Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem

Guidance Notes
Risk Evaluation Questionnaire
High Cost Credit Providers & Retail Credit Firms

November 2026

Document History

Version	Comments	Date
1.0	Initial version	20/11/2026

Back to Contents

Contents

Document History 2
Contents 3
1 Background and Scope 4
2 Timeline for Submitting the REQ 4
3 Requirement to provide information to the Central Bank 5
4 Mechanism for Submission of Returns 5
5 Where do I go if I need further information? 5
6 Where do I go if I have technical issues with the Portal? 5
7 Overview of the REQ and Information to be provided by Institutions 6
8 Instructions / Guidance Notes for Completing the REQ 6
8.0 Cover 7
8.1 General 8
8.2 Inherent Risk 11
8.3 Mitigation and Control 14
8.4 Physical Presence 38
8.5 Residence And Establishment 38
8.6 Beneficial Owners 39
8.7 Politically Exposed Persons 40
8.8 Geography Of Funds Flow 41
9 Appendices 42
9.1 Definitions 42
9.2 Dropdowns 45

Back to Contents

1 Background and Scope

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

The Risk Evaluation Questionnaire (REQ) seeks to consider:

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

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

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

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

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

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

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

2 Timeline for Submitting the REQ

The reference date for data included in the REQ is 31 December of the preceding calendar year unless otherwise stated. The REQ is due annually on March 24th.

The deadline for the first submission (in respect of reference date of 31 December 2026) is 24 March 2027. This is a hard deadline and no extensions will be granted.

Back to Contents

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

Each institution is required to submit to the Central Bank the information set out in Section 8 of this guidance. The REQ will be submitted in Excel and is available on the website to download and complete.

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

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_A16.xlsx

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A16 - the A16 Return code
- .xlsx or .zip - the file extension

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

5 Where do I go if I need further information?

Section 8 (Instructions / Guidance Notes for completing the REQ) is designed to aid institutions when completing each section of the return.

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

Back to Contents

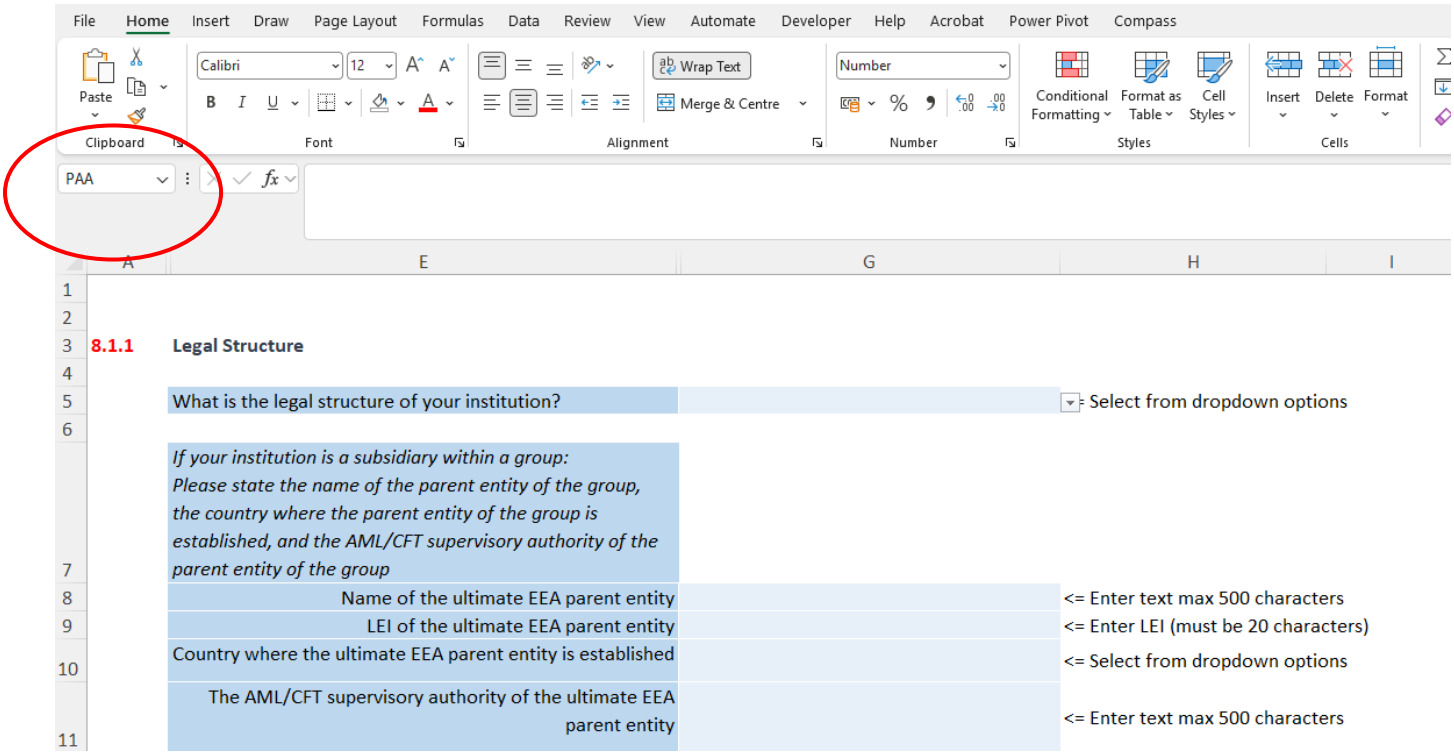
7 Overview of the REQ and Information to be provided by Institutions

This guidance document is for High Cost Credit Providers and Retail Credit Firms. Each institution must use the REQ specific to its sector. If the institution is part of a group with multiple institutions regulated by the Central Bank, then each individual institution must submit a REQ.

