



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Guidance Notes Risk Evaluation Questionnaire

Schedule 2 & Trust or Company Service
Providers

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1 Background and Scope

The Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (the CJA 2010) obliges credit and financial institutions (institutions) to put in place an effective, risk based Anti-Money Laundering/Countering the financing of Terrorism (AML/CFT) framework, which includes the application of a risk based approach, customer due diligence (CDD) measures, reporting of suspicious transactions, governance, policies and procedures, record keeping and training. There is also a legal obligation for institutions to comply with EU Council Regulations relating to Financial Sanctions (FS) measures as soon as they are adopted.

The Risk Evaluation Questionnaire (REQ) seeks to consider:

- 1.1. Information 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 high level information provided by the institution); and
- 1.3 Information on the AML/CFT/FS framework put in place by the institution.

The Central Bank of Ireland (the Central Bank) has developed new sector specific REQs to capture more detailed and pertinent risk data. Based on the information contained within the REQs, the Central Bank will conduct analysis and assess the level of ML/TF risks for individual institutions and across sectors. This REQ also seeks to cover the data points to be collected on behalf of AMLA as per the Regulatory Technical Standards ('RTS') under Article 40(2) of Directive (EU) 2024/1640 and Article 12(7) of Regulation (EU) 2024/1620.

Institutions will be required to submit their completed REQs to the Central Bank via the Central Bank of Ireland Portal (the Portal).

The reporting frequency, the timeline for submission and the submission process are outlined in Sections 2 and 4.

Please Note: Where an institution has identified a material issue requiring notification to the Central Bank, the institution should communicate any such material issues through normal supervisory channels. Institutions are reminded the REQ is not an appropriate channel for sole communication of such issues.

2 Timeline for Submitting the REQ

The reference date for data included in the REQ is 31 December of the preceding calendar year unless otherwise stated. The REQ is due annually on March 19th.

The deadline for the first submission (in respect of reference date of 31 December 2026) is 19 March 2027. This is a hard deadline, and no extensions will be granted.

3 Requirement to provide information to the Central Bank

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

4 Mechanism for Submission of Returns

The XML (Extensible Markup Language) files for the REQs must be generated in accordance with the rules specified in the XSD schema which is provided with this guidance document. Each institution is required to submit to the Central Bank, the information set out in Section 8 of this guidance. The XSD schema is accessible on the Central Bank website. An Excel version of the REQ is also available on the website but this is solely to support understanding. Only XML format submissions will be accepted. A completed sample XML is available on the Central Bank website alongside this guidance and the XSD schema.

In addition to conforming to the XSD schema, the following constraints must be observed:

1. Explicit closing XML tags must be used for all elements. e.g.
`<A13011 Identifier="MCA" EnumerationYesNo="Yes"></A13011>`
 rather than
`<A13011 Identifier="MCA" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:
`<?xml version="1.0" encoding="utf-8"?>`
`<Schedule2TCSP xmlns="http://www.centralbank.ie/Schemas/AML/2025/A13">`
`...`
`...`
`...`
`</Schedule2TCSP>`

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

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

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

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

Naming convention

The file name must be of the form: CCCCCC_YYYYMMDD_A13.xml

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A13 - the A13 Return code
- .xml or .zip - the file extension

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

5 Where do I go if I need further information?

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

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

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

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

E-mail: onlinereturns@centralbank.ie

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

This guidance document is for institutions categorised as Schedule 2 institutions as well as Trust or Company Service Providers. Each institution must use the XSD schema specific to its sector. If your institution is part of a group with multiple institutions regulated by the Central Bank, then each individual institution must submit a REQ.

Only data written from the Irish institution should be reported.

8 Instructions / Guidance Notes for Completing the REQ

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

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

All values should be entered in Euro unit value.

Where currency conversion is required for reported data or for thresholds of the items, reporting obliged entities should apply the following approach:

1. For data points reported as a stock at the end of the reference year, the applicable exchange rate should be the official exchange rate (e.g. the ECB exchange rate) published on 31 December of the reference year. If no official exchange rate is available on 31 December, reporting obliged entities should use the official rate published on 30 December, or the most recent preceding date for which an official rate is available.
2. For data points reported as of a specific date during the reference year, reporting obliged entities should use the official exchange rate applicable on the date the transaction took place. If no official rate is available on that date, they should use the rate published on the most recent preceding date. By way of exception, where applying this approach would be excessively burdensome and the impact immaterial, reporting obliged entities may use the year-end exchange rate (in accordance with the method described in point 1) for such transactions or events.

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

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

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

Country	No. of natural person customers who are PEPs, their family members or persons known to be close associates	No. of legal entity customers whose beneficial owners include at least one PEP, family member or person known to be a close associate
MNW	MNX	MNY
FR	4	2

```
<A1307>
  <A13071 MNW="FR" MNX="4" MNY="2"></A13071>
</A1307>
```

8.1 Table structures

The XSD taxonomy has two different types of table structure, Table Structure A and Table Structure B. The way to complete each table structure in the XML file is different. Please see below two examples illustrating how to complete each. A full XML example file is available on our website, and it is noted in this guidance which structure should be used for each table.

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

8.1.1 Table Structure A

In this example, two different “REFs” are needed, meaning MCM and MCN. In this guidance document, we can see that the respective Data Types for these three fields under “Description” are “EnumerationValue”, and “IntegerValue”. You must enter the REF and the appropriate answer using the correct Data Type.

```
<A1302B>
  <A13022 MCM="NP" MCN="20"></A13022>
  <A13022 MCM="LE" MCN="100"></A13022>
  <A13022 MCM="Cust_FIU" MCN="0"></A13022>
```

Customer segments

Please specify the total number of customers at the end of the preceding calendar year, segmented by natural persons and legal entities, and their attributes.

Please enter a number (or 0) in all fields in this table.

Segment	No. of Customers
MCM	MCN
NP	20
LE	100
Cust_FIU	0

In Table Structure A, each enumeration option must not be repeated, e.g. MCM in the example above cannot have “NP” entered twice.

The following tables have Table Structure A:

Guidance Section	Tab_Code	Table_Code
8.3.1 Customer Segments	A1302B	A13022
8.5 Residence and Establishment	A1304	A13041
8.6 Beneficial Owner	A1305	A13051
8.7 Politically Exposed Person	A1306	A13061
8.8 Geography of Funds Flow	A1307	A13071

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, IAA 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).

<A1301A>

```
<A13011 Identifier="MAA" EnumerationLegalStructure="Stand_alone_entity"></A13011>
<A13011 Identifier="MAB" String500="Consultoria Lola"></A13011>
<A13011 Identifier="MAC" LEI="F5WCUMTUM4RKZ1MAIE39"></A13011>
<A13011 Identifier="MAD" EnumerationCountryEEANA="HR"></A13011>
<A13011 Identifier="MAE" String500="frferffgeferfrgergergregrerg"></A13011>
```

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 ultimate EEA parent entity	Consultoria Lola
LEI of the ultimate EEA parent entity	F5WCUMTUM4RKZ1MAIE39
Country where the ultimate EEA parent entity is established	HR
The AML/CFT supervisory authority of the ultimate EEA parent entity	frferffgeferfrgergergregrerg

In Table Structure B, each identifier/REF must not be repeated, e.g. IAA in the example above cannot be entered twice.

The following tables have Table Structure B:

Guidance Section	Tab_Code	Table_Code
8.2.1 Legal Structure	A1301A	A13011
8.2.2 Business Model	A1301A	A13011
8.2.3 Statement of Compliance	A1301A	A13011
8.3.2 Lending	A1302A	A13021
8.3.3 Factoring	A1302A	A13021
8.3.4 Financial Leasing	A1302A	A13021
8.3.5 Safe Custody	A1302A	A13021
8.3.6 TCSP	A1302A	A13021
8.3.7 Other Products and Services	A1302A	A13021
8.3.8 Distribution Channels and Third Parties	A1302A	A13021
8.3.9 Remote Onboarding	A1302A	A13021
8.4.1 Business Wide Risk Assessment	A1303A	A13031
8.4.2 Policies and Procedures	A1303A	A13031
8.4.3 Onboarding	A1303A	A13031
8.4.4 Offboarding	A1303A	A13031
8.4.5 Customer Due Diligence	A1303A	A13031
8.4.6 Transaction Monitoring	A1303A	A13031
8.4.7 Alerts	A1303A	A13031
8.4.8 Suspicious Transaction Reporting	A1303A	A13031
8.4.9 Sanctions Screening	A1303A	A13031
8.4.10 Outsourcing	A1303A	A13031
8.4.11 Training	A1303A	A13031
8.4.12 Compliance and Assurance Testing	A1303A	A13031
8.4.13 Audit	A1303A	A13031
8.4.14 Governance	A1303A	A13031
8.4.15 Group AML	A1303A	A13031

Variable Names:

- Identifier: "REF" code.
- LEI: Legal Entity Identifier (20 characters).

