



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

# Guidance Notes Risk Evaluation Questionnaire Credit Institutions

June 2025

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# 1 Background and Scope

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

The Risk Evaluation Questionnaire (REQ) seeks to consider:

1.1. Information of the nature of the institution's business relevant to the inherent risk of AML/CTF/FS

1.2 Information on the way in which an institution has assessed the Money Laundering (ML) Terrorist Financing (TF) and Financial Sanction (FS) risks posed by its business model (based on high level information provided by the institution); and

1.3 Information on the AML/CFT/FS framework put in place by the institution.

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

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

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

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

## 2 Timeline for Submitting the REQ

The reference date for data included in the REQ is 31 December of the preceding calendar year unless otherwise stated. Given the extended timeline for the first submission the reference date for the first submission is 31 December 2024.

The deadline for the first submission (in respect of reference date of 31 December 2024) is 27 February 2026. This is a hard deadline and no extensions will be granted.

### 3 Requirement to provide information to the Central Bank

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

### 4 Mechanism for Submission of Returns

The XML (Extensible Markup Language) files for the 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. `<A01011 Identifier="AAH" EnumerationYesNo="Yes"></A01011>` rather than `<A01011 Identifier="AAH" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:  

```
<?xml version="1.0" encoding="utf-8"?>
<CreditInstitutions xmlns="http://www.centralbank.ie/Schemas/AML/2025/A01">
...
...
...
</CreditInstitutions>
```

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

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

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

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

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

## 5 Where do I go if I need further information?

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

Any further queries in relation to the completion and/or submission of the REQ should be directed to [AML\\_Analytics@centralbank.ie](mailto:AML_Analytics@centralbank.ie).

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

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

E-mail: [portalsupport@centralbank.ie](mailto:portalsupport@centralbank.ie)

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

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

## 8 Instructions / Guidance Notes for Completing the REQ

Instructions for each field are detailed below. Where applicable, definitions are in line with definitions in the CJA 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. Exchange rate can be based on the time of the transactions if available or can be as at the reference date.

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

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

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

If any of sections 8.5-8.13 are not applicable to your institution then enter one line of non-applicable values, i.e. Select 00 from Country and enter zeros for the rest of the fields, e.g.

Country	Overall					of which High Risk (per your Institution's Customer Risk Assessment)				
	No. of customers	No. of incoming transactions	Value of incoming transactions	No. of outgoing transactions	Value of outgoing transactions	No. of customers	No. of incoming transactions	Value of incoming transactions	No. of outgoing transactions	Value of outgoing transactions
BLU	BAU	BLV	BLW	BLX	BLY	BLZ	BMA	BMB	BMC	BMD
00	0	0	0	0	0	0	0	0	0	0

<A0110>

<A01101 BLU="00" BAU="0" BLV="0" BLW="0" BLX="0" BLY="0" BLZ="0" BMA="0" BMB="0" BMC="0" BMD="0"></A01101>

</A0110>

## 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 aforementioned XML file, two items have to be considered: "REF" and "Description" (both in this guidance document). "REF" identifies the code associated to the specific "Field". "Description" includes the Data Type (for Table Structure A) or the Variable Name (for Table Structure B).

### 8.1.1 Table Structure A

In this example, three different "REFs" are needed, meaning AAI, AAJ and AAK. In this guidance document, we can see that the respective Data Types for these three fields under "Description" are "EnumerationValue", "DecimalValue" and "DecimalValue". You must enter the REF and the appropriate answer using the correct Data Type.

<A0101B>

```
<A01012 AAI="AT" AAJ="328.44" AAK="920.17"></A01012>
<A01012 AAI="BE" AAJ="904.26" AAK="400.81"></A01012>
<A01012 AAI="BG" AAJ="182.25" AAK="664.32"></A01012>
<A01012 AAI="CY" AAJ="983.31" AAK="691.02"></A01012>
<A01012 AAI="CZ" AAJ="163.60" AAK="923.17"></A01012>
<A01012 AAI="DE" AAJ="517.86" AAK="815.83"></A01012>
<A01012 AAI="DK" AAJ="41.24" AAK="129.13"></A01012>
<A01012 AAI="EE" AAJ="518.01" AAK="737.37"></A01012>
```

Select each EEA country and for each EEA country enter the Value of Transactions by customers that are resident in that EEA country where the institution operates on a FOE basis and on a FOS basis.

Select EEA Country
AAI
AT
BE
BG
CY
CZ
DE
DK
EE
ES

FOE	FOS
AAJ	AAK
328.44	920.17
904.26	400.81
182.25	664.32
983.31	691.02
163.60	923.17
517.86	815.83
41.24	129.13
518.01	737.37
1,023,562	2,145,632

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

The following tables have Table Structure A:

Guidance Section	Tab_Code	Table_Code
8.2.2 International Presence	A0101B	A01012
8.3.1 Customer segments	A0102B	A01022
8.3.2 Sector	A0102C	A01023
8.4.8 Suspicious Alerts and Transaction Rejections	A0103B	A01032
8.5 Physical Presence	A0104	A01041
8.6 Residence & Establishment	A0105	A01051
8.7 Beneficial Owners	A0106	A01061
8.8 Payment Transactions	A0107	A01071
8.9 Pooled Accounts	A0108	A01081
8.10 Correspondent Relationship	A0109	A01091
8.11 Trade Finance	A0110	A01101
8.12 Geography of Funds Flow	A0111	A01111
8.13 Transaction Monitoring	A0112	A01121

### 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, AAA 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).

<A0101A>

```
<A01011 Identifier="AAA" EnumerationLegalStructure="Stand_alone_entity"></A01011>
<A01011 Identifier="AAB" String500="Consultoria Lola"></A01011>
<A01011 Identifier="AAL" LEI="F5WCUMTUM4RKZ1MAIE39"></A01011>
<A01011 Identifier="AAC" EnumerationCountryEEANA="HR"></A01011>
<A01011 Identifier="AAD" String500="frferffgeferfrgergergregrgerg"></A01011>
<A01011 Identifier="BHT" String500="Consultoria Pepe"></A01011>
<A01011 Identifier="BHU" LEI="F5WCUMTUM4RKZ1MAIE39"></A01011>
<A01011 Identifier="BHV" EnumerationCountry="HR"></A01011>
```



## 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	frferffgeferfrgergergregrgerg
Name of the global parent entity of the group	Consultoria Pepe
LEI of the global parent entity of the group	F5WCUMTUM4RKZ1MAIE39
Country where the global parent entity of the group is established	HR
The AML/CFT supervisory authority of the global parent entity of the group	fedwdfwefwefdwfwfff
<i>If your institution is a branch of an entity:</i>	

In Table Structure B, each identifier/REF must not be repeated, e.g. AAA 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	A0101A	A01011
8.2.3 Statement of Compliance	A0101A	A01011
8.3.1 Customer segments	A0102A	A01021
8.3.2 Sector	A0102A	A01021
8.3.3 Anonymity	A0102A	A01021
8.3.4 Correspondent Relationship	A0102A	A01021
8.3.5 Cryptos and tokens	A0102A	A01021
8.3.6 Deposits and Withdrawals	A0102A	A01021
8.3.7 Currency Cash Exchange	A0102A	A01021
8.3.8 Safe Deposit Boxes	A0102A	A01021
8.3.9 Virtual IBAN Accounts	A0102A	A01021
8.3.10 Prepaid Cards	A0102A	A01021
8.3.11 Lending	A0102A	A01021
8.3.12 Factoring	A0102A	A01021
8.3.13 Investment Services and Activities	A0102A	A01021
8.3.14 Money Remittance	A0102A	A01021
8.3.15 Exchange crypto-fiat	A0102A	A01021
8.3.16 Exchange fiat-crypto	A0102A	A01021
8.3.17 Exchange crypto-crypto	A0102A	A01021
8.3.18 Transfer crypto-assets	A0102A	A01021
8.3.19 Custody of Crypto Assets	A0102A	A01021
8.3.20 Crowdfunding	A0102A	A01021
8.3.21 Other Products and/or Services	A0102A	A01021
8.3.22 Intermediaries and Distribution Channels	A0102A	A01021
8.3.23 Remote Onboarding	A0102A	A01021

8.4.1 Business Wide Risk Assessment	A0103A	A01031
8.4.2 Policies and Procedures	A0103A	A01031
8.4.3 Onboarding	A0103A	A01031
8.4.4 Offboarding	A0103A	A01031
8.4.5 Customer Due Diligence	A0103A	A01031
8.4.6 Transaction Monitoring	A0103A	A01031
8.4.7 Alerts	A0103A	A01031
8.4.9 Suspicious Transaction Reporting	A0103A	A01031
8.4.10 Sanctions Screening	A0103A	A01031
8.4.11 Outsourcing	A0103A	A01031
8.4.12 Education & Training	A0103A	A01031
8.4.13 Compliance & Assurance Testing	A0103A	A01031
8.4.14 Audit	A0103A	A01031
8.4.15 Internal controls and reporting systems	A0103A	A01031
8.4.16 Governance	A0103A	A01031
8.4.17 Compliance with Fund Transfers Regulation	A0103A	A01031

#### Variable Names:

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

Do not use variable names other than those defined.

#### Pre-defined entity references:

English	Symbol (Entity References)	XML (predefined entity references)
less than	<	&lt;
greater than	>	&gt;
ampersand	&	&amp;
apostrophe	'	&apos;
quotation mark	"	&quot;

### 8.1.3 Table Order

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

```
<xs:element ref="A01:A0101A"/> <!--General Table-->
<xs:element ref="A01:A0101B"/> <!--General InternationalPresence Table-->
<xs:element ref="A01:A0102A"/> <!--Inherent Risk Table-->
<xs:element ref="A01:A0102B"/> <!--Inherent Risk Segment Table-->
<xs:element ref="A01:A0102C"/> <!--Inherent Risk Sector Table-->
<xs:element ref="A01:A0103A"/> <!--Mitigation and Control Table-->
<xs:element ref="A01:A0103B"/> <!--Mitigation and Control Alerts Table-->
<xs:element ref="A01:A0104"/> <!--Physical Presence Table -->
<xs:element ref="A01:A0105"/> <!--Residence and Establishment Table-->
<xs:element ref="A01:A0106"/> <!--PEP and BO Table-->
<xs:element ref="A01:A0107"/> <!--Payment Transactions Table-->
<xs:element ref="A01:A0108"/> <!--Pooled Accounts Table-->
<xs:element ref="A01:A0109"/> <!--Correspondent Relationship Table-->
<xs:element ref="A01:A0110"/> <!--Trade Finance Table-->
<xs:element ref="A01:A0111"/> <!--Geography of Funds Flow Table-->
<xs:element ref="A01:A0112"/> <!--Transaction Monitoring Table-->
```

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

## 8.2 General

### 8.2.1 Legal Structure

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

<A01011 Identifier="AAA" EnumerationLegalStructure="Stand\_alone\_entity"></A01011>

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

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

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

## 8.2.2 International Presence

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

<A01011 Identifier="AAH" EnumerationYesNo="Yes"></A01011>

REF	Field	Description
<b>AAH</b>	Operate in EEA under FOE or FOS	<p>Does your institution operate within the EEA under Freedom of Establishment (FOE) and/or Freedom to Provide Services (FOS)?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
<b>ACO</b>	Established Outside EEA	<p>Has your institution established a branch or is it providing services outside the EEA through subsidiaries, agents, distributors, or other physical presence?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>

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

<A01012 AAI="AT" AAJ="98.98" AAK="988.99"></A01012>

REF	Field	Description
AAI	EEA Country	Select each EEA country and for each EEA country enter the Value of Transactions in the preceding calendar year by customers that are resident in that EEA country on a FOE basis and on a FOS basis.  Select from <a href="#">CountriesEEA</a> Data Type: EnumerationValue
AAJ	FOE	For each EEA country, enter the Value of Transactions in the preceding calendar year by customers that are resident in that EEA country where the institution operates on a FOE basis. If you do not operate on a FOE basis in a country then enter 0 for that country.  Data Type: DecimalValue
AAK	FOS	For each EEA country, enter the Value of Transactions in the preceding calendar year that are resident in that EEA country where the institution operates on a FOS basis. If you do not operate on a FOS basis in a country then enter 0 for that country.  Data Type: DecimalValue

### 8.2.3 Statement of Compliance

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

<A01011 Identifier="ACP" EnumerationYesNo="Yes"></A01011>

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

## 8.3 Inherent Risk

### 8.3.1 Customer segments

For each customer type 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 onboarded physically and a cash-intensive customer.

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

<A01021 Identifier="ACU" IntegerValue="73887"></A01021>

REF	Field	Description
ACU	Total NP Customers	Enter the total number of Natural Person customers at 31 December of the preceding calendar year. This includes inactive customers, frozen/blocked customers and customers awaiting off-boarding. If not applicable enter 0.  Variable name: IntegerValue
ACV	Total LE Customers	Enter the total number of Legal Entity customers at 31 December of the preceding calendar year. This includes inactive customers, frozen/blocked customers and customers awaiting off-boarding. If not applicable enter 0.  Variable name: IntegerValue
BIM	Active NP Customers	Enter the total number of <b>active</b> Natural Person customers at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BIN	Active LE Customers	Enter the total number of <b>active</b> Legal Entity customers at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BIO	Total Occasional Customers	Enter the total number of occasional customers during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BIP	Active NP Transactions	Enter the total number of transactions during the preceding calendar year by Natural Person customers active at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BIQ	Active LE Transactions	Enter the total number of transactions during the preceding calendar year by Legal Entity customers active at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BIR	Active Occasional Transactions	Enter the total number of transactions during the preceding calendar year by occasional customers. If not applicable enter 0.  Variable name: IntegerValue



<b>BIS</b>	Active NP Value	Enter the total value of transactions (EUR) during the preceding calendar year by Natural Person customers active at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
<b>BIT</b>	Active LE Value	Enter the total value of transactions (EUR) during the preceding calendar year by Legal Entity customers active at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
<b>BIU</b>	Active Occasional Value	Enter the total value of transactions (EUR) during the preceding calendar year by occasional customers. If not applicable enter 0.  Variable name: DecimalValue

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

<A01022 ACW="NP\_physcially\_on" ACX="979"></A01022>

REF	Field	Description
<b>ACW</b>	Segment	Select each customer type from <u>CustomerType</u> at 31 December of the preceding calendar year. Each customer segment <b>must</b> be selected.  Data Type: EnumerationValue
<b>ACX</b>	No. of Customers	Specify the total number of customers at 31 December of the preceding calendar year per <u>CustomerType</u> . If any customer type is not applicable enter 0 for that customer type.  Data Type: IntegerValue

### 8.3.2 Sector

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

<A01021 Identifier="BML" IntegerValue="745"></A01021>

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

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

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

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

<A01023 ADA="Mining" ADB="6"></A01023>

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

### 8.3.3 Anonymity

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

<A0121 Identifier="ADZ" EnumerationYesNo="Yes"></A0121>

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

### 8.3.4 Correspondent Relationship

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

<A0121 Identifier="AEL" EnumerationYesNo="Yes"></A0121>

REF	Field	Description
AEL	Respondent Nesting	Does your institution's <a href="#">Correspondent relationship</a> service allow for "nesting" or downstream clearing, where other respondent institutions with a direct relationship with the respondent but not your institution can indirectly use the account?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
AEM	Respondent Nesting Percentage	State the proportion of the total corresponding relationship accounts that have been used in the manner described above during the preceding calendar year. If not applicable enter 0.  Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue
AEN	Respondent Group	Does your institution's correspondent relationship service allow other entities within the respondent's group to use the account without undergoing your institution's due diligence process?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
AEO	Respondent Group Percentage	State the proportion of the total corresponding relationship accounts that have been used in the manner described above during the preceding calendar year. If not applicable enter 0.  Enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue
AEP	Respondent payable-through accounts (PTA)	Does your institution's correspondent relationship service include opening a <a href="#">payable-through account</a> for the respondent's customers to make transactions directly on their account?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
BED	Respondent PTA In Value	Total Value (EUR) of correspondent service transactions on <a href="#">payable-through accounts</a> in the preceding calendar year (incoming). If not applicable enter 0.  Variable name: DecimalValue
BEE	Respondent PTA Out Value	Total Value (EUR) of correspondent service transactions <a href="#">payable-through accounts</a> in the preceding calendar year (outgoing). If not applicable enter 0.  Variable name: DecimalValue
BGV	Respondent Nested Accounts In	Total Value (EUR) of correspondent service transactions going through <a href="#">nested accounts</a> in the preceding calendar year (incoming). If not applicable enter 0.  Variable name: DecimalValue
BGW	Respondent Nested Account Out	Total Value (EUR) of correspondent service transactions going through <a href="#">nested accounts</a> in the preceding calendar year (outgoing). If not applicable enter 0.  Variable name: DecimalValue

### 8.3.5 Cryptos and tokens

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

<A0121 Identifier="AEQ" EnumerationYesNo="Yes"></A0121>

REF	Field	Description
AEQ	Financial Product with Crypto underlying	Does your institution acquire or trade in Financial products with <a href="#">Crypto-asset</a> as the underlying value?  Select from YesNo Variable name: EnumerationYesNo
AER	Cryptos	Does your institution acquire or trade in cryptos (e.g. Bitcoin, Ethereum, Ripple, Bitcoin Cash, Cardano, Litecoin etc.)?  Select from YesNo Variable name: EnumerationYesNo
AES	Tokens	Does your institution acquire or trade in crypto tokens (issued through an Initial Coin Offering)?  Select from YesNo Variable name: EnumerationYesNo
AET	Financial Products	What financial products with <a href="#">Crypto-asset</a> did you acquire or trade in? If not applicable enter N/A.  List the areas separated by semicolon ( ; ) with no spaces either side.  Character limit: 500 characters Variable name: String500
AEU	ETFs Number of Transactions	What are the total numbers of Exchange Traded Funds (ETFs) in the preceding calendar year? If not applicable enter 0.  Variable name: IntegerValue
AEV	ETFs Value	What are the total values (EUR) of Exchange Traded Funds (ETFs) in the preceding calendar year? If not applicable enter 0.  Variable name: DecimalValue
AEW	Regulated FPs Number of Transactions	What are the total numbers of Other financial products traded on the regulated market in the preceding calendar year? If not applicable enter 0.  Variable name: IntegerValue
AEX	Regulated FPs Value	What are the total values (EUR) of Other financial products traded on the regulated market in the preceding calendar year? If not applicable enter 0.  Variable name: DecimalValue
AEY	Non Regulated FPs Number of Transactions	What are the total numbers of Other financial products traded on the non-regulated market in the preceding calendar year? If not applicable enter 0.  Variable name: IntegerValue
AEZ	Non Regulated FPs Value	What are the total values (EUR) of Other financial products traded on the non-regulated market in the preceding calendar year? If not applicable enter 0.  Variable name: DecimalValue
AFA	Bitcoin Number of Transactions	What are the total numbers of Bitcoin in the preceding calendar year? If not applicable enter 0.  Variable name: IntegerValue
AFB	Bitcoin Value	What are the total values (EUR) of Bitcoin in the preceding calendar year? If not applicable enter 0.

