



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Guidance Notes

Risk Evaluation Questionnaire

Credit Unions

May 2026

Document History

Version	Comments	Date
1.0	Initial version	27/02/2026
1.1	PEP Section 8.7 data point JSN is amended to align with the AMLA's guidance and the RTSs under AMLD 40(2) and AMLAR 12(7).	22/05/2026

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1 Background and Scope

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

The Risk Evaluation Questionnaire (REQ) seeks to consider:

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

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

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

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

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

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

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

2 Timeline for Submitting the REQ

The reference date for data included in the REQ is 31 December of the preceding calendar year unless otherwise stated.

The deadline for the first submission (in respect of reference date of 31 December 2025) is 18 September 2026. This is a hard deadline and no extensions will be granted.

3 Requirement to provide information to the Central Bank

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

4 Mechanism for Submission of Returns

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

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

1. Explicit closing XML tags must be used for all elements.
e.g. `<A07011 Identifier="JAB" EnumerationYesNo="Yes"></A07011>` rather than `<A07011 Identifier="JAB" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:

```
<?xml version="1.0" encoding="utf-8"?>
<CU xmlns="http://www.centralbank.ie/Schemas/AML/2025/A07">
...
...
...
</CU>
```

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

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

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

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

Naming convention

The file name must be of the form: CXXXXX_YYYYMMDD_A07.xml

- CXXXXX – the institution code you use to log in to the system
- YYYYMMDD – must be the reporting date
- A07 – the A07 Return code
- .xml or .zip – the file extension

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

5 Where do I go if I need further information?

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

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

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

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

E-mail: onlinereturns@centralbank.ie

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

This guidance document is for credit unions. Each institution must use the XSD schema specific to its sector.

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 - 8.9 are not applicable to your institution then enter one line of non-applicable values, e.g.

Country	Overall (Incoming)		Overall (Outgoing)		of which High Risk (per your institution's Customer Risk Assessment)			
	No. of transactions (Source)	Value of transactions (Source)	No. of transactions (Destination)	Value of transactions (Destination)	No. of transactions (Source)	Value of transactions (Source)	No. of transactions (Destination)	Value of transactions (Destination)
JSO	JSP	JSQ	JSR	JSS	JST	JSU	JSV	JSW
00	0	0	0	0	0	0	0	0

<A0707>

<A07071 JSO="00" JSP="0" JSQ="0" JSR="0" JSS="0" JST="0" JSU="0" JSV="0" JSW="0">

</A07071>

</A0707>

8.1 Table structures

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

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

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

8.1.1 Table Structure A

In this example, three different “REFs” are needed, meaning FBN, FBO and FBP. 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.

```
<A0706>
  <A07061 JSL="FR" JSM="4" JSN="2"></A07061>
  <A07061 JSL="AT" JSM="5" JSN="0"></A07061>
  <A07061 JSL="BE" JSM="9" JSN="5"></A07061>
  <A07061 JSL="US" JSM="10" JSN="20"></A07061>
```

Country	No. of natural person customers who are PEPs, their family members or persons known to be close associates	No. of beneficial owners of your legal entity customers who are PEPs, their family members or persons known to be close associates
JSL	JSM	JSN
FR	4	2
AT	5	0
BE	9	5
US	10	20

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

Guidance Section	Tab_Code	Table_Code
8.3.1 Customer segments	A0702B	A07022
8.4.8 Suspicious Alerts and Transaction Rejections	A0703B	A07032
8.5 Residence and Establishment	A0704	A07041
8.6 Beneficial Owner	A0705	A07051
8.7 Politically Exposed Person	A0706	A07061
8.8 Geography of Funds Flow	A0707	A07071
8.9 Transaction Monitoring	A0708	A07081

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”, etc.). As previously stated, the Variable Name is specified under “Description” in this guidance document. For example, JDD under “Description” is identified as “EnumerationBWRAConducted”, 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](#) (“BWRAConducted” in this case).

<A0703A>

<A07031 Identifier="JDD" EnumerationBWRAConducted="Yes"></A07031>

<A07031 Identifier="JDE" EnumerationYesNo="Yes"></A07031>

<A07031 Identifier="JDF" DateValue="2025-12-31"></A07031>

<A07031 Identifier="JDG" EnumerationFrequency="Yearly"></A07031>

<A07031 Identifier="JDH" EnumerationYesNoNA="No"></A07031>

<A07031 Identifier="JDI" String500="JxJJCMJ"></A07031>

Does your institution conduct a Business Wide Risk Assessment ('BWRA')?	Yes
Did Senior Management approve the latest version of the BWRA?	Yes
What is the approval date of your institution's most recent BWRA?	2025-12-31
What is the frequency of BWRA review by your institution?	Yearly
Did the most recent BWRA review prompt an update to your institution's policies, procedures, oversight measures, or risk appetite?	No
Describe (briefly) the changes that have been implemented in relation to the BWRA performed and why the changes have been made.	JxJJCMJ

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

The following tables have Table Structure B:

Guidance Section	Tab_Code	Table_Code
8.2.1 Physical Presence	A0701	A07011
8.2.2 Statement of Compliance	A0701	A07011
8.3.1 Customer segments	A0702A	A07021
8.3.2 Sector	A0702A	A07021
8.3.3 Cash Transactions	A0702A	A07021
8.3.4 Currency Cash Exchange	A0702A	A07021
8.3.5 Lending	A0702A	A07021
8.3.6 Money Remittance	A0702A	A07021
8.3.7 Payment Transactions	A0702A	A07021
8.3.8 Remote Onboarding	A0702A	A07021
8.4.1 Business Wide Risk Assessment	A0703A	A07031
8.4.2 Policies and Procedures	A0703A	A07031
8.4.3 Onboarding	A0703A	A07031
8.4.4 Offboarding	A0703A	A07031
8.4.5 Customer Due Diligence	A0703A	A07031
8.4.6 Transaction Monitoring	A0703A	A07031
8.4.7 Alerts (in the preceding calendar year)	A0703A	A07031
8.4.9 Suspicious Transaction Reporting	A0703A	A07031
8.4.10 Sanctions Screening	A0703A	A07031

8.4.11 Outsourcing	A0703A	A07031
8.4.12 Education and Training	A0703A	A07031
8.4.13 Compliance and Assurance Testing	A0703A	A07031
8.4.14 Audit	A0703A	A07031
8.4.15 Governance	A0703A	A07031
8.4.16 Compliance with Fund Transfers Regulation	A0703A	A07031

Variable Names:

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

Do not use variable names other than those defined.

Special Characters

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

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

Pre-defined entity references:

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

8.1.3 Table Order

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

```
<!--General-->
<xs:element ref="A07:A0701"/>
<!--Inherent Risk-->
<xs:element ref="A07:A0702A"/>
<!--Inherent Risk Segment-->
<xs:element ref="A07:A0702B"/>
<!--Mitigation And Control-->
<xs:element ref="A07:A0703A"/>
<!--Mitigation And Control Alerts-->
<xs:element ref="A07:A0703B"/>
<!--Residence And Establishment-->
<xs:element ref="A07:A0704"/>
<!--Beneficial Owner-->
<xs:element ref="A07:A0705"/>
<!--Politically Exposed Person-->
<xs:element ref="A07:A0706"/>
<!--Geography Of Funds Flow-->
<xs:element ref="A07:A0707"/>
<!--Transaction Monitoring-->
<xs:element ref="A07:A0708"/>
```

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 Physical Presence

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

```
<A07011 Identifier="JAA" IntegerValue="972"></A07011>
```

REF	Field	Description
JAA	Number of branches	Total number of branches operated by your institution Variable name: IntegerValue If not applicable enter 0

8.2.2 Statement of Compliance

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

<A07011 Identifier="JAB" EnumerationYesNo="No"></A07011>

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

8.3 Inherent Risk

8.3.1 Customer segments

For each customer type/customer segment, as per the enumeration lists provided, please specify each of the below, as at the reference date i.e. 31 December of the preceding calendar year, by customer segment.

Please note customers can come under more than one customer type and the sum of all customer types does not need to sum to the total number of customers. For example, a customer can be both a corporate legal entity and a legal entity with complex structure.

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

It is acknowledged that some institutions may not have captured some of these data points. Hence, for the first REQ return, firms are not expected to retrospectively source data if it is the case. Firms are expected to report accurately from the second return onward.

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

<A07021 Identifier="JAG" IntegerValue="680"></A07021>

REF	Field	Description
JAG	Natural Person Customers	State the total number of natural person customers as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JAH	Legal Entity Customers	State the total number of legal entity customers as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JAI	Walk-in customers or customers carrying out occasional transactions	State the total number of walk-in customers or customers carrying out occasional transactions as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JAJ	Active Natural Person Customers	State the total number of active natural person customers as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JAK	Active Legal Entity Customers	State the total number of active legal entity customers as of 31 December of the preceding calendar year.

		Variable name: IntegerValue If not applicable enter 0
JAL	Transaction number by active natural person customers	State the total number of transactions in the preceding calendar year by your active natural person customers. Variable name: IntegerValue If not applicable enter 0
JAM	Transaction number by active legal entity customers	State the total number of transactions in the preceding calendar year by your active legal entity customers. Variable name: IntegerValue If not applicable enter 0
JAN	Transaction number by walk-in customers or customers carrying out occasional transactions	State the total number of transactions in the preceding calendar year by your walk-in customers or customers carrying out occasional transactions. Variable name: IntegerValue If not applicable enter 0
JAO	Transaction value by active natural person customers	State the total value of transactions (EUR) in the preceding calendar year by your active natural person customers. Variable name: DecimalValue If not applicable enter 0
JAP	Transaction value by active legal entity customers	State the total value of transactions (EUR) in the preceding calendar year by your active legal entity customers. Variable name: DecimalValue If not applicable enter 0
JAQ	Transaction value by walk-in customers or customers carrying out occasional transactions	State the total value of transactions (EUR) in the preceding calendar year by your walk-in customers or customers carrying out occasional transactions. Variable name: DecimalValue If not applicable enter 0

Table Structure A – XML only requires REFs, e.g. <A07022 JAR="NP_physically_on" JAS="507"></A07022>

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

8.3.2 Sector

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

<A07021 Identifier="JAT" IntegerValue="652"></A07021>

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

8.3.3 Cash Transactions

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

<A07021 Identifier="JAU" IntegerValue="43"></A07021>

It is acknowledged that some institutions may have not differentiated cash with other means of transactions due to using the same codes for withdrawals and lodgements. Hence, for the first REQ return, firms are not expected to retrospectively source data if it is the case. Firms are expected to report accurately from the second return onward.