Unless otherwise specified, only report data relating to business written from your Irish institution.

8 Instructions / Guidance Notes for Completing the REQ

Instructions for each field are detailed below. Each question has a corresponding 3 letter code, e.g. the first question, "What is the legal structure of your institution?" has the code PAA. These reference codes can be found in the "Name Box" in the top left corner of Excel. To search for a reference code in Excel use Ctrl + G.



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).

Please do not copy, paste, drag, or drop data into cells.

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

All values should be entered as full Euro amounts. Where currency conversion is required for reported data or for thresholds of the items, reporting obliged entities should apply the following approach:

i. 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

Back to Contents

entities should use the official rate published on 30 December, or the most recent preceding date for which an official rate is available.

ii. 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 unless otherwise stated, with a reference date of 31 December of the preceding calendar year unless otherwise stated.

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

Depending on the business model of your institution, not every question will be applicable, please follow the instructions as to whether a cell should be answered. 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 but requires an answer, please use the below options:

- Numbers: Enter 0
- Dates: Enter 2000-01-01
- Texts: Enter N/A
- Country dropdown: Select Not applicable
- Other dropdowns: Select N/A

8.0 Cover

This tab displays the overall quality status of your workbook. It indicates whether the workbook is ready for submission, or if errors need to be fixed. Do not try to upload a file that states “Cannot be submitted – please fix errors”.

Please check the validations to the right of each question which will give details of any errors.

A completed example of the REQ which is ready for submission is available on the website here in the HCCP & RCF zip file.

Back to Contents

8.1 General

8.1.1 Legal Structure

REF	Field	Description
PAA	Legal Structure	What is the legal structure of your institution? Select from LegalStructure
PAB	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. This question should be left blank if your institution is not a subsidiary. Character limit: 500 characters
PAC	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. This question should be left blank if your institution is not a subsidiary. Character limit: 20 characters If LEI not available please enter 00000000000000000000
PAD	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. This question should be left blank if your institution is not a subsidiary. Select from CountriesEEA
PAE	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. This question should be left blank if your institution is not a subsidiary. If the parent entity is not regulated for AML/CFT purposes enter N/A. The ultimate EEA parent is the Head Office of the branch where the entity passporting into Ireland under Freedom of Establishment is not part of an EEA (sub)group. Otherwise it is the top entity of that EEA (sub)group. Character limit: 500 characters
PAJ	Name of the global parent entity of the group	Enter the statutory name of your ultimate global parent entity if your institution is a subsidiary within a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity. If not applicable leave blank.

Back to Contents

		Character limit: 500 characters
PAK	LEI of the global parent entity of the group	Enter the Legal Entity Identifier (LEI) of your institution's ultimate global parent entity if your institution is a subsidiary within a group. If not applicable leave blank. Character limit: 20 characters If LEI not available please enter 00000000000000000000
PAL	Country where the global parent entity of the group is established	Select the country where the ultimate global parent entity is established, if your institution is a subsidiary within a group and the group global head office is located in a third country, regardless of the existence of an EEA parent entity. If not applicable leave blank. Select from Country
PAM	The AML/CFT supervisory authority of the global parent entity of the group	Enter the AML/CFT supervisory authority for your institution's ultimate global parent entity if your institution is a subsidiary within a group. Enter N/A if the ultimate global parent entity is not regulated for AML/CFT purposes or if not applicable. Character limit: 500 characters If not applicable leave blank.

8.1.2 Statement Of Compliance

REF	Field	Description
PAN	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

Back to Contents

PAO	Reason for Non Compliance	If the answer is No to the Statement of Compliance above, please provide a brief summary of material non-compliance. Character limit: 500 characters If not applicable leave blank.
PAP	Compliance Name	Name of the person signing this Statement of Compliance on behalf of the Institution This must be answered. Character limit: 100 characters
PAQ	Position Held	Position of the person signing this Statement of Compliance on behalf of the Institution This must be answered. Character limit: 100 characters
PAR	PCF	Is the person signing this Statement of Compliance on behalf of the firm been approved by the Central Bank to a Pre-Approval Control Function (PCF) position? Select from YesNo

Back to Contents

8.2 Inherent Risk

8.2.1 Customer Segments

For each customer type listed please specify the number of customers as at the reference date i.e. 31 December of the preceding calendar year. Please note customers can come under more than one customer type, and the sum of all customer types does not need to sum to the total number of customers. For example, a customer can be counted under both Natural Person and a customer with cross border transactions involving non-EEA countries.