- String100/500: String with 100/500 character limit. Only [ASCII printable characters](#) plus € and £ are allowed. Pre-defined XML entity references must be used. No empty/exclusively blank space values allowed.
- DecimalValue: Decimal value, limit to 6 decimal places.
- DateValue: YYYY-MM-DD.
- PercentageValue: Percentage as a decimal, e.g. enter 4.7% as 0.047, limit to 6 decimal places.
- IntegerValue: Non-negative integer values.
- Enumerations: Check the corresponding list in 9.2 [Enumerations](#).

Do not use variable names other than those defined.

Special Characters

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

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

Pre-defined entity references:

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

8.1.3 Table Order

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

```
<!--General-->
<xs:element ref="A13:A1301A"/>
<!--Inherent Risk-->
<xs:element ref="A13:A1302A"/>
<!--Inherent Risk Segment 1-->
<xs:element ref="A13:A1302B"/>
<!--Mitigation And Control-->
<xs:element ref="A13:A1303A"/>
<!--Residence And Establishment-->
<xs:element ref="A13:A1304"/>
<!--Beneficial Owner-->
<xs:element ref="A13:A1305"/>
<!--Politically Exposed Person-->
<xs:element ref="A13:A1306"/>
<!--Geography Of Funds Flow-->
```

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.

```
<A13011 Identifier="MAA" EnumerationLegalStructure="Stand_alone_entity"></A13011>
```

REF	Field	Description
MAA	Legal Structure	What is the legal structure of your institution? Select from LegalStructure Variable name: EnumerationLegalStructure
MAB	Subsidiary - Name of the ultimate EEA parent entity	Enter the statutory name of your ultimate European Economic Area (EEA) parent entity if your institution is a subsidiary within a group. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MAC	Subsidiary - LEI of the ultimate EEA parent entity	Enter the Legal Entity Identifier (LEI) of your institution's ultimate EEA parent if your institution is a subsidiary within a group. Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000
MAD	Subsidiary - Country where the ultimate EEA parent entity is established	Select the country where the ultimate EEA parent of the group is established if your institution is a subsidiary within a group. Select from CountriesEEANA Variable name: EnumerationCountryEEANA
MAE	Subsidiary - The AML/CFT supervisory authority of the ultimate EEA parent entity	Enter the AML/CFT supervisory authority of the ultimate EEA parent entity if your institution is a subsidiary within a group. If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under Freedom of Establishment is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group. Variable name: String500 Character limit: 500 characters

		If not applicable enter N/A
MAF	Subsidiary - Name of the global parent entity of the group	Enter the statutory name of your ultimate global parent entity if your institution is a subsidiary within a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MAG	Subsidiary - LEI of the global parent entity of the group	Enter the Legal Entity Identifier (LEI) of your institution's ultimate global parent entity if your institution is a subsidiary within a group. Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000
MAH	Subsidiary - Country where the global parent entity of the group is established	Select the country where the ultimate global parent entity is established, if your institution is a subsidiary within a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity. Select from Country Variable name: EnumerationCountry
MAI	Subsidiary - The AML/CFT supervisory authority of the global parent entity of the group	Enter the AML/CFT supervisory authority for your institution's ultimate global parent entity if your institution is a subsidiary within a group. Enter N/A if the ultimate global parent entity is not regulated for AML/CFT purposes or if not applicable. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MAJ	Branch - Name of the ultimate EEA parent entity	Enter the legal name of your ultimate European Economic Area (EEA) parent entity if your institution is a branch of an EEA institution which is passporting into Ireland under Freedom of Establishment. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group. Variable name: String500 Character limit: 500 characters

		If not applicable enter N/A
MAK	Branch - LEI of the ultimate EEA parent entity	Enter the Legal Entity Identifier (LEI) of your ultimate EEA parent entity if your institution is a branch of an EEA institution which is passporting into Ireland under Freedom of Establishment. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group. Variable name: LEI Character limit: 20 characters If not applicable or LEI not available please enter 00000000000000000000
MAL	Branch - Country where the ultimate EEA parent entity is established	Select the country where the ultimate European parent entity of the group is established if your institution is a branch of an EEA institution which is passporting into Ireland under Freedom of Establishment. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group. Select from CountriesEEANA Variable name: EnumerationCountryEEANA
MAM	Branch - The AML/CFT supervisory authority of the ultimate EEA parent entity	Enter the AML/CFT supervisory authority of the ultimate European parent entity if your institution is a branch of an EEA institution which is passporting into Ireland under Freedom of Establishment. If not applicable or if the parent entity is not regulated for AML/CFT purposes enter N/A. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under FOE is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MAN	Branch - Name of the global parent entity	Enter the legal name of your ultimate global parent entity if your institution is a branch of an institution with its head office in a third country, regardless of the existence of an EEA parent entity.

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

8.2.2 Business Model

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

```
<A13011 Identifier="MAR" EnumerationYesNo="Yes"></A13011>
```

REF	Field	Description
MAR	Schedule 2 Activities Provided	Does your institution engage in Schedule 2 activities Select from YesNo Variable name: EnumerationYesNo
MAS	Schedule 2 Activities Lending	Does your institution engage in lending including, consumer credit, credit agreements relating to immovable property, factoring, with or without recourse, financing of commercial

		transactions (including forfeiting) Select from YesNo Variable name: EnumerationYesNo
MAT	Schedule 2 Activities Leasing	Does your institution engage in financial leasing Select from YesNo Variable name: EnumerationYesNo
MAU	Schedule 2 Activities Payment Service	Does your institution engage in payment services as defined in Article 4(3) of Directive 2007/64/EC of the European Parliament and of the Council of 13 November 2007¹⁴ on payment services in the internal market amending Directives 97/7/EC, 2002/65/EC, 2005/60/EC and 2006/48/EC and repealing Directive 97/5/EC Select from YesNo Variable name: EnumerationYesNo
MAV	Schedule 2 Activities Payment Other	Does your institution engage in issuing and administering other means of payment (e.g. travellers' cheques and bankers' drafts) insofar as such activity is not covered by point 3 Select from YesNo Variable name: EnumerationYesNo
MAW	Schedule 2 Activities Guarantees	Does your institution engage in guarantees and commitments Select from YesNo Variable name: EnumerationYesNo
MAX	Schedule 2 Activities Trading	Does your institution engage in trading for own account or for account of customers in any of the following: (a) Money market instruments (cheques, bills, certificates of deposit, etc.) (b) Foreign exchange (c) Financial futures and options (d) Exchange and interest-rate instruments (e) Transferable securities Select from YesNo Variable name: EnumerationYesNo
MAY	Schedule 2 Activities Issuing Securities	Does your institution engage in securities issues and the provision of services relating to such issues Select from YesNo

