

Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem

Guidance Notes Risk Evaluation Questionnaire

Fund Management Companies

November 2026

Document History

Version	Author	Comments	Date
1.0	CBI	Initial version	02/06/2026
1.1	CBI	Updated 8.7 Beneficial Owner cell IOK, removed incorrect PEP wording and replaced with "Number of beneficial owners of your legal entity investors residing in the country."	18/11/2026
1.1	CBI	New AMLA datapoints added – IOS, IOT, IOU	18/11/2026
1.1	CBI	Fix to EnumerationFrequency list, removing extra whitespace from the end of "1_years-2_years"	18/11/2026
1.1	CBI	Outsourcing datapoints have new enumeration values (IJK, IJL, IJM, IJN, IJO, IJP, IJQ, IJR, IJS, IJT, IJU). New Values: - Not_outsourced - Partially_outsourced - Totally_outsourced	18/11/2026
1.1	CBI	IKD and IKE questions removed and replaced with two new AMLA outsourcing questions.	18/11/2026
1.1	CBI	IKK, ILM (Full Time Equivalent questions) updated from integer value to decimal to allow for more accurate representation.	18/11/2026
1.1	CBI	ICD - Added N/A option to enumeration (i.e. changed from EnumerationYesNo to EnumerationYesNoNA)	18/11/2026
1.1	CBI	IHR – Removed reference to "true positive alerts", now refers to all alerts.	18/11/2026
1.1	CBI	Updated guidance on 8.2.2 international presence to capture data correctly under AMLA guidance.	18/11/2026
1.1	CBI	Updated guidance in section 7 regarding section 8.2.2 and 8.4.14	18/11/2026

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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 for institutions to comply with EU Council Regulations relating to Financial Sanctions (FS) measures as soon as they are adopted.

The Risk Evaluation Questionnaire (REQ) seeks to consider:

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

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

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

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

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

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

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

2 Timeline for Submitting the REQ

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

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

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3 Requirement to provide information to the Central Bank

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

4 Mechanism for Submission of Returns

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

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

1. Explicit closing XML tags must be used for all elements. *e.g.*
   <A06011 Identifier="ICA" EnumerationYesNo="Yes"></A06011>
   rather than
   <A06011 Identifier="ICA" EnumerationYesNo="Yes"/ >
2. The XML tags must be contained in the following wrapper:
   <?xml version="1.0" encoding="utf-8"?>
   <FundManCo xmlns="http://www.centralbank.ie/Schemas/AML/2025/A06">
   …
   …
   …
   </FundManCo>

The completed REQ return file should be uploaded on the Portal at:
https://www.centralbank.ie/regulation/central-bank-portal

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

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

Naming convention
The file name must be of the form: CCCCCC_YYYYMMDD_A06.xml

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A06 - the A06 Return code
- .xml or .zip - the file extension

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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 Fund Management Companies. Each institution must use the XSD schema specific to its sector. If your institution is part of a group with multiple institutions regulated by the Central Bank, then each individual institution must submit a REQ.

This REQ should be completed based on business written from the Irish institution only apart from the following two sections:

Section 8.2.2 – include business written from your Irish institution and its branches.

Section 8.4.14 - If the legal structure of your institution is reported as "Parent_ of_group" within the EEA, it is required to report all information explicitly for this section in an aggregated manner for all your institution's EEA entities. Otherwise enter 0 for all answers in this sect

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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 investor risk ratings can use the ratings as at the reference date, even if investor risk rating has changed during the year.

All values should be entered in Euro unit value.

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

1. For data points reported as a stock at the end of the reference year, the applicable exchange rate should be the official exchange rate (e.g. the ECB exchange rate) published on 31 December of the reference year. If no official exchange rate is available on 31 December, reporting obliged entities should use the official rate published on 30 December, or the most recent preceding date for which an official rate is available.

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

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

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

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If any of sections 8.5-8.10 are not applicable to your institution then enter one line of non-applicable values, i.e. Select 00 from Country and enter zeros for the rest of the fields, e.g.

Country	No. of natural person investors who are PEPs, their familly members or persons known to be close associates	No. of beneficial owners of your legal entity investors who are PEPs, their familly members or persons known to be close associates
IOG	IOH	IOI
00	0	0

```
<A0607>
       <A06071 IOG="00" IOH="0" IOI="0"></A06071>
</A0607>
```

8.1 Table structures

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

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

8.1.1 Table Structure A

In this example, three different “REFs” are needed, meaning IAR, IAS and IAT. 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.

```
<A0601B>
  <A06012 IAR="AT" IAS="179" IAT="562.63"></A06012>
  <A06012 IAR="BE" IAS="865" IAT="211.25"></A06012>
  <A06012 IAR="BG" IAS="98" IAT="511.90"></A06012>
  <A06012 IAR="CY" IAS="750" IAT="583.90"></A06012>
```

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

Select EEA Country	Investor Numbers	Total Transaction Value (EUR)
IAR	IAS	IAT
AT	179	562.63
BE	865	211.25
BG	98	511.90
CY	750	583.90

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

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The following tables have Table Structure A:

Guidance Section	Tab_Code	Table_Code
8.2.2 General International Presence	A0601B	A06012
8.3.1 Inherent risk segment 1	A0602B	A06022
8.3.1 Inherent risk segment 2	A0602C	A06023
8.3.2 Inherent risk sector	A0602D	A06024
8.5 Physical Presence	A0604	A06041
8.6 Residence and Establishment	A0605	A06051
8.7 Beneficial Owner	A0606	A06061
8.8 Politically Exposed Person	A0607	A06071
8.9 AUM Fund	A0608	A06081
8.10 AUM Investor	A0609	A06091

8.1.2 Table Structure B

Different from Table Structure A, in this case we do not use "REF" in the same way. Now we employ only the items "Identifier" and Variable Name ("String500", "EnumerationYesNo", "LEI", etc.). As previously stated, the Variable Name is specified under "Description" in this guidance document. For example, IAA under "Description" is identified as "EnumerationLegalStructure", you must enter this Variable Name in the XML as below and you must pick the appropriate answer from the corresponding list in **9.2** Enumerations ("LegalStructure" in this case).

```
<A0601A>
    <A06011 Identifier="IAA" EnumerationLegalStructure="Stand_alone_entity"></A06011>
    <A06011 Identifier="IAB" String500="Consultoria Lola"></A06011>
    <A06011 Identifier="IAC" LEI="F5WCUMTUM4RKZ1MAIE39"></A06011>
    <A06011 Identifier="IAD" EnumerationCountryEEANA="HR"></A06011>
    <A06011 Identifier="IAE" String500="frferffgeferfrgergergregrgerg"></A06011>
```

Section 1 - Legal Structure

What is the legal structure of your institution?	Stand_alone_entity
If your institution is a subsidiary within a group: Please state the name of the parent entity of the group, the country where the parent entity of the group is established, and the AML/CFT supervisory authority of the parent entity of the group	
Name of the ultimate EEA parent entity	Consultoria Lola
LEI of the ultimate EEA parent entity	F5WCUMTUM4RKZ1MAIE39
Country where the ultimate EEA parent entity is established	HR
The AML/CFT supervisory authority of the ultimate EEA parent entity	frferffgeferfrgergergregrgerg

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

The following tables have Table Structure B:

Guidance Section	Tab_Code	Table_Code
8.2.1 Legal Structure	A0601A	A06011

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8.2.3 Statement Of Compliance	A0601A	A06011
8.3.1 Investor Segments	A0602A	A06021
8.3.2 Sector	A0602A	A06021
8.3.3 Order Receipt And Transmission	A0602A	A06021
8.3.4 Portfolio Management	A0602A	A06021
8.3.5 Management UCITS	A0602A	A06021
8.3.6 Management AIF	A0602A	A06021
8.3.7 Intermediaries And Distribution Channels	A0602A	A06021
8.4.1 Business Wide Risk Assessment	A0603A	A06031
8.4.2 Policies And Procedures	A0603A	A06031
8.4.3 Offboarding	A0603A	A06031
8.4.4 Customer Due Diligence	A0603A	A06031
8.4.5 Mitigation And Control Transaction Monitoring	A0603A	A06031
8.4.6 Alerts	A0603A	A06031
8.4.7 Suspicious Transaction Reporting	A0603A	A06031
8.4.8 Sanctions Screening	A0603A	A06031
8.4.9 Outsourcing	A0603A	A06031
8.4.10 Training	A0603A	A06031
8.4.11 Compliance and Assurance Testing	A0603A	A06031
8.4.12 Audit	A0603A	A06031
8.4.13 Governance	A0603A	A06031
8.4.14 Group-wide AML/CFT Framework	A0603A	A06031

Variable Names:

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

Do not use variable names other than those defined.

Special Characters
XML reserves five specific characters that can be seen in the table below. If these characters appear in your data, they must be 'escaped'.
For example, if your firm's name is 'Smith & Jones', the ampersand must be written as ***&*** *i.e.*, "*Smith* ***&*** *Jones*". If you don't do this, the XML structure will break, and the file will be rejected.