		Variable name: DecimalValue
<b>AFC</b>	Ethereum Number of Transactions	What are the total numbers of Ethereum in the preceding calendar year? If not applicable enter 0.  Variable name: IntegerValue
<b>AFD</b>	Ethereum Value	What are the total values (EUR) of Ethereum in the preceding calendar year? If not applicable enter 0.  Variable name: DecimalValue
<b>AFE</b>	Crypto Token Number of Transactions	What are the total numbers of Crypto tokens in the preceding calendar year? If not applicable enter 0.  Variable name: IntegerValue
<b>AFF</b>	Crypto Token Value	What are the total values (EUR) of Crypto tokens in the preceding calendar year? If not applicable enter 0.  Variable name: DecimalValue
<b>AFG</b>	Other Crypto Number of Transactions	What are the total numbers of other cryptos (not listed above) in the preceding calendar year? If not applicable enter 0.  Variable name: IntegerValue
<b>AFH</b>	Other Crypto Value	What are the total values (EUR) of other cryptos (not listed above) in the preceding calendar year? If not applicable enter 0.  Variable name: DecimalValue
<b>AFI</b>	Financial Product Type	If you entered a value greater than 0 at RegulatedFPsValue or NonRegulatedFPsValue, please specify which financial products. If not applicable enter N/A.  Character limit: 500 characters Variable name: String500
<b>AFJ</b>	Crypto Type	If you entered a value greater than 0 at "Other cryptos", please specify which cryptos. If not applicable enter N/A.  Character limit: 500 characters Variable name: String500
<b>AFK</b>	Crypto Wallets	Does your institution offer crypto wallets?  Select from YesNo Variable name: EnumerationYesNo
<b>AFL</b>	Crypto Wallet Future	If your institution currently does not offer crypto wallets, does it intend to do so in the future?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>AFM</b>	Crypto Currency Trading Exposure	Does your institution engage in Cryptocurrency trading services?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>AFN</b>	Custody Service Exposure	Does your institution engage in virtual asset Custody services?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>AFO</b>	Crypto Investment Exposure	Does your institution engage in virtual asset Investment products?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>AFP</b>	Blockchain Technology and partnership Exposure	Does your institution make use of Blockchain Technology and partnership?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA

### 8.3.6 Deposits and Withdrawals

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

<A0121 Identifier="AFQ" IntegerValue="4546"></A0121>

REF	Field	Description
AFQ	Cash NP Deposits Number of Transactions	Deposits (by natural persons): Cash - Total Number (No.) of Transactions. If not applicable enter 0.  Variable name: IntegerValue
AFR	Cash NP Deposits Value	Deposits (by natural persons): Cash - Total Value (EUR) of Transactions. If not applicable enter 0.  Variable name: DecimalValue
AFS	Cash NP Deposits Number of Transactions 10000 or more	Deposits (by natural persons): Cash - Total Number (No.) of Transactions amounting to EUR 10,000 or more. If not applicable enter 0.  Variable name: IntegerValue
AFT	Cash NP Deposits Value 10000 or more	Deposits (by natural persons): Cash - Total Value (EUR) of Transactions amounting to EUR 10,000 or more If not applicable enter 0.  Variable name: DecimalValue
AFU	Cash NP Deposits Highest	Deposits (by natural persons): Cash - Highest Value (EUR) single transaction. If not applicable enter 0.  Variable name: DecimalValue
AFV	Cash LE Deposits Number of Transactions	Deposits (by legal entities): Cash - Total Number (No.) of Transactions. If not applicable enter 0.  Variable name: IntegerValue
AFW	Cash LE Deposits Value	Deposits (by legal entities): Cash - Total Value (EUR) of Transactions. If not applicable enter 0.  Variable name: DecimalValue
AFX	Cash LE Deposits Number of Transactions 10000 or more	Deposits (by legal entities): Cash - Total Number (No.) of Transactions amounting to EUR 10,000 or more If not applicable enter 0.  Variable name: IntegerValue
AFY	Cash LE Deposits Value 10000 or more	Deposits (by legal entities): Cash - Total Value (EUR) of Transactions amounting to EUR 10,000 or more If not applicable enter 0. Variable name: DecimalValue
AFZ	Cash LE Deposits Highest	Deposits (by legal entities): Cash - Highest Value (EUR) per type of transaction. If not applicable enter 0.  Variable name: DecimalValue
AGA	Cash NP Withdraw Number of Transactions	Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions. If not applicable enter 0.  Variable name: IntegerValue
AGB	Cash NP Withdraw Value	Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions. If not applicable enter 0.  Variable name: DecimalValue
AGC	Cash NP Withdraw Number of Transactions 10000 or more	Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions amounting to EUR 10,000 or more If not applicable enter 0.  Variable name: IntegerValue
AGD	Cash NP Withdraw Value 10000 or more	Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions amounting to EUR 10,000 or more If not applicable enter 0.

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



### 8.3.7 Currency Cash Exchange

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

<A0121 Identifier="AGK" IntegerValue="4234"></A0121>

REF	Field	Description
AGK	Cash FX Number of Transactions Buy	Total Number (No.) of Currency Cash Exchange Transactions. If not applicable enter 0.  Variable name: IntegerValue
AGL	Cash FX Number of Transactions Sell	Total Number (No.) of Currency Cash Exchange Transactions If not applicable enter 0.  Variable name: IntegerValue
AGM	Cash FX Value Buy	Total Value (EUR) of Currency Cash Exchange Transactions If not applicable enter 0.  Variable name: DecimalValue
AGN	Cash FX Value Sell	Total Value (EUR) of Currency Cash Exchange Transactions If not applicable enter 0.  Variable name: DecimalValue
AGO	Cash FX Number of Transactions 1000 or more Buy	Total Number (No.) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.  Variable name: IntegerValue
AGP	Cash FX Number of Transactions 1000 or more Sell	Total Number (No.) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.  Variable name: IntegerValue
AGQ	Cash FX Value 1000 or more Buy	Total Value (EUR) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.  Variable name: DecimalValue
AGR	Cash FX Value 1000 or more Sell	Total Value (EUR) of Currency Cash Exchange Transactions amounting to EUR 1,000 or more If not applicable enter 0.  Variable name: DecimalValue
AGS	Cash FX High Value Buy	Highest Value (EUR) of single Currency Cash Exchange transaction (buy) If not applicable enter 0.  Variable name: DecimalValue
AGT	Cash FX High Value Sell	Highest Value (EUR) of single Currency Cash Exchange transaction (sell) If not applicable enter 0.  Variable name: DecimalValue
AOG	Cash FX Cash Total Value	Total Value (EUR) of transactions cash-to-cash carried out during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue

### 8.3.8 Safe Deposit Boxes

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

<A0121 Identifier="AGU" IntegerValue="756"></A0121>

REF	Field	Description
AGU	Deposit Box - Number of Customers	No. of customers who availed of safe deposit box services in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AGV	Deposit Box - Number Rented	No. of safe deposit boxes rented out to your customers in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AGW	Deposit Box - Number of Locations	No. of locations where safe deposit boxes are offered for rent in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue

### 8.3.9 Virtual IBAN Accounts

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

<A0121 Identifier="AGX" EnumerationYesNo="Yes"></A0121>

REF	Field	Description
AGX	IBAN Own Name	Does your institution provide the facility to its customers to map a range of virtual IBANs against an IBAN-identifiable master account held in their name?  Select from YesNo    Variable name: EnumerationYesNo
AGY	IBAN Own Name Number of Transactions	Report the total number of master accounts provided with virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution. If not applicable enter 0.  Variable name: IntegerValue
AGZ	IBAN Entity Name	Does your institution offer its customers virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution?  Select from YesNo    Variable name: EnumerationYesNo
AHA	IBAN Entity Name Number of Transactions	State the total number of master accounts provided with virtual IBANs which are mapped against an IBAN-identifiable master account in the name of your institution held with another institution. If not applicable enter 0.  Variable name: IntegerValue
BEF	IBAN Transactions In Number of Transactions	Number of transactions on Virtual IBANs (incoming) in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BEG	IBAN Value In	Total Value (EUR) of transactions on Virtual IBANs (incoming) in the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
BEH	IBAN Transactions Out Number of Transactions	Number of transactions on Virtual IBANs (outgoing) in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BEI	IBAN Value Out	Total Value (EUR) of transactions on Virtual IBANs (outgoing) in the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
BEJ	IBAN Reissued	Total Number of re-issued IBANs. If not applicable enter 0.  Variable name: IntegerValue
BEK	IBAN Number Reissued	Total Number of re-issued IBANs where the end-user is not a customer of the institution. If not applicable enter 0.  Variable name: IntegerValue

### 8.3.10 Prepaid Cards

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

&lt;A0121 Identifier="AHB" IntegerValue="4545"&gt;&lt;/A0121&gt;

REF	Field	Description
AHB	No. of prepaid cards – Issued over all years	No. of <a href="#">Prepaid Cards</a> – Total Issued by your institution (overall) still in issuance at the end of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHC	No. of reloadable prepaid cards - Issued over all years	No. of reloadable <a href="#">Prepaid Cards</a> - Issued by your institution (overall). If not applicable enter 0.  Variable name: IntegerValue
AHD	No. of customers to whom prepaid cards were issued to - Issued over all years	No. of customers to whom <a href="#">Prepaid Cards</a> were issued to - Issued by your institution (overall). If not applicable enter 0.  Variable name: IntegerValue
AHE	No. of customers with more than 3 prepaid cards - Issued over all years	No. of customers to whom more than 3 <a href="#">Prepaid Cards</a> were issued by your institution (overall). If not applicable enter 0.  Variable name: IntegerValue
AHF	Total value of issued prepaid cards – Issued over all years	Total value (EUR) issued on/loaded to <a href="#">Prepaid Cards</a> - Issued by your institution (over all years). If not applicable enter 0. For example, where you have issued prepaid cards worth €50,000 with a current outstanding balance of €670 then AHF = 50000  Variable name: DecimalValue
AHG	Total value outstanding on issued prepaid cards - In issuance at end of preceding year	Total value (EUR) outstanding on issued <a href="#">Prepaid Cards</a> - Issued by your institution (over all years). If not applicable enter 0. This is the value of the outstanding balance of all cards ever issued. For example, where you have issued prepaid cards worth €5,000 with a current outstanding balance of €670 then AHG = 670  Variable name: DecimalValue
AHH	No. of prepaid cards with outstanding balance > 150 - In issuance at end of preceding year	No. of <a href="#">Prepaid Cards</a> with outstanding balance > EUR 150 - Issued by your institution (over all years). If not applicable enter 0.  Variable name: IntegerValue
AHI	No. of prepaid cards - Issued in preceding year	No. of <a href="#">Prepaid Cards</a> - Issued by your institution (during the preceding calendar year). If not applicable enter 0.  Variable name: IntegerValue
AHJ	No. of reloadable prepaid cards - Issued in preceding year	No. of reloadable <a href="#">Prepaid Cards</a> - Issued by your institution (during the preceding calendar year). If not applicable enter 0.  Variable name: IntegerValue
AHK	No. of customers to whom prepaid cards were issued to - Issued in preceding year	No. of customers to whom <a href="#">Prepaid Cards</a> were Issued to - Issued by your institution (during the preceding calendar year). If not applicable enter 0.  Variable name: IntegerValue
AHL	No. of customers with more than 3 prepaid cards - Issued in preceding year	No. of customers to whom <a href="#">Prepaid Cards</a> were issued with more than three prepaid cards - Issued by your institution (during the preceding calendar year). If not applicable enter 0.  Variable name: IntegerValue
AHM	Total value of issued prepaid cards - Issued in preceding year	Total value (EUR) issued on/loaded to <a href="#">Prepaid Cards</a> , issued by your institution (during the preceding calendar year). If not applicable enter 0. For example, where you have issued prepaid

		cards worth €5,000 over the preceding calendar year with a current outstanding balance of €120 then AHM = 5000
		Variable name: DecimalValue
<b>AHN</b>	Total value outstanding on issued prepaid cards - Issued in preceding year	Total value (EUR) outstanding on issued <a href="#">Prepaid Cards</a> , issued by your institution (during the preceding calendar year). If not applicable enter 0. This is the value of the outstanding balance of cards issued during the preceding calendar year. For example, where you have issued prepaid cards worth €2,000 over the preceding calendar year that still remain valid with a current outstanding balance of €120 then AHN = 120
		Variable name: DecimalValue
<b>AHO</b>	No. of prepaid cards with outstanding balance >150 - Issued in preceding year	No. of <a href="#">Prepaid Cards</a> with outstanding balance > EUR 150 - Issued by your institution (during the preceding calendar year). If not applicable enter 0.
		Variable name: IntegerValue

### 8.3.11 Lending

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

<A01021 Identifier="BEL" IntegerValue="43324"></A01021>

REF	Field	Description
BEL	Outstanding loans - Number	Total Number of outstanding loans. If not applicable enter 0.  Variable name: IntegerValue
BEM	Loans granted during the preceding calendar year - Number	Total Number of loans granted during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BEN	Outstanding asset backed loans with cash collateral - Number	Total Number of outstanding <u>asset backed loans</u> with cash collateral. If not applicable enter 0.  Variable name: IntegerValue
BEO	Loan repayments during the preceding calendar year - Number	Total Number of loan repayments during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BEP	Prematurely repaid loans during the preceding calendar year - Number	Total Number of prematurely repaid loans during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BEQ	Loan repayments from non-EEA countries during the preceding calendar year - Number	Total Number of loan repayments from non-EEA countries during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
BER	Lending Granted No Associated Product	Total Number of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service. If not applicable enter 0.  Variable name: IntegerValue
BGO	Outstanding loans - Value	Total Value (EUR) of outstanding loans. If not applicable enter 0.  Variable name: DecimalValue
BGP	Loans granted during the preceding calendar year - Value	Total Value (EUR) of loans granted during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
BGQ	Outstanding asset backed loans with cash collateral - Value	Total Value (EUR) of outstanding asset backed loans with cash collateral. If not applicable enter 0.  Variable name: DecimalValue
BGR	Loan repayments during the preceding calendar year - Value	Total Value (EUR) of loan repayments during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
BGS	Prematurely repaid loans during the preceding calendar year - Value	Total Value (EUR) of prematurely repaid loans during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
BGT	Loan repayments from non-EEA countries during the preceding calendar year - Value	Total Value (EUR) of loan repayments from non-EEA countries during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue

	year - Value	
BGU	Lending Granted No Product Value	Total Value (EUR) of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service. If not applicable enter 0.  Variable name: DecimalValue

### 8.3.12 Factoring

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

<A01021 Identifier="BES" IntegerValue="0"></A01021>

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

### 8.3.13 Investment Services and Activities

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

<A01021 Identifier="BIY" IntegerValue="424"></A01021>

REF	Field	Description
BIY	Invest Orders Retail	Reception and transmission of orders - Number of <a href="#">retail clients</a> . If not applicable enter 0.  Variable name: IntegerValue
BIZ	Invest Orders Professional	Reception and transmission of orders - Number of <a href="#">professional clients</a> . If not applicable enter 0.  Variable name: IntegerValue
BJA	Invest Orders Unlisted	Reception and transmission of orders - Percentage of amounts of orders transmitted (orders forwarded to the market, including unexecuted orders) involving unlisted financial instruments (that are not traded on a regulated market, multilateral trading facility (MTF), or organised trading facility (OTF)), other than financial instruments issued by the institution or its group. If not applicable enter 0.  Variable name: PercentageValue Enter the proportion as a decimal, e.g. enter 4.7% as 0.047
BJB	Invest Orders Outside EEA	Reception and transmission of orders - Number of <a href="#">AML/CFT regulated customers</a> outside the EEA. If not applicable enter 0.  Variable name: IntegerValue
BJC	Invest Custody Retail	Custody - Number of <a href="#">retail clients</a> . If not applicable enter 0.  Variable name: IntegerValue