		Variable name: EnumerationYesNo
MAZ	Schedule 2 Activities Advice	Does your institution engage in advice to undertakings on capital structure, industrial strategy and related questions and advice as well as services relating to mergers and the purchase of undertakings Select from YesNo Variable name: EnumerationYesNo
MBA	Schedule 2 Activities Money Broking	Does your institution engage in money broking Select from YesNo Variable name: EnumerationYesNo
MBB	Schedule 2 Activities Portfolio Management	Does your institution engage in portfolio management and advice Select from YesNo Variable name: EnumerationYesNo
MBC	Schedule 2 Activities Safekeeping of Securities	Does your institution engage in safekeeping and administration of securities Select from YesNo Variable name: EnumerationYesNo
MBD	Schedule 2 Activities Safe Custody Services	Does your institution engage in safe custody services Select from YesNo Variable name: EnumerationYesNo
MBE	Schedule 2 Activities Issuing Electronic Money	Does your institution engage in issuing electronic money Select from YesNo Variable name: EnumerationYesNo
MBF	Schedule 2 Activities Lending Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBG	Schedule 2 Activities Leasing Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks,

		please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBH	Schedule 2 Activities Payment Service Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBI	Schedule 2 Activities Payment Other Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBJ	Schedule 2 Activities Guarantees Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBK	Schedule 2 Activities Trading Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBL	Schedule 2 Activities Issuing Securities Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBM	Schedule 2 Activities Advice Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks,

		please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBN	Schedule 2 Activities Money Broking Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBO	Schedule 2 Activities Portfolio Management Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBP	Schedule 2 Activities Safekeeping of Securities Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBQ	Schedule 2 Activities Safe Custody Services Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBR	Schedule 2 Activities Issuing Electronic Money Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MBS	TCSP Services Provided	Does your institution provide Schedule 2 services

		Select from YesNo Variable name: EnumerationYesNo
MBT	TCSP Services Company Formation	Does your institution provide the service of forming companies or other bodies corporate Select from YesNo Variable name: EnumerationYesNo
MBU	TCSP Services Director or Secretary	Does your institution provide the service of acting as a director or secretary of a company under an arrangement with a person other than the company Select from YesNo Variable name: EnumerationYesNo
MBV	TCSP Services Director or Secretary Arrangement	Does your institution provide the service of arranging for another person to act as a director or secretary of a company Select from YesNo Variable name: EnumerationYesNo
MBW	TCSP Services Acting or Arranging Partner	Does your institution provide the service of acting, or arranging for a person to act, as a partner of a partnership Select from YesNo Variable name: EnumerationYesNo
MBX	TCSP Services Providing Office or Address	Does your institution provide the service of providing a registered office, business address, correspondence or administrative address or other related services for a body corporate or partnership Select from YesNo Variable name: EnumerationYesNo
MBY	TCSP Services Acting or Arranging Trustee	Does your institution provide the service of acting, or arranging for another person to act, as a trustee of a trust Select from YesNo Variable name: EnumerationYesNo
MBZ	TCSP Services Acting or Arranging Nominee	Does your institution provide the service of acting, or arranging for another person to act, as a nominee shareholder for a person other than a company whose securities are listed on a regulated market

		Select from YesNo Variable name: EnumerationYesNo
MCA	TCSP Services Company Formation Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MCB	TCSP Services Director or Secretary Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MCC	TCSP Services Director or Secretary Arrangement Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MCD	TCSP Services Acting or Arranging Partner Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MCE	TCSP Services Providing Office or Address Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MCF	TCSP Services Acting or Arranging Trustee Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500

		Character limit: 500 characters If not applicable enter N/A
MCG	TCSP Services Acting or Arranging Nominee Comments	If your institution has any specific features in its corresponding business activities that affect how it manages ML/TF risks, please provide a brief description (optional). Variable name: String500 Character limit: 500 characters If not applicable enter N/A

8.2.3 Statement of Compliance

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

<A13011 Identifier="MCH" EnumerationYesNo="Yes"></A13011>

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

		Variable name: String100 Character limit: 100 characters If not applicable enter N/A
MCL	PCF	Has the person signing this Statement of Compliance on behalf of the firm been approved by the Central Bank to a Pre-Approval Control Function (PCF) position? Select from YesNo Variable name: EnumerationYesNo

8.3 Inherent Risks

8.3.1 Customer Segments

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

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

<A13022 MCM="NP" MCN="26"></A13022>

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

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

<A13021 Identifier="MCO" IntegerValue="161"></A13021>

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

8.3.2 Lending

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

<A13021 Identifier="MCP" IntegerValue="161"></A13021>

REF	Field	Description
MCP	Outstanding loans - Number	Total Number of outstanding loans. Variable name: IntegerValue If not applicable enter 0
MCQ	Loans granted during the preceding calendar year - Number	Total Number of loans granted during the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
MCR	Outstanding asset backed loans with cash collateral - Number	Total Number of outstanding asset backed loans with cash collateral. Variable name: IntegerValue If not applicable enter 0
MCS	Loan repayments during the preceding calendar year - Number	Total Number of fully repaid loans during the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
MCT	Prematurely repaid loans during the preceding calendar year - Number	Total Number of prematurely fully repaid loans during the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

MCU	Loan repayments from non-EEA countries during the preceding calendar year - Number	Total Number of fully repaid loans with at least one transaction from non-EEA countries during the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
MCV	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. Variable name: IntegerValue If not applicable enter 0
MCW	Outstanding loans - Value	Total Value (EUR) of outstanding loans. Variable name: DecimalValue If not applicable enter 0
MCX	Loans granted during the preceding calendar year - Value	Total Value (EUR) of loans granted during the preceding calendar year. Variable name: DecimalValue If not applicable enter 0
MCY	Outstanding asset backed loans with cash collateral - Value	Total Value (EUR) of outstanding asset backed loans with cash collateral. Variable name: DecimalValue If not applicable enter 0
MCZ	Lending Outstanding Real Estate	Total Number of outstanding residential real estate loans. Variable name: IntegerValue If not applicable enter 0
MDA	Lending Outstanding Real Estate Third Party	Total Number of outstanding real estate loans with third party payments in the past calendar year. Variable name: IntegerValue If not applicable enter 0

8.3.3 Factoring

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

```
<A13021 Identifier="MDB" IntegerValue="618"></A13021>
```

REF	Field	Description
MDB	Factoring Volume	Total Number of factoring contracts granted in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
MDC	Factoring Value	Total Value (EUR) of factoring contracts granted during the preceding calendar year. Variable name: DecimalValue If not applicable enter 0
MDD	Factoring Value Non-EEA	Total Value (EUR) of factoring contracts granted to obligors established in non-EEA countries during the preceding calendar year. Variable name: DecimalValue If not applicable enter 0

8.3.4 Financial Leasing

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

```
<A13021 Identifier="MDE" IntegerValue="660"></A13021>
```

REF	Field	Description
MDE	Leasing No. Leases Granted	Total Number and of financial leases granted Variable name: IntegerValue If not applicable enter 0
MDF	Leasing No. New Leases Granted	Total Number and of financial leases granted in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
MDG	Leasing No. Lease Repayments	Total Number of fully repaid financial leases during the preceding calendar year Variable name: IntegerValue If not applicable enter 0
MDH	Leasing No. Prematurely Repaid Leases	Total Number of prematurely fully repaid financial leases during the preceding calendar year

		Variable name: IntegerValue If not applicable enter 0
MDI	Leasing No. Lease Repayments from non-EEA	Total Number of lease payments from non-EEA countries during the preceding calendar year Variable name: IntegerValue If not applicable enter 0
MDJ	Leasing Value Leases Granted	Total Value and of financial leases granted Variable name: DecimalValue If not applicable enter 0
MDK	Leasing Value New Leases Granted	Total Value and of financial leases granted in the preceding calendar year Variable name: DecimalValue If not applicable enter 0

8.3.5 Safe Custody

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

```
<A13021 Identifier="MDL" IntegerValue="157"></A13021>
```

REF	Field	Description
MDL	Safe Custody No. Customers	Total Number of customers using safe deposit boxes Variable name: IntegerValue If not applicable enter 0
MDM	Safe Custody No. New Customers	Total Number of new customers using safe deposit boxes in the preceding calendar year Variable name: IntegerValue If not applicable enter 0

8.3.6 TCSP

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

```
<A13021 Identifier="MDN" IntegerValue="825"></A13021>
```

REF	Field	Description
MDN	TCSP No. Customers Company Formation	Total number of legal entity customers using your firms service of forming companies or other corporate bodies