Pre-defined entity references:

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

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ampersand	&	&
apostrophe	'	'
quotation mark	"	"

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8.1.3 Table Order

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

```
<!--General-->
<xs:element ref="A06:A0601A"/>
<!--General International Presence-->
<xs:element ref="A06:A0601B"/>
<!--Inherent Risk-->
<xs:element ref="A06:A0602A"/>
<!--Inherent Risk Segment 1-->
<xs:element ref="A06:A0602B"/>
<!--Inherent Risk Segment 2-->
<xs:element ref="A06:A0602C"/>
<!--Inherent Risk Sector-->
<xs:element ref="A06:A0602D"/>
<!--Mitigation And Control-->
<xs:element ref="A06:A0603A"/>
<!--Physical Presence-->
<xs:element ref="A06:A0604"/>
<!--Residence And Establishment-->
<xs:element ref="A06:A0605"/>
<!--Beneficial Owner-->
<xs:element ref="A06:A0606"/>
<!--Politically Exposed Person-->
<xs:element ref="A06:A0607"/>
<!--AUM Fund-->
<xs:element ref="A06:A0608"/>
<!--AUM Investor-->
<xs:element ref="A06:A0609"/>
```

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

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8.2 General

8.2.1 Legal Structure

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A06011 Identifier="IAA" EnumerationLegalStructure="Stand_alone_entity"></A06011>

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

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

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

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		for AML/CFT purposes. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

8.2.2 International Presence

Per EEA country in which your institution and your branches operate, on either an FOS or FOE basis, specify the total number of investors (in funds your institution manages) that reside or are established in that EEA country and the total annual value of transactions (EUR) generated by these investors.

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

```
<A06012 IAR="AT" IAS="98" IAT="10000.00"></A06012>
```

REF	Field	Description
IAR	EEA Country	Select each EEA country using Alpha-2 country codes Data Type: EnumerationValue Select from CountriesEEA
IAS	EEA No. of Investors Through FOE	For each EEA country that your institution operates in on a Freedom of Establishment basis, enter the total number of investors that reside or are established in that EEA country in the preceding calendar year that are investors in a fund your institution manages Data Type: IntegerValue If not applicable enter 0
IAT	EEA Value of Transactions (EUR) Through FOE	For each EEA country, enter the total annual value of transactions (EUR) generated by these investors in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0
IAU	EEA No. of Investors Through FOS	For each EEA country, enter the total number of investors that reside or are established in that EEA country in the preceding calendar year that are investors in a fund your institution manages through Freedom of Services Data Type: IntegerValue If not applicable enter 0
IAV	EEA Value of Transactions (EUR) Through FOS	For each EEA country, enter the total annual value of transactions (EUR) generated by these investors in the preceding calendar year. Data Type: DecimalValue

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		If not applicable enter 0

8.2.3 Statement of Compliance

Table Structure B - XML requires an Identifier (REF) and a Variable name to be entered, e.g.
<A06011 Identifier="IAW" EnumerationYesNo="Yes"></A06011>

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

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8.3 Inherent Risks

8.3.1 Investor Segments

For each investor type/segment (as per the enumeration lists provided) among investors in funds your institution manages, please specify each of the below, as at the reference date i.e. 31 December of the preceding calendar year.

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

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

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

```
<A06021 Identifier="IBB" IntegerValue="605"></A06021>
```

REF	Field	Description
IBB	Active Natural Person Investors	State the total number of active natural person investors in funds your institution manages as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
IBC	Active Legal Entity Investors	State the total number of active legal entity investors in funds your institution manages as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

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

```
<A06022 IBD="NP" IBE="488" IBF="451" IBG="727.62"></A06022>
```

REF	Field	Description
IBD	Investor Segment Type 1	Select each investor type from InvestorSegment1. Each investor segment must be selected. Note investors can fall in more than one investor segment. Every entry must specify a unique investor segment and product pairing along with the number of investors, transaction and their value. Complete one record per investor segment Data Type: EnumerationValue

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		Select from InvestorSegment1
IBE	No. of Investors Segment 1	As of 31 December of the preceding calendar year, state the total numbers of investors by investor segment Data Type: IntegerValue If not applicable enter 0
IBF	No. of transactions Segment 1	State the total number of transactions in the preceding calendar year by the corresponding investor segment. Data Type: IntegerValue If not applicable enter 0
IBG	Total Value Segment 1	State the total value of transactions (EUR) in the preceding calendar year by the corresponding investor segment. Data Type: DecimalValue If not applicable enter 0

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

```
<A06023 IBH="NP_wealth" IBG="142"></A06023>
```

REF	Field	Description
IBH	Investor Segment Type 2	Select specific InvestorSegment2. Note investors can fall in more than one investor segment. Each investor segment must be selected. Data Type: EnumerationValue Select from InvestorSegment2
IBI	No. of Investors Segment 2	As of 31 December of the preceding calendar year, state the total numbers of investors by investor segments. Data Type: IntegerValue If not applicable enter 0

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

```
<A06021 Identifier="IBJ" IntegerValue="753"></A06021>
```

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

8.3.2 Sector

For investor data points please specify the total number of legal entity high risk investors as of 31 December of the preceding calendar year.

If the investor engages in multiple sectors, then you may use the principal investor sector or all investor sectors. It is not necessary for the sum of sectors to equal the total number of investors.

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

```
<A06024 IBK="Mining" IBJ="392"></A06024>
```

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

For the purposes of this question on Investment Services and Activities, consistent with Recital 103 of Directive 2014/65/EU (MiFID), eligible counterparties - as referred to in Article 30 of MiFID - should be considered to be acting as clients. For clarity, Obliged Entities should not include the management of UCITS and/or AIFs in any of the datapoints of this section.

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

```
<A06021 Identifier="IOS" EnumerationYesNo="No"></A06021>
```

REF	Field	Description
IOS	MiFID Services Provided	Does your institution provide MiFID services to any clients?

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		Select from YesNo Variable name: EnumerationYesNo

8.3.3 Order Receipt and Transmission

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

```
<A06021 Identifier="IBM" IntegerValue="661"></A06021>
```

REF	Field	Description
IBM	ORT - No. retail investors	Total number of retail investors who have engaged with your institutions Order Receipt and Transmission services Variable name: IntegerValue If not applicable enter 0
IBN	ORT - No. non-retail	Total number of professional investors who have engaged with your institutions Order Receipt and Transmission services Variable name: IntegerValue If not applicable enter 0
IBO	ORT - No. AML/CFT regulated entities non-EEA	Total number of investors which are AML/CFT regulated entities, domiciled outside of the EEA Variable name: IntegerValue If not applicable enter 0

8.3.4 Portfolio Management

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

```
<A06021 Identifier="IBP" IntegerValue="862"></A06021>
```

REF	Field	Description
IBP	PM - No. Retail	Total number of retail investors availing of your institutions Portfolio Management services in the given country in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
IBQ	PM - No. non-Retail	Total number of professional investors availing of your institutions Portfolio Management services in the given country

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		in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
IBR	PM - Total Value AUM	Total value (EUR) of assets under management as part of your institution's portfolio management services as of 31st of December of the preceding calendar year Variable name: DecimalValue If not applicable enter 0
IBS	PM - No. High Wealth Investors	State the total number of investors availing of your institutions Portfolio Management services who have a portfolio value at 5 million euro or more Variable name: IntegerValue If not applicable enter 0

8.3.5 Management UCITS

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

```
<A06021 Identifier="IBT" IntegerValue="82"></A06021>
```

REF	Field	Description
IBT	UCITS - No. Retail	For UCITS your institution manages, what is the total number of retail client Variable name: IntegerValue If not applicable enter 0
IBU	UCITS - No. non-Retail	For UCITS your institution manages, what is the total number of professional client Variable name: IntegerValue If not applicable enter 0
IBV	UCITS - Total Value AUM	For UCITS your institution manages, what is the total value (EUR) of AUM Variable name: DecimalValue If not applicable enter 0

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8.3.6 Management AIF

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

```
<A06021 Identifier="IBW" IntegerValue="628"></A06021>
```

REF	Field	Description
IBW	AIF - No. Retail	For AIFs your institution manages, what is the total number of retail clients Variable name: IntegerValue If not applicable enter 0
IBX	AIF - No. non-Retail	For AIFs your institution manages, what is the total number of professional client Variable name: IntegerValue If not applicable enter 0
IBY	AIF - No. Open Ended Funds	For AIFs your institution manages, what is the total number of Open Ended funds Variable name: IntegerValue If not applicable enter 0
IBZ	AIF - No. Closed Ended Funds	For AIFs your institution manages, what is the total number of Closed Ended funds Variable name: IntegerValue If not applicable enter 0
ICA	AIF - Total Value AUM	For AIFs your institution manages, what is the total value (EUR) of AUM Variable name: DecimalValue If not applicable enter 0
ICB	AIF - Total Value AUM Unlisted Assets	For AIFs your institution manages, what is the total value (EUR) of AUM in unlisted financial assets Variable name: DecimalValue If not applicable enter 0

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8.4 Mitigation & Control

For Mitigation & Control many sections will be denoted “Investors”, “Funds” or “Institution Level”. This is to allow firms the ability to report any differences they may have in policies, procedures, monitoring, assessments for Investors and Funds. Where questions are marked “Institution Level” the answer should be for the institution as a whole, not specifically with regard to Investors or Funds only.