REF	Field	Description
PAS	**Customer Types**	**Different customer segments - note customers can fall in more than one customer segment.**
	Natural Persons	Natural person customers (i.e., personal customers, retail customers)
	Legal Entity	Legal entity customers (i.e., non-personal customers, legal persons and/or other entities and/or legal structures and/or arrangements)
	Customers with requests from the Financial Intelligence Unit (FIU)	Customers with requests from the Financial Intelligence Unit (FIU)
	Customers with complex structures	Customers with a complex structure
	Customers with cross border transactions involving non-EEA countries	Customers with at least one transaction over EUR 250 from/to a non-EEA country. i.e. "*transactions are received/paid from/to non-EEA countries, if different from the country of residence of the customer*".
PAT	Number of Customers	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segment. If not applicable enter 0

REF	Field	Description
PAU	Number of customers with at least one transaction in the previous year	Number of customers with at least one transaction in the previous year If not applicable enter 0
PAV	Total number of customers with high risk activities	Total number of customers with high risk activities that should include, at least, activities mentioned under Annex III of Regulation (EU) 2024/1624. If not applicable enter 0

Back to Contents

8.2.2 Balance Sheet

REF	Field	Description
PIP	Balance Sheet Assets	Total value of assets held or under management as at 31st of December of the preceding calendar year If not applicable enter 0

8.2.3 Cash Transactions

REF	Field	Description
PAW	Cash In Transactions	Number of cash inwards transactions in the previous year If not applicable enter 0
PAX	Cash In Value	Total Value (EUR) of cash inwards transactions in the previous year If not applicable enter 0
PAY	Cash Out Transactions	Number of cash outwards transactions in the previous year If not applicable enter 0
PAZ	Cash Out Value	Total Value (EUR) of cash outwards transactions in the previous year If not applicable enter 0
PBA	Cash Customers over 20000	Total Number of natural persons totalling cash transactions over 20 000 EUR during the previous year If not applicable enter 0

Back to Contents

8.2.4 Intermediaries and Distribution Channels

REF	Field	Description
PBB	Intermediary No AML	Number of new customers onboarded in the preceding calendar year by third parties not directly subject to AML/CTF supervision. If not applicable enter 0
PBC	The number of new customers onboarded through a Third Party in the preceding calendar year.	The number of new customers onboarded through a Third Party in the preceding calendar year. If not applicable enter 0

8.2.5 Remote Onboarding

REF	Field	Description
PBD	Onboarding Remote NP	State the number of Natural Person customers accepted via remote onboarding in the preceding calendar year. If not applicable enter 0
PBE	Onboarding Remote LE	State the number of Legal Entity customers accepted via remote onboarding in the preceding calendar year. If not applicable enter 0

8.2.6 Lending

REF	Field	Description
PBF	Number of outstanding loans	Total number of outstanding loans If not applicable enter 0
PBG	Value of outstanding loans	Total value (EUR) of outstanding loans If not applicable enter 0
PBH	Number of loans granted	Total number of loans granted during the preceding calendar year If not applicable enter 0
PBI	Value of loans granted	Total value (EUR) of loans granted during the preceding calendar year If not applicable enter 0
PBJ	Outstanding asset backed loans with cash collateral - Number	Total Number of outstanding asset backed loans with cash collateral

Back to Contents

		If not applicable enter 0
PBK	Outstanding asset backed loans with cash collateral - Value	Total Value (EUR) of outstanding asset backed loans with cash collateral If not applicable enter 0
PBL	Number of loan repayments	Total Number of fully repaid loans during the preceding calendar year If not applicable enter 0
PBM	Number of prematurely repaid loans	Total Number of loans which were prematurely fully repaid during the preceding calendar year If not applicable enter 0
PBN	Number of loan repayments from non-EEA countries	Total Number of fully repaid loans during the preceding calendar year with at least one repayment from non-EEA countries during the lifetime of the loan If not applicable enter 0
PBO	Number of consumer loans not associated with products or services	Total number of consumer loans granted during the preceding calendar year that are not associated to the acquisition of any product or service If not applicable enter 0
PBP	Number of real estate loans	Total number of outstanding real estate loans If not applicable enter 0
PBQ	Number of real estate loans with third party payments	Total number of real estate loans with third party payments during the preceding calendar year If not applicable enter 0

8.3 Mitigation and Control

8.3.1 Business Wide Risk Assessment

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

REF	Field	Description
PBR	BWRA Conducted	State whether your institution conducts a Business Wide Risk Assessment (BWRA). Select from YesNo
PBS	BWRA Senior Management Approval	State whether Senior Management of your institution approved the latest version of the BWRA. Select from YesNoNA
PBT	BWRA Last Approval Date	State the approval date of your institution's most recent BWRA in the format of YYYY-MM-DD.

Back to Contents

		If not applicable enter 2000-01-01
PBU	BWRA Money Laundering	State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
PBV	BWRA Terrorist Financing	State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
PBW	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
PBX	BWRA Customer Groups	State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
PBY	BWRA Geographies	State whether geographies are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
PBZ	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
PCA	BWRA Distribution Channel	State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's most recent BWRA. Select from YesNoNA
PCB	BWRA Policy Procedure	State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures. Select from YesNoNA
PCC	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

Back to Contents

8.3.2 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.