		Variable name: IntegerValue If not applicable enter 0
MDO	TCSP No. Customers Acting Director	Total number of legal entity customers using your firms service of acting as a director or secretary of a company under an arrangement with a person other than the company Variable name: IntegerValue If not applicable enter 0
MDP	TCSP No. Customers Arranging Director	Total number of legal entity customers using your firms service of arranging for another person to act as a director or secretary of a company Variable name: IntegerValue If not applicable enter 0
MDQ	TCSP No. Customers Partner	Total number of legal entity customers using your firms service of acting, or arranging for a person to act, as a partner of a partnership Variable name: IntegerValue If not applicable enter 0
MDR	TCSP No. Customers Office or Address	Total number of legal entity customers using your firms service of providing a registered office, business address, correspondence or administrative address or other related services for a body corporate or partnership Variable name: IntegerValue If not applicable enter 0
MDS	TCSP No. Customers Trustee	Total number of legal entity customers using your firms service of acting, or arranging for another person to act, as a trustee of a trust Variable name: IntegerValue If not applicable enter 0
MDT	TCSP No. Customers Nominee Shareholder	Total number of legal entity customers using your firms service of acting, or arranging for another person to act, as a nominee shareholder for a person other than a company whose securities are listed on a regulated market. Variable name: IntegerValue If not applicable enter 0

8.3.7 Other Products and Services

The number of [active customers](#) as at 31 December of the preceding calendar year, number of transactions and value of transactions during the preceding calendar year should be completed for each product/service.

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

```
<A13021 Identifier="MDU" IntegerValue="633"></A13021>
```

REF	Field	Description
MDU	Other Services No. Customers Aircraft Finance	State the total number of active customers your institution provides services to that are active in the Aircraft Finance sector Variable name: IntegerValue If not applicable enter 0
MDV	Other Services No. Customers Maritime Finance	State the total number of active customers your institution provides services to that are active in the Maritime Finance sector Variable name: IntegerValue If not applicable enter 0
MDW	Other Services No. Customers Mining	State the total number of active customers your institution provides services to that are active in the Mining sector Variable name: IntegerValue If not applicable enter 0
MDX	Other Services No. Customers Oil and Gas	State the total number of active customers your institution provides services to that are active in the Oil and Gas sector Variable name: IntegerValue If not applicable enter 0
MDY	Other Services No. Customers Energy	State the total number of active customers your institution provides services to that are active in the Energy sector Variable name: IntegerValue If not applicable enter 0
MDZ	Other Services No. Customers Defence	State the total number of active customers your institution provides services to that are active in the Defence sector Variable name: IntegerValue

		If not applicable enter 0
MEA	Other Services No. Customers Real Estate Financing	State the total number of active customers your institution provides services to that are active in the Real Estate Financing sector Variable name: IntegerValue If not applicable enter 0
MEB	Other Services No. Transactions Aircraft Finance	State the total number of transactions made by customers your institution provides services to that are active in the Aircraft Finance sector Variable name: IntegerValue If not applicable enter 0
MEC	Other Services No. Transactions Maritime Finance	State the total number of transactions made by customers your institution provides services to that are active in the Maritime Finance sector Variable name: IntegerValue If not applicable enter 0
MED	Other Services No. Transactions Mining	State the total number of transactions made by customers your institution provides services to that are active in the Mining sector Variable name: IntegerValue If not applicable enter 0
MEE	Other Services No. Transactions Oil and Gas	State the total number of transactions made by customers your institution provides services to that are active in the Oil and Gas sector Variable name: IntegerValue If not applicable enter 0
MEF	Other Services No. Transactions Energy	State the total number of transactions made by customers your institution provides services to that are active in the Energy sector Variable name: IntegerValue If not applicable enter 0
MEG	Other Services No. Transactions Defence	State the total number of transactions made by customers your institution provides services to that are active in the Defence sector

		Variable name: IntegerValue If not applicable enter 0
MEH	Other Services No. Transactions Real Estate Financing	State the total number of transactions made by customers your institution provides services to that are active in the Real Estate Financing sector Variable name: IntegerValue If not applicable enter 0
MEI	Other Services Value Transactions Aircraft Finance	State the total value of transactions made by customers your institution provides services to that are active in the Aircraft Finance sector Variable name: DecimalValue If not applicable enter 0
MEJ	Other Services Value Transactions Maritime Finance	State the total value of transactions made by customers your institution provides services to that are active in the Maritime Finance sector Variable name: DecimalValue If not applicable enter 0
MEK	Other Services Value Transactions Mining	State the total value of transactions made by customers your institution provides services to that are active in the Mining sector Variable name: DecimalValue If not applicable enter 0
MEL	Other Services Value Transactions Oil and Gas	State the total value of transactions made by customers your institution provides services to that are active in the Oil and Gas sector Variable name: DecimalValue If not applicable enter 0
MEM	Other Services Value Transactions Energy	State the total value of transactions made by customers your institution provides services to that are active in the Energy sector Variable name: DecimalValue If not applicable enter 0

MEN	Other Services Value Transactions Defence	State the total value of transactions made by customers your institution provides services to that are active in the Defence sector Variable name: DecimalValue If not applicable enter 0
MEO	Other Services Value Transactions Real Estate Financing	State the total value of transactions made by customers your institution provides services to that are active in the Real Estate Financing sector Variable name: DecimalValue If not applicable enter 0

8.3.8 Distribution Channels and Third Parties

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

<A13021 Identifier="MEP" EnumerationYesNo="Yes"></A13021>

REF	Field	Description
MEP	Intermediary Used	Does your institution use 3rd parties in the provision of services to your customers? Select from YesNo Variable name: EnumerationYesNo
MEQ	Intermediary Total Number	State the total number of 3rd parties that your institution has a relationship with as of 31 December of the preceding calendar year Variable name: IntegerValue If not applicable enter 0
MER	Intermediary Non Designated	State the number of the 3rd parties above that are not themselves obliged entities under Regulation (EU) 2024/1624 or national legislation Variable name: IntegerValue If not applicable enter 0
MES	Intermediary No AML	Number of new customers onboarded in the preceding calendar year by 3rd parties that are not themselves obliged entities under Regulation (EU) 2024/1624 or national legislation. Variable name: IntegerValue If not applicable enter 0

MET	Intermediary Customer Number	Of the new customers introduced to your institution in the preceding calendar year, what number were introduced through a 3rd party with which you have a relationship with regarding the provision of services? Variable name: IntegerValue If not applicable enter 0
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8.3.9 Remote Onboarding

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

<A13021 Identifier="MEU" IntegerValue="20"></A13021>

REF	Field	Description
MEU	Onboarding Remote NP Num	Of those Natural Persons who have been onboarded in the preceding calendar year what number of these underwent remote onboarding Variable name: IntegerValue If not applicable enter 0
MEV	Onboarding Remote NP Num 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)? Variable name: IntegerValue If not applicable enter 0
MEW	Onboarding Remote LE Num	Of those Legal Entities who have been onboarded in the preceding calendar year what number of these underwent remote onboarding Variable name: IntegerValue If not applicable enter 0
MEX	Onboarding Remote LE Num 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)? Variable name: IntegerValue If not applicable enter 0

8.4 Mitigation & Control

8.4.1 Business Wide Risk Assessment

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

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

```
<A13031 Identifier="MEY" EnumerationBWRAConducted="Exemption_applies"></A13031>
```

REF	Field	Description
MEY	BWRA Conducted	State whether your institution conducts a Business Wide Risk Assessment (BWRA). Select from BWRAConducted Variable name: EnumerationBWRAConducted
MEZ	BWRA Senior Management Approval	State whether Senior Management of your institution approved the latest version of the BWRA. Select from YesNoNA Variable name: EnumerationYesNo
MFA	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
MFB	BWRA Review Frequency	Select the frequency of BWRA review by your institution. Select from Frequency Variable name: EnumerationFrequency
MFC	BWRA Business Change	State whether the most recent BWRA review identified any areas for improvement or changes such as to your institution's policies, procedures, oversight measures, or risk appetite. Select from YesNoNA Variable name: EnumerationYesNoNA
MFD	BWRA Business Change Description	Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