8.4.1 Business Wide Risk Assessment

This section gathers information in relation to your institution’s Business Wide Risk Assessment (BWRA)

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

```
<A06031 Identifier="ICC" EnumerationBWRAConducted="Yes"></A06031>
```

REF	Field	Description
ICC	BWRA Conducted	State whether your institution conducts a Business Wide Risk Assessment (BWRA). Select from BWRAConducted Variable name: EnumerationBWRAConducted
ICD	BWRA Senior Management Approval	State whether Senior Management of your institution approved the latest version of the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICE	BWRA Last Approval Date	State the approval date of your institution’s most recent BWRA in the format of YYYY-MM-DD. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ICF	BWRA Review Frequency	Select the frequency of BWRA review by your institution. Select from Frequency Variable name: EnumerationFrequency
ICG	BWRA Business Change	State whether the most recent BWRA review identified any areas for improvement or changes such as to your institution’s policies, procedures, oversight measures, or risk appetite. Select from YesNoNA Variable name: EnumerationYesNoNA

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ICH	BWRA Business Change Description	Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ICI	BWRA Money Laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICJ	BWRA Terrorist Financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICK	BWRA Sanctions	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICL	BWRA Corruption	State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICM	BWRA Conflicts of Interest	State whether risks of conflicts of interests are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICN	BWRA Tax Evasion	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICO	BWRA Internal Fraud	State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's most recent BWRA.

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		Select from YesNoNA Variable name: EnumerationYesNoNA
ICP	BWRA External Fraud	State whether risks of external fraud and embezzlement (by investors, funds or other business relations) are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICQ	BWRA Cybercrime	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICR	BWRA Market Abuse	State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICS	BWRA Investor Groups	State whether investor groups are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICT	BWRA Geographies	State whether geographies are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICU	BWRA Product Groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICV	BWRA Distribution Channel	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's most recent BWRA.

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		Select from YesNoNA Variable name: EnumerationYesNoNA
ICW	BWRA Crypto	State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICX	BWRA Risk Other	State whether risks of other areas are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
ICY	BWRA Risk Other Detail	If Yes to BWRARiskOther, please describe the areas that explicitly cited and considered in your most recent BWRA. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ICZ	Other Risk Assessment Process - Money laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDA	Other Risk Assessment Process - Terrorist financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDB	Other Risk Assessment Process - Circumvention of sanctions regulations	State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDC	Other Risk Assessment Process - Corruption (bribery)	State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's risk assessment

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		processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDD	Other Risk Assessment Process - Conflicts of interests	State whether risks of conflicts of interests are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDE	Other Risk Assessment Process - Evasion of tax regulations	State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDF	Other Risk Assessment Process - Internal fraud and embezzlement (by employees/management of your institution)	State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDG	Other Risk Assessment Process - External fraud and embezzlement (by investors or other business relations)	State whether risks of external fraud and embezzlement (by investors, funds or other business relations) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDH	Other Risk Assessment Process - Cybercrime/ Ransomware	State whether risks of cybercrime/ransomware are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDI	Other Risk Assessment Process - Market abuse	State whether risks of market abuse are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA

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		Variable name: EnumerationYesNoNA
IDJ	Other Risk Assessment Process - Investor groups	State whether investor groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDK	Other Risk Assessment Process - Geographies	State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDL	Other Risk Assessment Process - Product groups	State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDM	Other Risk Assessment Process - Distribution channels	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDN	Other Risk Assessment Process - Cryptos	State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA. Select from YesNoNA Variable name: EnumerationYesNoNA
IDO	BWRA Risk Appetite	State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite. Select from YesNoNA Variable name: EnumerationYesNoNA
IDP	BWRA Policy Procedure	State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and

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		procedures. Select from YesNoNA Variable name: EnumerationYesNoNA
IDQ	BWRA Product Service	State whether the outcomes of the BWRA were used for determining or adjusting your institution's new products and services. Select from YesNoNA Variable name: EnumerationYesNoNA
IDR	BWRA Transaction Monitoring	State whether the outcomes of the BWRA were used for setting scenarios and rules for transaction monitoring. Select from YesNoNA Variable name: EnumerationYesNoNA
IDS	BWRA Process Other	State whether the outcomes of the BWRA were used for determining or adjusting your institution's other processes and activities. Select from YesNoNA Variable name: EnumerationYesNoNA
IDT	BWRA Process Other Detail	If Yes to BWRA Process Other, briefly describe the other processes and activities in which your institution uses the outcomes of the BWRA. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IDU	Risk App Formulated	State whether your institution formulates a ML/TF risk appetite. Select from YesNo Variable name: EnumerationYesNo

8.4.2 Policies and Procedures

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

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

```
<A06031 Identifier="IDV" DateValue="2019-02-04"></A06031>
```

REF	Field	Description
IDV	Pol & Proc - Investor onboarding	Enter the date when your institution's management approved the last version of policies and procedures for fund onboarding Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IDW	Pol & Proc - Ongoing Investor Due Diligence	Enter the date when your institution's management approved the last version of policies and procedures for fund reviews (e.g. the frequency of review on high risk funds). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IDX	Pol & Proc - Ongoing monitoring of business relationships	Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of business relationships. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IDY	Pol & Proc - Investor Offboarding	Enter the date when your institution's management approved the last version of policies and procedures for fund offboarding (e.g. closing an account, offboarding due to AML/CFT concerns, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IDZ	Pol & Proc - Politically Exposed Persons	Enter the date when your institution's management approved the last version of policies and procedures for Politically Exposed Persons (PEPs). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEA	Pol & Proc - High risk investor	Enter the date when your institution's management approved the last version of policies and procedures for high risk funds. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

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IEB	Pol & Proc - Transaction monitoring	Enter the date when your institution's management approved the last version of policies and procedures for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEC	Pol & Proc - Suspicious transaction reporting	Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process. This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the conducts of your institution's business to both Revenue and the FIU of any STR generated. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IED	Pol & Proc - Evasion of tax regulations	Enter the date when your institution's management approved the last version of policies and procedures for evasion of tax regulations by investors (e.g. closing an account, offboarding due to AML/CFT concerns, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEE	Pol & Proc - Bribery	Enter the date when your institution's management approved the last version of policies and procedures for bribery (e.g. monitoring and reporting of bribery instances). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEF	Pol & Proc - Conflicts of interest	Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEG	Pol & Proc - Fraud within or outside the organisation	Enter the date when your institution's management approved the last version of policies and procedures for fraud within or outside your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

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

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IEN	Pol & Proc - Internal Audit/Assurance Testing	Enter the date when your institution's management approved the last version of policies and procedures and resourcing for the internal audit or assurance testing so it operates to an acceptable standard. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEO	Pol & Proc - Separation of functions (Three Lines of Defence)	Enter the date when your institution's management approved the last version of policies and procedures for separation of functions (i.e. Three Lines of Defence). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEP	Pol & Proc - Training	Enter the date when your institution's management approved the last version of policies and procedures for training (e.g. staff members of your institution complete relevant required training). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEQ	Pol & Proc - Geographic Risk Factors	Enter the date when your institution's management approved the last version of policies and procedures for geographic risk factors (e.g. business activity in high risk jurisdictions, enhanced investor due diligence due to geographic risk, etc.). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IER	Pol & Proc - AML/CFT Record Keeping	Enter the date when your institution's management approved the last version of policies and procedures for record keeping (e.g. provisions in Section 55 of the CJA 2010). Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IES	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
IET	Pol & Proc - Investor risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support the risk assessment processes.

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		Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IEU	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
IEV	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 Investor Offboarding

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

```
<A06031 Identifier="IEW" IntegerValue="414"></A06031>
```

REF	Field	Description
IEW	Investor Offboarding Number	State the total number of investors in funds your institution manages whose business relationships were terminated in the preceding calendar year due to AML/CFT/FS concerns. Variable name: IntegerValue If not applicable enter 0
IEX	Investor Offboarding Number ML	State the total number of investors in funds your institution manages whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns Variable name: IntegerValue If not applicable enter 0
IEY	Investor Offboarding Number TF	State the total number of investors in funds your institution manages whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns. Variable name: IntegerValue

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		If not applicable enter 0
IEZ	Investor Offboarding Number FS	State the total number of investors in funds your institution manages whose business relationships with your institution were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns. Variable name: IntegerValue If not applicable enter 0
IFA	Investor Offboarding Number HR	State the total number of investors in funds your institution manages that were rated high risk prior to offboarding (being terminated) in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

8.4.4 Investor Due Diligence

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

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

```
<A06031 Identifier="IFB" EnumerationYesNo="No"></A06031>
```

REF	Field	Description
IFB	Identity Verification NP	State whether the identity of natural person investors is verified prior to providing services. Select from YesNo Variable name: EnumerationYesNo
IFC	Identity Verification LE	State whether the identity of legal entity investors is verified prior to providing services. Select from YesNo Variable name: EnumerationYesNo
IFD	Identity Verification BO LE	State whether the identity of the beneficial owner of legal entity investors is established and verified prior to providing services. Select from YesNo Variable name: EnumerationYesNo

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IFE	Ownership Structure Identified LE	State whether ownership and/or control structure is identified for legal entity investors prior to providing services. Select from YesNo Variable name: EnumerationYesNo
IFF	Nature Of Relationship NP	State whether the purpose and intended nature of the business relationship is established prior to providing services to natural person investors Select from YesNo Variable name: EnumerationYesNo
IFG	Nature Of Relationship LE	State whether the purpose and intended nature of the business relationship is established prior to providing services to legal entity investors. Select from YesNo Variable name: EnumerationYesNo
IFH	Source Of Funds NP	State whether source/origin of the funds/assets is identified prior to providing services to natural person investors Select from YesNo Variable name: EnumerationYesNo
IFI	Source Of Funds LE	State whether source/origin of the funds/assets is identified prior to providing services to legal entity investors. Select from YesNo Variable name: EnumerationYesNo
IFJ	Investor Rep Identified NP	State whether an investor's representative is identified prior to providing services to natural person investors. Select from YesNo Variable name: EnumerationYesNo
IFK	Investor Rep Identified LE	State whether an investor's representative is identified prior to providing services to legal entity investors. Select from YesNo Variable name: EnumerationYesNo
IFL	CDD Review NP	State whether all funds your institution manages periodically reviews the risk profiles for natural persons investors.