REF	Field	Description
JAU	Cash NP Deposits Number of Transactions	Deposits (by natural persons): Cash - Total Number (No.) of Transactions. Variable name: IntegerValue If not applicable enter 0
JAV	Cash NP Deposits Value	Deposits (by natural persons): Cash - Total Value (EUR) of Transactions. Variable name: DecimalValue If not applicable enter 0
JAW	Cash NP Deposits Number of Transactions 10000 or more	Deposits (by natural persons): Cash - Total Number (No.) of Transactions amounting to €10,000 or more. Variable name: IntegerValue If not applicable enter 0
JAX	Cash NP Deposits Value 10000 or more	Deposits (by natural persons): Cash - Total Value (EUR) of Transactions amounting to €10,000 or more. Variable name: DecimalValue If not applicable enter 0
JAY	Cash NP Deposits Highest	Deposits (by natural persons): Cash - Highest Value (EUR) single transaction. Variable name: DecimalValue If not applicable enter 0
JAZ	Cash LE Deposits Number of Transactions	Deposits (by legal entities): Cash - Total Number (No.) of Transactions. Variable name: IntegerValue If not applicable enter 0
JBA	Cash LE Deposits Value	Deposits (by legal entities): Cash - Total Value (EUR) of Transactions. Variable name: DecimalValue

		If not applicable enter 0
JBB	Cash LE Deposits Number of Transactions 10000 or more	<p>Deposits (by legal entities): Cash - Total Number (No.) of Transactions amounting to €10,000 or more.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JBC	Cash LE Deposits Value 10000 or more	<p>Deposits (by legal entities): Cash - Total Value (EUR) of Transactions amounting to €10,000 or more.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JBD	Cash LE Deposits Highest	<p>Deposits (by legal entities): Cash - Highest Value (EUR) per type of transaction.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JBE	Cash NP Withdraw Number of Transactions	<p>Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JBF	Cash NP Withdraw Value	<p>Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JBG	Cash NP Withdraw Number of Transactions 10000 or more	<p>Withdrawals (by natural persons): Cash - Total Number (No.) of Transactions amounting to €10,000 or more.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JBH	Cash NP Withdraw Value 10000 or more	<p>Withdrawals (by natural persons): Cash - Total Value (EUR) of Transactions amounting to €10,000 or more.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JB I	Cash NP Withdraw Highest	<p>Withdrawals (by natural persons): Cash - Highest Value (EUR) per type of transaction.</p> <p>Variable name: DecimalValue</p>

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

8.3.4 Currency Cash Exchange

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

<A07021 Identifier="JBP" IntegerValue="806"></A07021>

REF	Field	Description
JBP	Number of currency cash exchange (buy)	Total number of currency cash exchange during the preceding calendar year (Buy) Variable name: IntegerValue If not applicable enter 0
JBQ	Value of currency cash exchange (buy)	Total value (EUR) of currency cash exchange during the preceding calendar year (Buy) Variable name: DecimalValue If not applicable enter 0
JBR	Number of currency cash exchange over €1,000 (buy)	Total number of currency cash exchange amounting to €1,000 or more during the preceding calendar year (Buy) Variable name: IntegerValue If not applicable enter 0
JBS	Value of currency cash exchange over €1,000 (buy)	Total value (EUR) of currency cash exchange amounting to €1,000 or more during the preceding calendar year (Buy) Variable name: DecimalValue If not applicable enter 0
JBT	Highest value of single currency cash exchange (buy)	Highest value (EUR) of a single currency cash exchange during the preceding calendar year (Buy) Variable name: DecimalValue If not applicable enter 0
JBU	Number of currency cash exchange (sell)	Total number of currency cash exchange during the preceding calendar year (Sell) Variable name: IntegerValue If not applicable enter 0
JBV	Value of currency cash exchange (sell)	Total value (EUR) of currency cash exchange during the preceding calendar year (Sell) Variable name: DecimalValue If not applicable enter 0
JBW	Number of currency cash exchange over €1,000 (sell)	Total number of currency cash exchange amounting to €1,000 or more during the preceding calendar year (Sell) Variable name: IntegerValue If not applicable enter 0

JBX	Value of currency cash exchange over €1,000 (sell)	<p>Total value (EUR) of currency cash exchange amounting to €1,000 or more during the preceding calendar year (Sell)</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JBY	Highest value of single currency cash exchange (sell)	<p>Highest value (EUR) of a single currency cash exchange during the preceding calendar year (Sell)</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JBZ	Value of cash-to-cash transactions	<p>Total value (EUR) of cash-to-cash transactions carried out during the preceding calendar year</p> <p>Variable name: DecimalValue If not applicable enter 0</p>

8.3.5 Lending

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

<A07021 Identifier="JCA" IntegerValue="250"></A07021>

REF	Field	Description
JCA	Number of outstanding loans	Total number of outstanding loans Variable name: IntegerValue If not applicable enter 0
JCB	Value of outstanding loans	Total value (EUR) of outstanding loans Variable name: DecimalValue If not applicable enter 0
JCC	Number of loans granted	Total number of loans granted during the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCD	Value of loans granted	Total value (EUR) of loans granted during the preceding calendar year Variable name: DecimalValue If not applicable enter 0
JCE	Number of loan repayments	Total number of loan repayments during the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCF	Value of loan repayments	Total value (EUR) of loan repayments during the preceding calendar year Variable name: DecimalValue If not applicable enter 0
JCG	Number of prematurely repaid loans	Total number of prematurely repaid loans during the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCH	Value of prematurely repaid loans	Total value (EUR) of prematurely repaid loans during the preceding calendar year Variable name: DecimalValue If not applicable enter 0
JCI	Number of loan repayments	Total number of loan repayments from non-EEA countries during the preceding calendar year

	from non-EEA countries	Variable name: IntegerValue If not applicable enter 0
JCJ	Value of loan repayments from non-EEA countries	Total value (EUR) of loan repayments from non-EEA countries during the preceding calendar year Variable name: DecimalValue If not applicable enter 0
JCK	Number of consumer loans not associated with products or services	Total number of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service Variable name: IntegerValue If not applicable enter 0
JCL	Value of consumer loans not associated with products or services	Total value (EUR) of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service Variable name: DecimalValue If not applicable enter 0
JCM	Number of real estate loans	Total number of outstanding real estate loans Variable name: IntegerValue If not applicable enter 0
JCN	Number of real estate loans with third party payments	Total number of real estate loans with third party payments during the preceding calendar year Variable name: IntegerValue If not applicable enter 0

8.3.6 Money Remittance

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

<A07021 Identifier="JCO" IntegerValue="34"></A07021>

Please be advised that this section relates to institutions' capacity as agents and the money remittance transactions that they process as agents of money remitters.

REF	Field	Description
JCO	Number of incoming money remittance payments	Total number of incoming money remittance processed by your institution as an agent of money remitters in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCP	Number of outgoing money remittance payments	Total number of outgoing money remittance processed by your institution as an agent of money remitters in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCQ	Value of incoming money remittance payments	Total value (EUR) of incoming money remittance processed by your institution as an agent of money remitters in the preceding calendar year Variable name: DecimalValue If not applicable enter 0
JCR	Value of outgoing money remittance payments	Total value (EUR) of outgoing money remittance processed by your institution as an agent of money remitters in the preceding calendar year Variable name: DecimalValue If not applicable enter 0
JCS	Number of incoming money remittance transactions above EUR 1,000	Total number of incoming money remittance transactions above EUR 1,000 processed by your institution as an agent of money remitters in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCT	Number of outgoing money remittance transactions above EUR 1,000	Total number of outgoing money remittance transactions above EUR 1,000 processed by your institution as an agent of money remitters in the preceding calendar year Variable name: IntegerValue If not applicable enter 0

8.3.7 Payment Transactions

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

<A07021 Identifier="JCU" IntegerValue="907"></A07021>

REF	Field	Description
JCU	Number of payment accounts	Total number of payment accounts including current accounts Variable name: IntegerValue If not applicable enter 0
JCV	Number of incoming payment transactions	Total number of incoming payment transactions in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCW	Value of incoming payment transactions	Total value (EUR) of incoming payment transactions in the preceding calendar year Variable name: DecimalValue If not applicable enter 0
JCX	Number of outgoing payment transactions	Total number of outgoing payment transactions in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
JCY	Value of outgoing payment transactions	Total value (EUR) of outgoing payment transactions in the preceding calendar year Variable name: DecimalValue If not applicable enter 0

8.3.8 Remote Onboarding

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

<A07021 Identifier="JCZ" PercentageValue="0.5"></A07021>

REF	Field	Description
JCZ	Onboarding Remote NP Prop	<p>Of those Natural Persons who have been onboarded in the preceding calendar year what proportion of these underwent remote onboarding</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>
JDA	Onboarding Remote LE Prop	<p>Of those Legal Entities who have been onboarded in the preceding calendar year what proportion of these underwent remote onboarding</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>
JDB	Onboarding Remote NP Prop High	<p>What is the proportion 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)?</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>
JDC	Onboarding Remote LE Prop High	<p>What is the proportion 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)?</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>

8.4 Mitigation and Control

8.4.1 Business Wide Risk Assessment

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

```
<A07031 Identifier="JDD" EnumerationBWRAConducted="Exemption_applies"></A07031>
```