MFE	BWRA Money Laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFF	BWRA Terrorist Financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFG	BWRA Sanctions	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFH	BWRA Tax Evasion	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFI	BWRA Customer Groups	State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFJ	BWRA Geographies	State whether geographies are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFK	BWRA Product Groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFL	BWRA Distribution Channel	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's most

		recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFN	Other Risk Assessment Process - Money laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFN	Other Risk Assessment Process - Terrorist financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFO	Other Risk Assessment Process - Circumvention of sanctions regulations	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFP	Other Risk Assessment Process - Evasion of tax regulations	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFQ	Other Risk Assessment Process - Customer groups	State whether customer groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFR	Other Risk Assessment Process - Geographies	State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA

MFS	Other Risk Assessment Process - Product groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFT	Other Risk Assessment Process - Distribution channels	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
MFU	BWRA Risk Appetite	State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite. Select from YesNoNA Variable name: EnumerationYesNoNA
MFV	BWRA Policy Procedure	State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures. Select from YesNoNA Variable name: EnumerationYesNoNA
MFW	BWRA Product Service	State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services. Select from YesNoNA Variable name: EnumerationYesNoNA
MFX	BWRA Transaction Monitoring	State whether the outcomes of the BWRA were used for setting scenarios and rules for transaction monitoring. Select from YesNoNA Variable name: EnumerationYesNoNA
MFY	BWRA Process Other	State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities. Select from YesNoNA

		Variable name: EnumerationYesNoNA
MFZ	BWRA Process Other Detail	If Yes to BWRA Process Other, briefly describe the other processes and activities in which your institution uses the outcomes of the BWRA. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MGA	Risk App Formulated	State whether your institution formulates a ML/TF risk appetite. Select from YesNo Variable name: EnumerationYesNo

8.4.2 Policies and Procedures

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

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

<A13031 Identifier="MGB" DateValue="2012-08-20"></A13031>

REF	Field	Description
MGB	Pol & Proc - CDD	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
MGC	Pol & Proc - Ongoing monitoring of transactions and business relationships	Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of transactions and business relationships. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
MGD	Pol & Proc - Politically Exposed Persons	Enter the date when your institution's management approved the last version of policies and procedures for Politically

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

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

8.4.3 Onboarding

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

<A13031 Identifier="MGL" EnumerationYesNo="No"></A13031>

REF	Field	Description
MGL	Onboarding - Internet / Email - Natural person customers	State whether your institution offers onboarding via Internet/Email for natural person customers. Select from YesNo Variable name: EnumerationYesNo
MGM	Onboarding - App - Natural person customers	State whether your institution offers onboarding via mobile app for natural person customers. Select from YesNo Variable name: EnumerationYesNo
MGN	Onboarding - Counter/Desk i.e. face to face – Natural person customers	State whether your institution offers onboarding via counter/desk (i.e. face to face) for natural person customers. Select from YesNo Variable name: EnumerationYesNo
MGO	Onboarding - Third party - Natural person customers	State whether your institution offers onboarding via third party for natural person customers. Select from YesNo Variable name: EnumerationYesNo
MGP	Onboarding - Other - Natural person customers	State whether your institution offers onboarding via other options for natural person customers. Select from YesNo Variable name: EnumerationYesNo

MGQ	Onboarding - Onboarding Other Details Natural person customers	If Yes to Other - Natural person customers, specify other onboarding options. List the other onboarding options available to natural persons separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MGR	Onboarding - Internet / Email - Legal entity customers	State whether your institution offer onboarding via Internet/Email for legal entity customers. Select from YesNo Variable name: EnumerationYesNo
MGS	Onboarding - App - Legal entity customers	State whether your institution offer onboarding via mobile app for legal entity customers. Select from YesNo Variable name: EnumerationYesNo
MGT	Onboarding - 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 YesNo Variable name: EnumerationYesNo
MGU	Onboarding - Third party - Legal entity customers	State whether your institution offer onboarding via third party for legal entity customers. Select from YesNo Variable name: EnumerationYesNo
MGV	Onboarding - Other - Legal entity customers	State whether your institution offer onboarding via other options for legal entity customers. Select from YesNo Variable name: EnumerationYesNo
MGW	Onboarding - Onboarding Other Details Legal entity customers	If Yes to Other - Legal entity customers, specify other onboarding options. List the other onboarding options available to legal entities separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters

		If not applicable enter N/A
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8.4.4 Offboarding

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

<A13031 Identifier="MGX" IntegerValue="241"></A13031>

REF	Field	Description
MGX	Customer Offboarding Number	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS concerns. Variable name: IntegerValue If not applicable enter 0
MGY	Customer Offboarding Number ML	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns Variable name: IntegerValue If not applicable enter 0
MGZ	Customer Offboarding Number TF	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns. Variable name: IntegerValue If not applicable enter 0
MHA	Customer Offboarding Number FS	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. Variable name: IntegerValue If not applicable enter 0
MHB	Customer Offboarding Number HR	State the total number of customers rated high risk as per your institution's customer risk assessment prior to offboarding, whose business relationships with your institution were terminated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

8.4.5 Customer Due Diligence

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

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

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

```
<A13031 Identifier="MHC" EnumerationCDD="Yes_in_all_cases"></A13031>
```

REF	Field	Description
MHC	Identity Verification NP	State whether the identity of natural person customers is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
MHD	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 Select from CDD Variable name: EnumerationCDD
MHE	Source Of Funds NP	State whether source/origin of the funds/assets is identified prior to providing services to natural person customers Select from CDD Variable name: EnumerationCDD
MHF	Customer Rep Identified NP	State whether a customer's representative is identified prior to providing services to natural person customers. Select from CDD Variable name: EnumerationCDD
MHG	Tax Motive Identified NP	State whether tax motives are identified prior to providing services to natural person customers. Select from CDD Variable name: EnumerationCDD
MHH	Geos Identified NP	State whether geographies involved are identified prior to providing services to natural person customers. Select from CDD

		Variable name: EnumerationCDD
MHI	Identity Verification LE	State whether the identity of legal entity customers is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
MHJ	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
MHK	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
MHL	Nature Of Relationship LE	State whether the purpose and intended nature of the business relationship is established prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD
MHM	Source Of Funds LE	State whether source/origin of the funds/assets is identified prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD
MHN	Customer Rep Identified LE	State whether a customer's representative is identified prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD
MHO	Tax Motive Identified LE	State whether tax motives are identified prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD

MHP	Geos Identified LE	State whether geographies involved are identified prior to providing services to legal entity customers. Select from CDD Variable name: EnumerationCDD
MHQ	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
MHR	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
MHS	CDD CRA Update	Date when your institution last updated the Customer Risk Assessment Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
MHT	CDD Low Customer	Number of total customers per ML/TF risk category (low risk). If your institution uses five risk categories then Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
MHU	CDD Medium-Low Customer	Number of total customers per ML/TF risk category (medium-low risk). If your institution uses five risk categories then Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue

		If not applicable enter 0
MHV	CDD MH Customer	Number of total customers per ML/TF risk category (medium-high risk). If your institution uses five risk categories then Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
MHW	CDD High Customer	Number of total customers per ML/TF risk category (high-risk). If your institution uses five risk categories then Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
MHX	CDD customers Due NP	Number of natural person customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. Variable name: IntegerValue If not applicable enter 0
MHY	CDD customers Reviewed NP	Number of natural person customers for whom customer information was reviewed and updated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
MHZ	CDD customers Due LE	Number of legal entity customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. Variable name: IntegerValue If not applicable enter 0
MIA	CDD customers Reviewed LE	Number of legal entity customers for whom customer information was reviewed and updated in the preceding

		calendar year. Variable name: IntegerValue If not applicable enter 0
MIB	Backlog Prop NP Total	Specify the proportion of backlogs of all natural person customers. Variable name: DecimalValue If not applicable enter 0
MIC	Backlog Prop NP High	Specify the proportion of backlogs of high-risk natural person customers. Variable name: DecimalValue If not applicable enter 0
MID	Backlog Prop NP PEP	Specify the proportion of backlogs of customers who are <u>politically exposed persons</u>, their family members or persons to be close associates. Variable name: DecimalValue If not applicable enter 0
MIE	Backlog Prop NP Unacceptable	Specify the proportion of backlog made up of unacceptable-risk natural person customers (e.g. yet to be exited). Variable name: DecimalValue If not applicable enter 0
MIF	Backlog Prop LE Total	Specify the proportion of backlogs of all legal entity customers. Variable name: DecimalValue If not applicable enter 0
MIG	Backlog Prop LE High	Specify the proportion of backlogs of high-risk legal entity customers. Variable name: DecimalValue If not applicable enter 0
MIH	Backlog Prop LE Unacceptable	Specify the proportion of backlog made up of unacceptable-risk legal entity customers (e.g. yet to be exited). Variable name: DecimalValue If not applicable enter 0