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		Select from YesNo Variable name: EnumerationYesNo
IFM	CDD Review LE	State whether all funds your institution manages periodically reviews the risk profiles for legal entity investors. Select from YesNo Variable name: EnumerationYesNo
IFN	CDD Review NP Low	If Yes to CDD Review NP, for all funds your institution manages, state the least frequent periodicity of these reviews for low-risk natural person investors. Select from Frequency Variable name: EnumerationFrequency
IFO	CDD Review LE Low	If Yes to CDD Review LE, for all funds your institution manages, state the least frequent periodicity of these reviews for low-risk legal entity investors. Select from Frequency Variable name: EnumerationFrequency
IFP	CDD Review NP Medium	If Yes to CDD Review NP, for all funds your institution manages, state the least frequent periodicity of these reviews for medium-risk natural person investors. Select from Frequency Variable name: EnumerationFrequency
IFQ	CDD Review LE Medium	If Yes to CDD Review LE, for all funds your institution manages, state the least frequent periodicity of these reviews for medium-risk legal entity investors. Select from Frequency Variable name: EnumerationFrequency
IFR	CDD Review NP High	If Yes to CDD Review NP, for all funds your institution manages, state the least frequent periodicity of these reviews for high-risk natural person investors. Select from Frequency Variable name: EnumerationFrequency
IFS	CDD Review LE High	If Yes to CDD Review LE, for all funds your institution manages, state the least frequent periodicity of these reviews for high-risk legal entity investors.

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		Select from Frequency Variable name: EnumerationFrequency
IFT	CDD Review NP PEP	If Yes to CDD Review NP, for all funds your institution manages, state the least frequent periodicity of these reviews for investors who are politically exposed persons, their family members or persons that are close associates. Select from Frequency Variable name: EnumerationFrequency
IFU	CDD Review NP Unacceptable	If Yes to CDD Review NP, for all funds your institution manages, state the least frequent periodicity of these reviews for unacceptable-risk natural person investors (e.g. yet to be exited). Select from Frequency Variable name: EnumerationFrequency
IFV	CDD Review LE Unacceptable	If Yes to CDD Review LE, for all funds your institution manages, state the least frequent periodicity of these reviews for unacceptable-risk legal entity investors (e.g. yet to be exited). Select from Frequency Variable name: EnumerationFrequency
IFW	CDD Risk Assessment Update	State the date of the most recent update to an Investor Risk Assessment process for funds that your institution manages Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IFX	CDD Low Investors	Number of total investors in funds your institution manages per ML/TF risk category (low risk). If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then, Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk

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		Variable name: IntegerValue If not applicable enter 0
IFY	CDD Medium-Low Investors	Number of total investors in funds your institution manages per ML/TF risk category (medium-low risk). If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then, Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
IFZ	CDD Medium-High Investors	Number of total investors in funds your institution manages per ML/TF risk category (medium-high risk). If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then, Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
IGA	CDD High Investors	Number of total investors in funds your institution manages per ML/TF risk category (high risk). If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk If your institution uses five risk categories then,

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		Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk Variable name: IntegerValue If not applicable enter 0
IGB	CDD investors Due NP	Number of natural person investors (in funds your institution manages) for whom updates of investor information were due in the preceding calendar year as per relevant policies Variable name: IntegerValue If not applicable enter 0
IGC	CDD investors Due LE	Number of legal entity investors (in funds your institution manages) for whom updates of investor information were due in the preceding calendar year as per relevant policies Variable name: IntegerValue If not applicable enter 0
IGD	CDD investors Reviewed NP	Number of natural person investors (in funds your institution manages) for whom investor information was reviewed and updated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
IGE	CDD investors Reviewed LE	Number of legal entity investors (in funds your institution manages) for whom investor information was reviewed and updated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
IGF	No Ident Total	What number of total active investors in funds your institution manages that have no CDD documentation/information. This should exclude discontinued investors. Variable name: IntegerValue If not applicable enter 0
IGG	No Ident High	What number of high-risk active investors in funds your institution manages have no CDD documentation/information. This should exclude discontinued investors.

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		Variable name: IntegerValue If not applicable enter 0
IGH	No Ident PEP	What number of active investors in funds your institution manages who are PEPs have no CDD documentation/information. This should exclude discontinued investors. Variable name: IntegerValue If not applicable enter 0
IGI	Incomplete Total	Specify the number of total active investors in funds your institution manages with incomplete CDD documentation. This should exclude discontinued investors. Variable name: IntegerValue If not applicable enter 0
IGJ	Incomplete High	Specify the number of high-risk active investors with incomplete CDD documentation. This should exclude discontinued investors. Variable name: IntegerValue If not applicable enter 0
IGK	Incomplete PEP	Specify the number of active investors who PEPs, their family members or persons known to be close associates with incomplete CDD documentation. This should exclude discontinued investors. Variable name: IntegerValue If not applicable enter 0
IGL	CDD BO not Identified	Number of investors in funds your institution manages that are legal entities /trusts whose beneficial owners have not been identified. Variable name: IntegerValue If not applicable enter 0
IGM	CDD BO not Verified HR	Number of investors in funds your institution manages that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified Variable name: IntegerValue If not applicable enter 0

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IGN	CDD no Purpose	Number of investors in funds your institution manages for whom no information on the purpose and intended nature of the business relationship has been obtained. Variable name: IntegerValue If not applicable enter 0
IGO	Investor Data not in Line with Article 20	Number of investors in funds your institution manages whose CDD data and information is not yet in line with the requirements of Article 20 AMLR Variable name: IntegerValue If not applicable enter 0
IGP	Investor Number Without Risk Profile	State the number of investors of funds your institution manages who have not had a ML/TF risk profile created Variable name: IntegerValue If not applicable enter 0

8.4.5 Transaction Monitoring

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

```
<A06031 Identifier="IGQ" EnumerationYesNo="No"></A06031>
```

REF	Field	Description
IGQ	TM In Place	State whether or not there is transaction monitoring in place for all funds your institution manages Select from YesNo Variable name: EnumerationYesNo
IGR	TM How Automated	Is the transaction monitoring system(s) in place partially or fully automated? Select from MonitoringApproach Variable name: EnumerationMonitoringApproach
IGS	TM Alert Number of Transactions	For the transaction monitoring systems in place for funds your institution manages, can they all generate alerts in case of inconsistencies between the expected transactions profile relating to the investor and the actual number of transactions? Select from YesNoNA

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		Variable name: EnumerationYesNoNA
IGT	TM Alert Value of Aggregated Transactions	For the transaction monitoring systems in place for funds your institution manages, can they all generate alerts in case of inconsistencies between the expected transactions profile relating to the investor and the actual value of aggregated transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
IGU	TM Alert Value of Single Transactions	For the transaction monitoring systems in place for funds your institution manages, can they all generate alerts in case of inconsistencies between the expected transactions profile relating to the investor and the actual value of single transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
IGV	TM Alert Counterparties	For the transaction monitoring systems in place for funds your institution manages, can they all generate alerts in case of inconsistencies between the expected transactions profile relating to the investor and the actual counterparties? Select from YesNoNA Variable name: EnumerationYesNoNA
IGW	TM Alert Geographies	For the transaction monitoring systems in place for funds your institution manages, can they all generate alerts in case of inconsistencies between the expected transactions profile relating to the investor and the actual geographies? Select from YesNoNA Variable name: EnumerationYesNoNA
IGX	TM Alert Group Transactions	For the transaction monitoring systems in place for funds your institution manages, can they all generate alerts in case of inconsistencies between the expected transactions profile relating to the investor and the actual intra-group transactions? Select from YesNoNA Variable name: EnumerationYesNoNA
IGY	TM Alert Banks	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the investor and the actual banks/payment institutions involved?