<b>BJD</b>	Invest Custody Professional	Custody - Number of <a href="#">professional clients</a> . If not applicable enter 0.  Variable name: IntegerValue
<b>BJE</b>	Invest Custody No Relationship	Custody - Percentage of <a href="#">assets under custody</a> for which the institution does not have a direct business relationship with the final investor. If not applicable enter 0.  Variable name: PercentageValue Enter the proportion as a decimal, e.g. enter 4.7% as 0.047
<b>BJF</b>	Invest Custody Outside EEA	Custody - Number of <a href="#">AML/CFT regulated customers</a> outside the EEA. If not applicable enter 0.  Variable name: IntegerValue
<b>BJG</b>	Invest Portfolio Retail	Portfolio management - Number of <a href="#">retail clients</a> If not applicable enter 0.  Variable name: IntegerValue
<b>BJH</b>	Invest Portfolio Professional	Portfolio management - Number of <a href="#">professional clients</a> If not applicable enter 0.  Variable name: IntegerValue
<b>BJI</b>	Invest Portfolio AUM	Portfolio management - Total <a href="#">assets under management</a> If not applicable enter 0.  Variable name: DecimalValue
<b>BJJ</b>	Invest Portfolio 5000000 or more	Portfolio management - Number of customers for which customer holding total assets with a value of at least EUR 5,000,000 If not applicable enter 0.  Variable name: IntegerValue

### 8.3.14 Money Remittance

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

<A01021 Identifier="BJK" IntegerValue="42"></A01021>

REF	Field	Description
<b>BJK</b>	Remit Volume In	Total Number of money remittance payments in the preceding calendar year (incoming). If not applicable enter 0.  Variable name: IntegerValue
<b>BJL</b>	Remit Volume Out	Total Number of money remittance payments in the preceding calendar year (outgoing). If not applicable enter 0.  Variable name: IntegerValue
<b>BJM</b>	Remit Value In	Total Value (EUR) of remittance payments in the preceding calendar year (incoming). If not applicable enter 0.  Variable name: DecimalValue
<b>BJN</b>	Remit Value Out	Total Value (EUR) of remittance payments in the preceding calendar year (outgoing). If not applicable enter 0.  Variable name: DecimalValue
<b>BJO</b>	Remit 1000 In	Total Number of money remittance transactions above 1000 euro in the preceding calendar year (incoming). If not applicable enter 0.  Variable name: IntegerValue
<b>BJP</b>	Remit 1000 Out	Total Number of money remittance transactions above 1000 euro in the preceding calendar year (outgoing). If not applicable enter 0.



Variable name: IntegerValue

### 8.3.15 Exchange crypto-fiat

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

<A01021 Identifier="BJX" DecimalValue="83889.798"></A01021>

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

### 8.3.16 Exchange fiat-crypto

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

<A01021 Identifier="BKC" DecimalValue="424.78"></A01021>

REF	Field	Description
BKC	Fiat Crypto Value	Total amount (EUR) fiat-crypto in the previous year. If not applicable enter 0.  Variable name: DecimalValue
BKD	Fiat Crypto Transaction Numbers	Total number of transactions fiat-crypto in the previous year. If not applicable enter 0.  Variable name: IntegerValue
BKE	Fiat Crypto Customers	Number of customers using this type of service in the previous year. If not applicable enter 0.  Variable name: IntegerValue
BKF	Fiat Crypto To Unhosted	Total number of transactions fiat-crypto to unhosted wallets in the previous year. If not applicable enter 0.  Variable name: IntegerValue
BKG	Fiat Crypto From Unhosted	Total number of transactions fiat-crypto from unhosted wallets in the previous year. If not applicable enter 0.  Variable name: IntegerValue

### 8.3.17 Exchange crypto-crypto

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

<A01021 Identifier="BKH" DecimalValue="424.7878"></A01021>

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

### 8.3.18 Transfer crypto-assets

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

<A01021 Identifier="BKL" DecimalValue="4.887"></A01021>

REF	Field	Description
BKL	Transfer Crypto Value	Total amount (EUR) that customers transferred in the previous year. If not applicable enter 0.  Variable name: DecimalValue
BKM	Transfer Crypto Customers	Number of customers using this type of service in the previous year. If not applicable enter 0.  Variable name: IntegerValue
BKN	Transfer Crypto To Unhosted	Total number of transactions to unhosted wallets in the previous year. If not applicable enter 0.  Variable name: IntegerValue
BKO	Transfer Crypto From Unhosted	Total number of transactions from unhosted wallets in the previous year. If not applicable enter 0.  Variable name: IntegerValue

### 8.3.19 Custody of Crypto Assets

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

<A01021 Identifier="BKU" IntegerValue="5466"></A01021>

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

### 8.3.20 Crowdfunding

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

<A01021 Identifier="BKP" DecimalValue="747.89"></A01021>

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

### 8.3.21 Other Products and/or Services

The number of active customers 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.

<A01021 Identifier="AHP" IntegerValue="5244"></A01021>

REF	Field	Description
AHP	Aircraft Finance - No. of Active Customers	Aircraft Finance - No. of <a href="#">Active customer</a> at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHQ	Maritime Finance - No. of Active Customers	Maritime Finance - No. of <a href="#">Active customer</a> at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHR	Wealth Management – No. of Active Customers	Wealth Management - No. of <a href="#">Active customer</a> at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHS	Treasury Services - No. of Active Customers	Treasury Services - No. of <a href="#">Active customer</a> at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHT	Securities Services - No. of Active Customers	Securities Services - No. of <a href="#">Active customer</a> at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHU	Depository Services - No. of Active Customers	Depository Services - No. of <a href="#">Active customer</a> at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHW	Merchant Services - No. of Active Customers	<a href="#">Merchant Services</a> - No. of <a href="#">Active customer</a> at 31 December of the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AHX	Aircraft Finance - Value of Transactions	Aircraft Finance - Value of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
AHY	Maritime Finance - Value of Transactions	Maritime Finance - Value of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
AHZ	Wealth Management - Value of Transactions	Wealth Management - Value of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
AIA	Treasury Services - Value of Transactions	Treasury Services - Value of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
AIB	Securities Services - Value of Transactions	Securities Services - Value of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
AIC	Depository Services - Value of	Depository Services - Value of Transactions during the preceding calendar year. If not applicable enter 0.

	Transactions	Variable name: DecimalValue
<b>AIE</b>	Merchant Services - Value of Transactions	<a href="#">Merchant Services</a> - Value of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
<b>AIF</b>	Aircraft Finance - No. of Transactions	Aircraft Finance - Count of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>AIG</b>	Maritime Finance - No. of Transactions	Maritime Finance - Count of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>AIH</b>	Wealth Management - No. of Transactions	Wealth Management - Count of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>AIL</b>	Treasury Services - No. of Transactions	Treasury Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>AIJ</b>	Securities Services - No. of Transactions	Securities Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>AIK</b>	Depository Services - No. of Transactions	Depository Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>AIM</b>	Merchant Services - No. of Transactions	Merchant Services - Count of Transactions during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue

### 8.3.22 Intermediaries and Distribution Channels

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

<A01021 Identifier="AIN" EnumerationYesNo="Yes"></A01021>

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

### 8.3.23 Remote Onboarding

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

<A01021 Identifier="AIT" PercentageValue="0.67"></A01021>

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

## 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.

<A01031 Identifier="AIY" EnumerationBWRAConducted="Yes"></A01031>

REF	Field	Description
AIY	BWRA Conducted	<p>State whether your institution conducts a <a href="#">Business Wide Risk Assessment (BWRA)</a>.</p> <p>Select from <a href="#">BWRAConducted</a></p> <p>Variable name: EnumerationBWRAConducted</p>
AIZ	BWRA Senior Management Approval	<p>State whether Senior Management of your institution approved the latest version of the BWRA.</p> <p>Select from: Yes; No; N/A</p> <p>Variable name: EnumerationYesNoNA</p>
AJA	BWRA Last Approval Date	<p>State the approval date of your institution's most recent BWRA in the format of YYYY-MM-DD.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
AJB	BWRA Review Frequency	<p>Select the frequency of BWRA review by your institution.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AJC	BWRA Business Change	<p>State whether the most recent BWRA review identified any areas for improvement or changes such as to your institution's policies, procedures, oversight measures, or risk appetite.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p>
AJD	BWRA Business Change Description	<p>Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made. If not applicable enter N/A.</p> <p>Character limit: 500 characters</p> <p>Variable name: String500</p>
AJE	BWRA Money Laundering	<p>State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p>
AJF	BWRA Terrorist Financing	<p>State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p>
AJG	BWRA Sanctions	<p>State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p>
AJH	BWRA Corruption	<p>State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA.</p>



		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJI</b>	BWRA Conflicts of Interest	State whether risks of conflicts of interests are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJJ</b>	BWRA Tax Evasion	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJK</b>	BWRA Internal Fraud	State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJL</b>	BWRA External Fraud	State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJM</b>	BWRA Cybercrime	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJN</b>	BWRA Market Abuse	State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJX</b>	BWRA Customer Groups	State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJY</b>	BWRA Geographies	State whether geographies are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJZ</b>	BWRA Product Groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AKA</b>	BWRA Distribution Channel	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AKC</b>	BWRA Crypto	State whether <a href="#">cryptos</a> as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJO</b>	BWRA Risk Other	State whether risks of other areas are explicitly identified and assessed in your institution's most recent BWRA.
		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJP</b>	BWRA Risk Other Detail	If Yes to BWRA_OtherRisks, please describe the areas that were explicitly identified and assessed in your institution's most recent BWRA. If not applicable enter N/A.
		List the areas separated by semicolon ( ; ) with no spaces either side.
		Character limit: 500 characters

		Variable name: String500
<b>BGX</b>	Other Risk Assessment Process - Money laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BGY</b>	Other Risk Assessment Process - Terrorist financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BGZ</b>	Other Risk Assessment Process - Circumvention of sanctions regulations	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHA</b>	Other Risk Assessment Process - Corruption (bribery)	State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHB</b>	Other Risk Assessment Process - Conflicts of interests	State whether risks of conflicts of interests are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHC</b>	Other Risk Assessment Process - Evasion of tax regulations	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHD</b>	Other Risk Assessment Process - Internal fraud and embezzlement (by employees/management of your institution)	State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHE</b>	Other Risk Assessment Process - External fraud and embezzlement (by customers or other business relations)	State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHF</b>	Other Risk Assessment Process - Cybercrime/ Ransomware	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHG</b>	Other Risk Assessment Process - Market abuse	State whether risks of market abuse are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHH</b>	Other Risk Assessment Process - Customer groups	State whether customer groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA
<b>BHI</b>	Other Risk Assessment Process - Geographies	State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA

<b>BHJ</b>	Other Risk Assessment Process - Product groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>BHK</b>	Other Risk Assessment Process - Distribution channels	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>BHL</b>	Other Risk Assessment Process - Cryptos	State whether <a href="#">cryptos</a> as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJQ</b>	BWRA Risk Appetite	State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJR</b>	BWRA Policy Procedure	State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJS</b>	BWRA Product Service	State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJT</b>	BWRA Transaction Monitoring	State whether the outcomes of the BWRA were used for setting scenarios and <a href="#">rules</a> for transaction monitoring.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJU</b>	BWRA Process Other	State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>AJV</b>	BWRA Process Other Detail	If Yes to BWRA_OtherProcess, briefly describe the other processes and activities in which your institution uses the outcomes of the BWRA. If not applicable enter N/A.  List the processes separated by semicolon ( ; ) with no spaces either side.  Character limit: 500 characters Variable name: String500
<b>AJW</b>	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 are formally approved by the management body in its management function or the compliance manager in accordance with Article 9 of Regulation (EU) 2024/1624. Where more than one topic (e.g. CDD and transaction monitoring) are covered by the same document, the approval date of the document should be reported for all topics covered. When there is no policy or procedure available for one or more items, please enter 2000-01-01.

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

<A01031 Identifier="AKF" DateValue="2024-02-12"></A01031>

REF	Field	Description
AKF	Customer onboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer onboarding (e.g. steps to be taken in setting up an account, or requirements before being able to transact, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
AKG	Ongoing Customer Due Diligence	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer review (e.g. the frequency of review on high risk customers).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
AKH	Customer Offboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer offboarding (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
AKI	Politically Exposed Persons	<p>Enter the date when your institution's management approved the last version of policies and procedures for Politically Exposed Persons (PEPs).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
AKJ	High risk customers	<p>Enter the date when your institution's management approved the last version of policies and procedures for high risk customers.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
AKK	Transaction monitoring	<p>Enter the date when your institution's management approved the last version of policies and procedures for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, customer risk review in result of positive alerts, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
AKL	Suspicious transaction reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process.</p>

		<p>This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the conducts of your institution's business to both Revenue and the FIU of any STR generated within your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKM</b>	Evasion of tax regulations	<p>Enter the date when your institution's management approved the last version of policies and procedures for evasion of tax regulations by customers (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKN</b>	Ongoing monitoring of business relationships	<p>Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of business relationships.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKP</b>	Bribery	<p>Enter the date when your institution's management approved the last version of policies and procedures for bribery (e.g. monitoring and reporting of bribery instances).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKQ</b>	Conflicts of interest	<p>Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKR</b>	Fraud within or outside the organisation	<p>Enter the date when your institution's management approved the last version of policies and procedures for fraud within or outside your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKS</b>	Sanctions screening	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanctions screening (e.g. monitoring and detecting instances of financial sanctions evasion).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKT</b>	Sanction hits handling	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanction hits handling (e.g. escalating, recording, and investigating instances of financial sanctions evasion).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKU</b>	Sanction hits reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanction hits reporting (e.g. in the case of a sanction "hit", the Sanctions Return Form is correctly</p>

		<p>completed and reported to the Central Bank Sanctions Team as required).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKV</b>	Treating and reporting of ML/TF & Financial Sanctions incidents	<p>Enter the date when your institution's management approved the last version of policies and procedures for identification, investigation and where required, reporting of potential instances of money laundering, terrorist financing, and confirmed financial sanctions evasion matches.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKW</b>	Whistleblowing	<p>Enter the date when your institution's management approved the last version of policies and procedures for whistleblowing.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKX</b>	Compliance function	<p>Enter the date when your institution's management approved the last version of policies and procedures and resourcing the compliance function so it operates to an acceptable standard.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKY</b>	Internal Audit/Assurance Testing	<p>Enter the date when your institution's management approved the last version of policies and procedures and resourcing for the internal audit or assurance testing so it operates to an acceptable standard.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AKZ</b>	Separation of functions (Three Lines of Defence)	<p>Enter the date when your institution's management approved the last version of policies and procedures for separation of functions (i.e. Three Lines of Defence).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>ALA</b>	Training	<p>Enter the date when your institution's management approved the last version of policies and procedures for training (e.g. staff members of your institution complete relevant required training).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>ALB</b>	Geographic Risk Factors	<p>Enter the date when your institution's management approved the last version of policies and procedures for geographic risk factors (e.g. business activity in high risk jurisdictions, enhanced customer due diligence due to geographic risk, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>ALC</b>	AML/CFT Record Keeping	<p>Enter the date when your institution's management approved the last version of policies and procedures for record keeping (e.g. provisions in Section 55 of the CJA 2010).</p>

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
<b>ABB</b>	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
<b>ABC</b>	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
<b>ABD</b>	Correspondent relationships	Enter the date when your institution's management approved the last version of policies and procedures for Correspondent relationships  Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
<b>ABE</b>	Legislation changes/regulatory guidance	Enter the date when your institution's management approved the last version of policies and procedures and internal processes on foot of legislative changes/regulatory guidance.  Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
<b>ALD</b>	Review Frequency	Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures.  Select from <a href="#">Frequency</a> Variable name: EnumerationFrequency



### 8.4.3 Onboarding

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

<A01031 Identifier="ALE" EnumerationYesNo="Yes"></A01031>

REF	Field	Description
<b>ALE</b>	Internet / Email - Natural person customers	State whether your institution offers onboarding via Internet/Email for natural person customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALF</b>	App - Natural person customers	State whether your institution offers onboarding via mobile app for natural person customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALG</b>	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
<b>ALH</b>	Third party - Natural person customers	State whether your institution offers onboarding via third party for natural person customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALI</b>	Other - Natural person customers	State whether your institution offers onboarding via other options for natural person customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALJ</b>	Onboarding Other Details Natural person customers	If Yes to OnboardingOtherNatural, specify other onboarding options. If not applicable enter N/A.  List the other onboarding options available to natural persons separated by semicolon ( ; ) with no spaces either side.  Character limit: 500 characters Variable name: String500
<b>ALK</b>	Internet / Email - Legal entity customers	State whether your institution offer onboarding via Internet/Email for legal entity customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALL</b>	App - Legal entity customers	State whether your institution offer onboarding via mobile app for legal entity customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALM</b>	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
<b>ALN</b>	Third party - Legal entity customers	State whether your institution offer onboarding via third party for legal entity customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALO</b>	Other - Legal entity customers	State whether your institution offer onboarding via other options for legal entity customers.  Select from YesNo    Variable name: EnumerationYesNo
<b>ALP</b>	Onboarding Other Details Legal entity customers	If Yes to OnboardingOtherLegal, specify other onboarding options. If not applicable enter N/A.