MII	Concrete Timelines NP	State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for natural persons. Select from YesNoNA Variable name: EnumerationYesNoNA
MIJ	Concrete Timelines LE	State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for legal entities. Select from YesNoNA Variable name: EnumerationYesNoNA
MIK	No Ident Total	What proportion of total active customers have no CDD documentation/information. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MIL	CDD BO not Identified	Number of customers that are legal entities /trusts whose beneficial owners have not been identified. Variable name: IntegerValue If not applicable enter 0
MIM	CDD BO not Verified HR	Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified Variable name: IntegerValue If not applicable enter 0
MIN	Customer Data not in Line with Article 20	Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR. Note that this data point will not be assessed until the Regulation (EU) 2024/1624 applies from 10 July 2027. For submissions with reference dates before this Regulation applies, this data point can be answered as 0 or any integer value. Variable name: IntegerValue If not applicable enter 0
MIO	Customer Number Without Risk Profile	State the number of customers of your institution who have not had a ML/TF risk profile created (this should exclude any

		customers with whom the obliged entity does not have a business relationship) Variable name: IntegerValue If not applicable enter 0
MIP	Customer Number Without Identification Documentation or Verification Information	State the number of customers of your institution without identification and verification documentation/ information Variable name: IntegerValue If not applicable enter 0

8.4.6 Transaction Monitoring

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

<A13031 Identifier="MIQ" EnumerationMonitoringApproach="Yes_automatically"></A13031>

REF	Field	Description
MIQ	TM How Monitor	State whether your institution monitors transactions and how this is done. Select from MonitoringApproach Variable name: EnumerationMonitoringApproach
MIR	TM Alert Number of Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
MIS	TM Alert Value of Aggregated Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
MIT	TM Alert Value of Single Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of single transactions? Select from YesNoNA

		Variable name: EnumerationYesNoNA
MIU	TM Alert Counterparties	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties? Select from YesNoNA Variable name: EnumerationYesNoNA
MIV	TM Alert Geographies	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies? Select from YesNoNA Variable name: EnumerationYesNoNA

8.4.7 Alerts

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

<A13031 Identifier="MIW" IntegerValue="411"></A13031>

REF	Field	Description
MIW	Rule Count - Automated	How many rules were in place in your institution's automated transaction monitoring system in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
MIX	Total Alert Count - Automated	How many alerts were generated by the automated transaction monitoring system in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
MIY	Percent Alerts - Automated	What is the proportion of automated transaction monitoring alerts to total transactions? Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MIZ	Alert TP Review - Automated	How many true positive alerts (STR filed from automated alerts) led to a review of the customer's risk, CDD or otherwise. Variable name: IntegerValue

		If not applicable enter 0
MJA	Alert Backlog - Automated	At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
MJB	Alert Mean Time To Close - Automated	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for automated alerts only), from the initial alert generation? Variable name: DecimalValue If not applicable enter 0
MJC	Alert Ratio STR - Automated	If automated system: Ratio between number of STRs and number of alerts. This corresponds to the number of alerts generated by the automated systems and the number of STRs resulting from alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) of Regulation (EU) 2024/1624. This excludes alerts of systems exclusively meant to detect transaction subject to targeted financial sanctions. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MJD	Rule Count Manual	How many rules were in place in your institution's manual transaction monitoring process in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
MJE	Total Alert Count - Manual	How many alerts were generated by the manual transaction monitoring process in the preceding calendar year? Variable name: IntegerValue If not applicable enter 0
MJF	Percent Alerts - Manual	What is the proportion of manual transaction monitoring alerts to total transactions? Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0

MJG	Alert TP Review - Manual	How many true positive alerts (STR filed from manual alerts) led to a review of the customer's risk, CDD or otherwise Variable name: IntegerValue If not applicable enter 0
MJH	Alert Backlog - Manual	At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
MJI	Alert Mean Time To Close TP - Manual	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for manual alerts only), from the initial alert generation? Variable name: DecimalValue If not applicable enter 0
MJJ	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. Variable name: DecimalValue If not applicable enter 0

8.4.8 Suspicious Transaction Reporting

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

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<A13031 Identifier="MJK" EnumerationYesNo="No"></A13031>
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REF	Field	Description
MJK	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
MJL	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
MJM	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year.

		Variable name: IntegerValue If not applicable enter 0
MJN	FIU Days to Report	Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the preceding calendar year. Variable name: DecimalValue If not applicable enter 0

8.4.9 Sanctions Screening

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

<A13031 Identifier="MJ0" EnumerationYesNo="Yes"></A13031>

REF	Field	Description
MJO	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
MJP	Sanction Max Hours	Maximum number of hours between the publication of the Targeted Financial Sanction by the authorities and the implementation of these changes in the institution's screening tools. Variable name: DecimalValue If not applicable enter 0
MJQ	Sanction EU	Specify if customers and beneficial owners are checked against EU sanctions lists. Select from YesNo Variable name: EnumerationYesNo
MJR	Sanction National List	Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo Variable name: EnumerationYesNo

MJS	Sanction UN	Specify if customers and beneficial owners are checked against UN sanctions lists. Select from YesNo Variable name: EnumerationYesNo
MJT	Sanction Other	Specify if customers and beneficial owners are checked against any other sanctions lists Select from YesNo Variable name: EnumerationYesNo
MJU	Sanction Other Specify	If your institution uses any other sanctions lists not mentioned above please specify Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MJV	Sanction Transact Check	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when executing a transaction. Select from YesNo Variable name: EnumerationYesNo
MJW	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 listings are updated. Select from YesNo Variable name: EnumerationYesNo
MJX	Sanction Periodic Customer	At the start of service provision and afterwards, state whether your institution periodically checks whether customers are included on sanctions lists. Select from YesNo Variable name: EnumerationYesNo
MJY	Sanction Periodic BO	At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to customers are included on sanctions lists. Select from YesNo

		Variable name: EnumerationYesNo
MJZ	Sanction Periodic Rep	At and after the start of service provision, state whether your institution periodically checks whether representatives connected to customers are included on sanctions lists. Select from YesNo Variable name: EnumerationYesNo
MKA	Sanction Periodic Customer Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. Variable name: IntegerValue If not applicable enter 0
MKB	Sanction Periodic BO Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for beneficial owners connected to customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. Variable name: IntegerValue If not applicable enter 0
MKC	Sanction Periodic Rep Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for representatives connected to customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. Variable name: IntegerValue If not applicable enter 0
MKD	Sanction Total Hits	State the number of actual hits that the sanctions list screening delivered in the preceding calendar year. In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list Variable name: IntegerValue If not applicable enter 0
MKE	Sanction Total Hits Value	State the total value (EUR) of frozen assets recorded in relation to those hits that the sanctions list screening delivered in the preceding calendar year.