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		Select from YesNoNA Variable name: EnumerationYesNoNA

8.4.6 Alerts

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

```
<A06031 Identifier="IGZ" IntegerValue="390"></A06031>
```

REF	Field	Description
IGZ	Business 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
IHA	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
IHB	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
IHC	Alerts Investigated - Automated	How many automated alerts were investigated by an AML/transaction monitoring staff member? Variable name: IntegerValue If not applicable enter 0
IHD	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
IHE	Alert Investigated FP - Automated	How many automated alerts were closed as false positives following investigation? Variable name: IntegerValue

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		If not applicable enter 0
IHF	Business 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
IHG	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
IHH	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
IHI	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
IHJ	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
IHK	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
IHL	Alert TP Review - Automated	How many true positive alerts (STR filed from automated alerts) led to a review of the investor's risk, CDD or otherwise. Variable name: IntegerValue

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		If not applicable enter 0
IHM	Alert Backlog - Automated	At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
IHN	Alert Mean Time To Close - Automated	Over the course of the preceding calendar year, what was the average time in days to close an alerts (account for automated alerts), from the initial alert generation? Variable name: DecimalValue If not applicable enter 0
IHO	Alert Ratio STR - Automated	If automated system: Ratio between number of STRs and number of alerts. This corresponds to the number of alerts generated by the automated systems and the number of STRs resulting from alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) of Regulation (EU) 2024/1624. This excludes alerts of systems exclusively meant to detect transaction subject to targeted financial sanctions. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
IHP	Alert TP Review - Manual	How many true positive alerts (STR filed from manual alerts) led to a review of the investor's risk, CDD or otherwise Variable name: IntegerValue If not applicable enter 0
IHQ	Alert Backlog - Manual	At 31 December of the preceding calendar year, how many alerts (manual) from that year are still not closed? Variable name: IntegerValue If not applicable enter 0
IHR	Alert Mean Time To Close – Manual	Over the course of the preceding calendar year, what was the average time in days to close an alerts (account for manual alerts), from the initial alert generation? Variable name: DecimalValue If not applicable enter 0

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IHS	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. Variable name: DecimalValue If not applicable enter 0

8.4.7 Suspicious Transaction Reporting

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

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

```
<A06031 Identifier="IHT" EnumerationYesNo="Yes"></A06031>
```

REF	Field	Description
IHT	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
IHU	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
IHV	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
IHW	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
IHX	FIU Number STs Bribe	State the total number of suspicious transactions contained in STRs based on bribery/corruption reported to the FIU in the

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		preceding calendar year. Variable name: IntegerValue If not applicable enter 0
IHY	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
IHZ	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
IIA	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
IIB	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
IIC	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
IID	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

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IIE	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
IIF	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
IIG	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
IIH	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
III	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
IIJ	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
IIK	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

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		If not applicable enter 0
IIL	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
IIM	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
IIN	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
IIO	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
IIP	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
IIQ	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
IIR	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.

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

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8.4.8 Sanctions Screening

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

```
<A06031 Identifier="IIX" DecimalValue="700.97"></A06031>
```

REF	Field	Description
IIX	Sanction Max Hours	State the maximum number of hours between the publication of the Targeted Financial Sanctions (TFS) by the authorities and the implementation of these changes in screening tools of funds your institution manages in the preceding calendar year Variable name: DecimalValue If not applicable enter 0
IIY	Sanction EU	For all funds your institution manages, specify if investors and beneficial owners are checked against EU sanctions lists. Select from YesNo Variable name: EnumerationYesNo
IIZ	Sanction National List	For all funds your institution manages, specify if investors and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo Variable name: EnumerationYesNo
IJA	Sanction UN	For all funds your institution manages, specify if investors and beneficial owners are checked against UN sanctions lists. Select from YesNo Variable name: EnumerationYesNo
IJB	Sanction Other	For all funds your institution manages, specify if investors and beneficial owners are checked against any other sanctions lists Select from YesNo Variable name: EnumerationYesNo
IJC	Sanction Other Specify	If any sanctions lists are used that are not mentioned above, please specify Variable name: String500 Character limit: 500 characters If not applicable enter N/A

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IJD	Sanction Transact Check	At and after the start of service provision, state whether all funds your institution manages check whether investors and their beneficial owners are included on sanctions lists when executing a transaction. Select from YesNo Variable name: EnumerationYesNo
IJE	Sanction List Update	At and after the start of service provision, whether all funds your institution manages check whether investors and their beneficial owners are included on sanctions lists when sanctions listing updated. Select from YesNo Variable name: EnumerationYesNo
IJF	Sanction Periodic Investor	At the start of service provision and afterwards, state whether all funds your institution managed perform periodic sanction checks on investors. Select from YesNo Variable name: EnumerationYesNo
IJG	Sanction Periodic BO	At the start of service provision and afterwards, state whether all funds your institution manage perform periodic sanction checks on beneficial owners of investors. Select from YesNo Variable name: EnumerationYesNo
IJH	Sanction Periodic Rep	At the start of service provision and afterwards, state whether all funds your institution manages perform periodic sanction checks on investor representatives. Select from YesNo Variable name: EnumerationYesNo
IJI	Sanction Total Hits	State the number of true positive hits that the sanctions list screening delivered in the preceding calendar year for funds your institution manages. In this context “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list Variable name: IntegerValue If not applicable enter 0
IJJ	Sanction Total Hits Value	State the total value (EUR) of frozen assets recorded in relation to those hits that the sanctions list screening delivered in the

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

8.4.9 Outsourcing

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

```
<A06031 Identifier="IOU" EnumerationOutsource="Not_outsourced"></A06031>
```

REF	Field	Description
IOU	Outsource CDD Article 20	State whether the CDD measures as detailed in Article 20 AMLR are outsourced to third parties (including within the Group) Select from Outsource Variable name: EnumerationOutsource
IJK	Outsource CDD Onboarding	State whether CDD fund acceptance (e.g. CDD activities related to fund onboarding checks) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJL	Outsource CDD Review	State whether CDD periodic fund review (e.g. recurring process of reviewing fund CDD status/documentation/risk) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJM	Outsource TM	State whether transaction monitoring has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource

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IJN	Outsource Alert Processing	State whether alerts processing has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJO	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
IJP	Outsource Sanction Screen	State whether sanctions screening has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJQ	Outsource CDM	State whether Customer Data Management (e.g. external storage, management and handling of fund data) has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJR	Outsource Training	State whether AML/CFT training has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJS	Outsource PEP	State whether PEP detection has been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJT	Outsource Compliance	State whether compliance monitoring checks have been outsourced to third parties (including within the Group). Select from Outsource Variable name: EnumerationOutsource
IJU	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).

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		Select from Outsource Variable name: EnumerationOutsource
IJV	Outsource Other AMLCFT Specify	If Yes to Outsource Other AML CFT, specify the other processes. List the other outsourced elements of your AML/CFT processes separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IJW	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 (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
IJX	Outsource Compliance Assessed	Has your institution assessed outsource provider's compliance with the requirements in the preceding calendar year Select from YesNoNA Variable name: EnumerationYesNoNA
IJY	Outsource Assess Report Obligation	State whether your institution ensures outsource provider compliance with the requirements via reporting obligation. Select from YesNoNA Variable name: EnumerationYesNoNA
IJZ	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

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		Variable name: EnumerationYesNoNA
IKA	Outsource Assess Audit Rights	State whether your institution ensures outsource provider compliance with the requirements via audit rights (e.g. retain rights to audit the outsource providers). Select from YesNoNA Variable name: EnumerationYesNoNA
IKB	Outsource Assess Other	State, if there are any other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. Select from YesNoNA Variable name: EnumerationYesNoNA
IKC	Other Outsource Compliance Check Approaches	Detail which other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IKD	Outsource Tasks to Third Countries Non-Group	State whether the existence of AML/CFT tasks outsourced to a non-group entity located in a non-EEA third country Select from Outsource Variable name: EnumerationOutsource
IKE	Outsource Tasks to Third Countries Within Group	State whether the existence of AML/CFT tasks outsourced to an entity within your institution's group that is located in a non-EEA third country Select from Outsource Variable name: EnumerationOutsource

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8.4.10 Education and Training

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

```
<A06031 Identifier="IKF" PercentageValue="1.0"></A06031>
```

REF	Field	Description
IKF	Non-AML/CFT specialist staff - % Staff coverage	State the proportion of non-AML/CFT specialist staff (customer/investor facing staff [entities you have direct business relationship with], executive directors) who have attended training in the preceding calendar year with regard to financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
IKG	AML Specialist staff - % Staff coverage	State the proportion of AML specialist staff who have attended training in the preceding calendar year regarding financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
IKH	Agents and distributors - % Staff coverage	State the proportion of agents and distributors who have attended training in the preceding calendar year regarding financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
IKI	Board members & non-executive directors - % Staff coverage	State the proportion of members of Board members and non-executive directors who have attended training in the preceding calendar year regarding financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
IKJ	Other - % Staff coverage	State the proportion of other staff members, not listed above, who have attended training in the preceding calendar year regarding financial crime. Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0

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IKK	Staff Numbers	Enter the total number of full-time equivalent employees employed by the institution. Variable name: DecimalValue If not applicable enter 0

8.4.11 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.

```
<A06031 Identifier="IKL" DateValue="2016-11-26"></A06031>
```

REF	Field	Description
IKL	Compliance SEBWRA	State the most recent date when the structure and effectiveness of your institution's business-wide risk assessment was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKM	Compliance Training	State the most recent date when AML/CFT-related awareness-raising and staff training measures were assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKN	Compliance Verification	State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKO	Compliance Sanctions	State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution. Variable name: DateValue

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		Format YYYY-MM-DD If not applicable enter 2000-01-01
IKP	Compliance Resources	State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKQ	Compliance Organisation	State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was assessed by the compliance function in your institution. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKR	Compliance CDD	State the most recent date when the determination of ML/TF risk profile of investors was assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKS	Compliance TM	State the most recent date when the transaction monitoring process was assessed by the compliance. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKT	Compliance STR	State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKU	Compliance Records	State the most recent date when record keeping policies and procedures were assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
IKV	Compliance TPDD	State the most recent date when outsourcing arrangements were assessed by the compliance function. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01