		<p>List the other onboarding options available to legal entities separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
ALQ	Remote Data	<p>State whether your institution has policies and procedures in place defining which data is considered adequate for correctly establishing and verifying a customer's identity for the remote onboarding process (i.e. options excluding counter/desk).</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
ALR	Purpose Questions	<p>State whether the onboarding process includes specific questions aimed at identifying the intended purpose and nature of the business relationship.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
ALS	Purpose Questions Specify	<p>If Yes to PurposeQ, briefly specify the subject matter of these questions. If not applicable enter N/A.</p> <p>List the subject matter of these questions asked separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
ALT	Excluded Customer	<p>State whether your institution has specific customer groups that may not be remotely onboarded.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
ALU	Excluded Customer Specify	<p>If Yes to ExcludedCustomer, briefly specify these customer groups. If not applicable enter N/A.</p> <p>List the specific customer groups separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
ALV	Verify Irish Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. EUR 1.00, transfer from an Irish bank account in the customer's own name.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
ALW	Verify Foreign Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. EUR 1.00, transfer from a foreign bank account in the customer's own name.</p>

		Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA  N/A indicates that the institution does not offer remote onboarding.
ALX	Verify Upload Photo NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via uploading a photo or photocopy of the customer's ID document.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA  N/A indicates that the institution does not offer remote onboarding.
ALY	Verify Person Photo NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via scan of ID document and image of the customer to be authenticated by a natural person.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA  N/A indicates that the institution does not offer remote onboarding.
ALZ	Verify Upload Doc NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity with uploading a photo of a bank account statement, payslip, or other documents with the customer's proof of address.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA  N/A indicates that the institution does not offer remote onboarding.
AMA	Verify Chip Doc NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a scan of an ID documents with a chip device.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA  N/A indicates that the institution does not offer remote onboarding.
AMB	Verify Passport NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via request for passport details in an online application form.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA  N/A indicates that the institution does not offer remote onboarding.
AMC	Verify At Desk NP	In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via verification of the customer's identity at the counter/desk.  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA  N/A indicates that the institution does not offer remote onboarding.

<b>AMD</b>	Verify other Human intervention NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other methods of human intervention not listed above.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
<b>AME</b>	Other Human intervention NP Detail	<p>If Yes to VerifyHumanNP, briefly describe the method of other human intervention (natural person customer). If not applicable enter N/A.</p> <p>List the other methods of human intervention used separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.    Variable name: String500</p>
<b>AMF</b>	Verify Other NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other procedures.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
<b>AMG</b>	Other NP Detail	<p>If Yes to VerifyOtherNP, briefly specify the other procedures (natural person customer). If not applicable enter N/A.</p> <p>List the other methods used separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.    Variable name: String500</p>
<b>AMH</b>	Verify Other Human Intervention Legal entity customer	<p>In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other human intervention not listed above.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
<b>AMI</b>	Other Human intervention Legal entity customer Detail	<p>If Yes to VerifyHumanLEGAL, briefly describe the method of other human intervention (legal entity customer). If not applicable enter N/A.</p> <p>List the other methods of human intervention used separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.    Variable name: String500</p>
<b>AMJ</b>	Verify Other Legal entity customer	<p>In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other procedures.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p>

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

		<p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
<b>AMR</b>	Verify other Human intervention Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via other human intervention not listed above.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
<b>AMS</b>	Other Human intervention Representatives Detail	<p>If Yes to VerifyHumanReprsent, briefly describe the method of other human intervention (representatives). If not applicable enter N/A.</p> <p>List the other methods of human intervention used separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.    Variable name: String500</p>
<b>AMT</b>	Verify Other Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies representative identity with other procedures.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
<b>AMU</b>	Other Representatives Detail	<p>If Yes to VerifyOtherRepresent, briefly specify the other procedures (representatives). If not applicable enter N/A.</p> <p>List the methods of identity verification used separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.    Variable name: String500</p>
<b>AMV</b>	Verify Human intervention BO	<p>In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other human intervention.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>
<b>AMW</b>	Other Human Intervention BO Detail	<p>If Yes to VerifyHumanBO, briefly describe the method of other human intervention (beneficial owners). If not applicable enter N/A.</p> <p>List the methods of other human intervention used separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.    Variable name: String500</p>
<b>AMX</b>	Verify Other BO	<p>In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other procedures.</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>

<b>AMY</b>	Other BO Detail	<p>If Yes to VerifyOtherBO, briefly specify the other procedures (beneficial owners). If not applicable enter N/A.</p> <p>List the other methods of identity verification separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
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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.

<A01031 Identifier="AMZ" IntegerValue="44234"></A01031>

REF	Field	Description
<b>AMZ</b>	Customer Offboarding Number	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>ANA</b>	Customer Offboarding Number ML	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>ANB</b>	Customer Offboarding Number TF	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>ANC</b>	Customer Offboarding Number FS	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>AND</b>	Customer Offboarding Number HR	<p>State the total number of customers rated higher risk as per your institution's CDD process prior to offboarding, whose business relationships with your institution were terminated in the preceding calendar year. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>

### 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.

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

High( - ) -> High

Low( + ) -> Low

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

<A01031 Identifier="ANE" EnumerationCDD="Yes\_in\_all\_cases"></A01031>

REF	Field	Description
ANE	Identity Verification NP	State whether the identity of natural person customers or legal entity customers is verified prior to providing services.  Select from <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANF	Identity Verification LE	
ANG	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 <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANH	Ownership Structure Identified LE	State whether ownership and/or control structure is identified for legal entity customers prior to providing services.  Select from <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANI	Nature Of Relationship NP	State whether the purpose and intended nature of the business relationship is established prior to providing services to natural person customers or legal entity customers.  Select from <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANJ	Nature Of Relationship LE	
ANK	Source Of Funds NP	State whether source/origin of the funds/assets is identified prior to providing services to natural person customers or legal entity customers.  Select from <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANL	Source Of Funds LE	
ANM	Customer Rep Identified NP	State whether a customer's representative is identified prior to providing services to natural person customers or legal entity customers.  Select from <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANN	Customer Rep Identified LE	
ANO	Tax Motive Identified NP	State whether tax motives are identified prior to providing services to natural person customers or legal entity customers.  Select from <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANP	Tax Motive Identified LE	
ANQ	Geos Identified NP	State whether geographies involved are identified prior to providing services to natural person customers or legal entity customers.  Select from <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
ANR	Geos Identified LE	

<b>ANS</b>	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 <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
<b>ANT</b>	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 <a href="#">BWRAConducted</a> Variable name: EnumerationCDD
<b>ANU</b>	CDD Review NP	State whether your institution periodically reviews its customers' risk profiles for natural person or legal entity customers.  Select from YesNo Variable name: EnumerationYesNo
<b>ANV</b>	CDD Review LE	
<b>ANW</b>	CDD Review NP Low	If Yes to CDDReviewNP or CDDReviewLE, state the <a href="#">Frequency</a> of these reviews for low-risk natural person or legal entity customers.  Select from <a href="#">Frequency</a> Variable name: EnumerationFrequency
<b>ANX</b>	CDD Review LE Low	
<b>ANY</b>	CDD Review NP Medium	If Yes to CDDReviewNP or CDDReviewLE, state the <a href="#">Frequency</a> of these reviews for medium-risk natural person or legal entity customers.  Select from <a href="#">Frequency</a>  Variable name: EnumerationFrequency
<b>ANZ</b>	CDD Review LE Medium	
<b>AOA</b>	CDD Review NP High	If Yes to CDDReviewNP or CDDReviewLE, state the <a href="#">Frequency</a> of these reviews for high-risk natural person or legal entity customers.  Select from <a href="#">Frequency</a>  Variable name: EnumerationFrequency
<b>AOB</b>	CDD Review LE High	
<b>AOC</b>	CDD Review NP PEP	State the <a href="#">Frequency</a> of these reviews for customers who are politically exposed persons, their family members or persons that are close associates.  Select from <a href="#">Frequency</a>  Variable name: EnumerationFrequency
<b>AOD</b>	CDD Review NP Unacceptable	If Yes to CDDReviewNP or CDDReviewLE, state the <a href="#">Frequency</a> of these reviews for unacceptable-risk natural person or legal entity customers (e.g. yet to be exited).  Select from <a href="#">Frequency</a>  Variable name: EnumerationFrequency
<b>AOE</b>	CDD Review LE Unacceptable	
<b>BFO</b>	CDD CRA Update	Date when your institution assessed the need to update the Customer Risk Assessment for the last time  Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
<b>BFP</b>	CDD Low Customer	Number of customers per ML/TF risk category (low risk). If not applicable enter 0.  Variable name: IntegerValue
<b>BFQ</b>	CDD Medium-Low Customer	Number of customers per ML/TF risk category (medium-low risk). If not applicable enter 0.



		Variable name: IntegerValue
<b>BFR</b>	CDD MH Customer	Number of customers per ML/TF risk category (medium-high risk). If not applicable enter 0.
		Variable name: IntegerValue
<b>BFS</b>	CDD High Customer	Number of customers per ML/TF risk category (high-risk). If not applicable enter 0.
		Variable name: IntegerValue
<b>BJU</b>	CDD customers Due NP	Number of customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. If not applicable enter 0.
<b>BJV</b>	CDD customers Due LE	
		Variable name: IntegerValue
<b>BGM</b>	CDD customers Reviewed NP	Number of customers for whom customer information was reviewed and updated in the preceding calendar year. If not applicable enter 0.
<b>BGN</b>	CDD customers Reviewed LE	
<b>AOJ</b>	Backlog Prop NP Total	Specify the percentage of backlogs of all natural person or legal entity customers.  Enter the percentage as a decimal, e.g. enter 4.7% as 0.047      Variable name: PercentageValue. Input 0 if no there is no backlog.
<b>AOK</b>	Backlog Prop LE Total	
<b>AOL</b>	Backlog Prop NP High	If Yes to BacklogExistNP or BacklogExistLE, of the customer reviews in the backlog, specify the proportion of these that are high risk customers.  Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue. Input 0 if no there is no backlog.
<b>AOM</b>	Backlog Prop LE High	
<b>AON</b>	Backlog Prop NP PEP	Specify the percentage of backlogs of customers who are politically exposed persons, their family members or persons to be close associates.  Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue. Input 0 if no there is no backlog.
<b>AOO</b>	Backlog Prop NP Unacceptable	If Yes to BacklogExistNP or BacklogExistLE, specify the percentage of backlogs of unacceptable-risk natural person or legal entity customers (e.g. yet to be exited).  Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue. Input 0 if no there is no backlog.
<b>AOP</b>	Backlog Prop LE Unacceptable	
<b>AOQ</b>	Concrete Timelines NP	State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs.  Select from: Yes; No; N/A      Variable name: EnumerationYesNoNA
<b>AOR</b>	Concrete Timelines LE	
<b>BHM</b>	No Ident Total	What proportion of <b>total active</b> customers have no CDD documentation/information. If not applicable enter 0.  Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047
<b>BHN</b>	No Ident High	What proportion of <b>high risk active</b> customers have no CDD documentation/information. If not applicable enter 0.  Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047

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

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

## 8.4.6 Transaction Monitoring

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

<A01031 Identifier="AOW" EnumerationYesNoNA="No"></A01031>

REF	Field	Description
AOW	TM Profile	<p>Does your institution draw up a <a href="#">transaction profile</a> for customers at the initiation of services?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA</p>
AOX	TM Profile Review	<p>What is the frequency of review of the <a href="#">transaction profile</a>?</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AOY	TM Profile Number Transactions	<p>Does your institution include number of transactions in an expected <a href="#">transactions profile</a>?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>
AOZ	TM Profile Value of Aggregated Transactions	<p>Does your institution include the value of total transactions in an expected <a href="#">transactions profile</a>?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>
APA	TM Profile Value of Single Transa	<p>Does your institution include the value of single transactions in an expected <a href="#">transactions profile</a>?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>
APB	TM Profile Counterparties	<p>Does your institution include counterparties in an expected <a href="#">transactions profile</a>?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>
APC	TM Profile Geographies	<p>Does your institution include geographies in an expected <a href="#">transactions profile</a>?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>
APD	TM Profile Group Transactions	<p>Does your institution include intra-group transactions in an expected <a href="#">transactions profile</a>, i.e. do you include the expected movement of customer funds between their group companies?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>
APE	TM Profile Banks	<p>Does your institution include banks involved in an expected <a href="#">transactions profile</a>?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>

<b>BIC</b>	TM Alert Number of Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If no profile is created please select N/A</p>
<b>BID</b>	TM Alert Value of Aggregated Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If not applicable please select N/A</p>
<b>BIE</b>	TM Alert Value of Single Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of single transactions?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If not applicable please select N/A</p>
<b>BIF</b>	TM Alert Counterparties	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If not applicable please select N/A</p>
<b>BIG</b>	TM Alert Geographies	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If not applicable please select N/A</p>
<b>BIH</b>	TM Alert Group Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual intra-group transactions?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If not applicable please select N/A</p>
<b>BII</b>	TM Alert Banks	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual banks/payment institutions involved?</p> <p>Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA If not applicable please select N/A</p>
<b>APF</b>	TM How Monitor	<p>State whether your institution monitors transactions and how this is done.</p> <p>Select from <a href="#">MonitoringApproach</a> Variable name: EnumerationMonitoringApproach</p>

APG	TM Model Validation	<p>Are formal steps taken after creating the rules for an automated transaction monitoring system in which the rules are tested for appropriateness and efficacy?</p> <p>Select from <a href="#">ModelValidation</a> Variable name: EnumerationModelValidation Select N/A if transaction monitoring is conducted manually or no transaction monitoring is in place</p>
APH	TM AI	<p>Does your institution use artificial intelligence technology in its transaction monitoring process?</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If no transaction monitoring in place please select N/A</p>
API	TM Rule	<p>Does your institution use <a href="#">rules</a> as part of its transaction monitoring process?</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If no transaction monitoring in place please select N/A</p>
APJ	TM High Risk Geographies	<p>Does your institution have <a href="#">rules</a> in its transaction monitoring process with respect to high risk geographies?</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A</p>
APK	TM Offshore Jurisdictions	<p>Does your institution have <a href="#">rules</a> in its transaction monitoring process with respect to <a href="#">offshore jurisdictions</a>?</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A</p>
APL	TM Customer Segments	<p>Does your institution have <a href="#">rules</a> in its transaction monitoring process with respect to Customer Segments?</p> <p>Customer segments can be any internal definition of customer groupings, retail or corporate customers, risk levels, associated sector, high value customer etc.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A</p>
APM	TM Sectors	<p>Does your institution have <a href="#">rules</a> in its transaction monitoring process with respect to Sectors?</p> <p>Does your institution risk rate various sectors and apply this information to transaction monitoring rules?</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A</p>
APN	TM PEP	<p>Are there <a href="#">rules</a> or conditions in your institution's transaction monitoring system to account for risk associate with <a href="#">PEPs</a> and PEP close associates?</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A</p>
APO	TM Cash	<p>Does your institution have <a href="#">rules</a> in its transaction monitoring process with respect to cash transactions?</p>

		Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
APP	TM Text	Are transaction description fields / bodies of text considered in any of the <a href="#">rules</a> your institution has in its transaction monitoring system  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
APQ	TM Complex	Does your institution have <a href="#">rules</a> in its transaction monitoring process with respect to complex structures?  See definition of <a href="#">complex structure</a>  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
APR	TM Banks	Does your institution have <a href="#">rules</a> in its transaction monitoring process with respect to what banks / payment institutions are involved in transactions?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
APS	TM Other	Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their <a href="#">rules</a> ?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
APT	TM Other Detail	Detail briefly any other factors/topics included in rules in your institution's <a href="#">rules</a> as part of your transaction monitoring system.  Character limit: 500 characters Variable name: String500
APU	TM Review	Does your institution periodically review its <a href="#">rules</a> in its transaction monitoring process?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
APV	TM Review Latest	Please give completion date of the review. If a repeating review process is in place, please give the most recent date for a <a href="#">rule</a> which has been reviewed.  Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
APW	TM Review Latest Changes	Did the most recent review lead to any changes in <a href="#">rules</a> ?  Select from: Yes; No; N/A Variable name: EnumerationYesNoNA If you answered No to TMBusinessRule please select N/A
APX	TM Real Time or Post Event	State whether detection of (possible) suspicious financial transactions takes place in real-time or post-event.  In this context, real-time detection means monitoring which is carried out live and can react to transactions as they take place as opposed to post-event detection which is done in batches at certain points in time after the transactions take place.

		Select from <a href="#">DetectionTime</a> Variable name: EnumerationDetectionTime
APY	TM Insufficient Info	<p>How many transactions did your institution reject on the basis of insufficient information* about the payer or the payee in the preceding calendar year? If not applicable enter 0.</p> <p>*Information as referred to in Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto assets.</p> <p>Variable name: IntegerValue</p>

#### 8.4.7 Alerts (in the preceding calendar year)

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

<A01031 Identifier="APZ" IntegerValue="46456"></A01031>

REF	Field	Description
APZ	Rule Count - Automated	<p>How many rules were in place in your institution's automated transaction monitoring system in the preceding calendar year? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
AQA	Total Alert Count - Automated	<p>How many alerts were generated by the automated transaction monitoring system in the preceding calendar year? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
AQB	Percent Alerts - Automated	<p>What is the proportion of automated <a href="#">transaction monitoring alerts</a> to total transactions? If not applicable enter 0.</p> <p>Please enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue</p>
AQD	Alerts Investigated - Automated	<p>How many automated alerts were investigated by an AML/transaction monitoring staff member? If not applicable enter 0.</p> <p>Investigated refers to the process of analysing the alert to decide if it should be subject to escalation as a Suspicious Transaction Report</p> <p>Variable name: IntegerValue</p>
AQE	Alerts Escalated - Automated	<p>How many automated alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
AQF	Alert Investigated FP - Automated	<p>How many automated alerts were closed as <a href="#">false positives</a> following investigation? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
BDW	Rule Count - Manual	<p>How many rules were in place in your institution's manual transaction monitoring process in the preceding calendar year? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
BDX	Total Alert Count - Manual	<p>How many alerts were generated by the manual transaction monitoring process in the preceding calendar year?</p>



		<p>If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>BDY</b>	Percent Alerts - Manual	<p>What is the proportion of manual transaction monitoring alerts to total transactions? If not applicable enter 0.</p> <p>Please enter the proportion as a decimal, e.g. enter 4.7% as 0.047 Variable name: PercentageValue</p>
<b>BDZ</b>	Alerts Investigated - Manual	<p>How many manual alerts were investigated by an AML/transaction monitoring staff member? If not applicable enter 0.</p> <p>Investigated refers to an initial check to indicate if a transaction monitoring alert is worth sending to investigators/compliance.</p> <p>Variable name: IntegerValue</p>
<b>BEA</b>	Alerts Escalated - Manual	<p>How many manual alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>BEB</b>	Alert Investigated FP - Manual	<p>How many manual alerts were closed as false positives following investigation? If not applicable enter 0.</p> <p>A false positive is an alert which results in no Suspicious Transaction Report (STR) being filed.</p> <p>Variable name: IntegerValue</p>
<b>AQG</b>	Alert TP Review - Automated	<p>How many <b>true positive alerts</b> (STR filed from automated alerts) led to a review of the customer's risk, CDD or otherwise? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>AQH</b>	Alert Backlog - Automated	<p>At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed? If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>AQI</b>	Alert Mean Time To Close TP - Automated	<p>Over the course of the preceding calendar year, what was the average time in days to close an alert (account for automated alerts), from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.</p> <p>Variable name: DecimalValue</p>
<b>AQJ</b>	Alert Max Time To Close TP - Automated	<p>Over the course of the preceding calendar year, what was the maximum time to close an alert (account for automated alerts) which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.</p> <p>Variable name: DecimalValue</p>
<b>BGA</b>	Alert Ratio STR - Automated	<p>If automated system: Ratio between number of STRs and number of alerts. This corresponds to the number of alerts generated by the automated systems and the number of STRs resulting from alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) of Regulation (EU) 2024/1624. This excludes alerts of systems exclusively meant to detect transaction subject to targeted financial sanctions.</p>

		Variable name: PercentageValue If not applicable enter 0.
<b>BHP</b>	Alert TP Review - Manual	How many <a href="#">true positive alerts</a> (STR filed from manual alerts) led to a review of the customer's risk, CDD or otherwise? If not applicable enter 0.
<b>BHQ</b>	Alert Backlog - Manual	Variable name: IntegerValue At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed? If not applicable enter 0.
<b>BHR</b>	Alert Mean Time To Close TP – Manual	Variable name: IntegerValue Over the course of the preceding calendar year, what was the average time in days to close an alert (account for manual alerts), from the initial alert generation, which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.
<b>BHS</b>	Alert Max Time To Close TP – Manual	Variable name: DecimalValue Over the course of the preceding calendar year, what was the maximum time to close an alert (account for manual alerts) which resulted in a Suspicious Transaction Report (STR) filing? If not applicable enter 0.
<b>BGB</b>	Alert Trans Excess - Manual	Variable name: DecimalValue If manual system, does the annual number of transactions exceed the number of transactions that the institution can manually process?  Select from: Yes; No; N/A    Variable name: EnumerationYesNoNA
<b>BGC</b>	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. If not applicable enter 0.  Variable name: DecimalValue

### 8.4.8 Suspicious Alerts and Transaction Rejections

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

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

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

<A01032 AQK="Alert\_ML" AQL="30" AQM="20"></A01032>

REF	Field	Description
AQK	Alert Type	Select specific suspicious <a href="#">AlertType</a>  Data Type: EnumerationValue
AQL	Transaction Alert Number	For a specific suspicious alert type, state the total number of transaction alerts in the preceding calendar year. If not applicable enter 0.  Data Type: IntegerValue
AQM	Transaction Reject Number	For a specific suspicious alert type, state the total number of transaction alerts rejected in the preceding calendar year. If not applicable enter 0.  Data Type: IntegerValue

### 8.4.9 Suspicious Transaction Reporting

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

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

<A01031 Identifier="AQP" EnumerationYesNo="No"></A01031>

REF	Field	Description
AQP	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
AQR	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AQS	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AQV	Number STR Bribe	State the total number of suspicious transaction reports (STRs) based on bribery/corruption reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AQW	FIU Number STs Bribe	State the total number of suspicious transactions contained in STRs based on bribery/corruption reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
AQZ	FIU Number STR HT	State the total number of suspicious transaction reports (STRs) based on human trafficking reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
ARA	FIU Number STs HT	State the total number of suspicious transactions contained in STRs based on human trafficking reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
ARD	FIU Number STR LWE	State the total number of suspicious transaction reports (STRs) based on left wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
ARE	FIU Number STs LWE	State the total number of suspicious transactions contained in STRs based on left wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
ARH	FIU Number STR MS	State the total number of suspicious transaction reports (STRs) based on migrant smuggling reported to the FIU in the preceding calendar year. If not applicable enter 0.

		Variable name: IntegerValue
<b>ARI</b>	FIU Number STs MS	State the total number of suspicious transactions contained in STRs based on migrant smuggling reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ARL</b>	FIU Number STR ML	State the total number of suspicious transaction reports (STRs) based on money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ARM</b>	FIU Number STs ML	State the total number of suspicious transactions contained in STRs based on money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ARP</b>	FIU Number STR PEP	State the total number of suspicious transaction reports (STRs) based on politically exposed person reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ARQ</b>	FIU Number STs PEP	State the total number of suspicious transactions contained in STRs based on politically exposed person reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ART</b>	FIU Number STR RWE	State the total number of suspicious transaction reports (STRs) based on right wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ARU</b>	FIU Number STs RWE	State the total number of suspicious transactions contained in STRs based on right wing extremism reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ARX</b>	FIU Number STR Sanctions	State the total number of suspicious transaction reports (STRs) based on sanctions list match reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ARY</b>	FIU Number STs Sanctions	State the total number of suspicious transactions contained in STRs based on sanctions list match reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ASB</b>	FIU Number STR SE	State the total number of suspicious transaction reports (STRs) based on sexual exploitation reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue
<b>ASC</b>	FIU Number STs SE	State the total number of suspicious transactions contained in STRs based on sexual exploitation reported to the FIU in the preceding calendar year. If not applicable enter 0.
		Variable name: IntegerValue

<b>ASF</b>	FIU Number STR SWF	State the total number of suspicious transaction reports (STRs) based on social welfare fraud reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>ASG</b>	FIU Number STs SWF	State the total number of suspicious transactions contained in STRs based on social welfare fraud reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>ASJ</b>	FIU Number STR TE	State the total number of suspicious transaction reports (STRs) based on tax evasion reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>ASK</b>	FIU Number STs TE	State the total number of suspicious transactions contained in STRs based on tax evasion reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>ASN</b>	FIU Number STR TF	State the total number of suspicious transaction reports (STRs) based on terrorist financing reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>ASO</b>	FIU Number STs TF	State the total number of suspicious transactions contained in STRs based on terrorist financing reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>ASR</b>	FIU Number STR TBML	State the total number of suspicious transaction reports (STRs) based on trade based money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>BME</b>	FIU Number STs TBML	State the total number of suspicious transactions contained in STRs based on trade based money laundering reported to the FIU in the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue
<b>BGK</b>	FIU Days to Report	Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the preceding calendar year. If not applicable enter 0.  Variable name: DecimalValue
<b>BGL</b>	FIU Report Before Transaction	Number of STRs submitted to the FIU before the completion of the transaction during the preceding calendar year. If not applicable enter 0.  Variable name: IntegerValue

### 8.4.10 Sanctions Screening

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

<A01031 Identifier="ASV" EnumerationYesNo="No"></A01031>

REF	Field	Description
ASV	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
BGD	Sanction Average Hours	Average number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools. If not applicable enter 0.  Variable name: DecimalValue
BGE	Sanction Max Hours	Maximum number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools. If not applicable enter 0.  Variable name: DecimalValue
ASX	Sanction EU	Specify if customers and beneficial owners are checked against EU sanctions lists  Select from YesNo Variable name: EnumerationYesNo
ASW	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
ASZ	Sanction UN	Specify if customers and beneficial owners are checked against UN lists.  Select from YesNo Variable name: EnumerationYesNo
ATA	Sanction Other	Specify if customers and beneficial owners are checked against other sanctions lists.  Select from YesNo Variable name: EnumerationYesNo
ATB	Sanction Other Specify	If your institution uses any other sanctions lists not mentioned above please specify. If not applicable enter N/A.  List the sanction lists used separated by semicolon ( ; ) with no spaces either side.  Character limit: 500 characters Variable name: String500
ATC	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
ATD	Sanction List Update	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when sanctions listing updated.  Select from YesNo Variable name: EnumerationYesNo
ATE	Sanction Periodic Customer	At and after the start of service provision, state whether your institution periodically checks whether customers are included on sanctions lists.  Select from YesNo Variable name: EnumerationYesNo
ATF	Sanction Periodic Customer Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for customers.

		<p>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>ATG</b>	Sanction Periodic BO	<p>At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to non-high risk customers are included on sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
<b>ATH</b>	Sanction Periodic BO Frequency	<p>State the frequency (number of checks per calendar year) that the periodic checks are performed for beneficial owners connected to non-high risk customers.</p> <p>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>ATI</b>	Sanction Periodic Rep	<p>At and after the start of service provision, state whether your institution periodically checks whether representatives connected to non-high risk customers are included on sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
<b>ATJ</b>	Sanction Periodic Rep Frequency	<p>State the frequency (number of checks per calendar year) that the periodic checks are performed for representatives connected to non-high risk customers.</p> <p>State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
<b>ATK</b>	Sanction Total Hits	<p>State the number of actual hits that the sanctions list screening delivered in the preceding calendar year. If not applicable enter 0.</p> <p>In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list</p> <p>Variable name: IntegerValue</p>
<b>ATL</b>	Sanction Total Hits Value	<p>State the total value (EUR) of frozen assets recorded in relation to those hits that the sanctions list screening delivered in the preceding calendar year. If not applicable enter 0.</p> <p>In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list. In the case of currency conversions, conversion at time of transaction or exchange rate as of 31 December of the preceding calendar year is acceptable.</p> <p>Variable name: DecimalValue</p>



### 8.4.11 Outsourcing

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

<A01031 Identifier="ATU" EnumerationOutsource="No\_but\_concrete\_plans\_to\_source\_in\_future"></A01031>

REF	Field	Description
ATU	Outsource CDD Onboarding	<p>State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
ATV	Outsource CDD Review	<p>State whether CDD periodic customer review (e.g. recurring process of reviewing customer CDD status/documentation/risk) has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
ATW	Outsource TM	<p>State whether transaction monitoring has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
ATX	Outsource Alert Processing	<p>State whether alerts processing has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
ATY	Outsource STR Reporting	<p>State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
ATZ	Outsource Sanction Screen	<p>State whether sanctions screening has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
AUB	Outsource CDM	<p>State whether customer data management (e.g. external storage, management and handling of customer data) has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
BIV	Outsource Training	<p>State whether AML/CFT training has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
BIW	Outsource PEP	<p>State whether PEP detection has been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>
BIX	Outsource Compliance	<p>State whether compliance monitoring checks have been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a></p> <p>Variable name: EnumerationOutsource</p>

<b>AUC</b>	Outsource Other AMLCFT	<p>State whether other processes related to risk management with regard to AML/CFT/proliferation financing have been outsourced to third parties (including within the Group).</p> <p>Select from <a href="#">Outsource</a> Variable name: EnumerationOutsource</p>
<b>AUD</b>	Outsource Other AMLCFT Specify	<p>If Yes to OutsrcOtherAMLCFT, specify the other processes. If not applicable enter N/A.</p> <p>List the other outsourced elements of your AML/CFT processes separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>
<b>AUE</b>	Outsource Provider Compliance Requirements	<p>State the proportion of outsourced AML/CFT tasks where your institution incorporates compliance requirements with respect to financial crime legislation within its outsourcing agreements (e.g. Criminal Justice Act).</p> <p>To calculate apply the following process: Denominator: number of tasks (customer due diligence, training, transaction monitoring, etc.) that are at least partly outsourced. Numerator: number of such tasks for which one or more written outsourcing agreement covering all outsourced aspects is in place.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0.</p>
<b>AUG</b>	Outsource Assess Report Obligation	<p>State whether your institution ensures outsource provider compliance with the requirements via reporting obligation.</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p>
<b>AUH</b>	Outsource Assess Training	<p>State whether your institution ensures outsource provider compliance with the requirements via training (e.g. ensure outsource providers are sufficiently trained in topics relating to the compliance requirements).</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p>
<b>AUJ</b>	Outsource Assess Audit Rights	<p>State whether your institution ensures outsource provider compliance with the requirements via audit rights (e.g. retain rights to audit the outsource providers).</p> <p>Select from: Yes; No; N/A Variable name: EnumerationYesNoNA</p>
<b>AUK</b>	Outsource Assess Other	<p>State, if any, which other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. If not applicable enter N/A.</p> <p>List the processes separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>

## 8.4.12 Education & Training

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

<A01031 Identifier="AUL" IntegerValue="324"></A01031>

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

<b>AUY</b>	Other - % Staff coverage	<p>Variable name: PercentageValue</p> <p>State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with regard to financial crime. If not applicable enter 0.</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>Variable name: PercentageValue</p>
<b>BFN</b>	Training Test	<p>State the proportion of staff or trainees for whom at least one training was validated by a test. If not applicable enter 0.</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>Variable name: PercentageValue</p>
<b>BIL</b>	Staff Numbers	<p>Enter the total number of full-time equivalent employees employed by the institution.</p> <p>Variable name: IntegerValue</p>

### 8.4.13 Compliance & Assurance Testing

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

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

<A01031 Identifier="AUZ" DateValue="2024-03-12"></A01031>

REF	Field	Description
AUZ	Compliance SEBWRA	State the most recent date when the structure and effectiveness of your institution's <u>business-wide risk assessment</u> was assessed by the compliance function in your institution.  Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
AVA	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
AVB	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
AVC	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
AVD	Compliance Resources	State the most recent date when the adequacy of the human and technical 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
AVE	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
AVL	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
AVM	Compliance TM	State the most recent date when the transaction monitoring process was assessed by the compliance function.