		In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list. In the case of currency conversions, conversion at time of transaction or exchange rate as of 31 December of the preceding calendar year is acceptable. Variable name: DecimalValue If not applicable enter 0
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8.4.10 Outsourcing

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

<A13031 Identifier="MKF" EnumerationOutsource="Partially_outsourced"></A13031>

REF	Field	Description
MKF	Outsource CDD Article 20	State whether the CDD measures as detailed in Article 20 AMLR are outsourced to third parties (including within the Group) Select from Outsource Variable name: EnumerationOutsource
MKG	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
MKH	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
MKI	Outsource TM	State whether transaction monitoring has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
MKJ	Outsource Alert Processing	State whether alerts processing has been outsourced to third parties (including within the Group). Select from Outsource

		Variable name: EnumerationOutsource
MKK	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
MKL	Outsource Sanction Screen	State whether sanctions screening has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
MKM	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
MKN	Outsource Training	State whether AML/CFT training has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
MKO	Outsource PEP	State whether PEP detection has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
MKP	Outsource Compliance	State whether compliance monitoring checks have been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
MKQ	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

MKR	Outsource Other AMLCFT Specify	If Yes to Outsource Other AML CFT, specify the other processes. List the other outsourced elements of your AML/CFT processes separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MKS	Outsource Tasks to Non-Group Entities Located in Third Countries	State the existence of AML/CFT tasks outsourced to an external service provider located in high risk third country (excluding outsourcing to other entities of the group located in high risk third countries) Select from Outsource Variable name: EnumerationOutsource
MKT	Outsource Tasks to Group Entities Located in Third Countries	State whether the existence of AML/CFT tasks outsourced to an external service provider located in high risk third country is part of the group structure of your institution Select from Outsource Variable name: EnumerationOutsource

8.4.11 Training

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

<A13031 Identifier="MKU" PercentageValue="0.3"></A13031>

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

MKW	Agents and distributors - % Staff coverage	State the proportion of agents and distributors who have attended training in the preceding calendar year with regard to financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MXK	Board members & non-executive directors - % Staff coverage	State the proportion of members of Board members and non-executive directors who have attended training in the preceding calendar year with regard to financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MKY	Other - % Staff coverage	State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with regard to financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MKZ	Staff Numbers	Enter the total number of full-time equivalent employees employed by the institution. Variable name: IntegerValue If not applicable enter 0

8.4.12 Compliance and Assurance Testing

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

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

<A13031 Identifier="MLA" DateValue="2023-12-09"></A13031>

REF	Field	Description
MLA	Compliance SEBWRA	State the most recent date when the structure and effectiveness of your institution's business-wide risk assessment was assessed by the compliance function in your institution. Variable name: DateValue

		Format YYYY-MM-DD If not applicable enter 2000-01-01
MLB	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
MLC	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
MLD	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
MLE	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
MLF	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
MLG	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
MLH	Compliance TM	State the most recent date when the monitoring processes for transactions and business relationships were assessed by the compliance.

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
MLI	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
MLJ	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
MLK	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
MLL	Compliance BWRA Descript	Briefly describe any material findings/potential breaches identified from the last assessment of your institution's business-wide risk assessment. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MLM	Compliance Training Descript	Briefly describe any material findings/potential breaches identified from the last assessment of AML/CFT-related awareness-raising and staff training measures. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MLN	Compliance Verification Descript	Briefly describe any material findings/potential breaches identified from the last assessment of identification and identity verification procedures. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters

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

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

MLY	Compliance AML Staff	Number of dedicated AML/CFT compliance staff (in Full Time Equivalent). Variable name: IntegerValue If not applicable enter 0
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8.4.13 Audit

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

Indicate the audit report signing date if available or end of the audit period. You may report its start in case of an ongoing audit at the reference date.

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

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<A13031 Identifier="MLZ" DateValue="2005-03-31"></A13031>
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REF	Field	Description
MLZ	Audit BWRA	State the most recent date when the structure and effectiveness of Business Wide Risk Assessment (BWRA) was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
MMA	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
MMB	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
MMC	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
MMD	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
MME	Audit Organisation	State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
MMF	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
MMG	Audit TM	State the most recent date when the monitoring processes for transactions and business relationships were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
MMH	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
MMI	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
MMJ	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
MMK	Audit BWRA Descript	If Yes to Audit BWRA, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MML	Audit Training Descript	If Yes to Audit Training, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MMM	Audit Verification Descript	If Yes to Audit Verification, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MMN	Audit Sanctions Descript	If Yes to Audit Sanctions, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MMO	Audit Resources Descript	If Yes to Audit Resources, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with

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

		Character limit: 500 characters If not applicable enter N/A
MMU	Audit TPDD Descript	If Yes to Audit TPDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
MMV	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
MMW	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

8.4.14 Governance

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

<A13031 Identifier="MMX" EnumerationFrequency="4_years-5_years"></A13031>

REF	Field	Description
MMX	Money Laundering Senior Management	State the Frequency that money laundering and terrorist financing is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable name: EnumerationFrequency
MMY	Money Laundering Board	State the Frequency that money laundering and terrorist financing is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency
MMZ	Designated Responsibility	State whether your institution appointed a member of senior management with primary responsibility for implementing, managing and overseeing your institution's compliance with its

		AML/CFT obligations as required under Section 54(8) of the CJA 2010 Select from YesNo Variable name: EnumerationYesNo
MNA	Designated Compliance Officer	Has your institution appointed an individual at management level (to be called a 'Compliance Officer') to monitor and manage compliance with, and the internal communication of, internal policies, controls and procedures adopted by your institution as required under Section 54(7) of the CJA 2010? Select from YesNo Variable name: EnumerationYesNo
MNB	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
MNC	Reported Shortcomings	State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
MND	Shortcomings Recovery	Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken. Select from YesNoNA Variable name: EnumerationYesNoNA
MNE	Shortcomings Recovery Details	If Yes to Shortcomings Recovery, briefly describe the reported AML/CFT shortcomings and remediation measures taken. Provide a list of shortcomings and recovery measures in pairs, with each pair separated by semicolon (;) with no spaces either side. i.e. <shortcoming1><recovery1>;<shortcoming2><recovery2>; etc. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

8.4.15 Compliance with Fund Transfer Regulation

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

<A13031 Identifier="MNF" IntegerValue="50"></A13031>

REF	Field	Description
MNF	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. Variable name: IntegerValue If not applicable enter 0
MNG	FTR Outbound	Total number of outbound transfers in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
MNH	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. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0

8.4.16 GroupAML

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

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

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

<A13031 Identifier="MNI" PercentageValue="0.3"></A13031>

REF	Field	Description
MNI	Groupwide AML CDD	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of CDD in the preceding calendar year Variable name: PercentageValue

		Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MNJ	Groupwide AML Monitoring	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Ongoing Monitoring in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MNK	Groupwide AML STRs	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of STRs in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MNL	Groupwide AML High Risk Customers	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Identity and Transaction Level Information on High Risk Customers in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MNM	Groupwide Deficiencies	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Deficiencies in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MNN	Groupwide Jurisdiction AML Review	If your institution is the parent entity within a group structure, state the proportion of jurisdictions in which the group is established that were covered by reviews (which included access to customer and transaction level data) performed by the group AML Compliance function during the preceding three calendar years Variable name: PercentageValue

		Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
MNO	Groupwide Deficiencies Identified by NCA EEA	If your institution is the parent entity within a group structure, state the number of EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
MNP	Groupwide Deficiencies Identified by NCA non-EEA	If your institution is the parent entity within a group structure, state the number of non-EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year Variable name: IntegerValue If not applicable enter 0

8.5 Residence and Establishment

The questions below concern the institution's customer base.

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

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

```
<A13041 MNQ="AF" MNR="775" MNS="706" MNT="488" MNU="929" MNV="208" MNW="964"></A13041>
```

REF	Field	Description
MNQ	RE - Country	Select from the list of Alpha-2 country codes, Country for each applicable country that has natural persons residing or legal entities established in that country. Data Type: EnumerationValue Select from Country
MNR	Natural person customers – Total Number	Natural person customers – Total Data Type: IntegerValue If not applicable enter 0
MNS	Natural person customers – No. of which are New Customers	Natural person customers - Number of which are New Customers (Natural person customers with whom a business relationship was entered into in the preceding calendar year)

		Data Type: IntegerValue If not applicable enter 0
MNT	Legal entity customers – Total Number	Legal entity customers – Total Data Type: IntegerValue If not applicable enter 0
MNU	Legal entity customers - No. of which are New Customers	Legal entity customers - Number of which are New Customers (with whom a business relationship was entered into in the preceding calendar year) Data Type: IntegerValue If not applicable enter 0
MNV	Legal entity customers - No. with at least one beneficial owner residing in non-EEA countries	Legal entity customers - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence). Data Type: IntegerValue If not applicable enter 0
MNW	Legal entity customers - No. of which have PEP Risk Identified	Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment Data Type: IntegerValue If not applicable enter 0

8.6 Beneficial Owner

The questions below concern the [Beneficial Owners](#) (BOs) of your institution's customer base.