REF	Field	Description
PCD	Pol & Proc - Customer Due Diligence	Enter the date when your institution's management approved the last version of policies and procedures for initial and on-going customer due diligence. Format YYYY-MM-DD If not applicable enter 2000-01-01
PCE	Pol & Proc -Transaction & Business relationship Monitoring	Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of transactions and business relationships. Format YYYY-MM-DD If not applicable enter 2000-01-01
PCF	Pol & Proc - compliance with financial sanctions	Enter the date when your institution's management approved the last version of policies and procedures for ensure compliance with financial sanctions regulations. Format YYYY-MM-DD If not applicable enter 2000-01-01
PCG	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). Format YYYY-MM-DD If not applicable enter 2000-01-01
PCH	Pol & Proc - Suspicious transaction reporting	Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process. This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the conducts of your institution's business to both Revenue and the FIU of any STR generated within your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
PCI	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). Format YYYY-MM-DD If not applicable enter 2000-01-01
PCJ	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).

Back to Contents

		Format YYYY-MM-DD If not applicable enter 2000-01-01
PCK	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. Format YYYY-MM-DD If not applicable enter 2000-01-01
PCL	Pol & Proc - Customer risk assessment process	Enter the date when your institution's management approved the last version of policies and procedures to support customer risk assessment processes. Format YYYY-MM-DD If not applicable enter 2000-01-01
PCM	Pol & Proc - Review Frequency	Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures. Select from Frequency

8.3.3 Onboarding

REF	Field	Description
PCN	Onboarding - Counter/Desk i.e. face to face – Natural person customers	State whether your institution offers onboarding via counter/desk (i.e. face to face) for natural person customers. Select from YesNo
PCO	Onboarding - Counter/Desk i.e. face to face - Legal entity customers	State whether your institution offers onboarding via counter/desk (i.e. face to face) for legal entity customers. Select from YesNo
PCP	Onboarding - Other - Natural person customers	State whether your institution offers onboarding via other options for natural person customers. Select from YesNo
PCQ	Onboarding - Other - Legal entity customers	State whether your institution offers onboarding via other options for legal entity customers. Select from YesNo

8.3.4 Offboarding

REF	Field	Description
PCR	Customer Offboarding Number	State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS concerns. If not applicable enter 0

Back to Contents

8.3.5 Customer Due Diligence

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

REF	Field	Description
PCS	CDD Review NP	State whether your institution periodically reviews its customers' risk profiles for natural person. Select from CDD
PCT	CDD Review LE	State whether your institution periodically reviews its customers' risk profiles for legal entity customers. Select from CDD
PCU	CDD CRA Update	Date when your institution last updated the Customer Risk Assessment Format YYYY-MM-DD If not applicable enter 2000-01-01
PCV	CDD Low Customer	Number of total customers per ML/TF risk category (low risk). If your institution uses five risk categories, then Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk If not applicable enter 0
PCW	CDD Medium-Low Customer	Number of total customers per ML/TF risk category (medium-low risk). If your institution uses five risk categories, then Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk If not applicable enter 0
PCX	CDD MH Customer	Number of total customers per ML/TF risk category (medium-high risk). If your institution uses five risk categories, then Low risk -> Low risk Medium-low risk -> Low risk Medium-high risk -> Medium-low risk High risk -> Medium-high risk Ultra/very high risk -> High risk If not applicable enter 0
PCY	CDD High Customer	Number of total customers per ML/TF risk category (high-risk). If your institution uses five risk categories, then

Back to Contents

		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 If not applicable enter 0
PCZ	CDD customers Due NP	Number of natural person customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. If not applicable enter 0
PDA	CDD customers Due LE	Number of legal entity customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures. If not applicable enter 0
PDB	CDD customers Reviewed NP	Number of natural person customers for whom customer information was reviewed and updated in the preceding calendar year. If not applicable enter 0
PDC	CDD customers Reviewed LE	Number of legal entity customers for whom customer information was reviewed and updated in the preceding calendar year. If not applicable enter 0
PDD	No Ident Total	Number of customers without identification and verification documentation/ information If not applicable enter 0
PDE	CDD BO not Identified	Number of customers that are legal entities /trusts whose beneficial owners have not been identified. If not applicable enter 0
PDF	CDD BO not Verified HR	Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified If not applicable enter 0
PDG	Customer Data not in Line With Article 20	Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR. Note that this data point will not be assessed until the Regulation (EU) 2024/1624 applies from 10 July 2027. For submissions with reference dates before this Regulation applies, this data point can be answered as 0 or any integer value.

Back to Contents

		If not applicable enter 0
PDH	Customer Number Without Risk Profile	State the number of customers of your institution who have not had a ML/TF risk profile created (this should exclude any customers with whom the obliged entity does not have a business relationship) If not applicable enter 0

8.3.6 Transaction Monitoring

REF	Field	Description
PDI	TM How Monitor	State whether your institution monitors transactions and how this is done. Select from MonitoringApproach
PDJ	TM Alert Number of Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions? Select from YesNoNA
PDK	TM Alert Value of Aggregated Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions? Select from YesNoNA
PDL	TM Alert Value of Single Transactions	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of single transactions? Select from YesNoNA
PDM	TM Alert Counterparties	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties? Select from YesNoNA
PDN	TM Alert Geographies	If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies? Select from YesNoNA