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
<b>AVN</b>	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
<b>AVO</b>	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
<b>AVP</b>	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
<b>AVQ</b>	Compliance Other	State whether any other financial crime topics or processes were assessed by the compliance function in the preceding calendar year  Select from YesNo Variable name: EnumerationYesNo
<b>AVR</b>	Compliance Other Specify	Specify the other financial crime topics or processes that were assessed by the compliance function in your institution in the preceding calendar year. If not applicable enter N/A.  Provide a list of topics or processes separated by semicolon ( ; ) with no spaces either side.  Character limit: 500 characters.  Variable name: String500
<b>AVF</b>	Compliance BWRA Descript	Briefly describe any material findings/potential breaches identified from the last assessment of your institution's business-wide risk assessment. If not applicable enter N/A.  Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.  Character limit: 500 characters Variable name: String500
<b>AVG</b>	Compliance Training Descript	Briefly describe any material findings/potential breaches identified from the last assessment of AML/CFT-related awareness-raising and staff training measures. If not applicable enter N/A.  Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side. Character limit: 500 characters. Variable name: String500
<b>AVH</b>	Compliance Verification Descript	Briefly describe any material findings/potential breaches identified from the last assessment of identification and identity verification procedures. If not applicable enter N/A.  Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side. Character limit: 500 characters. Variable name: String500

<b>AVI</b>	Compliance Sanctions Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of compliance with sanctions regulations. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AVJ</b>	Compliance Resources Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AVK</b>	Compliance Organisation Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the organisation of the AML/CFT system, governance and reporting to management bodies. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AVS</b>	Compliance CDD Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of customers in a business relationship. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AVT</b>	Compliance TM Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the transaction monitoring process. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AVU</b>	Compliance STR Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the suspicious transaction reporting process. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AVV</b>	Compliance Records Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of record keeping policies and procedures. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AVW</b>	Compliance TPDD Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of outsourcing arrangements. If not applicable enter N/A.</p>

		<p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.    Variable name: String500</p>
<b>AVX</b>	Compliance Other Process Descript	<p>If it is Yes to ComplianceOther, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters.</p> <p>Variable name: String500</p>
<b>AWG</b>	Compliance to Senior Management	<p>State the <a href="#">Frequency</a> of compliance function reporting (i.e. financial crime, AML, sanctions) to senior management.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
<b>AWH</b>	Compliance to Board	<p>State the <a href="#">Frequency</a> of compliance function reporting (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
<b>BFM</b>	Compliance AML Staff	<p>Number of dedicated AML/CFT compliance staff (in Full Time Equivalent)</p> <p>Variable name: IntegerValue</p>



### 8.4.14 Audit

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

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

<A01031 Identifier="AWW" DateValue="2024-03-12"></A01031>

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

<b>AXC</b>	Audit TM	<p>State the most recent date when the transaction monitoring process was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AXE</b>	Audit STR	<p>State the most recent date when the suspicious transactions reporting process was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AWO</b>	Audit Records	<p>State the most recent date when record keeping policies and procedures were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AXI</b>	Audit TPDD	<p>State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>AXK</b>	Audit Other	<p>State whether other financial crime processes were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
<b>AXL</b>	Audit Other Specify	<p>If Yes to AuditOtherProcess, briefly specify the other processes that were was subject to an internal audit by your institution or assessed by an external expert. If not applicable enter N/A.</p> <p>Provide a list of other processes separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>
<b>AWX</b>	Audit BWRA Descript	<p>If Yes to AuditSEBWRA, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters. Variable name: String500</p>
<b>AWL</b>	Audit Training Descript	<p>If Yes to AuditTraining, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>
<b>AWN</b>	Audit Verification Descript	<p>If Yes to AuditVerification, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>

<b>AWR</b>	Audit Sanctions Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If Yes to AuditSanctions, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AWZ</b>	Audit Resources Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If Yes to AuditResources, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AXH</b>	Audit Organisation Descript	<p>Character limit: 500 characters.    Variable name: String500</p> <p>If Yes to AuditOrganisation, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AXB</b>	Audit CDD Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If Yes to AuditCDD, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AXD</b>	Audit TM Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If Yes to AuditTM, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AXF</b>	Audit STR Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If Yes to AuditSTR, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AWP</b>	Audit Records Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If Yes to AuditRecords, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AXJ</b>	Audit TPDD Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If Yes to AuditTPDD, briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p>
<b>AXM</b>	Audit Other Process Descript	<p>Character limit: 500 characters    Variable name: String500</p> <p>If other financial crime topic assessed by the Internal Audit function, then briefly describe any material findings/potential breaches identified. If not applicable enter N/A.</p>

		Character limit: 500 characters    Variable name: String500
<b>AXV</b>	Audit to Senior Management	<p>State the <a href="#">Frequency</a> of internal audit function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
<b>AXW</b>	Audit to Board	<p>State the <a href="#">Frequency</a> of internal audit function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
<b>AYE</b>	NCA ML	<p>State whether a foreign supervisory authority issued findings regarding your institution's anti-money laundering framework in the preceding calendar year.</p> <p>Select from YesNo    Variable name: EnumerationYesNo</p>
<b>AAU</b>	NCA ML Descript	<p>If Yes to NCAML, briefly describe the findings/gaps identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters    Variable name: String500</p>
<b>AYF</b>	NCA TF	<p>State whether a foreign supervisory authority issued findings regarding your institution's countering the financing of terrorism framework in the preceding calendar year.</p> <p>Select from YesNo    Variable name: EnumerationYesNo</p>
<b>AAV</b>	NCA TF Descript	<p>If Yes to NCATF, briefly describe the findings/gaps identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters    Variable name: String500</p>
<b>AYG</b>	NCA FTR	<p>State whether a foreign supervisory authority issued findings on your institution's compliance with Funds Transfer Regulation in the preceding calendar year.</p> <p>Select from YesNo    Variable name: EnumerationYesNo</p>
<b>AAW</b>	NCA FTR Descript	<p>If Yes to NCAFTR, briefly describe the findings/gaps identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters    Variable name: String500</p>
<b>AYH</b>	NCA Sanctions	<p>State whether a foreign supervisory authority issued findings on your institution's prevention of circumvention of sanctions framework in the preceding calendar year.</p>

		Select from YesNo Variable name: EnumerationYesNo
<b>AAX</b>	NCA Sanctions Descript	<p>If Yes to NCASanctions, briefly describe the findings/gaps identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>
<b>AYI</b>	NCA Corruption	<p>State whether a foreign supervisory authority issued findings on your institution's management of anti-corruption (bribery) and prevention of conflicts of interests frameworks in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
<b>AAJ</b>	NCA Corruption Descript	<p>If Yes to NCACorruption, briefly describe the findings/gaps identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>
<b>AYJ</b>	NCA Other	<p>State whether a foreign supervisory authority issued findings on your institution's preventative frameworks with regard to other financial crime areas in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
<b>AYK</b>	NCA Other Specify	<p>If Yes to NCAOther, briefly specify. If not applicable enter N/A.</p> <p>Provide a list of other topics separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>
<b>AAZ</b>	NCA Other Descript	<p>If Yes to NCAOther, briefly describe the findings/gaps identified. If not applicable enter N/A.</p> <p>Provide a list of findings/gaps separated by semicolon ( ; ) with no spaces either side.</p> <p>Character limit: 500 characters Variable name: String500</p>

#### 8.4.15 Internal controls and reporting systems

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

<A01031 Identifier="BEY" DateValue="2022-03-12"></A01031>

REF	Field	Description
<b>BEY</b>	Report Improve	<p>State the most recent date when reports on the areas where the operation of AML&amp;CFT controls should be implemented or improved and suggested improvements were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>

<b>BEZ</b>	Report Compliance Action	<p>State the most recent date when reports on compliance monitoring actions and a plan of activities regarding AML/CFT compliance were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFA</b>	Report Remedial	<p>State the most recent date when a progress report of any significant remedial programmes were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFB</b>	Report Compliance Adequacy	<p>State the most recent date when reports on adequacy of the human and technical resources in the AML/CFT compliance function were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFC</b>	Report BWRA Findings	<p>State the most recent date when reports on the main findings of the business-wide ML/TF risk assessment were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFD</b>	Report Profiling Change	<p>State the most recent date when reports on the changes in the methodology for assessing customer risk profiles were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFE</b>	Report Customers	<p>State the most recent date when reports on the classification of customers by risk category were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFF</b>	Report ST Data	<p>State the most recent date when reports on statistical data on unusual and suspicious transaction were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFG</b>	Report Audit	<p>State the most recent date when reports on AML/CFT related findings of internal and external audits were submitted to your institution's senior management.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
<b>BFH</b>	Report Training	<p>State the most recent date when reports on AML/CFT training activities and plan were submitted to your institution's senior management.</p> <p>Variable name: DateValue</p>

		Format YYYY-MM-DD If not applicable enter 2000-01-01
<b>AWA</b>	Compliance Total Outstand	<p>State the total number of actions outstanding, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year.</p> <p>Enter 0 if none. Variable name: IntegerValue</p>
<b>AVY</b>	Compliance Critical Outstand	<p>State the number of <a href="#">critical-rated actions</a>, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year.</p> <p>Enter 0 if none. Variable name: IntegerValue</p>
<b>AVZ</b>	Compliance High Outstand	<p>State the number of high-rated actions outstanding, including those overdue, following assessment by the compliance function as of 31 December of the preceding calendar year.</p> <p>Enter 0 if none. Variable name: IntegerValue</p>
<b>AWE</b>	Compliance Total Overdue > 6 Months	<p>State the total number of actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year.</p> <p>Enter 0 if none. Variable name: IntegerValue</p>
<b>AWC</b>	Compliance Critical Overdue > 6 Months	<p>State the number of critical-rated actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year.</p> <p>Enter 0 if none. Variable name: IntegerValue</p>
<b>AWD</b>	Compliance High Overdue > 6 Months	<p>State the number of high-rated actions overdue for 6 months or longer, following assessment by the compliance function as of 31 December of the preceding calendar year.</p> <p>Enter 0 if none. Variable name: IntegerValue</p>

## 8.4.16 Governance

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

<A01031 Identifier="AYL" EnumerationFrequency="Only\_every\_5\_years\_or\_less"></A01031>

REF	Field	Description
AYL	Money Laundering Senior Management	<p>State the <a href="#">Frequency</a> that money laundering is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AYM	Terrorist Financing Senior Management	<p>State the <a href="#">Frequency</a> that terrorist financing is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AYN	FTR Senior Management	<p>State the <a href="#">Frequency</a> that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AYO	Sanction Circumvent Senior Management	<p>State the <a href="#">Frequency</a> that the circumvention of sanctions is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AYP	Corruption Senior Management	<p>State the <a href="#">Frequency</a> that corruption (bribery) and conflicts of interests is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AYS	Money Laundering Board	<p>State the <a href="#">Frequency</a> that money laundering is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AYT	Terrorist Financing Board	<p>State the <a href="#">Frequency</a> that terrorist financing is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from <a href="#">Frequency</a></p> <p>Variable name: EnumerationFrequency</p>
AYU	FTR Board	<p>State the <a href="#">Frequency</a> that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from <a href="#">Frequency</a></p>



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

### 8.4.17 Compliance with Fund Transfers Regulation

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

<A01031 Identifier="BGF" IntegerValue="53"></A01031>

REF	Field	Description
BGF	FTR Out Missing Info	<p>Number of outbound transfers for which requests were received from a counterparty in the transfer chain for information that is missing, incomplete or provided using inadmissible characters in the preceding calendar year. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
BGG	FTR Outbound	<p>Total number of outbound transfers in the preceding calendar year. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
BGH	FTR Outbound Reject	<p>Enter the proportion of outbound transfers rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters in the preceding calendar year. If not applicable enter 0.</p> <p>Enter the proportion as a decimal, e.g. enter 4.7% as 0.047</p> <p>Variable name: PercentageValue</p>
BGI	FTR Counter Fail	<p>Number of repeatedly failing counterparties flagged to the supervisor in the preceding calendar year. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>
BGJ	FTR Counter Total	<p>Total number of counterparties of outbound and inbound transfers in the preceding calendar year. If not applicable enter 0.</p> <p>Variable name: IntegerValue</p>

## 8.5 Physical Presence

The questions below concern the institution providing products or services through subsidiaries, branches, representative offices, and other physical presences.

Please state the number of subsidiaries, branches, agents, distributors, and other physical presences such as representative offices, broken down by country code.

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

```
<A01041 AZD="AD" AZE="5741" AZF="3290" AZG="8442" AZH="6753" BEV="646" BEW="457" BEX="0"></A01041>
```

REF	Field	Description
AZD	Country	Select from the list of Alpha-2 country codes, <a href="#">Country</a> for each applicable country where the institution has subsidiaries, branches, agents, distributors, representative offices, and participating interests  Data Type: EnumerationValue  If not applicable select 00
AZE	No. of subsidiaries	Number of subsidiaries in each country  Data Type: IntegerValue
AZF	No. of branches	Number of branches in each country  Data Type: IntegerValue
AZG	No. of representative offices	Number of representative offices in each country  Data Type: IntegerValue
AZH	No. of other physical presences	Number of other physical presence in each country  Data Type: IntegerValue
BEV	No. of agents	Number of agents in each country  Data Type: IntegerValue
BEW	No. of distributors	Number of distributors in each country  Data Type: IntegerValue
BEX	Number of white labelling partners	Number of white labelling partners in each country, where white labelling refers to a business arrangement where a product or service is provided by one company but is offered to customers by another company, regulated or non-regulated, under its own brand  Data Type: IntegerValue

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

Country	No. of subsidiaries	No. of branches	No. of representative offices	No. of other physical presences	No. of agents	No. of distributors	Number of white labelling partners
AZD	AZE	AZF	AZG	AZH	BEV	BEW	BEX
FR	0	1	0	0	0	0	0
GB	1	0	0	0	0	0	0

```
<A0104>
```

```
<A01041 AZD="FR" AZE="0" AZF="1" AZG="0" AZH="0" BEV="0" BEW="0" BEX="0"></A01041>
```

```
<A01041 AZD="GB" AZE="1" AZF="0" AZG="0" AZH="0" BEV="0" BEW="0" BEX="0"></A01041>
```

```
</A0104>
```

## 8.6 Residence & 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.

```
<A01051 AZI="AD" AZJ="2864" AZK="5527" AZL="5464" AZO="8393" AZP="1374" AZQ="2642" AZR="8867" AZU="9930" ABA="6756"></A01051>
```

REF	Field	Description
AZI	Country	Select from the list of Alpha-2 country codes, <a href="#">Country</a> for each applicable country that has natural persons residing or legal entities established in that country.  Data Type: EnumerationValue If not applicable select 00
AZJ	Natural person customers – Total Number	Natural person customers – Total Data Type: IntegerValue
AZK	Natural person customers – No. of which are New Customers	Natural person customers - Number of which are <a href="#">New Customers</a>  Data Type: IntegerValue
AZL	Natural person customers – No. of which are High Risk	Natural person customers - Number of which are High Risk according to institution's customer risk assessment Data Type: IntegerValue
AZO	Natural person customers – No. of which are PEPs	Natural person customers - Number of which are PEPs, their family members or persons known to be close associates. Data Type: IntegerValue
AZP	Legal entity customers – Total Number	Legal entity customers – Total Data Type: IntegerValue
AZQ	Legal entity customers - No. of which are New Customers	Legal entity customers - Number of which are <a href="#">New Customers</a>  Data Type: IntegerValue
AZR	Legal entity customers - No. of which are High Risk	Legal entity customers - Number of which are High Risk according to institution's customer risk profiling Data Type: IntegerValue
AZU	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 <a href="#">Beneficial Owner</a> located in non-EEA countries (residence).  Data Type: IntegerValue
ABA	Legal entity customers - No. of which have PEP Risk Identified	Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment  Data Type: IntegerValue

For example:

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

Country	Natural person				Legal entity customers				
	Total No.	No. of which are New Customers	No. of which are High Risk	No. of which are PEPs, their family members or persons known to be close associates	Total No.	No. of which are New Customers	No. of which are High Risk	No. of which are with at least one beneficial owner residing in non-EEA countries	No. of which have PEP Risk Identified
AZI	AZJ	AZK	AZL	AZO	AZP	AZQ	AZR	AZU	ABA
GB	4	2	2	2	4	1	2	1	1

<A0105>

<A01051AZI="GB" AZJ="4" AZK="2" AZL="2" AZO="2" AZP="4" AZQ="1" AZR="2" AZU="1"> ABA="1" </A01051>

<A0105>

## 8.7 Beneficial Owners

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, and how many of those are PEPs, their family members, or persons known to be close associates.

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

<A01061 AZV="AD" AZW="1073" AZX="9794"></A01061>

REF	Field	Description
AZV	Country	Select from the list of Alpha-2 country codes, <a href="#">Country</a> for each applicable country that has a PEP or legal entity BO residing in that country.  Data Type: EnumerationValue If not applicable select 00
AZW	Number of beneficial owners	Number of beneficial owners of your legal entity customers residing in the country.  Data Type: IntegerValue
AZX	No. of which are PEPs	Number of beneficial owners that are PEPs, their family members or persons known to be close associates residing in the country.  Data Type: IntegerValue <a href="#">Error! Reference source not found.</a>

For example:

- 4 BOs of your institution's legal entity customers **reside in** the UK
  - 2 of which are PEPs, their family members or persons known to be close associates
- 1 BO of your institution's legal entity customers resides in Denmark
  - Zero of which have PEP associations

Report as below:

Country	Your legal entity customers' BOs	
	Total No.	No. of which are PEPs, their family members or persons known to be close associates
AZV	AZW	AZX
GB	4	2
DK	1	0

<A0106>

<A01061 AZV="GB" AZW="4" AZX="2"></A01061>

<A01061 AZV="DK" AZW="1" AZX="0"></A01061>

<A0106>

## 8.8 Payment Transactions

The questions in this section only relate to international non-cash transactions between two bank accounts (customer-to-customer transfers). Domestic interbank transfers, debit card payments and cash deposits/withdrawals should be excluded.

Select each country, to and from, which your institution provided or received payments transactions in the preceding calendar year stating for **each** country:

- the total number of your customer accounts to which your institution provided payment transactions in the preceding calendar year
- the total number and value (EUR) of incoming and outgoing payment transactions in the preceding calendar year, excluding the following transactions:
  - Internal transfers: transactions between accounts held by the same customer within the institution that do not represent true external inflows;
  - Reversals: transactions that were subsequently cancelled, refunded, or otherwise reversed;
  - Intra-group transactions. Transactions between child entities that sit under / are linked to one group parent and/or transfers between parent and child entities within the one group.

The country selected should be based on the country of the bank account from which payments originated (inward payments), or of the ultimate recipient bank account (outward payments), e.g. using the IBAN, BIC or Swift Code country of the bank account.

The total data by country provided should be broken down by the customer risk ratings assigned to those accounts.

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

```
<A01071 AZY="AD" AZZ="4918" BAA="2442" BAB="416.24134" BMF="234" BAC="2230" BAD="9592.4994" BAE="0" BAF="0" B
AG="0" BMG="741258" BAH="9802" BAI="8130.6211"></A01071>
```

REF	Field	Description
AZY	CountryPT	Select from dropdown list of Alpha-2 country codes, <a href="#">Country</a> for each applicable country that has non-cash transactions between two bank accounts in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions.  Data Type: EnumerationValue If not applicable select 00
AZZ	Overall - No. of accounts (incoming)	Overall number of accounts that completed non-cash incoming transactions between two bank accounts in the preceding calendar year. Data Type: IntegerValue
BAA	Overall - No. of incoming transactions	Overall number of incoming non-cash transactions between two bank accounts in the preceding calendar year. Data Type: IntegerValue

<b>BAB</b>	Overall - Value of incoming transactions	EUR Value of total incoming non-cash transactions between two bank accounts in the preceding calendar year.  Data Type: DecimalValue
<b>BMF</b>	Overall - No. of accounts (outgoing)	Overall number of accounts that completed non-cash outgoing transactions between two bank accounts in the preceding calendar year. Data Type: IntegerValue
<b>BAC</b>	Overall - No. of outgoing transactions	Overall number of total outgoing non-cash transactions between two bank accounts in the preceding calendar year. Data Type: IntegerValue
<b>BAD</b>	Overall - Value of outgoing transactions	EUR Value of total outgoing non-cash transactions between two bank accounts in the preceding calendar year.  Data Type: DecimalValue
<b>BAE</b>	of which High Risk - No. of accounts (incoming)	Number of High Risk Customer accounts, per your institution's Customer risk assessment), that completed non-cash incoming transactions between two bank accounts in the preceding calendar year. Data Type: IntegerValue
<b>BAF</b>	of which High Risk - No. of incoming transactions	Number of incoming non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). Data Type: IntegerValue
<b>BAG</b>	of which High Risk - Value of incoming transactions	EUR Value of incoming non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).  Data Type: DecimalValue
<b>BMG</b>	of which High Risk - No. of accounts (outgoing)	Number of High Risk Customer accounts, per your institution's Customer risk assessment), that completed non-cash outgoing transactions between two bank accounts in the preceding calendar year. Data Type: IntegerValue
<b>BAH</b>	of which High Risk - No. of outgoing transactions	Number of outgoing non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). Data Type: IntegerValue
<b>BAI</b>	of which High Risk - Value of outgoing transactions	EUR Value of outgoing non-cash transactions between two bank accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).  Data Type: DecimalValue



## 8.9 Pooled Accounts

The following questions are related to pooled accounts, which are bank accounts opened by customers such as financial institutions or legal practitioners to hold their clients' money. In these accounts, clients' money is comingled, but the clients cannot directly tell your institution to carry out transactions.

Please state the number of pooled accounts and subaccounts, the total number and value (EUR) of incoming and outgoing transactions per country. The country selected should be based on the country of the bank accounts used in the preceding calendar year, e.g. using the IBAN, BIC or Swift Code country of the bank account.

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

```
<A01081 BLA="AD" BLB="8838" BLC="4403" BLD="5948.978" BLE="586" BLF="7880.477" BLG="9569" BLH="9373" BLI="7648.933" BLJ="8061" BLK="6342.9986"></A01081>
```

REF	Field	Description
<b>BLA</b>	Country	Select from dropdown list of Alpha-2 country codes, <a href="#">Country</a> for each applicable country that had pooled accounts in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions.  Data Type: EnumerationValue If not applicable select 00
<b>BLB</b>	Overall - No. of pooled accounts and subaccounts	Overall number of pooled accounts and subaccounts in the preceding calendar year. Data Type: IntegerValue
<b>BLC</b>	Overall - No. of incoming transactions	Overall number of incoming transactions for pooled accounts in the preceding calendar year. Data Type: IntegerValue
<b>BLD</b>	Overall - Value of incoming transactions	EUR Value of total incoming transactions for pooled accounts in the preceding calendar year.  Data Type: DecimalValue
<b>BLE</b>	Overall - No. of outgoing transactions	Overall number of total outgoing transactions for pooled accounts in the preceding calendar year. Data Type: IntegerValue
<b>BLF</b>	Overall - Value of outgoing transactions	EUR Value of total outgoing transactions for pooled accounts in the preceding calendar year.  Data Type: DecimalValue
<b>BLG</b>	of which High Risk – No. of pooled accounts and subaccounts	Number of High Risk Customer pooled accounts, per your institution's Customer risk assessment), in the preceding calendar year. Data Type: IntegerValue
<b>BLH</b>	of which High Risk – No. of incoming transactions	Number of incoming transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). Data Type: IntegerValue
<b>BLI</b>	of which High Risk – Value of incoming	EUR Value of incoming transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment).

	transactions	Data Type: DecimalValue
<b>BLJ</b>	of which High Risk – No. of outgoing transactions	Number of outgoing transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). Data Type: IntegerValue
<b>BLK</b>	of which High Risk – Value of outgoing transactions	EUR Value of outgoing transactions for pooled accounts in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment). Data Type: DecimalValue

## 8.10 Correspondent Relationship

The questions below concern [Correspondent relationships](#), where your institution is the correspondent.

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

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

```
<A01091 BLL="AD" BAT="9925" BLM="9983" BLN="1433.2988" BLO="7631" BLP="5165.4292" BJW="5583" BLQ="9273" BLR="4481.5426" BLS="7360" BLT="4739.3305"></A01091>
```

REF	Field	Description
BLL	Country	Select from dropdown list of Alpha-2 country codes, <a href="#">Country</a> for each applicable country that had institutions to which your institution provides correspondent services in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions with a correspondent relationship.  Data Type: EnumerationValue If not applicable select 00
BAT	Overall - No. of respondent institutions	Overall number of <b>respondent institutions</b> to which your institution provides correspondent services, in the preceding calendar year. Data Type: IntegerValue
BLM	Overall - No. of incoming transactions	Overall number of incoming transactions for institutions to which your institution provides correspondent services in the preceding calendar year. Data Type: IntegerValue
BLN	Overall - Value of incoming transactions	EUR Value of total incoming transactions for institutions to which your institution provides correspondent services in the preceding calendar year.  Data Type: DecimalValue
BLO	Overall - No. of outgoing transactions	Overall number of total outgoing transactions for institutions to which your institution provides correspondent services in the preceding calendar year. Data Type: IntegerValue
BLP	Overall - Value of outgoing transactions	EUR Value of total outgoing transactions for institutions to which your institution provides correspondent services in the preceding calendar year.  Data Type: DecimalValue
BJW	of which High Risk - No. of respondent institutions	Number of High Risk <b>respondent institutions</b> , per your institution's customer risk profiling), to which your institution provides correspondent services in the preceding calendar year. Data Type: IntegerValue
BLQ	of which High Risk - No. of incoming transactions	Number of incoming transactions for Institutions to which your institution provides correspondent services in the preceding calendar year for High Risk Customers, per your institution's customer risk assessment). Data Type: IntegerValue

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

## 8.11 Trade Finance

The questions below concern trade finance services to customers with importing or exporting activities.

Please state the number of customers to whom your institution provided trade finance in the preceding calendar year and specify the total number and value (EUR) of incoming and outgoing trade finance transactions in the preceding calendar year, based on the BICs (country codes) of the accounts used. The country selected should be based on the country of the bank account from which transactions originated (inward transactions), or of the ultimate recipient bank account (outward transactions), e.g. using the IBAN, BIC or Swift Code country of the bank account.

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

```
<A01101 BLU="AD" BAU="471" BLV="6006" BLW="7283.1896" BLX="1784" BLY="4957.672" BLZ="669" BMA="0" BMB="0" BMC="7577" BMD="448.36218"></A01101>
```

REF	Field	Description
<b>BLU</b>	Country	Select from the list of Alpha-2 country codes, <a href="#">Country</a> for each applicable country that had institutions to which your institution provides trade finance services in the preceding calendar year. Complete for each country that has either incoming or outgoing transactions with trade finance services.  Data Type: EnumerationValue If not applicable select 00
<b>BAU</b>	Overall - No. of customers	Overall number of customers to which your institution provides trade finance services, in the preceding calendar year.  Data Type: IntegerValue
<b>BLV</b>	Overall - No. of incoming transactions	Overall number of incoming transactions for institutions to which your institution provides trade finance services in the preceding calendar year.  Data Type: IntegerValue

<b>BLW</b>	Overall - Value of incoming transactions	EUR Value of total incoming transactions for institutions to which your institution provides trade finance services in the preceding calendar year.  Data Type: DecimalValue
<b>BLX</b>	Overall - No. of outgoing transactions	Overall number of total outgoing transactions for institutions to which your institution provides trade finance services in the preceding calendar year. Data Type: IntegerValue
<b>BLY</b>	Overall - Value of outgoing transactions	EUR Value of total outgoing transactions for institutions to which your institution provides trade finance services in the preceding calendar year.  Data Type: DecimalValue
<b>BLZ</b>	of which High Risk - No. of customers	Number of High Risk accounts, per your institution's Customer risk assessment, to which your institution provides trade finance services in the preceding calendar year. Data Type: IntegerValue
<b>BMA</b>	of which High Risk - No. of incoming transactions	Number of incoming transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue
<b>BMB</b>	of which High Risk - Value of incoming transactions	EUR Value of incoming transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.  Data Type: DecimalValue
<b>BMC</b>	of which High Risk - No. of outgoing transactions	Number of outgoing transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue
<b>BMD</b>	of which High Risk - Value of outgoing transactions	EUR Value of outgoing transactions for Institutions to which your institution provides trade finance services in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.  Data Type: DecimalValue

## 8.12 Geography of Funds Flow

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

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

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

```
<A0211 BDE="AD" BDF="1830" BDG="6170" BDH="44" BDI="1232" BDJ="9582" BDK="5961" BDL="1587" BDM="8184" BDN="7660" BDO="4506" BDP="4183" BDQ="5599"></A0211>
```

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

<b>BDE</b>	Country	Select from dropdown list of Alpha-2 country codes, <a href="#">Country</a> 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 If not applicable select 00
<b>BDF</b>	Overall - No. of customers (Source)	Overall number of customers with incoming transactions from each country in the preceding calendar year.  Data Type: IntegerValue
<b>BDG</b>	Overall - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year.  Data Type: IntegerValue
<b>BDH</b>	Overall - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year.  Data Type: DecimalValue
<b>BDI</b>	Overall - No. of customers (Destination)	Overall number of customers with outgoing transactions to each country in the preceding calendar year.  Data Type: IntegerValue
<b>BDJ</b>	Overall - No. of transactions (Destination)	Overall number of outgoing transactions to each country in the preceding calendar year.  Data Type: IntegerValue
<b>BDK</b>	Overall - Value of transactions (Destination)	EUR Value of total outgoing transactions to each country in the preceding calendar year.  Data Type: DecimalValue
<b>BMH</b>	of which High Risk - No. of customers (Source)	Overall number of customers with incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.  Data Type: IntegerValue
<b>BMI</b>	of which High Risk - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.  Data Type: IntegerValue
<b>BMJ</b>	of which High Risk - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.  Data Type: DecimalValue
<b>BMK</b>	of which High Risk - No. of customers (Destination)	Overall number of customers with outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.

		Data Type: IntegerValue
<b>BDL</b>	of which High Risk - No. of transactions (Destination)	Number of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.
		Data Type: IntegerValue
<b>BDM</b>	of which High Risk - Value of transactions (Destination)	EUR Value of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment.
		Data Type: DecimalValue

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

- 85 customers who had 600 incoming transactions where the source of the fund flow was Ireland and 100 customers who had 12,500 outgoing transactions where the destination of the fund flow was Ireland. 3 of the customers with incoming transactions from Ireland were High Risk customers. 5 of the customers with outgoing transactions to Ireland were High Risk customers.
- 15 customers who had 912 incoming transactions where the source of the fund flow was Germany and 20 customers who had 1,800 outgoing transactions where the destination of the fund flow was Germany. 1 of the customers with incoming transactions from Germany was a High Risk customer. 2 of the customers with outgoing transactions to Germany were High Risk customers.
- No customers had incoming transactions from the United Kingdom and 3 customers had 6 outgoing transactions to the United Kingdom. 1 of the customers with outgoing transactions to the United Kingdom was a High Risk customer.
- 1 customer had 1 incoming transaction where the source of the funds flow was France, and no customers had outgoing transactions where the destination of the funds flow was France. This customer has not a High Risk customer.

Country	Overall						of which High Risk (per your Institution's Customer Risk Assessment)					
	No. of customers (Source)	No. of transactions (Source)	Value of transactions (Source)	No. of customers (Destination)	No. of transactions (Destination)	Value of transactions (Destination)	No. of customers (Source)	No. of transactions (Source)	Value of transactions (Source)	No. of customers (Destination)	No. of transactions (Destination)	Value of transactions (Destination)
BDE	BDF	BDG	BDH	BDI	BDJ	BDK	BMH	BMI	BMJ	BMK	BDL	BDM
IE	85	600	741,534.00	100	12,500	123,456.00	3	26	247,178.00	5	3,125	280,864.12
DE	15	912	146,049.00	20	1,800	224,691.00	1	61	19,736.60	2	450	56,173.00
GB	0	0	0.00	3	6	1,248.00	0	0	0.00	1	1	500.00
FR	1	1	50.00	0	0	0.00	0	0	0.00	0	0	0.00

<A0111>

<A01111 BDE="IE" BDF="85" BDG="600" BDH="741532" BDI="100" BDJ="12500" BDK="123456"

BMH="3" BMI="26" BMJ="247178" BMK="5" BDL="3125" BDM="280864.12"></A01111>

<A01111 BDE="DE" BDF="15" BDG="912" BDH="146049" BDI="20" BDJ="1800" BDK="224691"

BMH="1" BMI="61" BMJ="19737.60" BMK="2" BDL="450" BDM="56173"></A01111>

<A01111 BDE="GB" BDF="0" BDG="0" BDH="0" BDI="3" BDJ="6" BDK="1248"

BMH="0" BMI="0" BMJ="0" BMK="1" BDL="1" BDM="500"></A01111>

<A01111 BDE="FR" BDF="1" BDG="1" BDH="50" BDI="0" BDJ="0" BDK="0"

BMH="0" BMI="0" BMJ="0" BMK="0" BDL="0" BDM="0"></A01111>

</A0111>

### 8.13 Transaction Monitoring

For each Transaction Monitoring rule/model in your institution's process, state the name of the rule/model, give a very brief description (see example below), specify the number of alerts for this rule/model, the number of [true positive alerts](#), and the number of [false positive alerts](#). All rules/models should be included, even those with no alerts in the preceding calendar year.

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

A true positive transaction monitoring alert is any alert that by itself, or as a group of alerts, was escalated to a Suspicious Transaction Report filing. All other alerts, which were closed without an STR filing are considered false positives. An alert which was triggered but was not investigated/closed at 31 December of the preceding calendar year should be counted as an alert but not as a true positive or as a false positive.

Rule Name / ID	High Level Rule / Model Description	Number of Transaction Monitoring Alerts for Rule/Model	Number of True Positive Alerts for Rule/Model	Number of False Positive Alerts for Rule/Model
R001_Foreign_Cash	Rule which detects significant cash deposit and subsequent risky international transaction	25	2	23
R002_Incoming_Smurfing	Detects large number of incoming small transactions from different sources, contrary to expected behaviour for customer segment	0	0	0

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

<A0221 BDR="DKUHDKJHDKHDFSA" BDS="UKHDKJHDKJ" BDT="20" BDU="1000" BDV="30"></A0221>

REF	Field	Description
BDR	Rule Name / ID	Unique Internal Rule ID. Please complete for each rule.  Free text with character limit: 500 characters. Data Type: StringValue
BDS	High Level Rule / Model Description	High-level description of each Rule / Model.  Free text with character limit: 2000 characters. Data Type: StringValue
BDT	Number of Transaction Monitoring Alerts for Rule/Model	Number of Transaction Monitoring Alerts for Rule/Model ( <b>Preceding Calendar Year</b> )  Data Type: IntegerValue
BDU	Number of True Positive Alerts for Rule/Model	Number of <a href="#">True Positive Alerts</a> for Rule/Model ( <b>Preceding Calendar Year</b> )  Data Type: IntegerValue
BDV	Number of False Positive Alerts for Rule/Model	Number of <a href="#">False Positive Alerts</a> for Rule/Model ( <b>Preceding Calendar Year</b> )  Data Type: IntegerValue



## 9 Appendices

### 9.1 Definitions

Phrase	Definition
<b>Active customer</b>	The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into, or who has at least one transaction initiated by the customer even if it is a periodic/automatic transaction, in the preceding calendar year but excludes any transactions which pertain to fee payments, services charges or similar.
<b>AML/CFT regulated customers</b>	All persons or entities of a similar nature to those listed in Article 3 of Regulation (EU) 2424/1624, including those that do not fall within the scope of Regulation (EU) 2024/1624 due to their non-EU status
<b>Asset backed loan</b>	A loan in relation to which an asset is pledged, or given as a collateral, to the lender to protect the lender against the borrower's failure to reimburse the funds, and cash collateral is a collateral which at least partially consists of cash or an account on which cash is deposited as per the definition of cash under Article 2(1)(a) of Regulation (EU) 2018/1672: 'cash' means: (i) currency; (ii) bearer-negotiable instruments; (iii) commodities used as highly-liquid stores of value; (iv) prepaid cards.
<b>Assets under custody</b>	Assets for which the institution provides safekeeping and administration services (cf. MiFID II - Annex I, Section B - Ancillary services) and final investor refers to the end client or individual who ultimately owns and benefits from the investments, as opposed to intermediaries or entities managing or holding the assets on behalf of others
<b>Assets under management</b>	Assets which are either under the scope of a portfolio management mandate or under the scope of an investment advice mandate
<b>Beneficial owner</b>	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.
<b>Business relationship</b>	As per Article 2(1), point (19), of Regulation (EU) 2024/1624.
<b>Business Wide Risk Assessment</b>	As per Article 10 of Regulation (EU) 2024/1624.
<b>Cash-intensive business</b>	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
<b>Charity</b>	Charitable organisation as defined in the Charities Act 2009.
<b>Complex business structure</b>	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 two or more 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.
<b>Correspondent relationship</b>	As per Article 2(1), point (22), of Regulation (EU) 2024/1624.
<b>Credit institution</b>	<p>(a) As per Article 2(1), point (5), of Regulation (EU) 2024/1624, or</p> <p>(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)</p>
<b>Critical-rated actions</b>	<p>Deficiencies that suggest the existence of one or more material weaknesses in the obliged entity's AML/CFT policies, systems and controls, identified by the internal auditor, external auditor or the supervisor.</p> <p>A material weakness is a weakness that has or will likely have a high impact on the compliance with AML/CFT regulatory requirements. The impact should be assessed based on the severity, duration and repetitiveness of the deficiency.</p>
<b>Crypto Asset Service Provider</b>	As per Article 2(1), point (9), of Regulation (EU) 2024/1624.
<b>Crypto risks</b>	Risks related to e.g. customers trading in cryptos, but also risks related to your institution's activities in this area.
<b>Crypto-asset</b>	As per Article 2(1), point (7), of Regulation (EU) 2024/1624.
<b>Crypto-asset services</b>	As per Article 2(1), point (8), of Regulation (EU) 2024/1624.
<b>Crypto token</b>	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.
<b>Customer</b>	The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into or who has a transaction initiated by the customers even if it is a periodic/automatic transaction, in accordance with Article 19(1) of Regulation (EU) 2024/1624.
<b>Customer Representative</b>	A customer representative is an individual authorised to act on behalf of the customer in managing their financial affairs, and is responsible for acting in the best interests of the customer and following their instructions.
<b>Depository Services</b>	The Depository institutions typically offers custodian and fiduciary services to both Irish and non-Irish regulated funds. Custodian services includes the safeguarding of assets of the customer/fund in question by controlling the monies the fund has to buy or sell securities or bonds for the fund. Fiduciary services includes the depository institutions reviewing the client's/fund's activities to ensure that the fund complies with relevant legislation and the prospectus requirements of the fund. This service is often referred to as Trustee Services
<b>Distributed ledger</b>	As per Article 3(1), point (2), of Regulation (EU) 2023/1114.
<b>Electronic money</b>	As per Article 2(1), point (17), of Regulation (EU) 2024/1624.
<b>E-Money Digital Accounts/Wallets</b>	Digital accounts/wallets are an online payment tool. The account/wallet stores value(s) which may include multiple currencies and/or crypto and enables customers to make and receive online payments.
<b>Factoring</b>	A form of finance which is secured by way of assignment or purchase of receivables.
<b>False positive alert</b>	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.
<b>Family members</b>	As per Article 2(1), point (35), of Regulation (EU) 2024/1624.

<b>Financial institution</b>	As per Article 2(1), point (6), of Regulation (EU) 2024/1624.
<b>Funds Transfer Regulation</b>	Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015, as supplemented by S.I. No. 608/2017 (EU)
<b>Group</b>	As per Article 2(1), point (41), of Regulation (EU) 2024/1624.
<b>High risk country</b>	Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163.
<b>Hit (in sanctions screening)</b>	In this context, “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.
<b>Human intervention</b>	As mentioned in EBA/GL/2022/15 – Guidelines on use of Remote Onboarding Solutions under Article 13(1) of Directive (EU) 2015/849.
<b>Intermediary</b>	This includes brokers, agents, 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.
<b>Investment Services</b>	Investment Services are any activity or service listed in Section A of annex 1 of MiFID II
<b>Legal entity</b>	Legal persons or other legal arrangement.
<b>Legal arrangement</b>	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
<b>Management body</b>	As per Article 2(1), point (37), point (38), and point (39), of Regulation (EU) 2024/1624.
<b>Maritime Finance</b>	Financing for maritime assets
<b>Merchant acquiring</b>	Handling a merchant’s account so that they can accept credit or debit card payments and settlement of payments into a merchant’s account.
<b>Merchant Services</b>	Similar to payment institutions whereby the credit institutions facilitate the merchant’s customer transactions.
<b>Money laundering</b>	As per Article 2(1), of Regulation (EU) 2024/1624.
<b>Money remittance</b>	As per Article 4(21), of Directive (EU) 2015/2366.
<b>Nested account</b>	An account where a financial institution (the nested financial institution) gains indirect access to services by transacting through another financial institution’s (the respondent institution) correspondent account
<b>New customer</b>	Natural persons or legal entities with whom a business relationship is entered into in the preceding calendar year.
<b>Occasional transaction</b>	As defined under Section 24 of the CJA 2010.
<b>Onboarded physically</b>	Onboarding face-to-face where the customer is physical present, that is, in the same physical location as the institution or a persona acting on the institution’s behalf.
<b>Offshore jurisdiction</b>	For the purposes of this REQ the term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
<b>Payable-through account</b>	A correspondent account that is used directly by third parties to transact business on their own behalf.
<b>Payment institution</b>	As per Article 4(4), of Directive (EU) 2015/2366.
<b>Payment instrument</b>	As per Article 4(14), of Directive (EU) 2015/2366.
<b>Payment transaction</b>	As per Article 4(5), of Directive (EU) 2015/2366.
<b>Person known to be a close associate</b>	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
<b>Politically Exposed Person (PEP)</b>	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.

<b>Pooled Account</b>	A bank account opened by a customer, for example a financial institution, legal practitioner or notary, for holding their clients' money. The clients' money will be commingled, but clients will not be able directly to instruct the bank to carry out transactions.
<b>Prepaid Cards/Vouchers</b>	As per Article 2(1), point (f), of Regulation (EU) 2018/1672.
<b>Professional clients</b>	As per Article 4(1), point 10, of Directive (EU) 2014/65
<b>Proliferation financing</b>	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.
<b>Remote onboarding</b>	Onboarding other than face-to-face at a physical location. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include: mobile app registration, Internet sign-up, email, over the phone etc.
<b>Residual risk</b>	The level of risk that remains after mitigation.
<b>Retail clients</b>	As per Article 4(1), point 11, of Directive (EU) 2014/65
<b>Risk appetite</b>	The level of risk a firm is prepared to accept.
<b>Safe deposit box rental</b>	Safe deposit boxes in a secured location where items can be stored for safe-keeping.
<b>Sanctions regulation</b>	As per Article 2(1), point (49), point (50), and point (51), of Regulation (EU) 2024/1624.
<b>Securities Services</b>	Facilitating their customers in the purchase, selling or management of securities such as bonds, mortgage backed securities, or money market products. Typical products and services are believed to be own account trading and traditional corporate banking activities and involves securities which are generally electronically traded on regulated markets and settled via regulated electronic settlement systems such as Clearstream and Euroclear. All payments to settlement systems are via regulated credit and financial institutions.
<b>Self-hosted address</b>	As per Article 3, point (20), of Regulation (EU) 2023/1113.
<b>Senior management</b>	As per Article 2(1), point (40), of Regulation (EU) 2024/1624.
<b>Shell institution/bank</b>	As per Article 2(1), point (23), of Regulation (EU) 2024/1624.
<b>Subaccount</b>	A subaccount is a secondary account that is linked to a primary account and used to track specific transactions or to segregate funds for a particular purpose. A subaccount does not stand alone and is always linked to a primary account
<b>Terrorist financing</b>	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
<b>Third country</b>	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.
<b>Trade finance</b>	Financing of international goods and services trade transactions on behalf of customers importing into or exporting from Ireland. Examples of trade finance activities are: letters of credit, open account facilities, trade credit insurance and import/export collection and guarantees.
<b>Transaction monitoring alert</b>	We define a Transaction Monitoring Alert as one or more transactions which triggers or collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst.

	<p>E.g. 1: A rule is in place which detects large deposits of cash anomalous to customer behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating if the investigator files a STR report this is considered a True Positive Alert, otherwise we consider it a False Positive Alert.</p> <p>E.g. 2: A scenario is in place to detect fast-moving transactions to high risk geographies. One model/rule detects placement of risky funds and another detects fast movement of these funds to a high risk destination. Both of these models/rules identify behaviour creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this we consider it a True Positive Alert for both rules/models, otherwise we consider it a False Positive Alert for both rules/models.</p>
<b>Transaction monitoring rule/model</b>	A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system.
<b>Transaction profile/ transaction monitoring profile</b>	Any recorded measure of expected transactional behaviour for customers.
<b>Transaction Monitoring Rule</b>	We define rules as non-AI based, pre-defined logical decision rules often following "IF-THEN", "IF-ELSE", "WHEN" patterns etc.
<b>Treasury Services</b>	Cash and Liquidity Management Services provided to non-retail entities.
<b>True positive alert</b>	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.
<b>Trust or company service provider</b>	As per Article 2(1), point (11), of Regulation (EU) 2024/1624.
<b>Virtual IBAN</b>	An identifier causing payments to be redirected to a payment account identified by an IBAN different from that identifier.
<b>Wealth management</b>	As per EBA/GL/2021/02, wealth management is the provision of banking and other financial services to high-net-worth individuals and their family or businesses. It is also known as private banking. Clients of wealth management firms can expect dedicated relationship management staff to provide tailored service covering, for example, banking (e.g., current accounts, mortgages and foreign exchange), investment management and advice, fiduciary services, safe custody, insurance, family office services, tax and estate planning and associated facilities, including legal support.

## 9.2 Enumerations

### AlertType

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

### BWRAConducted

Identifier	Description
Yes	Yes
No	No
Exemption_applies	Exemption applies from having in place the BWRA in accordance with Article 10(3) Regulation (EU) 2024/1620

### CDD

Identifier
Yes_in_all_cases
Yes_only_in_enhanced_CDD_cases
No

### LegalStructure

Identifier
Stand_alone_entity
Parent_of_group
Subsidiary_within_group
Branch_of_entity

### Country

ISO Alpha-2 country codes: <https://www.iso.org/iso-3166-country-codes.html>

### CustomerType

All customer types below should be [Active customer](#)

Identifier	Description
NP_physically_on	Natural Persons who were <a href="#">Onboarded physically</a> (in person)
NP_remotely_on	Natural Persons who were subject to <a href="#">Remote onboarding</a>
NP_not_categorised	Natural Persons who have not received a Customer Due Diligence (CDD) risk rating
NP_blocked	Natural Persons whose business relationship were/are due to be terminated by the institution due to AML/CFT concerns/issues.

NP_suspended	Natural Persons have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.)
NP_5000000	Natural persons that have total assets under management over a value of at least EUR 5,000,000
NP_50000000	Natural persons that have total assets over a value of at least EUR 50,000,000
LE_physically_on	Legal Entities that were <a href="#">Onboarded physically</a> (in person)
LE_remotely_on	Legal Entities that were subject to <a href="#">Remote onboarding</a>
LE_not_categorised	Legal Entities that have not received a customer risk rating (for any reason).
LE_blocked	Legal Entities that whose business relationship were/are due to be terminated by the institution due to AML/CFT concerns/issues.
LE_suspended	Legal Entities that have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.)
LE_SME	Legal Entities which are classified as Small/Medium enterprises (SMEs, as defined by the Department of Trade, Enterprise and Employment)
LE_corporate	Legal Entities that are corporate.
LE_TCSP	Legal Entities that used TCSP services in the preceding calendar year
Private_banking	Private Banking customers
Complex	Customers with a <a href="#">Complex business structure</a>
Cash_intensive	Legal Entities that are classified as businesses which deal with a large amount of cash e.g. supermarkets, privately owned parking, laundromats, petrol stations, restaurants etc.
Shell_institution	<a href="#">Shell institutions</a>
CASP	Legal Entities that are Crypto Asset Service Providers as defined under the MiCAR regulatory framework
Credit_institution	Legal Entities that are classified as a credit institution as defined by the Central Bank and Credit Institutions (Resolution) Act 2011.
Financial_institution	Legal Entities that are financial institutions
Government_body	Legal Entities that are present on the Central Statistics Office <a href="#">list of Public Sector Bodies</a> for the preceding calendar year.
SPV	Legal Entities that are Irish Section 110 <a href="#">Error! Reference source not found.</a> (SPV) or section 110 companies that qualify under Section 110 of the Irish Taxes Consolidation Act 1997.
NPO	Legal Entities that are non-profit organisations (NPOs) , which is a legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types “good works”.
NPO_non_EEA	Legal Entities that are non-profit organisations (NPOs) with cross border inflows/outflows to/from non-EEA countries.
Cust_non_EEA	Customers with at least one transactions over EUR 250 from/to a non-EEA country in the preceding calendar year.

## 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

## ModelValidation

Identifier
Yes_quantitatively
Yes_qualitatively
Yes_quantitatively_and_qualitatively
No
N/A

## MonitoringApproach

Identifier
Yes_manually
Yes_automatically
Yes_manually_and_automatically
No_transaction_monitoring

## Outsource

Identifier
No
No_but_concrete_plans_to_source_in_future
Yes_entities_within_group
Yes_completely_or_partially_to_non_group_entities

## DetectionTime

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

## Sector



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

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

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

	<p>Suggested NACE Codes: G.46.72, G.47.77</p> <p>Suggested NAICS Codes: 42394</p> <p>Suggested GICS Codes: 15104030, 15104040, 15104045, 25203010</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Art_dealer</b>	<p>Art Dealers</p> <p>Suggested NACE Codes: G.47.78</p> <p>Suggested NAICS Codes: 45992</p> <p>Suggested GICS Codes: 25504040</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Crypto</b>	<p>Virtual Assets/ Crypto Currency</p> <p>Suggested NACE Codes: <i>Not Available</i></p> <p>Suggested NAICS Codes: 523160</p> <p>Suggested GICS Codes: <i>Not Available</i></p> <p>Alternatively Appropriate Internal Classification</p>
<b>Gambling</b>	<p>Gambling</p> <p>Suggested NACE Codes: R.92.0</p> <p>Suggested NAICS Codes: 7132</p> <p>Suggested GICS Codes: 25301010</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Contruction</b>	<p>Construction</p> <p>Suggested NACE Codes: F</p> <p>Suggested NAICS Codes: 23</p> <p>Suggested GICS Codes: 201030</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Real_estate</b>	<p>Real Estate</p> <p>Suggested NACE Codes:</p>

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

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

	<p>Suggested NAICS Codes: 441222</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Catering</b>	<p>Catering</p> <p>Suggested NACE Codes: I.56.21</p> <p>Suggested NAICS Codes: 72232</p> <p>Suggested GICS Codes: 25301040</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Crowdfunding</b>	<p>Crowdfunding Service Providers</p> <p>Suggested NACE Codes: S.94.99</p> <p>Suggested NAICS Codes: 813219</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Sport</b>	<p>Professional Sports</p> <p>Suggested NACE Codes: R.93.12, R.93.11</p> <p>Suggested NAICS Codes: 71121</p> <p>Suggested GICS Codes: 50202010</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Stockbroker</b>	<p>Stock Brokers and Traders/ Trading Platforms</p> <p>Suggested NACE Codes: K.66.11, K.66.12</p> <p>Suggested NAICS Codes: 5231, 5232</p> <p>Suggested GICS Codes: 40203020, 40203030</p> <p>Alternatively Appropriate Internal Classification</p>
<b>Financial_service</b>	All other financial services sectors not mentioned above.
<b>Other_high_risk</b>	Other High Risk activities as per your institutions Customer Risk Assessment.
<b>Other_sector</b>	All remaining other sectors not covered by the above.

YesNoNA

Identifier	Description
Yes	Yes
No	No
N/A	Not applicable

YesNo

Identifier
Yes
No

## CountriesEEA

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

## CountriesEEANA

Identifier	Description
00	Not applicable
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	CzechRepublic
DE	Germany
DK	Denmark
EE	Estonia
ES	Spain
FI	Finland
FR	France

GR	Greece
HR	Croatia
HU	Hungary
IS	Iceland
IT	Italy
LI	Liechtenstein
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
NO	Norway
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia



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Eurosystem