Please specify (based on residency in a particular country) the number of BOs for your legal entity customers.

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

<A13051 MNX="AF" MNY="925"></A13051>

REF	Field	Description
MNX	BO - Country	Select from the list of Alpha-2 country codes, Country for each applicable country that has a legal entity BO residing in that country. Data Type: EnumerationValue

		Select from Country
MNY	Number of beneficial owners	Number of beneficial owners of your legal entity customers residing in the country. Data Type: IntegerValue If not applicable enter 0

8.7 Politically Exposed Person

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

For the purposes of these questions, use the nationality of the [PEPs](#).

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

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

```
<A13061 MNZ="AF" MOA="334" MOB="362"></A13061>
```

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

		If not applicable enter 0
--	--	---------------------------

8.8 Geography of Funds Flow

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

For the purposes of the below table's transactions, Inward Transactions refer to those originating from Customers' Own Account (below) and move towards your institution. Outward transactions are transactions that originate from your institution and end at a Customer's Own Account.

In the instance that your institution does not handle any client assets, a single row with appropriate N/A values should be reported.

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

```
<A13071 MOC="AF" MOD="319" MOE="459" MOF="323.67" MOG="407" MOH="190" MOI="377.13"></A13071>
```

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

MOG	Overall - No. of customers (Destination)	Overall number of customers with outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
MOH	Overall - No. of transactions (Destination)	Overall number of outgoing transactions to each country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
MOI	Overall - Value of transactions (Destination)	EUR Value of total outgoing transactions to each country in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0

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 with a fund your institution manages, or who has at least one transaction initiated by the customer even if it is a periodic/automatic transaction, in the preceding calendar year but excludes any transactions which pertain to fee payments, services charges or similar.
AML/CFT regulated customers	All persons or entities of a similar nature to those listed in Article 3 of Regulation (EU) 2024/1624, including those that do not fall within the scope of Regulation (EU) 2024/1624 due to their non-EU status
Beneficial owner	As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership through ownership interest or control as referred to in Article 52 and Article 53 of Regulation (EU) 2024/1624.
Business relationship	As per Article 2(1), point (19), of Regulation (EU) 2024/1624.
Business Wide Risk Assessment	As per Article 10 of Regulation (EU) 2024/1624.
Cash	As per Article 2(1), point (43), of Regulation (EU) 2024/1624.
Cash intensive business	A cash-intensive business is a business that primarily operates with cash transactions rather than electronic or credit payments. These businesses often handle a large volume of cash relative to their overall revenue, for example: Hospitality and Leisure Automotive and Transportation Retail and Consumer Goods Health and Personal Care Crafts and Trades Art, Luxury, and Collectibles Services and Education
Complex structure	The term complex structure (such as a long holding chain with use of front companies, or a lack of transparency) refers to an ownership structure that is comprised of more than two layers of ownership which often includes (but is not limited to) foundations, charities, non-profit organisations, offshore vehicles trusts, or other legal arrangements including bearer shares and nominee shareholding. Any additional internal definition of complex structure is also acceptable here.
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 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 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.
Factoring	A credit activity consisting of the financing of commercial transactions through the purchase of trade receivables, with or without recourse during the reference year. This includes payables finance and invoice discounting. Securitisation, leasing, forfaiting, stock financing (unless explicitly part of factoring operations) and intermediated/brokered factoring are excluded.
False positive alert	A false positive alert is a transaction monitoring alert which was automatically closed by a system without escalation or an escalated alert which was closed by an analyst as not being worthy of an STR. If the alert is a collection of several alerts, then all of these alerts are considered to be false positives.
Family members	As per Article 2(1), point (35), of Regulation (EU) 2024/1624.
Financial institution	As per Article 2(1), point (6), of Regulation (EU) 2024/1624.
Group	As per Article 2(1), point (41), of Regulation (EU) 2024/1624.
High risk country	Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163.
Hit (in sanctions screening)	In this context, “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.
Intermediary	This includes brokers, agents, distributors, intermediaries and all other contracted third parties which constitute a link in the chain of service provision to your customers, or in the execution of customer transactions. This concerns intermediaries with which your institution has entered into an agreement.
Legal entity	Legal person or other legal arrangement.
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Management body	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
New Customer	Natural persons or legal entities who invested in a fund your institution manages for the first time in the preceding calendar year.
ML/TF risk	The impact and likelihood of ML/TF taking place.
Money laundering	As per Article 2(1), of Regulation (EU) 2024/1624.
Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
Parent entity	As per Article 2(42) of Regulation (EU) 2024/1624.
Payment institution	As per Article 4(4), of Directive (EU) 2015/2366.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Professional clients	As per Article 4(1), point 10, of Directive (EU) 2014/65
Proliferation financing	The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-

	shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.
Remote onboarding	Onboarding other than face-to-face where the customer is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the customer's identity is being verified via video-link or similar technological means such as App registration, Internet sign-up, email, over the phone, etc.
Retail Customer	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 Boxes	Safe deposit boxes refer to secure, individually assigned physical storage containers located within a regulated credit institution or financial entity's premises, rented or otherwise made available to customers, typically under a contractual agreement.
Sanctions regulation	As per Article 2(1), point (49), point (50), and point (51), of Regulation (EU) 2024/1624.
Senior management	As per Article 2(1), point (40), of Regulation (EU) 2024/1624.
Shell institution/bank	As per Article 2(1), point (23), of Regulation (EU) 2024/1624.
Terrorist financing	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
Third country	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.
Transaction monitoring alert	In this context a Transaction Monitoring Alert means one or more transactions which triggers or collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst. E.g. 1: A rule is in place which detects large deposits of cash anomalous to customer behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating, if the investigator files a STR report this is considered a True Positive Alert; otherwise, we consider it a False Positive Alert. E.g. 2: A scenario is in place to detect fast-moving transactions to high risk geographies. One model/rule detects placement of risky funds, and another detects fast movement of these funds to a high risk destination. Both of these models/rules identify behaviour

	creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this, we consider it a True Positive Alert for both rules/models; otherwise, we consider it a False Positive Alert for both rules/models.
Transaction monitoring rule/model	A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system.
Transaction profile	Transaction profile in this context has the meaning of any measure of expected transactional behaviour for customers.
True positive alert	A true positive alert is a transaction monitoring alert which was escalated and led to the filing of an STR. If an STR is collection of several alerts, all of these alerts are considered to be true positive alerts.
Trust or company service provider	As per Article 2(1), point (11), of Regulation (EU) 2024/1624.

9.2 Enumerations

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

Country

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

CustomerSegment1

Identifier	Description
NP	Natural person customers (i.e., personal customers, retail clients)
LE	Legal entity customers (i.e., non-personal customers, legal persons and/or other entities and/or legal structures and/or arrangements)
Cust_FIU	Customers with information requests from the FIU
Active_customer	The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into with a fund your institution manages, 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.
Cust_non_EEA	Customers with at least one transaction over 250 euros from/to a non-EEA country in the previous year
Complex	Customers with a complex structure

BWRAConducted

Identifier
Yes
No
Exemption_applies

CDD

Identifier

Yes_in_all_cases
Yes_only_in_enhanced_CDD_cases
No

Frequency

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

LegalStructure

Identifier	Description
Stand_alone_entity	Stand-alone entity
Parent_of_group	Parent of a group
Subsidiary_within_group	Subsidiary within a group
Branch_of_entity	Branch of an entity

MonitoringApproach

Identifier	Description
Yes_manually	Yes, transaction monitoring is carried out manually
Yes_automatically	Yes, transaction monitoring is carried out automatically
Yes_manually_and_automatically	Yes, transaction monitoring is carried out manually and automatically
No_transaction_monitoring	N/A no transaction monitoring in place

Outsource

Identifier	Description
Not_outsourced	Not outsourced
Partially_outsourced	At least partially outsourced to group or non-group entities

Totally_outsourced	Fully outsourced to group or non-group entities
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CountriesEEANA

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