Back to Contents

8.3.7 Alerts

REF	Field	Description
PDO	Alert Backlog - Automated	On 31 December of the preceding calendar year, how many alerts (automated alerts) from that year were still not closed? If not applicable enter 0
PDP	Alert Backlog - Manual	On 31 December of the preceding calendar year, how many alerts (manual) from that year were still not closed? If not applicable enter 0
PDQ	Alert Mean Time To Close - Automated	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for automated alerts only), from the initial alert generation? If not applicable enter 0
PDR	Alert Mean Time To Close – Manual	Over the course of the preceding calendar year, what was the average time in days to close an alert (account for manual alerts only), from the initial alert generation? If not applicable enter 0
PDS	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. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
PDT	Alert Days - Manual	If manual system: Average time in days to analyse the transaction since the moment it occurred. If not applicable enter 0

8.3.8 Suspicious Transaction Reporting

REF	Field	Description
PDU	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.

Back to Contents

		Select from YesNo
PDV	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year. If not applicable enter 0
PDW	Number STs	State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year. If not applicable enter 0
PDX	FIU Days to Report	Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the preceding calendar year. If not applicable enter 0

8.3.9 Sanctions Screening

REF	Field	Description
PDY	Sanctions Prior To Service	State whether your institution verifies, prior to providing services, whether or not customers or potential customers and their beneficial owners are included on sanction list. Select from YesNo
PDZ	Sanction Max Hours	Maximum number of hours between the publication of the Targeted Financial Sanction by the authorities and the implementation of these changes in the institution's screening tools. If not applicable enter 0
PEA	Sanction EU	Specify if customers and beneficial owners are checked against EU sanctions lists. Select from YesNo
PEB	Sanction National List	Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo
PEC	Sanction UN	Specify if customers and beneficial owners are checked against UN sanctions lists. Select from YesNo
PED	Sanction Other	Specify if customers and beneficial owners are checked against any other sanctions lists

Back to Contents

		Select from YesNo
PEE	Sanction Other Specify	If your institution uses any other sanctions lists not mentioned above please specify Character limit: 500 characters If not applicable leave blank.
PEF	Sanction Transact Check	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when executing a transaction. Select from YesNo
PEG	Sanction List Update	At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when sanctions list is updated. Select from YesNo
PEH	Sanction Periodic Customer	At the start of service provision and afterwards, state whether your institution periodically checks whether customers are included on sanctions lists. Select from YesNo
PEI	Sanction Periodic Customer Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0
PEJ	Sanction Periodic BO	At and after the start of service provision, state whether your institution periodically checks whether beneficial owners connected to customers are included on sanctions lists. Select from YesNo
PEK	Sanction Periodic BO Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for beneficial owners connected to customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0
PEL	Sanction Periodic Rep	At and after the start of service provision, state whether your institution periodically checks whether representatives connected to customers are included on sanctions lists. Select from YesNo
PEM	Sanction Periodic Rep Frequency	State the frequency (number of checks per calendar year) that the periodic checks are performed for representatives

Back to Contents

		connected to customers. State a whole number only, for example if daily enter 365, if weekly enter 52, if monthly enter 12, if quarterly enter 4. If not applicable enter 0
PEN	Sanction Total Hits	State the number of actual hits that the sanctions list screening delivered in the preceding calendar year. In this context "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list If not applicable enter 0
PEO	Sanction Total Hits Value	State the total value (EUR) of frozen assets recorded in relation to those hits that the sanctions list screening delivered in the preceding calendar year. In this context "hit" means a true positive sanction alert in which the individual or company was in fact present on a sanctions list. If not applicable enter 0

8.3.10 Outsourcing

REF	Field	Description
PEP	Outsource CDD Onboarding	State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group). Select from Outsource
PEQ	Outsource CDD Review	State whether CDD periodic customer review (e.g. recurring process of reviewing customer CDD status/documentation/risk) has been outsourced to third parties (including within the Group). Select from Outsource
PER	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
PES	Outsource TM	State whether transaction monitoring has been outsourced to third parties (including within the Group). Select from Outsource
PET	Outsource STR Reporting	State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group).

Back to Contents

		Select from Outsource
PEU	Outsource Sanction Screen	State whether sanctions screening has been outsourced to third parties (including within the Group). Select from Outsource
PEV	Outsource Training	State whether AML/CFT training has been outsourced to third parties (including within the Group). Select from Outsource
PEW	Outsource PEP	State whether PEP detection has been outsourced to third parties (including within the Group). Select from Outsource
PEX	Outsource Compliance	State whether compliance monitoring checks have been outsourced to third parties (including within the Group). Select from Outsource
PEY	Outsource Other AMLCFT	State whether other processes related to risk management with regard to AML/CFT/proliferation financing have been outsourced to third parties (including within the Group). Select from Outsource
PEZ	Outsource Tasks to High Risk Third Countries	State whether AML/CFT tasks have been outsourced to an external service provider located in a third country that is not part of the group structure of your institution. Select from Outsource
PFA	Outsource Tasks to High Risk Third Countries Within Group	State whether AML/CFT tasks have been outsourced to an external service provider located in a third country that is part of the group structure of your institution. Select from Outsource

