution	Legal entity customers that are credit institutions
Financial_institution	Legal entity customers that are financial institutions
Gov_body	Legal entity customers that are government bodies
SPV	Legal entity customers that are special purpose vehicles
NPO	Legal entity customers that are non-profit organisations
NPO_non_EEA	Legal entity customers that are non-profit organisations with cross border transactions to/from non-EEA countries
Cust_non_EEA	Customers with cross border inflows/outflows to/from non-EEA countries.

BWRAConducted

Identifier

Yes
No
Exemption_applies

DetectionTime

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

Frequency

Identifier	Description
None	None
Ad_hoc	Ad hoc
Monthly	Monthly
Quarterly	Quarterly
Every_6_months	Every 6 months
Yearly	Yearly
1_years-2_years	>1 years but <2 years
2_years-3_years	>2 years but <3 years
3_years-4_years	>3 years but <4 years
4_years-5_years	>4 years but <5 years
Only_every_5_years_or_less	Only every 5 years or less frequent

FundingMethodPaymentInstrument

Identifier	Description
Funding_cash	Cash
Funding_bank_payment	Wire transfer, direct debit, etc. where money is forwarded directly from the sender's bank account to the receiver's bank account
Funding_debit_credit_card	Payment from a personal/business/corporate, etc. debit or credit card
Funding_prepaid_card	Use of a temporary E-Money prepaid card or voucher which requires funds to be loaded on it (possibly also reloadable), separated from credit and debit cards
Funding_other_emoney	Other electronic money payment methods and payment services not covered above (excluding crypto assets)
Funding_crypto	Payment using any crypto assets
Funding_other	Other funding method or payment instrument available/used not covered above

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
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MonitoringApproach

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

Outsource

Identifier	Description
No	No
No_but_concrete_plans_to_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

ProductServiceIncludingOverall

Identifier	Description
Overall_product_service	All products or services
Merchant_acquiring	Merchant acquiring
Digital_account_wallet	E-Money digital accounts/wallets
Prepaid_card_voucher	Prepaid cards & vouchers
Money_remittance	Money remittance

ProductService

Identifier	Description
Merchant_acquiring	Merchant acquiring
Digital_account_wallet	E-Money digital accounts/wallets
Prepaid_card_voucher	Prepaid cards & vouchers
Money_remittance	Money remittance
Other_product_service	Any other product or service provided by your institution

PSD2Activity

Identifier	Description
PSDActivity1	Services enabling cash to be placed on a payment account as well as all the operations required for operating a payment account
PSDActivity2	Services enabling cash withdrawals from a payment account as well as all the operations required for operating a payment account.
PSDActivity3	Execution of payment transactions, including transfers of funds on a payment account with the user's payment service provider or with another payment service provider: a) execution of direct debits, including one-off direct debits; b) execution of payment transactions through a payment card or a similar device; c) execution of credit transfers, including standing orders
PSDActivity4	Execution of payment transactions where the funds are covered by a credit line for a payment service user: a) execution of direct debits, including one-off direct debits; b) execution of payment transactions through a payment card or a similar device; c) execution of credit transfers, including standing orders
PSDActivity5	Issuing of payment instruments and/or acquiring of payment transactions.
PSDActivity6	Money remittance.
PSDActivity7	Payment initiation services.

Sector

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

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

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

	Alternatively Appropriate Internal Classification
Precious_metal	Precious Metals, Stones and Jewellery Traders Suggested NACE Codes: G.46.72, G.47.77 Suggested NAICS Codes: 42394 Suggested GICS Codes: 15104030, 15104040, 15104045, 25203010 Alternatively Appropriate Internal Classification
Art_dealer	Art Dealers Suggested NACE Codes: G.47.78 Suggested NAICS Codes: 45992 Suggested GICS Codes: 25504040 Alternatively Appropriate Internal Classification
Crypto	Virtual Assets/ Crypto Currency Suggested NACE Codes: <i>Not Available</i> Suggested NAICS Codes: 523160 Suggested GICS Codes: <i>Not Available</i> Alternatively Appropriate Internal Classification
Gambling	Gambling Suggested NACE Codes: R.92.0 Suggested NAICS Codes: 7132 Suggested GICS Codes: 25301010 Alternatively Appropriate Internal Classification
Contruction	Construction Suggested NACE Codes: F Suggested NAICS Codes: 23 Suggested GICS Codes: 201030 Alternatively Appropriate Internal Classification

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

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

	Suggested NACE Codes: Not Available Suggested NAICS Codes: 441222 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Catering	Catering Suggested NACE Codes: I.56.21 Suggested NAICS Codes: 72232 Suggested GICS Codes: 25301040 Alternatively Appropriate Internal Classification
Crowdfunding	Crowdfunding Service Providers Suggested NACE Codes: S.94.99 Suggested NAICS Codes: 813219 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Sport	Professional Sports Suggested NACE Codes: R.93.12, R.93.11 Suggested NAICS Codes: 71121 Suggested GICS Codes: 50202010 Alternatively Appropriate Internal Classification
Stockbroker	Stock Brokers and Traders/ Trading Platforms Suggested NACE Codes: K.66.11, K.66.12 Suggested NAICS Codes: 5231, 5232 Suggested GICS Codes: 40203020, 40203030 Alternatively Appropriate Internal Classification
Financial_service	All other financial services sectors not mentioned above.

Other_high_risk	Other High Risk activities as per your institutions Customer Risk Assessment.
Other_sector	All remaining other sectors not covered by the above.

ModelValidation

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

CountriesEEA

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

CountriesEEANA

Identifier	Description
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00	Not applicable
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	CzechRepublic
DE	Germany
DK	Denmark
EE	Estonia
ES	Spain
FI	Finland
FR	France
GR	Greece
HR	Croatia
HU	Hungary
IS	Iceland
IT	Italy
LI	Liechtenstein
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
NO	Norway
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
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