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IKW	Compliance Other	State whether any other financial crime topics or processes were assessed by the compliance function in the preceding calendar year Select from YesNo Variable name: EnumerationYesNo
IKX	Compliance Other Specify	Specify the other financial crime topics or processes that were tested or monitored by the compliance function in your institution in the preceding calendar year. Provide a list of topics or processes separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IKY	Compliance BWRA Descript	Briefly describe any material findings/potential breaches identified from the last assessment of your institution's business-wide risk assessment. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IKZ	Compliance Training Descript	Briefly describe any material findings/potential breaches identified from the last assessment of AML/CFT-related awareness-raising and staff training measures. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ILA	Compliance Verification Descript	Briefly describe any material findings/potential breaches identified from the last assessment of identification and identity verification procedures. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500

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		Character limit: 500 characters If not applicable enter N/A
ILB	Compliance Sanctions Descript	Briefly describe any material findings/potential breaches identified from the last assessment of compliance with sanctions regulations. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ILC	Compliance Resources Descript	Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ILD	Compliance Organisation Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the organisation of the AML/CFT system, governance and reporting to management bodies. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ILE	Compliance CDD Descript	Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of investors. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

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

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		Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ILK	Compliance to Senior Management	State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management. Select from Frequency Variable name: EnumerationFrequency
ILL	Compliance to Board	State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board. Select from Frequency Variable name: EnumerationFrequency
ILM	Compliance AML Staff	Number of dedicated AML/CFT compliance staff (in Full Time Equivalent). Variable name: DecimalValue If not applicable enter 0

8.4.12 Audit

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

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

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

```
<A06031 Identifier="ILN" DateValue="2002-12-05"></A06031>
```

REF	Field	Description
ILN	Audit BWRA	State the most recent date when the structure and effectiveness of Business Wide Risk Assessment (BWRA) was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue

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		Format YYYY-MM-DD If not applicable enter 2000-01-01
ILO	Audit Training	State the most recent date when AML/CFT-related awareness-raising and staff training measures were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILP	Audit Verification	State the most recent date when identification and identity verification procedures were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILQ	Audit Sanctions	State the most recent date when compliance with sanctions regulations was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILR	Audit Resources	State the most recent date when resources dedicated to AML/CFT were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILS	Audit Organisation	State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILT	Audit CDD	State the most recent date when the determination of ML/TF risk profile of investors was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILU	Audit TM	State the most recent date when the transaction monitoring process was subject to an internal audit by your institution or

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		assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILV	Audit STR	State the most recent date when the suspicious transactions reporting process was subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILW	Audit Records	State the most recent date when record keeping policies and procedures were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILX	Audit TPDD	State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert. Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01
ILY	Audit Other	State whether other financial crime processes were subject to an internal audit by your institution or assessed by an external expert. Select from YesNo Variable name: EnumerationYesNo
ILZ	Audit Other Specify	If Yes to Audit Other, briefly specify the other processes that were subject to an internal audit by your institution or assessed by an external expert. Provide a list of other processes separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IMA	Audit BWRA Descript	If Yes to Audit BWRA, briefly describe any material findings/potential breaches identified.

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		Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IMB	Audit Training Descript	If Yes to Audit Training, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IMC	Audit Verification Descript	If Yes to Audit Verification, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IMD	Audit Sanctions Descript	If Yes to Audit Sanctions, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IME	Audit Resources Descript	If Yes to Audit Resources, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

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

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		If not applicable enter N/A
IMK	Audit TPDD Descript	If Yes to Audit TPDD, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IML	Audit Other Process Descript	If other financial crime topics were assessed by the Internal Audit function, then describe any material findings/potential breaches identified. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IMM	Audit to Senior Management	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management. Select from Frequency Variable name: EnumerationFrequency
IMN	Audit to Board	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board. Select from Frequency Variable name: EnumerationFrequency
IMO	NCA ML	State whether a foreign supervisory authority issued findings regarding your institution's anti-money laundering framework in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
IMP	NCA TF	State whether a foreign supervisory authority issued findings regarding your institution's countering the financing of terrorism framework in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo

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IMQ	NCA Sanctions	State whether a foreign supervisory authority issued findings on your institution's prevention of circumvention of sanctions framework in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
IMR	NCA Corruption	State whether a foreign supervisory authority issued findings on your institution's management of anti-corruption (bribery) and prevention of conflicts of interests frameworks in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
IMS	NCA Other	State whether a foreign supervisory authority issued findings on your institution's preventative frameworks regarding other financial crime areas in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
IMT	NCA Other Specify	If Yes to NCA Other, briefly specify Provide a list of other topics separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IMU	NCA ML Descript	If Yes to NCA ML, briefly describe the findings/gaps identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A
IMV	NCA TF Descript	If Yes to NCA TF, briefly describe the findings/gaps identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Variable name: String500 Character limit: 500 characters If not applicable enter N/A

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

8.4.13 Governance

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

```
<A06031 Identifier="IMZ" EnumerationFrequency="1_years-2_years"></A06031>
```

REF	Field	Description
IMZ	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
INA	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.

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		Select from Frequency Variable name: EnumerationFrequency
INB	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
INC	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
IND	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
INE	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
INF	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
ING	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
INH	Designated Responsibility	State whether your institution appointed a member of senior management with primary responsibility for implementing, managing and overseeing your institution's compliance with its

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		AML/CFT obligations as required under Section 54(8) of the CJA 2010 Select from YesNo Variable name: EnumerationYesNo
INI	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
INJ	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
INK	Reported Shortcomings	State whether the compliance officer has reported any AML/CFT/FS compliance shortcomings in the preceding calendar year. Select from YesNo Variable name: EnumerationYesNo
INL	Shortcomings Recovery	Where AML/CFT/FS shortcomings were reported, state whether the report sets out recovery measures taken. Select from YesNoNA Variable name: EnumerationYesNoNA
INM	Shortcomings Recovery Details	If Yes to Shortcomings Recovery, briefly describe the reported AML/CFT/FS 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

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8.4.14 Group-wide AML/CFT Framework

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

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

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

```
<A06031 Identifier="INN" PercentageValue="0.3"></A06031>
```

REF	Field	Description
INN	Groupwide AML CDD	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of CDD in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
INO	Groupwide AML Monitoring	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Ongoing Monitoring in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
INP	Groupwide AML STRs	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of STRs in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
INQ	Groupwide AML High Risk Funds	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Identity and Transaction Level Information on High Risk Investors in the

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		preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
INR	Groupwide Deficiencies	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Deficiencies in the preceding calendar year Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
INS	Groupwide Jurisdiction AML Review	If your institution is the parent entity within a group structure, state the proportion of jurisdictions in which the group is established that were covered by reviews (which included access to fund and transaction level data) performed by the group AML Compliance function during the preceding three calendar years (applies only to groups that have been existing for more than 3 years). Variable name: PercentageValue Enter the percentage as a decimal, e.g. Enter 4.7% as 0.047 If not applicable enter 0
INT	Groupwide Deficiencies Identified by NCA EEA	If your institution is the parent entity within a group structure, state the number of EU/EEA group entities for which deficiences were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
INU	Groupwide Deficiencies Identified by NCA non-EEA	If your institution is the parent entity within a group structure, state the number of non-EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year Variable name: IntegerValue If not applicable enter 0

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8.5 Physical Presence

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

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

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

```
<A06041 INV="AF" INW="863" INX="644" INY="23" INZ="250"></A06041>
```

REF	Field	Description
INV	PP - Country	Select from the list of Alpha-2 country codes, Country for each applicable country where the institution has subsidiaries, branches, distributors, representative offices. Only the applicable countries need to be completed. Data Type: EnumerationValue Select from Country
INW	No. of subsidiaries	Number of subsidiaries in each country. Data Type: IntegerValue If not applicable enter 0
INX	No. of branches	Number of branches in each country Data Type: IntegerValue If not applicable enter 0
INY	No. of representative offices	Number of representative offices in each country Data Type: IntegerValue If not applicable enter 0
INZ	No. of other physical presences	Number of other physical presence in each country Data Type: IntegerValue If not applicable enter 0

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8.6 Residence and Establishment

The questions below concern the investor base of funds your institution manages.