Back to Contents

8.3.11 Education & Training

REF	Field	Description
PFB	Non-AML/CFT specialist staff - % Staff coverage	State the proportion of non-AML/CFT specialist staff (customer facing staff, executive directors) who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
PFC	AML Specialist staff - % Staff coverage	State the proportion of AML specialist staff who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
PFD	Agents and distributors - % Staff coverage	State the proportion of agents and distributors who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
PFE	Board members & non-executive directors - % Staff coverage	State the proportion of Board members and non-executive directors who have attended training in the preceding calendar year with regard to financial crime. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0
PFF	Staff Numbers	Enter the total number of full-time equivalent employees employed by the institution. If not applicable enter 0

Back to Contents

8.3.12 Compliance and Assurance Testing

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

REF	Field	Description
PFG	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. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFH	Compliance BWRA Description	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. Character limit: 500 characters If not applicable leave blank.
PFI	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. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFJ	Compliance Training Description	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. Character limit: 500 characters If not applicable leave blank.
PFK	Compliance Verification	State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFL	Compliance Verification Description	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. Character limit: 500 characters If not applicable leave blank.
PFM	Compliance Sanctions	State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution.

Back to Contents

		Format YYYY-MM-DD If not applicable enter 2000-01-01
PFN	Compliance Sanctions Description	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. Character limit: 500 characters If not applicable leave blank.
PFO	Compliance Resources	State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFP	Compliance Resources Description	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. Character limit: 500 characters If not applicable leave blank.
PFQ	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. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFR	Compliance Organisation Description	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. Character limit: 500 characters If not applicable leave blank.
PFS	Compliance Risk Profile	State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFT	Compliance Profile Description	Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of customers in a business relationship. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.

Back to Contents

PFU	Compliance TM	State the most recent date when the monitoring processes for transactions and business relationships were assessed by the compliance. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFV	Compliance TM Description	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. Character limit: 500 characters If not applicable leave blank.
PFW	Compliance STR	State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFX	Compliance STR Description	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. Character limit: 500 characters If not applicable leave blank.
PFY	Compliance Records	State the most recent date when record keeping policies and procedures were assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
PFZ	Compliance Records Description	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. Character limit: 500 characters If not applicable leave blank.
PGA	Compliance Outsourcing	State the most recent date when outsourcing arrangements were assessed by the compliance function. Format YYYY-MM-DD If not applicable enter 2000-01-01
PGB	Compliance Outsourcing Description	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. Character limit: 500 characters If not applicable leave blank.

Back to Contents

PGC	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 FrequencyNA
PGD	Compliance to Board	State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board. Select from FrequencyNA
PGE	Compliance AML Staff	Number of dedicated AML/CFT compliance staff (in Full Time Equivalent). If not applicable enter 0

8.3.13 Audit

State the dates when the various AML/CFT obligations/controls were last assessed by an internal audit or external expert. If there were any material findings or potential breaches found during these assessments, please, give a brief description of these material findings or potential breaches. Indicate the audit report signing date if available or end of the audit period. You may report its start in case of an ongoing audit at the reference date.

REF	Field	Description
PGF	Audit Commissioned	Has your institution engaged an internal audit or an external expert to assess your institutions AML/CFT obligations /controls since 01 January 2020? Select from YesNo
PGG	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. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGH	Audit BWRA Description	If Yes to Audit BWRA, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
PGI	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.

Back to Contents

		Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGJ	Audit Training Description	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. Character limit: 500 characters If not applicable leave blank.
PGK	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. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGL	Audit Verification Description	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. Character limit: 500 characters If not applicable leave blank.
PGM	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. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGN	Audit Sanctions Description	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. Character limit: 500 characters If not applicable leave blank.
PGO	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. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGP	Audit Resources Description	If Yes to Audit Resources, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with

Back to Contents

		no spaces either side. Character limit: 500 characters If not applicable leave blank.
PGQ	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. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGR	Audit Organisation Description	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. Character limit: 500 characters If not applicable leave blank.
PGS	Audit Risk Profile	State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was subject to an internal audit by your institution or assessed by an external expert. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGT	Audit Profile Description	If Yes to Audit Risk Profile, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
PGU	Audit TM	State the most recent date when the monitoring processes for transactions and business relationships were subject to an internal audit by your institution or assessed by an external expert. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGV	Audit TM Description	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. Character limit: 500 characters

Back to Contents

		If not applicable leave blank.
PGW	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. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGX	Audit STR Description	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. Character limit: 500 characters If not applicable leave blank.
PGY	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. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PGZ	Audit Records Description	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. Character limit: 500 characters If not applicable leave blank.
PHA	Audit Outsourcing	State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert. Format YYYY-MM-DD If No answered to PGF you may leave blank, if Yes answered to PGF but this question is not applicable enter 2000-01-01
PHB	Audit Outsourcing Description	If Yes to Audit Outsourcing, briefly describe any material findings/potential breaches identified. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side. Character limit: 500 characters If not applicable leave blank.
PHC	Audit to Senior Management	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management. Select from FrequencyNA
PHD	Audit to Board	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board.

Back to Contents

		Select from FrequencyNA

8.3.14 Governance

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, this section can be left blank.

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.