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

REF	Field	Description
JDD	BWRA Conducted	<p>State whether your institution conducts a <u>Business Wide Risk Assessment (BWRA)</u>.</p> <p>Select from <u>BWRAConducted</u> Variable name: EnumerationBWRAConducted</p>
JDE	BWRA Senior Management Approval	<p>State whether Senior Management of your institution approved the latest version of the BWRA.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JDF	BWRA Last Approval Date	<p>State the approval date of your institution's most recent BWRA.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JDG	BWRA Review Frequency	<p>Select the frequency of BWRA review by your institution.</p> <p>Select from <u>Frequency</u> Variable Name: EnumerationFrequency</p>
JDH	BWRA Business Change	<p>State whether the most recent BWRA review identified any areas for improvement or changes such as to your institution's policies, procedures, oversight measures, or risk appetite.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDI	BWRA Business Change Description	<p>Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JDJ	BWRA Money Laundering	<p>State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDK	BWRA Terrorist Financing	<p>State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDL	BWRA Sanctions	<p>State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent</p>

		<p>BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDM	BWRA Corruption	<p>State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDN	BWRA Conflicts of Interest	<p>State whether risks of conflicts of interests are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDO	BWRA Tax Evasion	<p>State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDP	BWRA Internal Fraud	<p>State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDQ	BWRA External Fraud	<p>State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDR	BWRA Cybercrime	<p>State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDS	BWRA Market Abuse	<p>State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDT	BWRA Customer Groups	<p>State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JDU	BWRA Geographies	<p>State whether geographies are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

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

		<p>than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEE	Other Risk Assessment Process - Conflicts of interests	<p>State whether risks of conflicts of interests are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEF	Other Risk Assessment Process - Evasion of tax regulations	<p>State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEG	Other Risk Assessment Process - Internal fraud and embezzlement (by employees/management of your institution)	<p>State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEH	Other Risk Assessment Process - External fraud and embezzlement (by customers or other business relations)	<p>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.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEI	Other Risk Assessment Process - Cybercrime/ Ransomware	<p>State whether risks of cybercrime/ransomware are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEJ	Other Risk Assessment Process - Market abuse	<p>State whether risks of market abuse are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEK	Other Risk Assessment Process - Customer groups	<p>State whether customer groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEL	Other Risk Assessment Process - Geographies	<p>State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

JEM	Other Risk Assessment Process - Product groups	<p>State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEN	Other Risk Assessment Process - Distribution channels	<p>State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEO	Other Risk Assessment Process - Cryptos	<p>State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEP	BWRA Risk Appetite	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEQ	BWRA Policy Procedure	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JER	BWRA Product Service	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JES	BWRA Transaction Monitoring	<p>State whether the outcomes of the BWRA were used for setting scenarios and rules for transaction monitoring.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JET	BWRA Process Other	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JEU	BWRA Process Other Detail	<p>If Yes to BWRA Process Other, briefly describe the other processes and activities in which your institution uses the outcomes of the BWRA.</p> <p>List the processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p>

		Character limit: 500 characters If not applicable enter N/A
JEV	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 or the compliance manager in accordance with Article 9 of Regulation (EU) 2024/1624. Where more than one topic (e.g. CDD and transaction monitoring) is covered by the same document, the approval date of the document should be reported for all topics covered. When there is no policy or procedure available for one or more items, please enter 2000-01-01.

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

<A07031 Identifier="JEW" DateValue="2025-09-02"></A07031>

REF	Field	Description
JEW	Pol & Proc - Customer onboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer onboarding (e.g. steps to be taken in setting up an account, or requirements before being able to transact, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JEX	Pol & Proc - Ongoing Customer Due Diligence	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer review (e.g. the frequency of review on high risk customers).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JEY	Pol & Proc - Ongoing monitoring of business relationships	<p>Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of business relationships.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JEZ	Pol & Proc - Customer Offboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer offboarding (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFA	Pol & Proc - 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>
JFB	Pol & Proc - High risk customers	<p>Enter the date when your institution's management approved the last version of policies and procedures for high risk customers.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFC	Pol & Proc - Transaction monitoring	<p>Enter the date when your institution's management approved the last version of policies and procedures for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, customer risk review in result of positive alerts,</p>

		<p>etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFD	Pol & Proc - Suspicious transaction reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process.</p> <p>This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the 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>
JFE	Pol & Proc - Evasion of tax regulations	<p>Enter the date when your institution's management approved the last version of policies and procedures for evasion of tax regulations by customers (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFF	Pol & Proc - Bribery	<p>Enter the date when your institution's management approved the last version of policies and procedures for bribery (e.g. monitoring and reporting of bribery instances).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFG	Pol & Proc - Conflicts of interest	<p>Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFH	Pol & Proc - Fraud within or outside the organisation	<p>Enter the date when your institution's management approved the last version of policies and procedures for fraud within or outside your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFI	Pol & Proc - Sanctions screening	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanctions screening (e.g. monitoring and detecting instances of financial sanctions evasion).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFJ	Pol & Proc - 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>
JFK	Pol & Proc - Sanction hits reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanction hits reporting (e.g. in</p>

		<p>the case of a sanction “hit”, the Sanctions Return Form is correctly completed and reported to the Central Bank Sanctions Team as required).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFL	Pol & Proc - Treating and reporting of ML/TF & Financial Sanctions incidents	<p>Enter the date when your institution’s management approved the last version of policies and procedures for identification, investigation and where required, reporting of potential instances of money laundering, terrorist financing, and confirmed financial sanctions evasion matches.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFM	Pol & Proc - Whistleblowing	<p>Enter the date when your institution’s management approved the last version of policies and procedures for whistleblowing.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFN	Pol & Proc - 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>
JFO	Pol & Proc - 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>
JFP	Pol & Proc - Separation of functions (Three Lines of Defence)	<p>Enter the date when your institution’s management approved the last version of policies and procedures for separation of functions (i.e. Three Lines of Defence).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFQ	Pol & Proc - Training	<p>Enter the date when your institution’s management approved the last version of policies and procedures for training (e.g. staff members of your institution complete relevant required training).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFR	Pol & Proc - Geographic Risk Factors	<p>Enter the date when your institution’s management approved the last version of policies and procedures for geographic risk factors (e.g. business activity in high risk jurisdictions, enhanced customer due diligence due to geographic risk, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JFS	Pol & Proc - AML/CFT Record Keeping	<p>Enter the date when your institution’s management approved the last version of policies and procedures for record keeping (e.g. provisions in Section 55 of the CJA 2010).</p>

		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
JFT	Pol & Proc - Business wide risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support business wide risk assessment processes. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
JFU	Pol & Proc - Customer risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support customer risk assessment processes. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
JFV	Pol & Proc - 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
JFW	Pol & Proc - Review Frequency	Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures. Select from Frequency Variable Name: EnumerationFrequency

8.4.3 Onboarding

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

<A07031 Identifier="JFX" EnumerationYesNo="No"></A07031>

REF	Field	Description
JFX	Onboarding - Internet / Email - Natural person customers	State whether your institution offers onboarding via Internet/Email for natural person customers. Select from YesNo Variable name: EnumerationYesNo
JFY	Onboarding - App - Natural person customers	State whether your institution offers onboarding via mobile app for natural person customers. Select from YesNo Variable name: EnumerationYesNo
JFZ	Onboarding - Counter/Desk i.e. face to face - Natural person customers	State whether your institution offers onboarding via counter/desk (i.e. face to face) for natural person customers. Select from YesNo Variable name: EnumerationYesNo
JGA	Onboarding - Third party - Natural person customers	State whether your institution offers onboarding via third party for natural person customers. Select from YesNo Variable name: EnumerationYesNo
JGB	Onboarding - Other - Natural person customers	State whether your institution offers onboarding via other options for natural person customers. Select from YesNo Variable name: EnumerationYesNo
JGC	Onboarding - Onboarding Other Details Natural person customers	If Yes to Other - Natural person customers, specify other onboarding options. List the other onboarding options available to natural persons separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
JGD	Onboarding - Internet / Email - Legal entity customers	State whether your institution offers onboarding via Internet/Email for legal entity customers. Select from YesNo

		Variable name: EnumerationYesNo
JGE	Onboarding - App – Legal entity customers	<p>State whether your institution offers onboarding via mobile app for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JGF	Onboarding - Counter/Desk i.e. face to face – Legal entity customers	<p>State whether your institution offers onboarding via counter/desk (i.e. face to face) for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JGG	Onboarding - Third party – Legal entity customers	<p>State whether your institution offers onboarding via third party for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JGH	Onboarding - Other – Legal entity customers	<p>State whether your institution offers onboarding via other options for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JGI	Onboarding - Onboarding Other Details Legal entity customers	<p>If Yes to Other - Legal entity customers, specify other onboarding options.</p> <p>List the other onboarding options available to legal entities separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JGJ	Onboarding - Remote Data	<p>State whether your institution has policies and procedures in place defining which data is considered adequate for correctly establishing and verifying a customer's identity for the remote onboarding process (i.e. options excluding counter/desk).</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JGK	Onboarding - Purpose Questions	State whether the onboarding process includes specific questions aimed at identifying the intended purpose and nature of the

		<p>business relationship.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
JGL	Onboarding - Purpose Questions Specify	<p>If Yes to Purpose Questions, briefly specify the subject matter of these questions.</p> <p>List the subject matter of these questions asked separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JGM	Onboarding - Excluded Customer	<p>State whether your institution has specific customer groups that may not be remotely onboarded.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JGN	Onboarding - Excluded Customer Specify	<p>If Yes to Excluded Customer, briefly specify these customer groups.</p> <p>List the specific customer groups separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JGO	Onboarding - Verify Irish Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from an Irish bank account in the customer's own name.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>

JGP	Onboarding - Verify Foreign Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from a foreign bank account in the customer's own name.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JGQ	Onboarding - Verify Upload Photo NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via uploading a photo or photocopy of the customer's ID document.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JGR	Onboarding - Verify Person Photo NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via scan of ID document and image of the customer to be authenticated by a natural person.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JGS	Onboarding - Verify Upload Doc NP	<p>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.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JGT	Onboarding - Verify Chip Doc NP	<p>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.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p>

		<p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JGU	Onboarding - Verify Passport NP	<p>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.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JGV	Onboarding - Verify At Desk NP	<p>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.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JGW	Onboarding - Verify other manual 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>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JGX	Onboarding - Other manual intervention NP Detail	<p>If Yes to Verify other manual intervention NP, briefly describe the method of other human intervention (natural person customer).</p> <p>List the other methods of human intervention used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JGY	Onboarding - Verify Other NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other procedures.</p> <p>N/A indicates that the institution does not offer remote</p>

		<p>onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JGZ	Onboarding - Other NP Detail	<p>If Yes to Verify Other NP, briefly specify the other procedures (natural person customer).</p> <p>List the other methods used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JHA	Onboarding - Verify other manual intervention LE	<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>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHB	Onboarding - Other manual intervention LE Detail	<p>If Yes to Verify other manual intervention LE, briefly describe the method of other human intervention (legal entity customer).</p> <p>List the other methods of human intervention used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JHC	Onboarding - Verify Other Legal entity customer	<p>In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other procedures.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHD	Onboarding - Other Legal entity customer Detail	<p>If Yes to Verify Other Legal entity customer, briefly specify the other procedures (legal entity customer).</p> <p>List the other methods of identity verification used separated by</p>

		<p>semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JHE	Onboarding - Verify Upload Photo Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo or photocopy of the customer representative's ID document.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHF	Onboarding - Verify Person Photo Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via scan of ID document and image of the customer representative to be authenticated by a natural person.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHG	Onboarding - Verify Upload Doc Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo of a bank account statement, payslip or other documents with the representative's proof of address.</p> <p>N/A indicates that the institution does not offer remote onboarding.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHH	Onboarding - Verify Chip Doc Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies representative identity via a scan of an ID document with a chip device.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHI	Onboarding - Verify Passport Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via request for passport details in an online application form.</p>

		<p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHJ	Onboarding - Verify At Desk Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via verification of the representative's identity at the counter/desk.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHK	Onboarding - Verify other manual intervention Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via other human intervention not listed above.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHL	Onboarding - Other manual intervention Representatives Detail	<p>If Yes to Verify other manual intervention Representatives, briefly describe the method of other human intervention (representatives).</p> <p>List the other methods of human intervention used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JHM	Onboarding - Verify Other Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies representative identity with other procedures.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
JHN	Onboarding - Other Representatives Detail	<p>If Yes to Verify Other Representatives, briefly specify the other procedures (representatives).</p> <p>List the methods of identity verification used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
JHO	Onboarding - Verify manual intervention BO	<p>In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other human intervention.</p>

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

8.4.4 Offboarding

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

<A07031 Identifier="JHS" IntegerValue="911"></A07031>

REF	Field	Description
JHS	Customer Offboarding Number	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS/fraud concerns.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JHT	Customer Offboarding Number ML	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JHU	Customer Offboarding Number TF	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JHV	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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JHW	Customer Offboarding Number HR	<p>State the total number of customers rated high risk as per your institution's customer risk assessment prior to offboarding, whose business relationships with your institution were terminated in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

8.4.5 Customer Due Diligence

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

<A07031 Identifier="JHX" EnumerationCDD="Yes_in_all_cases"></A07031>

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

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

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

High(-) -> High

Low(+) -> Low

REF	Field	Description
JHX	Identity Verification NP	<p>State whether the identity of natural person customers is verified prior to providing services.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
JHY	Nature Of Relationship NP	<p>State whether the purpose and intended nature of the business relationship is established prior to providing services to natural person customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
JHZ	Source Of Funds NP	<p>State whether source/origin of the funds/assets is identified prior to providing services to natural person customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
JIA	Customer Rep Identified NP	<p>State whether a customer's representative is identified prior to providing services to natural person customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
JIB	Tax Motive Identified NP	<p>State whether tax motives are identified prior to providing services to natural person customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
JIC	Geos Identified NP	<p>State whether geographies involved are identified prior to providing services to natural person customers.</p> <p>Select from CDD</p>

		Variable name: EnumerationCDD
JID	Identity Verification LE	<p>State whether the identity of legal entity customers is verified prior to providing services.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JIE	Identity Verification BO LE	<p>State whether the identity of the beneficial owner of legal entity customers is established and verified prior to providing services.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JIF	Ownership Structure Identified LE	<p>State whether ownership and/or control structure is identified for legal entity customers prior to providing services.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JIG	Nature Of Relationship LE	<p>State whether the purpose and intended nature of the business relationship is established prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JIH	Source Of Funds LE	<p>State whether source/origin of the funds/assets is identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JII	Customer Rep Identified LE	<p>State whether a customer's representative is identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JIJ	Tax Motive Identified LE	<p>State whether tax motives are identified prior to providing services to legal entity customers.</p> <p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JIK	Geos Identified LE	<p>State whether geographies involved are identified prior to providing services to legal entity customers.</p>

		<p>Select from CDD</p> <p>Variable name: EnumerationCDD</p>
JIL	CDD Review NP	<p>State whether your institution periodically reviews its customers' risk profiles for natural person customers.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
JIM	CDD Review LE	<p>State whether your institution periodically reviews its customers' risk profiles for legal entity customers.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
JIN	CDD Review NP Low	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for low-risk natural person customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
JIO	CDD Review NP Medium	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for medium-risk natural person customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
JIP	CDD Review NP High	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for high-risk natural person customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
JIQ	CDD Review NP PEP	<p>State the Frequency of these reviews for customers who are politically exposed persons, their family members or persons that are close associates.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
JIR	CDD Review NP Unacceptable	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for unacceptable-risk natural person customers (e.g. yet to be exited).</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>

JIS	CDD Review LE Low	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for low-risk legal entity customers.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
JIT	CDD Review LE Medium	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for medium-risk legal entity customers.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
JIU	CDD Review LE High	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for high-risk legal entity customers.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
JIV	CDD Review LE Unacceptable	<p>If Yes to CDD Review NP or CDD Review LE, state the Frequency of these reviews for unacceptable-risk legal entity customers (e.g. yet to be exited).</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
JIW	CDD CRA Update	<p>Date of the last update of the customer risk assessment (CRA).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JIX	CDD Low Customer	<p>Number of customers per ML/TF risk category (low risk).</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JIY	CDD Medium-Low Customer	<p>Number of customers per ML/TF risk category (medium-low risk).</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JIZ	CDD MH Customer	<p>Number of customers per ML/TF risk category (medium-high risk).</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JJA	CDD High Customer	<p>Number of customers per ML/TF risk category (high-risk).</p>

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJB	CDD customers Due NP	<p>Number of natural person customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJC	CDD customers Reviewed NP	<p>Number of natural person customers for whom customer information was reviewed and updated in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJD	CDD customers Due LE	<p>Number of legal entity customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJE	CDD customers Reviewed LE	<p>Number of legal entity customers for whom customer information was reviewed and updated in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJF	Backlog Prop NP Total	<p>Specify the proportion of backlogs of all natural person customers.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g., enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
JJG	Backlog Prop NP High	<p>Of the natural person customer reviews in the backlog, specify the proportion of these that are high risk customers.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g., enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
JJH	Backlog Prop NP PEP	<p>Specify the proportion of backlogs of customers who are politically exposed persons, their family members or persons to be close associates.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g., enter 4.7% as 0.047</p>

		If not applicable enter 0
JJI	Backlog Prop NP Unacceptable	<p>Specify the proportion of backlogs of unacceptable-risk natural person customers (e.g. yet to be exited).</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JJJ	Backlog Prop LE Total	<p>Specify the proportion of backlogs of all legal entity customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JJK	Backlog Prop LE High	<p>Of the legal entity customer reviews in the backlog, specify the proportion of these that are high risk customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JJL	Backlog Prop LE Unacceptable	<p>Specify the proportion of backlogs of unacceptable-risk legal entity customers (e.g. yet to be exited).</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JJM	Concrete Timelines NP	<p>State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JJN	Concrete Timelines LE	<p>State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JJO	No Ident Total	<p>What proportion of total active customers have no CDD documentation/information.</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>

JJP	No Ident High	<p>What proportion of high risk active customers have no CDD documentation/information.</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>
JJQ	No Ident PEP	<p>What proportion of active customers who are PEPs have no CDD documentation/information.</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>
JJR	Incomplete Total	<p>Specify the proportion of total active customers with incomplete CDD documentation over the overall active customers.</p> <p>Incomplete CDD documentation in this context refers to missing or outdated CDD documents as per your institution's CDD review process.</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>
JJS	Incomplete High	<p>Specify the proportion of high-risk active customers with incomplete CDD documentation over the overall active customers.</p> <p>Incomplete CDD documentation in this context refers to missing or outdated CDD documents as per your institution's CDD review process.</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>
JJT	Incomplete PEP	<p>Specify the proportion of active customers who are politically exposed persons, their family members or persons known to be close associates with incomplete CDD documentation over the overall active customers.</p> <p>Incomplete CDD documentation in this context refers to missing or outdated CDD documents as per your institution's CDD review process.</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>
JJU	CDD BO not Identified	<p>Number of customers that are legal entities /trusts whose beneficial owners have not been identified.</p>

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJV	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.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJW	CDD no Purpose	<p>Number of customers for whom no information on the purpose and intended nature of the business relationship has been obtained (excluding customers with whom your institution does not have a business relationship).</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJX	CDD not in line with Article 20 of AMLR	<p>Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 of the Regulation (EU) 2024/1624.</p> <p>Note that this data point will not be assessed until the Regulation (EU) 2024/1624 applies from 10 July 2027. For submissions with reference dates before this Regulation applies, this data point can be answered as 0 or any integer value.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JJY	Customer Number Without Risk Profile	<p>Number of customers without ML/TF risk profile (excluding customers with whom the obliged entity does not have a business relationship).</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>

8.4.6 Transaction Monitoring

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

<A07031 Identifier="JJZ" EnumerationYesNoNA="No"></A07031>

REF	Field	Description
JJZ	TM Profile	Does your institution draw up a transaction profile for customers at the initiation of services? It is acknowledged that a transaction profile for customers may not be explicitly drawn up when it encompasses an element of transaction activity within the overall risk profile. Select from YesNoNA Variable name: EnumerationYesNoNA
JKA	TM Profile Review	What is the frequency of review of the transaction profile ? Select from Frequency Variable name: EnumerationFrequency
JKB	TM Profile Number Transactions	Does your institution include number of transactions in an expected transactions profile ? Select from YesNoNA Variable name: EnumerationYesNoNA
JKC	TM Profile Value of Aggregated Transactions	Does your institution include the value of total transactions in an expected transactions profile ? Select from YesNoNA Variable name: EnumerationYesNoNA
JKD	TM Profile Value of Single Transactions	Does your institution include the value of single transactions in an expected transactions profile ? Select from YesNoNA Variable name: EnumerationYesNoNA
JKE	TM Profile Counterparties	Does your institution include counterparties in an expected transactions profile ? Select from YesNoNA Variable name: EnumerationYesNoNA
JKF	TM Profile Geographies	Does your institution include geographies in an expected transactions profile ? Select from YesNoNA Variable name: EnumerationYesNoNA
JKG	TM Profile Group Transactions	Does your institution include intra-group transactions in an expected transactions profile , i.e. do you include the expected movement of customer funds between their group companies? Select from YesNoNA Variable name: EnumerationYesNoNA

JKH	TM Profile Banks	<p>Does your institution include banks or payment institutions involved in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKI	TM Alert Number of Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKJ	TM Alert Value of Aggregated Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKK	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 YesNoNA Variable name: EnumerationYesNoNA</p>
JKL	TM Alert Counterparties	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKM	TM Alert Geographies	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKN	TM Alert Group Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual intra-group transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKO	TM Alert Banks	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual banks/payment institutions involved?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

JKP	TM How Monitor	<p>State whether your institution monitors transactions and how this is done.</p> <p>Select from MonitoringApproach Variable Name: EnumerationMonitoringApproach</p>
JKQ	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 N/A if transaction monitoring is conducted manually or no transaction monitoring is in place</p> <p>Select from ModelValidation Variable Name: EnumerationModelValidation</p>
JKR	TM AI	<p>Does your institution use artificial intelligence (including machine learning) technology in its transaction monitoring process?</p> <p>If no transaction monitoring in place please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKS	TM Rule	<p>Does your institution use rules as part of its transaction monitoring process?</p> <p>If no transaction monitoring in place please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKT	TM High Risk Geographies	<p>Does your institution have rules in its transaction monitoring process with respect to high risk geographies?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKU	TM Offshore Jurisdictions	<p>Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKV	TM BR Customer Segments	<p>Does your institution have rules 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>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

JKW	TM Sectors	<p>Does your institution have rules in its transaction monitoring process which take into account risks associated with specific sectors?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKX	TM PEP	<p>Are there rules or conditions in your institution's transaction monitoring system to account for risk associate with PEPs and PEP close associates?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKY	TM Cash	<p>Does your institution have rules in its transaction monitoring process with respect to cash transactions?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JKZ	TM Text	<p>Are transaction description fields / bodies of text considered in any of the rules your institution has in its transaction monitoring system.</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JLA	TM Complex	<p>Does your institution have rules in its transaction monitoring process with respect to complex structure?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JLB	TM Banks	<p>Does your institution have rules in its transaction monitoring process with respect to what banks / payment institutions are involved in transactions?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JLC	TM Other	<p>Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their rules?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

JLD	TM Other Detail	<p>Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JLE	TM Review	<p>Does your institution periodically review its rules in its transaction monitoring process?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JLF	TM Review Latest	<p>Please give completion date of the review. If a repeating review process is in place, please give the most recent date for a rule which has been reviewed.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JLG	TM Review Latest Changes	<p>Did the most recent review lead to any changes in rules?</p> <p>If you answered No to TM Rule please select N/A.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JLH	TM Real Time or Post Event	<p>State whether detection of (possible) suspicious financial transactions takes place in real-time or post-event.</p> <p>In this context, real-time detection means monitoring which is carried out live and can react to transactions as they take place as opposed to post-event detection which is done in batches at certain points in time after the transactions take place.</p> <p>Select from: DetectionTime Variable Name: EnumerationDetectionTime</p>
JLI	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 If not applicable enter 0</p>
JLJ	TM Distributed Ledger Info Enabler	<p>State whether your institution has implemented a tool that enables it to analyse the information available on distributed ledgers and generate alerts where unusual patterns or risk factors are identified, in relation to the transactions carried out by the customers.</p> <p>Select from YesNoNA</p>

Variable name: EnumerationYesNoNA

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.

<A07031 Identifier="JLK" IntegerValue="107"></A07031>

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

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

		<p>financial sanctions.</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>
JMA	Alert TP Review - Manual	<p>How many true positive alerts (STR filed from manual alerts) led to a review of the customer's risk, CDD or otherwise.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JMB	Alert Backlog - Manual	<p>On 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JMC	Alert Mean Time To Close TP – Manual	<p>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?</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JMD	Alert Days - Manual	<p>If manual system: Average time in days to analyse the transaction since the moment it occurred.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>

8.4.8 Suspicious Alerts and Transaction Rejections

Table Structure A – XML only requires REFs, e.g. <A07032 JME="Alert_ML" JMF="139" JMG="164"></A07032>

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

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

Every entry must specify a unique [AlertType](#) pairing along with the number of alerts and Number of rejections.

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

8.4.9 Suspicious Transaction Reporting

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

<A07031 Identifier="JMH" EnumerationYesNo="Yes"></A07031>

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

REF	Field	Description
JMH	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
JMI	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMJ	Number STR Bribe	State the total number of suspicious transaction reports (STRs) based on bribery/corruption reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMK	FIU Number STR HT	State the total number of suspicious transaction reports (STRs) based on human trafficking reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JML	FIU Number STR LWE	State the total number of suspicious transaction reports (STRs) based on left wing extremism reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMM	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. Variable name: IntegerValue If not applicable enter 0
JMN	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. Variable name: IntegerValue If not applicable enter 0
JMO	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. Variable name: IntegerValue If not applicable enter 0
JMP	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.

		Variable name: IntegerValue If not applicable enter 0
JMQ	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. Variable name: IntegerValue If not applicable enter 0
JMR	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. Variable name: IntegerValue If not applicable enter 0
JMS	FIU Number STR SWF	State the total number of suspicious transaction reports (STRs) based on social welfare fraud reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMT	FIU Number STR TE	State the total number of suspicious transaction reports (STRs) based on tax evasion reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMU	FIU Number STR TF	State the total number of suspicious transaction reports (STRs) based on terrorist financing reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMV	FIU Number STR TBML	State the total number of suspicious transaction reports (STRs) based on trade based money laundering reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMW	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
JMX	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. Variable name: IntegerValue If not applicable enter 0
JMY	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. Variable name: IntegerValue If not applicable enter 0
JMZ	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.

		Variable name: IntegerValue If not applicable enter 0
JNA	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 Variable name: IntegerValue If not applicable enter 0
JNB	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. Variable name: IntegerValue If not applicable enter 0
JNC	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. Variable name: IntegerValue If not applicable enter 0
JND	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. Variable name: IntegerValue If not applicable enter 0
JNE	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. Variable name: IntegerValue If not applicable enter 0
JNF	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. Variable name: IntegerValue If not applicable enter 0
JNG	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. Variable name: IntegerValue If not applicable enter 0
JNH	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. Variable name: IntegerValue If not applicable enter 0
JNI	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. Variable name: IntegerValue If not applicable enter 0
JNJ	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.

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

8.4.10 Sanctions Screening

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

<A07031 Identifier="JNL" EnumerationYesNo="Yes"></A07031>

REF	Field	Description
JNL	Sanctions Prior To Service	<p>State whether your institution verifies, prior to providing services, whether or not customers or potential customers and their beneficial owners are included on sanction list.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNM	Sanction Max Hours	<p>Maximum number of hours between the publication of the targeted financial sanctions by the authorities and the implementation of these changes in the institution's screening tools.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
JNN	Sanction EU	<p>Specify if customers and beneficial owners are checked against EU sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNO	Sanction National List	<p>Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC).</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNP	Sanction UN	<p>Specify if customers and beneficial owners are checked against UN sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNQ	Sanction Other	<p>Specify if customers and beneficial owners are checked against any other sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNR	Sanction Other Specify	<p>If your institution uses any other sanctions lists not mentioned above please specify.</p> <p>List the sanction lists used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JNS	Sanction Transact Check	<p>At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when executing a transaction.</p> <p>Select from YesNo</p>

		Variable name: EnumerationYesNo
JNT	Sanction List Update	<p>At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when sanctions listing updated.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNU	Sanction Periodic Customer	<p>At and after the start of service provision, state whether your institution periodically checks whether customers are included on sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNV	Sanction Periodic BO	<p>At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to customers are included on sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNW	Sanction Periodic Rep	<p>At and after the start of service provision, state whether your institution periodically checks whether representatives connected to customers are included on sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JNX	Sanction Periodic Customer Frequency	<p>State the frequency (number of checks per calendar year) that the periodic checks are performed for 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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JNY	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 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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JNZ	Sanction Periodic Rep Frequency	<p>State the frequency (number of checks per calendar year) that the periodic checks are performed for representatives connected to 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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JOA	Sanction Total Hits	<p>State the number of actual hits that the sanctions list screening delivered in the preceding calendar year.</p> <p>In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.</p>

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
JOB	Sanction Total Hits Value	<p>State the total value (EUR) of frozen assets recorded in relation to those hits that the sanctions list screening delivered in the preceding calendar year.</p> <p>In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list. In the case of currency conversions, conversion at time of transaction or exchange rate as of 31 December of the preceding calendar year is acceptable.</p> <p>Variable name: DecimalValue</p> <p>If not applicable enter 0</p>

8.4.11 Outsourcing

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

<A07031 Identifier="JOF" EnumerationOutsource="Yes_entities_within_group"></A07031>

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

REF	Field	Description
JOC	Outsource CDD Onboarding	State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOD	Outsource CDD Review	State whether CDD periodic customer review (e.g. recurring process of reviewing customer CDD status/documentation/risk) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOE	Outsource TM	State whether transaction monitoring has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOF	Outsource Alert Processing	State whether alerts processing has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOG	Outsource STR Reporting	State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOH	Outsource Sanction Screen	State whether sanctions screening has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOI	Outsource CDM	State whether customer data management (e.g. external storage, management and handling of customer data) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOJ	Outsource Training	State whether AML/CFT training has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOK	Outsource PEP	State whether PEP detection has been outsourced to third parties (including within the Group).

		Select from Outsource Variable name: EnumerationOutsource
JOL	Outsource Compliance	State whether compliance monitoring checks have been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JOM	Outsource Other AMLCFT	State whether other processes related to risk management with regard to AML/CFT/proliferation financing have been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
JON	Outsource Other AMLCFT Specify	If Yes to Outsource Other AMLCFT, specify the other processes. List the other outsourced elements of your AML/CFT processes separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
JOO	Outsource Provider Compliance Requirements	State the proportion of outsourced AML/CFT tasks where your institution incorporates compliance requirements with respect to financial crime legislation within its outsourcing agreements (e.g. Criminal Justice Act). To calculate the percentage, obliged entities should apply the following process: Denominator: number of tasks (customer due diligence, training, transaction monitoring, etc.) that are at least partly outsourced. Numerator: number of such tasks for which one or more written outsourcing agreement covering all outsourced aspects is in place. Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0
JOP	Outsource Compliance Assessed	State whether your institution assessed outsource provider's compliance with the requirements in the preceding calendar year. Select from YesNoNA Variable name: EnumerationYesNoNA
JOQ	Outsource Assess Report Obligation	State whether your institution ensures outsource provider compliance with the requirements via reporting obligation. Select from YesNoNA Variable name: EnumerationYesNoNA
JOR	Outsource Assess Training	State whether your institution ensures outsource provider compliance with the requirements via training (e.g. ensure outsource providers are sufficiently trained in topics relating to the compliance requirements). Select from YesNoNA Variable name: EnumerationYesNoNA

JOS	Outsource Assess Audit Rights	<p>State whether your institution ensures outsource provider compliance with the requirements via audit rights (e.g. retain rights to audit the outsource providers).</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JOT	Outsource Assess Other	<p>State whether your institution ensures outsource provider compliance with the requirements via other measures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JOU	Other Outsource Compliance Check Approaches	<p>Please state, if any, which other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements.</p> <p>List the processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JOV	Outsource Tasks to Third Countries	<p>State the existence of AML/CFT tasks outsourced to an external service provider located in third country is not part of the group structure of your institution.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
JOW	Outsource Tasks to Third Countries Within Group	<p>State the existence of AML/CFT tasks outsourced to an external service provider located in third country is part of the group structure of your institution.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

8.4.12 Education and Training

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

<A07031 Identifier="JOX" PercentageValue="0.5"></A07031>

REF	Field	Description
JOX	Non-AML/CFT specialist staff - % Staff coverage	<p>State the proportion of non-AML/CFT specialist staff (customer facing staff, executive directors) who have attended training in the preceding calendar year with regard to financial crime.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JOY	AML Specialist staff - % Staff coverage	<p>State the proportion of AML specialist staff who have attended training in the preceding calendar year with regard to financial crime.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JOZ	Board members & non-executive directors - % Staff coverage	<p>State the proportion of members of Board members and non-executive directors who have attended training in the preceding calendar year with regard to financial crime.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JPA	Other - % Staff coverage	<p>State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year with regard to financial crime.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g., enter 4.7% as 0.047 If not applicable enter 0</p>
JPB	Staff Numbers	<p>Enter the total number of full-time equivalent employees employed by the institution.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

8.4.13 Compliance and Assurance Testing

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

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

<A07031 Identifier="JPC" DateValue="2024-05-07"></A07031>

REF	Field	Description
JPC	Compliance SEBWRA	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPD	Compliance CDD	<p>State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPE	Compliance Training	<p>State the most recent date when AML/CFT-related awareness-raising and staff training measures were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPF	Compliance Verification	<p>State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPG	Compliance TM	<p>State the most recent date when the monitoring processes for transactions and business relationships were assessed by the compliance in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPH	Compliance STR	<p>State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function in your institution.</p>

		<p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPI	Compliance Records	<p>State the most recent date when record keeping policies and procedures were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPJ	Compliance Resources	<p>State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPK	Compliance Organisation	<p>State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPL	Compliance Sanctions	<p>State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPM	Compliance TPDD	<p>State the most recent date when outsourcing arrangements were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JPN	Compliance Other	<p>State whether any other financial crime topics or processes were assessed by the compliance function in your institution in the preceding calendar year.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
JPO	Compliance Other Specify	<p>Specify the other financial crime topics or processes that were tested or monitored by the compliance function in your institution in the preceding calendar year.</p> <p>Provide a list of topics or processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>

JPP	Compliance BWRA Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of your institution's business-wide risk assessment by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPQ	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 by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPR	Compliance Training Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of AML/CFT-related awareness-raising and staff training measures by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPS	Compliance Verification Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of identification and identity verification procedures by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPT	Compliance TM Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the transaction monitoring process by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPU	Compliance STR Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the suspicious transaction reporting process by the compliance function in your institution.</p>

		<p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPV	Compliance Records Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of record keeping policies and procedures by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPW	Compliance Resources Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPX	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 by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPY	Compliance Sanctions Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of compliance with sanctions regulations by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JPZ	Compliance TPDD Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of outsourcing arrangements by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
JQA	Compliance Other Process Descript	<p>Briefly describe any material findings/potential breaches of other financial crime topics or processes identified by the compliance function in your institution.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQB	Compliance to Senior Management	<p>State the frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
JQC	Compliance to Board	<p>State the frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from Frequency Variable Name: EnumerationFrequency</p>
JQD	Compliance AML Staff	<p>Number of dedicated AML/CFT compliance staff (in Full Time Equivalent).</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

8.4.14 Audit

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

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

<A07031 Identifier="JQE" DateValue="2025-10-16"></A07031>

REF	Field	Description
JQE	Audit BWRA	<p>State the most recent date when the structure and effectiveness of Business Wide Risk Assessment (BWRA) was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JQF	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>
JQG	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>
JQH	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>
JQI	Audit TM	<p>State the most recent date when the monitoring processes for transactions and business relationships were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JQJ	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>

JQK	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>
JQL	Audit Resources	<p>State the most recent date when resources dedicated to AML/CFT were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JQM	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>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
JQN	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>
JQO	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>
JQP	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>
JQQ	Audit Other Specify	<p>Specify the other processes that were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Provide a list of other processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQR	Audit BWRA Descript	<p>Briefly describe any material findings/potential breaches of your institution's business-wide risk assessment identified by the internal audit in your institution or by an external expert.</p>

		<p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQS	Audit CDD Descript	<p>Briefly describe any material findings/potential breaches of the determination of ML/TF risk profile of customers in a business relationship identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQT	Audit Training Descript	<p>Briefly describe any material findings/potential breaches of AML/CFT-related awareness-raising and staff training measures identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQU	Audit Verification Descript	<p>Briefly describe any material findings/potential breaches of identification and identity verification procedures identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQV	Audit TM Descript	<p>Briefly describe any material findings/potential breaches of the transaction monitoring process identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQW	Audit STR Descript	<p>Briefly describe any material findings/potential breaches of the suspicious transaction reporting process identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p>

		<p>Character limit: 500 characters If not applicable enter N/A</p>
JQX	Audit Records Descript	<p>Briefly describe any material findings/potential breaches of record keeping policies and procedures identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQY	Audit Resources Descript	<p>Briefly describe any material findings/potential breaches of resources dedicated to AML/CFT identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JQZ	Audit Organisation Descript	<p>Briefly describe any material findings/potential breaches of the organisation of the AML/CFT system, governance and reporting to management bodies identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JRA	Audit Sanctions Descript	<p>Briefly describe any material findings/potential breaches of compliance with sanctions regulations identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JRB	Audit TPDD Descript	<p>Briefly describe any material findings/potential breaches of outsourcing arrangements identified by the internal audit in your institution or by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JRC	Audit Other Process Descript	<p>If other financial crime topics were assessed by the internal audit function in your institution or an external expert, then describe any</p>

		<p>material findings/potential breaches identified.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
JRD	Audit to Senior Management	<p>State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management.</p> <p>Select from Frequency Variable Name: EnumerationFrequency</p>
JRE	Audit to Board	<p>State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from Frequency Variable Name: EnumerationFrequency</p>

8.4.15 Governance

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

<A07031 Identifier="JRF" EnumerationFrequency="3_years-4_years"></A07031>

REF	Field	Description
JRF	Money Laundering Senior Management	State the frequency that money laundering is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable Name: EnumerationFrequency
JRG	Terrorist Financing Senior Management	State the frequency that terrorist financing is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable name: EnumerationFrequency
JRH	FTR Senior Management	State the frequency that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable name: EnumerationFrequency
JRI	Sanction Circumvent Senior Management	State the frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable name: EnumerationFrequency
JRJ	Corruption Senior Management	State the frequency that corruption (bribery) and conflicts of interests is considered as a regular reporting item on the agenda at Senior Management/management body meetings. Select from Frequency Variable name: EnumerationFrequency
JRK	Money Laundering Board	State the frequency that money laundering is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency
JRL	Terrorist Financing Board	State the frequency that terrorist financing is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency
JRM	FTR Board	State the frequency that Funds Transfer Regulation is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency
JRN	Sanction Circumvent Board	State the frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Board meetings.

		Select from Frequency Variable name: EnumerationFrequency
JRO	Corruption Board	State the frequency that corruption (bribery) and conflicts of interests is considered as a regular reporting item on the agenda at Board meetings. Select from Frequency Variable name: EnumerationFrequency
JRP	Designated Responsibility	Has your institution appointed a member of senior management with primary responsibility for implementing, managing and overseeing your institutions' compliance with its AML/CFT obligations as required under Section 54(8) of the CJA 2010? Select from YesNo Variable name: EnumerationYesNo
JRQ	Designated Compliance Officer	Has your institution appointed an individual at management level (to be called a 'Compliance Officer') to monitor and manage compliance with, and the internal communication of, internal policies, controls and procedures adopted by your institution as required under Section 54(7) of the CJA 2010? Select from YesNo Variable name: EnumerationYesNo
JRR	COR Frequency	State the Frequency that the Board has been presented with a report ('Compliance Officer Report') from the compliance officer on your institution's AML/CFT activities? Select from Frequency Variable name: EnumerationFrequency
JRS	Reported Shortcomings	State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
JRT	Shortcomings Recovery	Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken. Select from YesNoNA Variable name: EnumerationYesNoNA
JRU	Shortcomings Recovery Details	If Yes to Shortcomings Recovery, briefly describe the reported AML/CFT shortcomings and remediation measures taken. Provide a list of shortcomings and recovery measures in pairs, with each pair separated by semicolon (;) with no spaces either side, i.e., <shortcoming1><recovery1>;<shortcoming2><recovery2>; etc. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

8.4.16 Compliance with Fund Transfers Regulation

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

<A07031 Identifier="JRV" IntegerValue="943"></A07031>

Please refer to EBA's [Travel Rule Guidelines](#), [Recast FTR](#), and [additional info](#) published by the Central Bank of Ireland if necessary to complete this section.

REF	Field	Description
JRV	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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JRW	FTR Outbound	<p>Total number of outbound transfers in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JRX	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.</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>
JRY	FTR Counter Fail	<p>Number of repeatedly failing counterparties flagged to the supervisor in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
JRZ	FTR Counter Total	<p>Total number of counterparties of outbound and inbound transfers in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

8.5 Residence and Establishment

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

<A07041 JSA="BG" JSB="706" JSC="8" JSD="688" JSE="53" JSF="758" JSG="298" JSH="113" JSI="767"></A07041>

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

Please specify the number of your customers who are natural persons residing or legal entities established in that country. Only the applicable countries need to be completed.

REF	Field	Description
JSA	Country - Residence or Establishment	Select from the list of Alpha-2 country codes for each applicable country that has natural persons residing or legal entities established in that country. Data Type: EnumerationValue Select from <u>Country</u>
JSB	Natural person customers – Total Number	Natural person customers - Total. Data Type: IntegerValue If not applicable enter 0
JSC	Natural person customers – No. of which are New Customers	Natural person customers - Number of which are New Customers (Natural person customers with whom a business relationship was entered into in the preceding calendar year). Data Type: IntegerValue If not applicable enter 0
JSD	Natural person customers – No. of which are High Risk	Natural person customers - Number of which are High Risk according to institution's customer risk assessment. Data Type: IntegerValue If not applicable enter 0
JSE	Legal entity customers – Total Number	Legal entity customers – Total. Data Type: IntegerValue If not applicable enter 0
JSF	Legal entity customers - No. of which are New Customers	Legal entity customers - Number of which are New Customers (with whom a business relationship was entered into in the preceding calendar year). Data Type: IntegerValue If not applicable enter 0
JSG	Legal entity customers - No. of which are High Risk	Legal entity customers - Number of which are High Risk according to institution's customer risk assessment.

		Data Type: IntegerValue If not applicable enter 0
JSH	Legal entity customers - No. with at least one beneficial owner residing in non-EEA countries	Legal entity customers - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence). Data Type: IntegerValue If not applicable enter 0
JSI	Legal entity customers - No. of which have PEP Risk Identified	Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment. Data Type: IntegerValue If not applicable enter 0

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

Country	Natural person customers			Legal entity customers				
	Total No.	No. of which are New Customers	No. of which are High Risk	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
JSA	JSB	JSC	JSD	JSE	JSF	JSG	JSH	JSI
GB	4	2	2	4	1	2	1	1

<A0704>

<A07041 JSA="GB" JSB="4" JSC="2" JSD="2" JSE="4" JSF="1" JSG="2" JSH="1" JSI="1"></A07041>

</A0704>

8.6 Beneficial Owner

Table Structure A – XML only requires REFs, e.g. `<A07051 JSJ="AL" JSK="916"></A07051>`

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

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

REF	Field	Description
JSJ	Country - Beneficial Owner	Select from the list of Alpha-2 country codes for each applicable country that has a PEP or legal entity BO residing in that country. Data Type: EnumerationValue Select from Country
JSK	Number of beneficial owners	Number of beneficial owners of your legal entity customers residing in the country. Data Type: IntegerValue If not applicable enter 0

For example, if 4 of your legal entity customers' BOs reside in the UK, report as below.

Country	No. of BOs of legal entity customers
JSJ	JSK
GB	4

`<A0705>`

`<A07051 JSJ="GB" JSK="4"></A07051>`

`</A0705>`

8.7 Politically Exposed Person

Table Structure A – XML only requires REFs, e.g. <A07061 JSL="AF" JSM="738" JSN="119"></A07061>

The questions below concern the institution's natural person customers who are PEPs, their family members or persons known to be close associates and the institution's legal entity customers whose beneficial owners (BOs) are PEPs, their family members or persons known to be close associates, as of 31 December of the preceding calendar year.

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

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

Only the applicable countries need to be completed.

REF	Field	Description
JSL	Country - PEP	<p>Select from the list of Alpha-2 country codes, each country where the following applies: A natural person customer of your institution is a PEP, family members, or a person known to be a close associate and has nationality/citizenship in the specified country, or a legal entity customer which is established or registered in this specified country.</p> <p>Data Type: EnumerationValue Select from Country</p>
JSM	Natural person customers – No. of which are PEPs	<p>Natural person customers - Number of which are PEPs, their family members or persons known to be close associates.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
JSN	Legal entity customers – No. of which have at least one PEP beneficial owner	<p>Legal entity customers – Number of which have at least one beneficial owner who is a PEP, family member or person known to be a close associate.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

For example, if 4 of your natural person customers who hold French nationality/citizenship are PEPs, and 1 of your legal entity customers established in France has 1 beneficial owner who is a PEP, family member or person known to be a close associate and 1 of your legal entity customers established in France has 3 beneficial owners who are PEPs, their family members or persons known to be close associates, report as below.

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

<A0706>
 <A07061 JSL="FR" JSM="4" JSN="2"></A07061>
</A0706>

8.8 Geography of Funds Flow

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

```
<A07071 JSO="AL" JSP="378" JSQ="727.72" JSR="458" JSS="312.93" JST="824" JSU="433.73" JSV="104" JSW="123.71"></A07071>
```

The questions below concern the source and destination of transmitted funds flow transacted by your customers using the products or services provided by your institution, e.g., entry/exit points for deposits, payments, withdrawals, transfers, remittance, FX, value transfer/exchange, etc.

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

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

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

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

- 600 incoming transactions where the source of the fund flow was Ireland and 12,500 outgoing transactions where the destination of the fund flow was Ireland. 26 of the incoming transactions from Ireland were by High Risk customers. 3125 of the outgoing transactions to Ireland were by High Risk customers.
- 912 incoming transactions where the source of the fund flow was Germany and 1,800 outgoing transactions where the destination of the fund flow was Germany. 61 of the incoming transactions from Germany was by High Risk customers. 450 of the outgoing transactions to Germany were by High Risk customers.
- There were no incoming transactions from the United Kingdom and 6 outgoing transactions to the United Kingdom. 1 of the outgoing transactions to the United Kingdom was by a High Risk customer.
- 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.

Country	Overall (Incoming)		Overall (Outgoing)		of which High Risk (per your institution's Customer Risk Assessment)			
	No. of transactions (Source)	Value of transactions (Source)	No. of transactions (Destination)	Value of transactions (Destination)	No. of transactions (Source)	Value of transactions (Source)	No. of transactions (Destination)	Value of transactions (Destination)
JSO	JSP	JSQ	JSR	JSS	JST	JSU	JSV	JSW
IE	600	741,534	12,500	123,456	26	247,178	3,125	280,864
DE	912	146,049	1,800	224,691	61	19,737	450	56,173
GB	0	0	6	1,248	0	0	1	500
FR	1	50	0	0	0	0	0	0

<A0707>

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<A07071 JSO="DE" JSP="912" JSQ="146049" JSR="1800" JSS="224691" JST="61" JSU="19737" JSV="450" JSW="56173"></A07071>

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</A0707>

8.9 Transaction Monitoring

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

```
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```

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

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

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

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

REF	Field	Description
JSX	Rule Name / ID	Unique Internal Rule ID. Please complete for each rule. Data Type: StringValue Character limit: 500 characters If not applicable enter N/A
JSY	High Level Rule / Model Description	High-level description of each Rule / Model. If not applicable enter N/A. Data Type: StringValue Character limit: 2000 characters If not applicable enter N/A
JSZ	Number of Transaction Monitoring Alerts for Rule/Model	Number of Transaction Monitoring Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
JTA	Number of True Positive Alerts for Rule/Model	Number of True Positive Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
JTB	Number of False Positive Alerts for Rule/Model	Number of False Positive Alerts for Rule/Model in the preceding calendar year. Data Type: IntegerValue

If not applicable enter 0

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

<A0708>

<A07081 JSX="R001_Foreign_Cash" JSY="Rule which detects significant cash deposit and subsequent risky international transaction" JSZ="25" JTA="2" JTB="23"></A07081>

<A07081 JSX="R002_Incoming_Smurfing" JSY="Detects large number of incoming small transactions from different sources, contrary to expected behaviour for customer segment" JSZ="0" JTA="0" JTB="0"></A07081></A0708>

9 Appendices

9.1 Definitions

Term	Interpretation
Active customer	The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into, or who has at least one transaction initiated by the customer even if it is a periodic/automatic transaction, in the preceding calendar year but excludes any transactions which pertain to fee payments, services charges or similar.
AML/CFT regulated customers	All persons or entities of a similar nature to those listed in Article 3 of Regulation (EU) 2424/1624, including those that do not fall within the scope of Regulation (EU) 2024/1624 due to their non-EU status
Beneficial owner	As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership through ownership interest or control as referred to in Article 52 and Article 53 of Regulation (EU) 2024/1624.
Business relationship	As per Article 2(1), point (19), of Regulation (EU) 2024/1624.
Business Wide Risk Assessment	As per Article 10 of Regulation (EU) 2024/1624.
Cash	As per Article 2(1), point (43), of Regulation (EU) 2024/1624.
Cash intensive business	A cash-intensive business is a business that primarily operates with cash transactions rather than electronic or credit payments. These businesses often handle a large volume of cash relative to their overall revenue, for example: Hospitality and Leisure Automotive and Transportation Retail and Consumer Goods Health and Personal Care Crafts and Trades Art, Luxury, and Collectibles Services and Education
Complex structure	The term complex structure (such as a long holding chain with use of front companies, or a lack of transparency) refers to an ownership structure that is comprised of more than two layers of ownership which often includes (but is not limited to) foundations, charities, non-profit organisations, offshore vehicles trusts, or other legal arrangements including bearer shares and nominee shareholding. Any additional internal definition of complex structure is also acceptable here.
Correspondent relationship	As per Article 2(1), point (22), of Regulation (EU) 2024/1624.
Credit institution	(a) As per Article 2(1), point (5), of Regulation (EU) 2024/1624, or (b) An Post in respect of any activity that it carries out, whether as principal or agent, that would render it, or a principal for whom it is an agent, a credit institution as a result of the application of (a)
Crypto Asset Service Provider	As per Article 2(1), point (9), of Regulation (EU) 2024/1624.
Crypto risks	Risks related to e.g. customers trading in cryptos, but also risks related to your institution's activities in this area.
Crypto-asset	As per Article 2(1), point (7), of Regulation (EU) 2024/1624.

Crypto-asset services	As per Article 2(1), point (8), of Regulation (EU) 2024/1624.
Crypto token	A crypto token is a digital asset created on a blockchain that can represent ownership, rights, or access to a specific asset, service, or utility within a blockchain ecosystem.
Customer	The customer is the natural or legal person with whom a business relationship is entered into or who has a transaction effected.
Customer Representative	A customer representative is an individual authorised to act on behalf of the customer in managing their financial affairs, and is responsible for acting in the best interests of the customer and following their instructions.
Distributed ledger	As per Article 3(1), point (2), of Regulation (EU) 2023/1114.
Electronic money	As per Article 2(1), point (17), of Regulation (EU) 2024/1624.
False positive alert	A false positive alert is a transaction monitoring alert which was automatically closed by a system without escalation or an escalated alert which was closed by an analyst as not being worthy of an STR. If the alert is a collection of several alerts then all of these alerts are considered to be false positives.
Family members	As per Article 2(1), point (35), of Regulation (EU) 2024/1624.
Financial institution	As per Article 2(1), point (6), of Regulation (EU) 2024/1624.
Funds Transfer Regulation	Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015, as supplemented by S.I. No. 608/2017 (EU)
Group	As per Article 2(1), point (41), of Regulation (EU) 2024/1624.
High risk country	Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163.
Hit (in sanctions screening)	In this context, “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.
Human intervention	As mentioned in EBA/GL/2022/15 – Guidelines on use of Remote Onboarding Solutions under Article 13(1) of Directive (EU) 2015/849.
Intermediary	This includes brokers, agents, distributors, intermediaries and all other contracted third parties which constitute a link in the chain of service provision to your customers, or in the execution of customer transactions. This concerns intermediaries with which your institution has entered into an agreement.
Legal entity	Legal person or other legal arrangement.
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Loans that are not associated with the acquisition of any product/service	Consumer credits and similar credit lines that are granted to customers without specifying a purpose for the credit. The customers are free to decide how they want to use the funds borrowed from the lender.
Management body	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
New customer	Natural persons or legal entities with whom a business relationship is entered into in the preceding calendar year.
ML/TF risk	The impact and likelihood of ML/TF taking place.
Money laundering	As per Article 2(1), of Regulation (EU) 2024/1624.
Nested account	An account where a financial institution (the nested financial institution) gains indirect access to services by transacting through

	another financial institution's (the respondent institution) correspondent account.
Occasional transaction	As defined under Section 24 of the CJA 2010.
Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
Onboarded physically	Onboarding face-to-face where the customer is physical present, that is, in the same physical location as the institution or a persona acting on the institution's behalf.
Parent entity	As per Article 2(42) of Regulation (EU) 2024/1624.
Payable-through account	A correspondent account that is used directly by third parties to transact business on their own behalf.
Payment institution	As per Article 4(4), of Directive (EU) 2015/2366.
Payment instrument	As per Article 4(14), of Directive (EU) 2015/2366.
Payment transaction	As per Article 4(5), of Directive (EU) 2015/2366.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Prematurely repaid loans	The total number of loans that were fully repaid and closed within the reporting year, premature to their originally planned disbursement date.
Prepaid Cards/Vouchers	Cards & Vouchers are preloaded with e-money, allowing the customer to spend the value loaded on the card either online or at points of sale. These can be reloadable or non-reloadable.
Proliferation financing	The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.
Remote onboarding	Onboarding other than face-to-face where the customer is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the customer's identity is being verified via video-link or similar technological means such as App registration, Internet sign-up, email, over the phone, etc.
Repaid loans	The total number of loans that were fully repaid and closed within the reporting year, regardless of their original disbursement date.
Residual risk	The level of risk that remains after mitigation.
Risk appetite	The level of risk a firm is prepared to accept.
Rule (in transaction monitoring)	A rule in this context means a rule/model/business rule/transaction monitoring rule as anything, manual or automated, designed to detect a specific transactional behaviour(s), scenario or typology which can by itself, or as a group of alerts, could be escalated for

	investigation and possible Suspicious Transaction Report. These are non-AI based logical decision rules often following “IF-THEN”, “IF-ELSE”, “WHEN” patterns etc.
Sanctions regulation	As per Article 2(1), point (49), point (50), and point (51), of Regulation (EU) 2024/1624.
Self-hosted address	As per Article 3, point (20), of Regulation (EU) 2023/1113.
Senior management	As per Article 2(1), point (40), of Regulation (EU) 2024/1624.
Shell institution/bank	As per Article 2(1), point (23), of Regulation (EU) 2024/1624.
Terrorist financing	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
Third country	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.
Trade finance	Financing of international goods and services trade transactions on behalf of customers importing into or exporting from Ireland. Examples of trade finance activities are: letters of credit, open account facilities, trade credit insurance and import/export collection and guarantees.
Transaction monitoring alert	<p>In this context a Transaction Monitoring Alert means one or more transactions which triggers or collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst.</p> <p>E.g. 1: A rule is in place which detects large deposits of cash anomalous to customer behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating, if the investigator files a STR report this is considered a True Positive Alert; otherwise we consider it a False Positive Alert.</p> <p>E.g. 2: A scenario is in place to detect fast-moving transactions to high risk geographies. One model/rule detects placement of risky funds and another detects fast movement of these funds to a high risk destination. Both of these models/rules identify behaviour creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this we consider it a True Positive Alert for both rules/models; otherwise we consider it a False Positive Alert for both rules/models.</p>
Transaction monitoring rule/model	A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system.
Transaction profile	Transaction profile in this context has the meaning of any measure of expected transactional behaviour for customers.
True positive alert	A true positive alert is a transaction monitoring alert which was escalated and led to the filing of an STR. If an STR is collection of several alerts, all of these alerts are considered to be true positive alerts.
Trust or company service provider	As per Article 2(1), point (11), of Regulation (EU) 2024/1624.

Wealth Management

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

9.2 Enumerations

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

AlertType

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

CDD

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

Country

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

CustomerSegment

Identifier	Description
NP_physically_on	Natural persons that were onboarded physically
NP_remotely_on	Natural persons that were onboarded remotely
NP_not_categorised	Natural persons that are not categorised as per CDD ratings
NP_blocked	Natural persons that are blocked/curtailed pending exit due to AML/CFT concerns
NP_suspended	Natural persons that are suspended

LE_physically_on	Legal entities that were onboarded physically
LE_remotely_on	Legal entities that were onboarded remotely
LE_not_categorised	Legal entities that are not categorised as per CDD ratings
LE_blocked	Legal entities that are blocked/curtailed pending exit due to AML/CFT concerns
LE_suspended	Legal entities that are suspended
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.
Complex	Customers with complex structures
Cash_intensive	Customers that operate cash intensive businesses
Club_Society	Legal entities that are clubs or societies
Cust_non_EEA	Customers with cross border transactions involving non-EEA countries
Cust_FIU	Customers with requests from the Financial Intelligence Unit (FIU)

BWRAConducted

Identifier
Yes
No
Exemption_applies

DetectionTime

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

Frequency

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

MonitoringApproach

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

Outsource

Identifier	Description
No	No
No_but_concrete_plans_to_source_in_future	No, but we have concrete plans to do this in the future
Yes_entities_within_group	Yes, to the parent/entities within the group to which my entity belongs
Yes_completely_or_partially_to_non_group_entities	Yes, completely or partially outsourced to non-group entities

ModelValidation

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

T: +353 (0)1 224 5800
E: AML_Analytics@centralbank.ie
www.centralbank.ie



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Central Bank of Ireland

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