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

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

```
<A06051 IOA="AF" IOB="462" IOC="49" IOD="167" IOE="790" IOF="731" IOG="854" IOH="369" IOI="648"></A06051>
```

REF	Field	Description
IOA	RE - Country	Select from the list of Alpha-2 country codes, Country for each applicable country that has natural persons investor (in funds your institution manages) residing or legal entity investor (in funds your institution manages) established in that country. Only the applicable countries need to be completed. Data Type: EnumerationValue Select from Country
IOB	Natural person investors – Total Number	Natural person investors – Total Data Type: IntegerValue If not applicable enter 0
IOC	Natural person investors – No. of which are New Investors	Natural person investors - Number of which are New Investors (Natural person investors with whom a business relationship was entered into in the preceding calendar year with a fund your institution manages) Data Type: IntegerValue If not applicable enter 0
IOD	Natural person investors – No. of which are High Risk	Natural person investors - Number of which are High Risk according to a investor risk assessment Data Type: IntegerValue If not applicable enter 0
IOE	Legal entity investors – Total Number	Legal entity investors – Total Data Type: IntegerValue If not applicable enter 0
IOF	Legal entity investors - No. of which are New Investors	Legal entity investors - Number of which are New Investors (with whom a business relationship was entered into in the preceding calendar year with a fund your institution manages)

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		Data Type: IntegerValue If not applicable enter 0
IOG	Legal entity investors - No. of which are High Risk	Legal entity investors - Number of which are High Risk according to a investor risk assessment Data Type: IntegerValue If not applicable enter 0
IOH	Legal entity investors - No. with at least one beneficial owner residing in non-EEA countries	Legal entity investor - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence). As per recital 125 AMLR, senior managing officials (SMOs) reported where no natural person is identifiable who ultimately owns or exerts control over an entity are not to be considered for the purposes of reporting this datapoint. Data Type: IntegerValue If not applicable enter 0
IOI	Legal entity investors - No. of which have PEP Risk Identified	Legal entity investors – Count of legal entity investors where PEP risk identified by legal entity country of establishment Data Type: IntegerValue If not applicable enter 0

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8.7 Beneficial Owner

The questions below concern the Beneficial Owners (BOs) of the investor base of funds your institution manages.

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

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

```
<A06061 IOJ="00" IOK="133"></A06061>
```

REF	Field	Description
IOJ	BO - Country	Select from the list of Alpha-2 country codes, Country for each applicable country that has a legal entity investor's BO residing in that country. Only the applicable countries need to be completed. Data Type: EnumerationValue Select from Country
IOK	Number of beneficial owners	Number of beneficial owners of your legal entity investors residing in the country. Data Type: IntegerValue If not applicable enter 0

8.8 Politically Exposed Person

The questions below concern Politically Exposed Persons in the investor base of funds your institution manages.

For the purposes of the natural person question, use the nationality of the PEPs.

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

For the purposes of the legal entity question, report the country for which Legal Entity BO's have the political appointment. E.g. for a French legal entity investor with at least 1 BO that is PEP, in Germany, this would be reported as a 1 for Germany.

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

```
<A06071 IOL="AF" IOM="581" ION="464"></A06071>
```

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REF	Field	Description
IOL	PEP - Country	Select from the list of Alpha-2 country codes, each country where the following applies: A natural person investor of a fund your institution manages is a PEP and has nationality/citizenship in the specified country. Or, a beneficial owner of a legal entity investor is a PEP and has nationality/citizenship in the specified country. Only the applicable countries need to be completed. Data Type: EnumerationValue Select from Country
IOM	Number of NP PEPs	State the number of natural person investors in funds your institution manages which are PEPs (Including their family members and people known to be close associates) and have nationality/citizenship in the specified country Data Type: IntegerValue If not applicable enter 0
ION	Number of BO PEPs	State the number of legal entity investors which have at least one BO that is a PEP (including their family members and people known to be close associates) which is established in the selected country, i.e. the political appointment that qualifies the individual as a PEP is in the selected country. As per recital 125 AMLR, senior managing officials (SMOs) reported where no natural person is identifiable who ultimately owns or exerts control over an entity are not to be considered for the purposes of reporting this datapoint. Data Type: IntegerValue If not applicable enter 0

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8.9 AUM Funds

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

```
<A06081 IOO="AL" IOP="486.78"></A06081>
```

REF	Field	Description
IOO	AUM - Country	Select from dropdown list of Alpha-2 country codes, a Country for each applicable country with a fund which your institution manages domiciled there. Only the applicable countries need to be completed. Data Type: EnumerationValue Select from Country
IOP	AUM - Total Value	Overall value (EUR) of AUM of funds domiciled in the given country Data Type: DecimalValue If not applicable enter 0

8.10 AUM Investors

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

```
<A06091 IOQ="AF" IOR="542.54" IOT="542.54"></A06091>
```

REF	Field	Description
IOQ	Geography - Country	Select from dropdown list of Alpha-2 country codes, Country for each applicable country where there is an investor (in a fund your institution manages) domiciled in the given country. Only the applicable countries need to be completed. Data Type: EnumerationValue Select from Country
IOR	Overall - Total Investor AUM	Overall value (EUR) of AUM of investors domiciled in the given country Data Type: DecimalValue If not applicable enter 0
IOT	Overall - Total Investor Subscriptions	Overall value (EUR) of subscriptions originating from the given country in the preceding calendar year. This should be investor inflows only and should not be netted against any redemptions. Data Type: DecimalValue If not applicable enter 0

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9 Appendices

9.1 Definitions

Term	Interpretation
Active investor	The investor is the natural or legal person or other legal arrangement with whom a business relationship is entered into with a fund your institution manages, or who has at least one transaction initiated by the investor even if it is a periodic/automatic transaction, in the preceding calendar year but excludes any transactions which pertain to fee payments, services charges or similar.
AML/CFT regulated customers	All persons or entities of a similar nature to those listed in Article 3 of Regulation (EU) 2024/1624, including those that do not fall within the scope of Regulation (EU) 2024/1624 due to their non-EU status
Assets under custody	Assets for which your institution provides safekeeping and administration services (cf. MiFID II - Annex I, Section B - Ancillary services) and final investor refers to the end client or individual who ultimately owns and benefits from the investments, as opposed to intermediaries or entities managing or holding the assets on behalf of others
Assets under management	Assets which are either under the scope of a portfolio management mandate or under the scope of an investment advice mandate
Beneficial owner	As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership 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.

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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)
Critical-rated actions	Deficiencies that suggest the existence of one or more material weaknesses in the obliged entity's AML/CFT policies, systems and controls, identified by the internal auditor, external auditor or the supervisor. A material weakness is a weakness that has or will likely have a high impact on the compliance with AML/CFT regulatory requirements. The impact should be assessed based on the severity, duration and repetitiveness of the deficiency.
Crypto risks	Risks related to e.g. investors trading in cryptos but also risks related to your institution's activities in this area.
Crypto-asset	As per Article 2(1), point (7), of Regulation (EU) 2024/1624.
Crypto token	A crypto token is a digital asset created on a blockchain that can represent ownership, rights, or access to a specific asset, service, or utility within a blockchain ecosystem.
Investor Representative	An investor representative is an individual authorised to act on behalf of the investor in managing their financial affairs and is responsible for acting in the best interests of the investor and following their instructions.
Depositary Services	Offering custodian and fiduciary services to both Irish and non-Irish regulated funds. Custodian services include the safeguarding of assets of the investor/fund in question by controlling the monies the fund has to buy or sell securities or bonds for the fund. Fiduciary services include the depositary firms reviewing the client's/fund's activities to ensure that the fund complies with relevant legislation and the prospectus requirements of the fund. This service is often referred to as Trustee Services.
False positive alert	A false positive alert is a transaction monitoring alert which was automatically closed by a system without escalation or an escalated alert which was closed by an analyst as not being worthy of an STR. If the alert is a collection of several alerts, then all of these alerts are considered to be false positives.
Family members	As per Article 2(1), point (35), of Regulation (EU) 2024/1624.
Financial institution	As per Article 2(1), point (6), of Regulation (EU) 2024/1624.
Group	As per Article 2(1), point (41), of Regulation (EU) 2024/1624.
High risk country	Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163.
Hit (in sanctions screening)	In this context, "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.
Intermediary	This includes brokers, agents, distributors, intermediaries and all other contracted third parties which constitute a link in the chain of service provision to your investors, or in the execution of investor transactions. This concerns intermediaries with which your institution has entered into an agreement.

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Legal entity	Legal person or other legal arrangement.
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Management body	As per Article 2(1), point (37), of Regulation (EU) 2024/1624.
New Investor	Natural persons or legal entities who invested in a fund your institution manages for the first time in the preceding calendar year.
ML/TF risk	The impact and likelihood of ML/TF taking place.
Money laundering	As per Article 2(1), of Regulation (EU) 2024/1624.
Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
Parent entity	As per Article 2(42) of Regulation (EU) 2024/1624.
Payment institution	As per Article 4(4), of Directive (EU) 2015/2366.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Professional clients	As per Article 4(1), point 10, of Directive (EU) 2014/65
Proliferation financing	The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.
Remote onboarding	Onboarding other than face-to-face where the investor is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The investor does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the investor's identity is being verified via video-link or similar technological means such as App registration, Internet sign-up, email, over the phone, etc.
Retail Investor	As per Article 4(1), point 11, of Directive (EU) 2014/65
Risk appetite	The level of risk a firm is prepared to accept.
Rule (in transaction monitoring)	A rule in this context means a rule/model/business rule/transaction monitoring rule as anything, manual or automated, designed to detect a specific transactional behaviour(s), scenario or typology which can by itself, or as a group of alerts, could be escalated for investigation and possible Suspicious Transaction Report. These are non-AI based logical decision rules often following "IF-THEN", "IF-ELSE", "WHEN" patterns etc.
Sanctions regulation	As per Article 2(1), point (49), point (50), and point (51), of Regulation (EU) 2024/1624.
Senior management	As per Article 2(1), point (40), of Regulation (EU) 2024/1624.
Shell institution/bank	As per Article 2(1), point (23), of Regulation (EU) 2024/1624.
Terrorist financing	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
Third country	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.

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Transaction monitoring alert	In this context a Transaction Monitoring Alert means one or more transactions which triggers or collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst. E.g. 1: A rule is in place which detects large deposits of cash anomalous to investor behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating, if the investigator files a STR report this is considered a True Positive Alert; otherwise, we consider it a False Positive Alert. E.g. 2: A scenario is in place to detect fast-moving transactions to high risk geographies. One model/rule detects placement of risky funds, and another detects fast movement of these funds to a high risk destination. Both of these models/rules identify behaviour creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this, we consider it a True Positive Alert for both rules/models; otherwise, we consider it a False Positive Alert for both rules/models.
Transaction monitoring rule/model	A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system.
Transaction profile	Transaction profile in this context has the meaning of any measure of expected transactional behaviour for investors.
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.
Unlisted financial assets	Financial instruments that are not traded on a regulated market, multilateral trading facility or organised trading facility.

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9.2 Enumerations

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

Country

Alpha-2 code as per the ISO 3166 plus XK – Kosovo and 00 to indicate not applicable

InvestorSegment1

Identifier	Description
NP	Natural person investors (i.e., personal investors, retail clients)
NP_PEP	Natural person investors that are politically exposed persons (PEPs), family members of PEPs or persons known to be a close associate.
NP_high	Natural person investors with High (or closest internal rating, e.g., Ultra High) customer risk rating
LE	Legal entity investors (i.e., non-personal investors, legal persons and/or other entities and/or legal structures and/or arrangements)
LE_PEP	Legal entity investors with PEP risk identified
LE_high	Legal entity investors with High (or closest internal rating, e.g., Ultra High) investors risk rating
Complex	Investors with a complex structure
Cash_intensive	Legal entity investors that operate in cash-intensive businesses
NP_blocked	Natural person investors that have been blocked/curtailed pending exit due to AML/CFT concerns
LE_blocked	Legal entity investors that have been blocked/curtailed pending exit due to AML/CFT concerns

InvestorSegment2

Identifier	Description
NP_wealth	Natural Person investors with total assets under management of at least EUR 5,000,000 **AND** with total assets of at least EUR 50,000,000
Private_banking	Natural Person investors that fall under the definition of private banking as per EBA Risk Factor Guidelines

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NP_not_categorised	Natural person investors without customer risk rating
NP_suspended	Natural Persons that have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.)
LE_not_categorised	Legal entity investors without customer risk rating
LE_suspended	Legal Entities that have had a temporary suspension placed on them (e.g. lack of up to date documents, awaiting transaction monitoring investigation output, potential sanctions alert etc.)
Shell_institution	Legal entity investors that are shell institutions
CASP	Legal entity investors that are crypto-asset service providers
Credit_institution	Legal entity investors that are credit institutions
Financial_institution	Legal entity investors that are financial institutions
Government_body	Legal entity investors that are government bodies
SPV	Legal entity investors that are special purpose vehicles
Cust_non_EEA	Investors with at least one transaction over 250 euros from/to a non-EEA country in the previous year
Cust_FIU	Investors with information requests from the FIU

BWRAConducted

Identifier
Yes
No
Exemption_applies

Frequency

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

LegalStructure

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

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MonitoringApproach

Identifier	Description
All_partially_or_fully_automated	Yes, all transaction monitoring systems for funds my institution manages are at least partially automated
Not_all_partially_or_fully_automated	No, not all transaction monitoring systems for funds my institution manages are at least partially automated
N/A	N/A no transaction monitoring in place

Outsource

Identifier	Description
Not_outsourced	Not outsourced
Partially_outsourced	Partially outsourced to group or non-group entity
Totally_outsourced	Totally outsourced to group or non-group entity

Sector

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

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

Identifier	Description
Mining	Mining (Raw materials & minerals) Suggested NACE Codes: *B.5, B.7, B.8, B.9* Suggested NAICS Codes: *212* Suggested GICS Codes: *15104010, 15104020, 15104025, 15104050, 10102050* Alternatively Appropriate Internal Classification
Oil_gas	Oil & Gas (onshore & offshore) Suggested NACE Codes: *B.6*

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	Suggested NAICS Codes: *2111* Suggested GICS Codes: *10101010, 10101020, 10102010, 10102020, 10102030, 10102040* Alternatively Appropriate Internal Classification
Energy	Power/Energy (Production & Distribution) Suggested NACE Codes: *D.35.11, D.35.12, D.35.13, D.35.14* Suggested NAICS Codes: *2211* Suggested GICS Codes: *5510* Alternatively Appropriate Internal Classification
Defence	Defence Industry, Military Goods (manufacturing, wholesale and retail) Suggested NACE Codes: *0.84.22, C.25.4* Suggested NAICS Codes: *92811* Suggested GICS Codes: *20101010* Alternatively Appropriate Internal Classification
Precious_metal	Precious Metals, Stones and Jewellery Traders Suggested NACE Codes: *G.46.72, G.47.77* Suggested NAICS Codes: *42394* Suggested GICS Codes: *15104030, 15104040, 15104045, 25203010* Alternatively Appropriate Internal Classification
Art_dealer	Art Dealers Suggested NACE Codes: *G.47.78* Suggested NAICS Codes: *45992* Suggested GICS Codes: *25504040* Alternatively Appropriate Internal Classification
Crypto	Virtual Assets/ Crypto Currency Suggested NACE Codes: *Not Available* Suggested NAICS Codes:

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	523160 Suggested GICS Codes: *Not Available* Alternatively Appropriate Internal Classification
Gambling	Gambling Suggested NACE Codes: *R.92.0* Suggested NAICS Codes: *7132* Suggested GICS Codes: *25301010* Alternatively Appropriate Internal Classification
Construction	Construction Suggested NACE Codes: *F* Suggested NAICS Codes: *23* Suggested GICS Codes: *201030* Alternatively Appropriate Internal Classification
Real_estate	Real Estate Suggested NACE Codes: *L.68* Suggested NAICS Codes: *531* Suggested GICS Codes: *6010* Alternatively Appropriate Internal Classification
TCSP	Trust or Company Service Providers Suggested NACE Codes: *K.64.30* Suggested NAICS Codes: *52592* Suggested GICS Codes: *40201040** Alternatively Appropriate Internal Classification
Religion	Religious Institutions & Charities Suggested NACE Codes: *S.94.91, Q.88.99* Suggested NAICS Codes: *81311, 81321*

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	Suggested GICS Codes: *Not Available* Alternatively Appropriate Internal Classification
Freight	Freight, Haulage & Shipping Suggested NACE Codes: *H.49, H.50, H.51, H.52.2, H.53* Suggested NAICS Codes: *481, 482, 483, 484, 486, 488, 491, 492* Suggested GICS Codes: *20301010, 20303010, 20304030, 20305030, 20305010, 20305020* Alternatively Appropriate Internal Classification
Advisory	Advisory & Consultancy Services Suggested NACE Codes: *M.70.22* Suggested NAICS Codes: *5416* Suggested GICS Codes: *20202020* Alternatively Appropriate Internal Classification
IP	Intellectual Property/ Patents Leasing Suggested NACE Codes: N.77.40 Suggested NAICS Codes: 53311 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
MTOPSP	Money Transfer Organisations/ Payment Service Providers Suggested NACE Codes: K66.19 Suggested NAICS Codes: 52232 Suggested GICS Codes: 40201060 Alternatively Appropriate Internal Classification
Pharm	Pharmaceuticals Suggested NACE Codes: C.21 Suggested NAICS Codes: 3254

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	Suggested GICS Codes: 3520 Alternatively Appropriate Internal Classification
Scrap_dealer	Scrap Dealers Suggested NACE Codes: G.46.77 Suggested NAICS Codes: 42393 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Sale_motor	Sale of motor vehicles Suggested NACE Codes: G.45.11, G.45.19, G.45.4 Suggested NAICS Codes: 423110 Suggested GICS Codes: 25501010* Alternatively Appropriate Internal Classification
Sale_boat	Sale of boats Suggested NACE Codes: Not Available Suggested NAICS Codes: 441222 Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Catering	Catering Suggested NACE Codes: I.56.21 Suggested NAICS Codes: 72232 Suggested GICS Codes: 25301040 Alternatively Appropriate Internal Classification
Crowdfunding	Crowdfunding Service Providers Suggested NACE Codes: S.94.99 Suggested NAICS Codes: 813219

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	Suggested GICS Codes: Not Available Alternatively Appropriate Internal Classification
Sport	Professional Sports Suggested NACE Codes: R.93.12, R.93.11 Suggested NAICS Codes: 71121 Suggested GICS Codes: 50202010 Alternatively Appropriate Internal Classification
Stockbroker	Stockbrokers and Traders/ Trading Platforms Suggested NACE Codes: K.66.11, K.66.12 Suggested NAICS Codes: 5231, 5232 Suggested GICS Codes: 40203020, 40203030 Alternatively Appropriate Internal Classification
Financial_service	All other financial services sectors not mentioned above.
Other_high_risk	Other High Risk activities as per your institutions Customer Risk Assessment.
Other_sector	All remaining other sectors not covered by the above.

CountriesEEA

Identifier	Description
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
ES	Spain
FI	Finland
FR	France
GR	Greece
HR	Croatia
HU	Hungary
IE	Ireland
IS	Iceland
IT	Italy
LI	Liechtenstein
LT	Lithuania

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LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
NO	Norway
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia

CountriesEEANA

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

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