REF	Field	Description
PHE	Designated Responsibility	State whether your institution appointed a member of senior management with primary responsibility for implementing, managing and overseeing your institution's compliance with its AML/CFT obligations as required under Section 54(8) of the CJA 2010 Select from YesNoNA
PHF	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 YesNoNA
PHG	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 FrequencyNA
PHH	Reported Shortcomings	State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year. Select from YesNoNA
PHI	Shortcomings Recovery	Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken. Select from YesNoNA
PHJ	Shortcomings Recovery Details	If Yes to Shortcomings Recovery, briefly describe the reported AML/CFT shortcomings and remediation measures taken. Provide a list of shortcomings and recovery measures in pairs, with each pair separated by semicolon (;) with no spaces either side.

Back to Contents

		i.e. <shortcoming1><recovery1>;<shortcoming2><recovery2>; etc. Character limit: 500 characters If not applicable leave blank.

8.3.15 Compliance with Fund Transfers Regulation

REF	Field	Description
PHK	FTR Out Missing Info	Number of outbound transfers for which requests were received from a counterparty in the transfer chain for information that is missing, incomplete or provided using inadmissible characters in the preceding calendar year. If not applicable enter 0
PHL	FTR Outbound	Total number of outbound transfers in the preceding calendar year. If not applicable enter 0
PHM	FTR Outbound Reject	Enter the proportion of outbound transfers rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters in the preceding calendar year. Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7% If not applicable enter 0

8.3.16 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, this section can be left blank.

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.

REF	Field	Description
PHN	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%

Back to Contents

PHO	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
PHP	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
PHQ	Groupwide AML High Risk Customers	If your institution is the parent entity within a group structure, state the proportion of group entities that provided reports to the Group AML Compliance function on the topic of Identity and Transaction Level Information on High Risk Customers in the preceding calendar year Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
PHR	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 Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
PHS	Groupwide Jurisdiction AML Review	If your institution is the parent entity within a group structure, state the proportion of jurisdictions in which the group is established that were covered by reviews (which included access to customer and transaction level data) performed by the group AML Compliance function during the preceding three calendar years Enter the percentage as a percentage, e.g. Enter 4.7% as 4.7, the cell is formatted for this to then appear as 4.7%
PHT	Groupwide Deficiencies Identified by NCA EEA	If your institution is the parent entity within a group structure, state the number of EU/EEA group entities for which deficiencies were identified by AML/CFT supervisors (from competent authorities) in the preceding calendar year
PHU	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

Back to Contents

Back to Contents

8.4 Physical Presence

Please state the number of branches by country and number of subsidiaries by country. Only the applicable countries need to be completed.

REF	Field	Description
PHV	PP - Country	Select from the list of countries, Country for each applicable country where the institution has subsidiaries or branches
PHW	No. of subsidiaries	Number of subsidiaries in each country. If not applicable enter 0
PHX	No. of branches	Number of branches in each country. If not applicable enter 0

8.5 Residence And Establishment

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

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

REF	Field	Description
PHY	RE - Country	Select from the list of countries, Country for each applicable country that has natural persons residing or legal entities established in that country.
PHZ	Natural person customers – Total Number	Natural person customers – Total If not applicable enter 0
PIA	Natural person customers – No. of which are New Customers	Natural person customers - Number of which are New Customers (Natural person customers with whom a business relationship was entered into in the preceding calendar year) If not applicable enter 0
PIB	Legal entity customers – Total Number	Legal entity customers – Total If not applicable enter 0
PIC	Legal entity customers - No. of which are New Customers	Legal entity customers - Number of which are New Customers (with whom a business relationship was entered into in the preceding calendar year) If not applicable enter 0
PID	Legal entity customers - No. with at least one beneficial	Legal entity customers - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence).

Back to Contents

	owner residing in non-EEA countries	If not applicable enter 0
PIE	Legal entity customers - No. of which have PEP Risk Identified	Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment If not applicable enter 0

8.6 Beneficial Owners

The questions below concern the beneficial owners (BOs) in relation to your institution's customer base.

REF	Field	Description
PIF	BO - Country	Select from the list of countries, Country for each applicable country that has a legal entity BO residing in that country.
PIG	Number of beneficial owners	Number of beneficial owners of your legal entity customers residing in the country. If not applicable enter 0

Back to Contents

8.7 Politically Exposed Persons

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

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

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 customer with at least 1 BO that is PEP, in Germany, this would be reported as a 1 for Germany.

REF	Field	Description
PIH	PEP - Country	Select from the list of countries, each country where the following applies: A natural person customer of your institution is a PEP (their family members, and people known to be close associates) and has nationality/citizenship in the specified country. Or, a beneficial owner of your legal entity customers is a PEP (their family members, and people known to be close associates) and has nationality/citizenship in the specified country.
PII	Number of NP PEPs	State the number of natural person customers which are PEPs (their family members, and people known to be close associates) and have nationality/citizenship in the specified country If not applicable enter 0
PIJ	Number of BO PEPs	State the number of legal entity customers which have at least one beneficial owner who is a PEP, family member or person known to be a close associate. If not applicable enter 0

Back to Contents

8.8 Geography Of Funds Flow

The questions below concern the source and destination of all funds flow transacted by your customers using your products or services, i.e. entry points for funds collected by you (e.g. repayment of loans, hire purchase, consumer hire etc by your institution's customers or similar credit repayments) and exit points for funds paid by you (e.g. loans , hire purchase, consumer hire payouts by your institution to customers or other similar credit advances).

This question is only for funds that are handled by your entity.

REF	Field	Description
PIK	Geography - Country	Select from dropdown list of countries, Country for each applicable country that had funds flow transmitted to it by your institution's customer using your institution's products or services in the preceding calendar year.
PIL	Overall - No. of transactions (Source)	Overall number of incoming transactions from each country in the preceding calendar year. If not applicable enter 0
PIM	Overall - Value of transactions (Source)	EUR Value of total incoming transactions from each country in the preceding calendar year. If not applicable enter 0
PIN	Overall - No. of transactions (Destination)	Overall number of outgoing transactions to each country in the preceding calendar year. If not applicable enter 0
PIO	Overall - Value of transactions (Destination)	EUR Value of total outgoing transactions to each country in the preceding calendar year. If not applicable enter 0

Back to Contents

9 Appendices

9.1 Definitions

Term	Interpretation
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 management	Assets which are either under the scope of a portfolio management mandate or under the scope of an investment advice mandate
Backlog	The number of customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures and for whom customer information was NOT reviewed and updated in the preceding calendar year.
Beneficial owner	As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership, through ownership interest or through control, as determined by 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.
Complex structure	The term complex structure (such as a long holding chain with use of front companies, opaqueness 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.
Customer Representative	A customer representative is an individual authorised to act on behalf of the customer in managing their financial affairs, and is responsible for acting in the best interests of the customer and following their instructions.
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.

Back to Contents

Intermediary	This includes brokers, agents, distributors, intermediaries and all other contracted third parties which constitute a link in the chain of service provision to your customers, or in the execution of customer transactions. This concerns intermediaries with which your institution has entered into an agreement.
Legal entity	Legal person or other legal arrangement. Any customer that is not a natural person should be included in Legal Entity, including charities and partnerships.
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Management body	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
New customer	Natural persons or legal entities with whom a business relationship is entered into in the preceding calendar year.
ML/TF risk	The impact and likelihood of ML/TF taking place.
Money laundering	As per Article 2(1), of Regulation (EU) 2024/1624.
Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
Onboarded physically	Onboarding face-to-face where the customer is physical present, that is, in the same physical location as the institution or a persona acting on the institution's behalf.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Professional clients	As per Article 4(1), point 10, of Directive (EU) 2014/65
Proliferation financing	The FATF produced a working definition of proliferation financing based on UNSCR 1540, which refers to the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.
Remote onboarding	Onboarding other than face-to-face where the customer is not physically present, that is, in the same physical location as the institution or a person acting on the institution's behalf. The customer does not at any stage arrive to a physical location for any part of the onboarding, this could include situations where the customer's identity is being verified via video-link or similar technological means such as App registration, Internet sign-up, email, over the phone, etc.
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.

Back to Contents

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.
Terrorist financing	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
Third country	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.
Transaction monitoring alert	In this context a Transaction Monitoring Alert means one or more transactions which triggers or collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst. E.g. 1: A rule is in place which detects large deposits of cash anomalous to customer behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating, if the investigator files a STR report this is considered a True Positive Alert; otherwise we consider it a False Positive Alert. E.g. 2: A scenario is in place to detect fast-moving transactions to high-risk geographies. One model/rule detects placement of risky funds and another detects fast movement of these funds to a high-risk destination. Both of these models/rules identify behaviour creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this we consider it a True Positive Alert for both rules/models; otherwise we consider it a False Positive Alert for both rules/models.
Transaction monitoring rule/model	A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system.
Transaction profile	Transaction profile in this context has the meaning of any measure of expected transactional behaviour for customers.
True positive alert	A true positive alert is a transaction monitoring alert which was escalated and led to the filing of an STR. If an STR is collection of several alerts, all of these alerts are considered to be true positive alerts.
Trust or company service provider	As per Article 2(1), point (11), of Regulation (EU) 2024/1624.
Wealth management	Wealth management encompasses all 'banking and other financial services to high-net worth individuals and their families or businesses', according to the ML/TF Risk Factor Guidelines (RFLGs), Guideline 12, EBA/GL/2021/02.

Back to Contents

9.2 Dropdowns

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

CDD

Identifier	Description
Yes_in_all_cases	Yes – All cases
Yes_only_in_enhanced_CDD_cases	Yes_only_in_enhanced_CDD_cases
No	No

Country

Country list as per the ISO 3166 plus Kosovo and Not applicable.

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

Back to Contents

FrequencyNA

Identifier	Description
N/A	Not applicable
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

MonitoringApproach

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

Outsource

Identifier	Description
Not_outsourced	Not outsourced
Partially_outsourced	Partially outsourced
Totally_outsourced	Totally outsourced

Back to Contents

CountriesEEA

Identifier
Austria
Belgium
Bulgaria
Cyprus
Czech Republic
Germany
Denmark
Estonia
Spain
Finland
France
Greece
Croatia
Hungary
Ireland
Iceland
Italy
Liechtenstein
Lithuania
Luxembourg
Latvia
Malta
Netherlands
Norway
Poland
Portugal
Romania
Sweden
Slovenia
Slovakia

Back to Contents

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



Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem