



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Guidance Notes Risk Evaluation Questionnaire

Investment Firms

May 2026

Document History

Version	Comments	Date
1.0	Initial version	28/11/2025
1.1	Minor typographical error corrected in definition of AML/CFT regulated customers	06/01/2026
1.2	<ul style="list-style-type: none"> 7 data points changed from DecimalValue to Percentage Value (ELI, ELJ, ELK, ELL, ELM, ELN, ELO) EOF guidance changed Sections 8.4.16/8.4.17 renamed to 8.4.15/8.4.16 ELB, ELC, ELD risk level mapping added EPZ, EQA, EQB, EQC non-high risk removed Section 8.2.3 given further explanation 	13/03/2026
1.3	<ul style="list-style-type: none"> Reference to Fraud removed from EJT - Offboarding for consistency Transaction tabs, Order Execution, Portfolio Management and Geography of Funds Flows updated with added clarity for the instance where the institution does not hold client assets Added clarification to EVF, EVI, EVL, to indicate that SMOs are to be excluded in the count of PEPs Question EVL updated from number of "BOs of LE customers that are PEPs" to "Number of LE customers with at least 1 BO that is a PEP" 	10/04/2026
1.4	<ul style="list-style-type: none"> IE added to CountriesEEA enumeration Missing MiFID activity (Placing of Financial Instruments Without a Firm Commitment Basis) added to business model table (EXF) 	21/05/2026

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1 Background and Scope

The Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (the CJA 2010) obliges credit and financial institutions (institutions) to put in place an effective, risk based Anti-Money Laundering/Countering the financing of Terrorism (AML/CFT) framework, which includes the application of a risk based approach, customer due diligence (CDD) measures, reporting of suspicious transactions, governance, policies and procedures, record keeping and training. There is also a legal obligation 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 2025) is 30 June 2026. This is a hard deadline, and no extensions will be granted.

3 Requirement to provide information to the Central Bank

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

4 Mechanism for Submission of Returns

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

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

1. Explicit closing XML tags must be used for all elements. e.g.
`<A03011 Identifier="EBK" EnumerationYesNo="Yes"></A03011>`
 rather than
`<A03011 Identifier="EBK" EnumerationYesNo="Yes"/>`
2. The XML tags must be contained in the following wrapper:
`<?xml version="1.0" encoding="utf-8"?>`
`<InvestmentFirms xmlns="http://www.centralbank.ie/Schemas/AML/2025/A03">`
`...`
`...`
`...`
`</InvestmentFirms>`

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_A03.xml

- CCCCCC - the institution code you use to log in to the system
- YYYYMMDD - must be the reporting date
- A03 - the A03 Return code
- .xml or .zip - the file extension

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

5 Where do I go if I need further information?

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

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

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

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

E-mail: onlinereturns@centralbank.ie

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

This guidance document is for Investment Firms. 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.

If the legal structure of your institution is reported as "Parent_of_group" within the EEA or "Stand_alone_entity", it is required to report all information explicitly for Section 8.2.3 and Section 8.4.16 in an aggregated manner for all of the EEA business, including business written under the freedom of establishment and the freedom to provide services. Only the Irish institution data should be reported for the remainder of this REQ.

If the legal structure of your institution is reported as other than "Parent_of_group" or "Stand_alone_entity", only data related to the Irish institution are required.

8 Instructions / Guidance Notes for Completing the REQ

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

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

All values should be entered in Euro unit value. Exchange rate can be based on the time of the transactions if available or can be as at the reference date.

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

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

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

If any of sections 8.5-8.12 are not applicable to your institution then enter one line of non-applicable values, i.e. Select 00 from Country and enter zeros for the rest of the fields, e.g.

Country	Overall								of which High Risk (per your customer risk assessment)				
	Total Value of Assets Under Management	Number of retail clients	Number of professional clients	Number of customers holding at least EUR 5 million	No. of Inflow Transactions	Value of Inflow Transactions	No. of Outflow Transactions	Value of Outflow Transactions	Total Value of Assets Under Management	No. of Inflow Transactions	Value of Inflow Transactions	No. of Outflow Transactions	Value of Outflow Transactions
EVZ	EWA	EWB	EWG	EWI	EWJ	EWK	EWL	EWI	EWJ	EWK	EWL	EWI	EWJ
00	0	0	0	0	0	0	0	0	0	0	0	0	0

<A0309>

<A03091 EVZ="00" EWA="0" EWB="0" EWC="0" EWD="0" EWE="0" EWF="0" EWG="0" EWH="0" EWJ="0" EXK="0" EXL="0" EXM="0"></A0309>

</A0309>

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. Due to browser restrictions, this example has been uploaded as a text file, only XML submissions will be accepted.

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 EBC, EBD and EBE. 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.

<A0301B>

```
<A03012 EBC="AT" EBD="389" EBE="604.94"></A03012>
<A03012 EBC="BE" EBD="216" EBE="764.18"></A03012>
<A03012 EBC="BG" EBD="637" EBE="285.88"></A03012>
<A03012 EBC="CY" EBD="947" EBE="919.34"></A03012>
```

Per EEA country in which your institution operates on an FOE (Freedom of Establishment) or FOS (Freedom of Services) basis, specify the total number of customers that reside or are established in that EEA country and the total annual value of transactions (EUR) generated by these customers.

Select EEA Country
EBC
AT
BE
BG
CY

Customer Numbers	Total Transaction Value (EUR)
EBD	EBE
389	604.94
216	764.18
637	285.88
947	919.34

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

The following tables have Table Structure A:

Guidance Section	Tab_Code	Table_Code
8.2.3 General International Presence	A0301B	A03012
8.3.1 Inherent risk segment 1	A0302B	A03022
8.3.1 Inherent risk segment 2	A0302C	A03023
8.3.1 Inherent risk segment 3	A0302D	A03024
8.3.2 Inherent risk sector	A0302E	A03025
8.3.16 Inherent risk funding methods	A0302F	A03026
8.4.7 Mitigation and control alerts	A0303B	A03032

8.5 Physical Presence	A0304	A03041
8.6 Residence and Establishment	A0305	A03051
8.7 Beneficial Owner	A0306	A03061
8.8 Politically Exposed Person	A0307	A03071
8.9 Order Execution	A0308	A03081
8.10 Portfolio Management	A0309	A03091
8.11 Geography of Funds Flow	A0310	A03101
8.12 Transaction Monitoring	A0311	A03111

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, EEA 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).

```
<A0301A>
  <A03011 Identifier="EAA" EnumerationLegalStructure="Stand_alone_entity"></A03011>
  <A03011 Identifier="EAB" String500="Consultoria Lola"></A03011>
  <A03011 Identifier="EAC" LEI="F5WCUMTUM4RKZ1MAIE39"></A03011>
  <A03011 Identifier="EAD" EnumerationCountryEEANA="HR"></A03011>
  <A03011 Identifier="EAE" String500="frferffgeferfrgergergregrerg"></A03011>
```

Section 1 - Legal Structure

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

In Table Structure B, each identifier/REF must not be repeated, e.g. EAA 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	A0301A	A03011
8.2.2 Business Model	A0301A	A03011
8.2.4 Statement of Compliance	A0301A	A03011
8.3.1 Customer Segments	A0302A	A03021
8.3.2 Sector	A0302A	A03021
8.3.3 Anonymity	A0302A	A03021

8.3.4 Investment Services and Activities	A0302A	A03021
8.3.5 Order Receipt and Transmission	A0302A	A03021
8.3.6 Multilateral Trading Facility	A0302A	A03021
8.3.7 Organised Trading Facility	A0302A	A03021
8.3.8 Regulated Market	A0302A	A03021
8.3.9 Custody Account Keeping	A0302A	A03021
8.3.10 Wealth Management	A0302A	A03021
8.3.11 Exchange Crypto-Fiat	A0302A	A03021
8.3.12 Exchange Fiat-Crypto	A0302A	A03021
8.3.13 Exchange Crypto-Crypto	A0302A	A03021
8.3.14 Transfer Crypto Assets	A0302A	A03021
8.3.15 Custody of Crypto Assets	A0302A	A03021
8.3.16 Crowdfunding	A0302A	A03021
8.3.18 Intermediaries and Distribution Channels	A0302A	A03021
8.3.19 Remote Onboarding	A0302A	A03021
8.4.1 Business Wide Risk Assessment	A0303A	A03031
8.4.2 Policies and Procedures	A0303A	A03031
8.4.3 Onboarding	A0303A	A03031
8.4.4 Offboarding	A0303A	A03031
8.4.5 Customer Due Diligence	A0303A	A03031
8.4.6 Transaction Monitoring	A0303A	A03031
8.4.8 Suspicious Alerts and Transaction Rejections	A0303A	A03031
8.4.9 Suspicious Transaction Reporting	A0303A	A03031
8.4.10 Sanctions Screening	A0303A	A03031
8.4.11 Outsourcing	A0303A	A03031
8.4.12 Education & Training	A0303A	A03031
8.4.13 Compliance & Assurance Testing	A0303A	A03031
8.4.14 Audit	A0303A	A03031
8.4.15 Governance	A0303A	A03031
8.4.16 Group-wide AML/CFT Framework	A0303A	A03031

Variable Names:

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

Do not use variable names other than those defined.

Special Characters

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

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

Pre-defined entity references:

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

8.1.3 Table Order

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

```
<!--General-->
<xs:element ref="A03:A0301A"/>
<!--General International Presence-->
<xs:element ref="A03:A0301B"/>
<!--Inherent Risk-->
<xs:element ref="A03:A0302A"/>
<!--Inherent Risk Segment 1-->
<xs:element ref="A03:A0302B"/>
<!--Inherent Risk Segment 2-->
<xs:element ref="A03:A0302C"/>
<!--Inherent Risk Segment 3-->
<xs:element ref="A03:A0302D"/>
<!--Inherent Risk Sector-->
<xs:element ref="A03:A0302E"/>
<!--Inherent Risk Funding Methods-->
<xs:element ref="A03:A0302F"/>
<!--Mitigation And Control-->
<xs:element ref="A03:A0303A"/>
<!--Mitigation And Control Alerts-->
<xs:element ref="A03:A0303B"/>
<!--Physical Presence-->
<xs:element ref="A03:A0304"/>
<!--Residence And Establishment-->
<xs:element ref="A03:A0305"/>
<!--Beneficial Owner-->
<xs:element ref="A03:A0306"/>
<!--Politically Exposed Person-->
<xs:element ref="A03:A0307"/>
<!--Order Execution-->
<xs:element ref="A03:A0309"/>
<!--Portfolio Management-->
<xs:element ref="A03:A0310"/>
<!--Geography Of Funds Flow-->
<xs:element ref="A03:A0311"/>
<!--Transaction Monitoring-->
<xs:element ref="A03:A0312"/>
```

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

8.2 General

8.2.1 Legal Structure

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

<A03011 Identifier="EAA" EnumerationLegalStructure="Stand_alone_entity"></A03011>

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

		<p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
EAG	Subsidiary - LEI of the global parent entity of the group	<p>Enter the Legal Entity Identifier (LEI) of your institution's ultimate global parent entity if your institution is a subsidiary within a group.</p> <p>Variable name: LEI</p> <p>Character limit: 20 characters</p> <p>If not applicable or LEI not available please enter 00000000000000000000</p>
EAH	Subsidiary - Country where the global parent entity of the group is established	<p>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.</p> <p>Select from Country</p> <p>Variable name: EnumerationCountry</p>
EAI	Subsidiary - The AML/CFT supervisory authority of the global parent entity of the group	<p>Enter the AML/CFT supervisory authority for your institution's ultimate global parent entity if your institution is a subsidiary within a group. Enter N/A if the ultimate global parent entity is not regulated for AML/CFT purposes or if not applicable.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
EAJ	Branch - Name of the ultimate EEA parent entity	<p>Enter the legal name of your ultimate European Economic Area (EEA) parent entity if your institution is a 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.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
EAK	Branch - LEI of the ultimate EEA parent entity	<p>Enter the Legal Entity Identifier (LEI) of your ultimate EEA parent entity if your institution is a 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.</p> <p>Variable name: LEI</p> <p>Character limit: 20 characters</p> <p>If not applicable or LEI not available please enter 00000000000000000000</p>
EAL	Branch - Country where the ultimate EEA parent entity is established	<p>Select the country where the ultimate European parent entity of the group is established if your institution is a branch of an EEA institution which is passporting into Ireland under FOE</p>

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

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

8.2.2 Business Model

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

<A03011 Identifier="EAR" EnumerationYesNo="No"></A03011>

REF	Field	Description
EAR	Holds Clients Assets	<p>Please indicate whether your institution holds client assets as part of its business activities.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EAS	MiFID Activity 1	<p>Indicate whether or not your institution engages in the Proprietary trading (dealing on own account) MiFID activity</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EAT	MiFID Activity 2	<p>Indicate whether or not your institution engages in the Receipt and transmission of orders in relation to one or more financial instruments MiFID activity</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EAU	MiFID Activity 3	<p>Indicate whether or not your institution engages in Execution of Orders on behalf of clients (Order Execution) MiFID activity</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EAV	MiFID Activity 4	<p>Indicate whether or not your institution engages in the Portfolio Management (management of individual capital, including asset/wealth management) MiFID activity</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EAW	MiFID Activity 5	<p>Indicate whether or not your institution engages in the Investment Advice and Advisory Services MiFID activity</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EAX	MiFID Activity 6	<p>Indicate whether or not your institution engages in the Underwriting of financial instruments and/or placing of financial instruments on an institution commitment basis MiFID</p>

		activity Select from YesNo Variable name: EnumerationYesNo
EAY	MiFID Activity 7	Indicate whether or not your institution engages in the Operation of a Multilateral Trading Facility MiFID activity Select from YesNo Variable name: EnumerationYesNo
EAZ	MiFID Activity 8	Indicate whether or not your institution engages in the Operation of an Organised Trading Facility MiFID activity Select from YesNo Variable name: EnumerationYesNo
EBA	MiFID Activity 9	Indicate whether or not your institution engages in the Operation of a Regulated Market MiFID activity Select from YesNo Variable name: EnumerationYesNo
EXF	MiFID Activity 10	Indicate whether or not your institution engages in the Placing of Financial Instruments Without a Firm Commitment Basis MiFID activity Select from YesNo Variable name: EnumerationYesNo

8.2.3 International Presence

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

For this section if the legal structure of your institution is reported as "Parent_of_group" within the EEA or "Stand_alone_entity", it is required to report all information in an aggregated manner for all of the EEA business, including business written under the freedom of establishment and the freedom to provide services. If the legal structure of your institution is reported as other than "Parent_of_group" or "Stand_alone_entity", only data related to the Irish institution are required.

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

<A03012 EBC="AT" EBD="98" EBE="10000.00"></A03012>

REF	Field	Description
EBC	EEA Country	Select each EEA country using Alpha-2 country codes, EEACountries Data Type: EnumerationValue Select from CountriesEEA

EBD	EEA No. of Customers	For each EEA country, enter the total number of customers that reside or are established in that EEA country in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0
EBE	EEA Value of Transactions (EUR)	For each EEA country, enter the total annual value of transactions (EUR) generated by these customers in the preceding calendar year. Data Type: DecimalValue If not applicable enter 0

8.2.4 Statement of Compliance

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

<A03011 Identifier="EBG" EnumerationYesNo="Yes"></A03011>

REF	Field	Description
EBG	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
EBH	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
EBI	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
EBJ	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
EBK	PCF	Is the person signing this Statement of Compliance on behalf of the firm been approved by the Central Bank to a Pre-Approval Control Function (PCF) position? Select from YesNo Variable name: EnumerationYesNo

8.3 Inherent Risk

8.3.1 Customer segments

For each customer type/customer segment, as per the enumeration lists provided, please specify each of the below, as at the reference date i.e. 31 December of the preceding calendar year, by customer segment and by overall (mandatory) and specific products/services (32 total combinations).

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

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

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

<A03021 Identifier="EBL" IntegerValue="1000"></A03021>

REF	Field	Description
EBL	Active Natural Person Customers	State the total number of <u>active</u> natural person customers as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0
EBM	Active Legal Entity Customers	State the total number of active legal entity customers as of 31 December of the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

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

<A03022 EBN="NP" EBO="Overall_product_service" EBP="988" EBQ="988" EBR="988.99"></A03022>

REF	Field	Description
EBN	Customer Segment Type 1	Select each customer type from <u>CustomerSegment1</u> . Each customer segment must be selected. Note customers can fall in more than one customer segment.

		<p>Every entry must specify a unique customer segment and product pairing along with the number of customers, transaction and their value.</p> <p>Complete one record per combination of customer and product segment</p> <p>Data Type: EnumerationValue Select from CustomerSegment1</p>
EBO	Product Segment 1	<p>Select each product/service from the list, including Overall_product_service. Note that customers can be provided with more than one product/service. Each product/service must be selected.</p> <p>Data Type: EnumerationValue Select from ProductServiceIncludingOverall</p>
EBP	No. of Customers Segment 1	<p>As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments and by customer type and specific products/services.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EBQ	No. of transactions Segment 1	<p>State the total number of transactions in the preceding calendar year by the corresponding customers.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EBR	Total Value Segment 1	<p>State the total value of transactions (EUR) in the preceding calendar year by the corresponding customers.</p> <p>Data Type: DecimalValue If not applicable enter 0</p>

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

<A03023 EBS="NP_occas_trans" EBU="988" EBV="988" EBR="988.99"></A03023>

REF	Field	Description
EBS	Customer Segment Type 2	<p>Select each customer type from CustomerSegment2. Note customers can fall in more than one customer segment. Each customer type must be selected.</p> <p>Data Type: EnumerationValue</p>

		Select from CustomerSegment2
EBT	No. of Customers Segment 2	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments. Data Type: IntegerValue If not applicable enter 0
EBU	No. of transactions Segment 2	State the total number of transactions in the preceding calendar year by the corresponding customers. Data Type: IntegerValue If not applicable enter 0
EBV	Total Value Segment 2	State the total value of transactions (EUR) in the preceding calendar year by the corresponding customers. Data Type: DecimalValue If not applicable enter 0

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

<A03024 EBW="NP_5000000" EBX="1000"></A03024>

REF	Field	Description
EBW	Customer Segment Type 3	Select specific CustomerSegment3 . Note customers can fall in more than one customer segment. Each customer type must be selected. Data Type: EnumerationValue Select from CustomerSegment3
EBX	No. of Customers Segment 3	As of 31 December of the preceding calendar year, state the total numbers of customers by customer segments above. Data Type: IntegerValue If not applicable enter 0

8.3.2 Sector

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

<A03021 Identifier="EBY" IntegerValue="642"></A03021>

REF	Field	Description
EBY	Total number of customers with high risk activities	Total number of active legal entity customers with high risk activities that should include, at least, activities mentioned under Annex III of Regulation (EU) 2024/1624.

Variable name: IntegerValue
If not applicable enter 0

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

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

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

<A03025 EBZ="Mining" ECA="261"></A03025>

REF	Field	Description
EBZ	Sector	Select each sector from Sector . Note that customers can fall in more than one sector. Each of the 27 sectors must be selected. Data Type: EnumerationValue Select from Sector
ECA	Sector - No. of High Risk Customers	For each specific Sector , specify the total number of legal entity high risk active customers 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

8.3.3 Anonymity

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

<A03021 Identifier="ECB" EnumerationYesNoNA="No"></A03021>

REF	Field	Description
ECB	Anonymity Provided	Is it possible for your institution's customers to conceal any aspect of their identity or remain anonymous when using the products, services, and transactions offered by your institution? Select from YesNoNA Variable name: EnumerationYesNoNA
ECC	Anonymity Provided Details	Provide details on the nature of the concealment of identity or anonymity available for customers using the products, services, and transactions offered by your institution. List the areas separated by semicolon (;) with no spaces either

		<p>side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ECD	Anonymity Product Number	<p>State the number of products and/or services in the preceding calendar year that allowed your institution's customers to conceal any aspect of their identity or remain anonymous.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ECE	Anonymity Transaction Number	<p>State the total number of transactions in the preceding calendar year that allowed your institution's customers to conceal any aspect of their identity or remain anonymous.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ECF	Anonymity Transaction Value	<p>State the value (EUR) of transactions in the preceding calendar year that allowed your institution's customers to conceal any aspect of their identity or remain anonymous.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>

8.3.4 Investment Services and Activities

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

<A03021 Identifier="ECG" DecimalValue="723.04"></A03021>

REF	Field	Description
ECG	Dealing on Own Account - Total Portfolio Holdings	<p>State the value (EUR) of total portfolio holdings in your firms Dealing on Own Account activities as of 31st of December of the preceding calendar year.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
ECH	Underwriting and Placement - Total retained value	<p>Where your institution has retained a financial commitment or asset holding (e.g. loan participation, bond holding, shareholding), following distribution or sell-down of your institution's initial underwritten participation/position, what is the total value (EUR) of the retained positions for all customers in the preceding calendar year.</p> <p>Variable name: DecimalValue</p>

		If not applicable enter 0
ECI	Underwriting and Placement - Total number of customers	Total number of customers who have engaged with your firm's Underwriting and Placement services. Variable name: IntegerValue If not applicable enter 0

8.3.5 Order Receipt and Transmission

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

<A03021 Identifier="ECJ" IntegerValue="740"></A03021>

REF	Field	Description
ECJ	ORT - No. retail clients	Total number of retail clients who have engaged with your institutions Order Receipt and Transmission services Variable name: IntegerValue If not applicable enter 0
ECK	ORT - No. non-retail	Total number of non- retail clients who have engaged with your institutions Order Receipt and Transmission services Variable name: IntegerValue If not applicable enter 0
ECL	ORT - No. AML/CFT regulated entities non-EEA	Total number of customers which are AML/CFT regulated entities, domiciled outside of the EEA Variable name: IntegerValue If not applicable enter 0
ECM	ORT - No. high risk retail clients	Total number of high risk retail clients who have engaged with your institutions Order Receipt and Transmission services Variable name: IntegerValue If not applicable enter 0
ECN	ORT - No. high risk non-retail clients	Total number of high risk non-retail clients who have engaged with your institutions Order Receipt and Transmission services Variable name: IntegerValue If not applicable enter 0
ECO	ORT - No. high risk AML/CFT regulated entities non-EEA	Total number of high risk customers which are AML/CFT regulated entities, domiciled outside of the EEA Variable name: IntegerValue

		If not applicable enter 0
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8.3.6 Multilateral Trading Facility

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

<A03021 Identifier="ECP" IntegerValue="220"></A03021>

REF	Field	Description
ECP	MTF - No. Retail clients	State the total number of <u>retail clients</u> availing of your institutions Multilateral Trading Facility services Variable name: IntegerValue If not applicable enter 0
ECQ	MTF - No. Non-Retail clients	State the total number of non-retail clients who avail of your institutions Multilateral Trading Facility services Variable name: IntegerValue If not applicable enter 0
ECR	MTF - No. of transactions	State the total number of transactions which took place on your institutions Multilateral Trading Facility in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
ECS	MTF - Total Value	State the total value of transactions which took place on your institutions Multilateral Trading Facility in the preceding calendar year Variable name: DecimalValue If not applicable enter 0
ECT	MTF - No. High Risk Retail clients	State the total number of high-risk retail clients availing of your institutions Multilateral Trading Facility services Variable name: IntegerValue If not applicable enter 0
ECU	MTF - No. High Risk Non-Retail clients	State the total number of high-risk non-retail clients who avail of your institutions Multilateral Trading Facility services Variable name: IntegerValue

		If not applicable enter 0
ECV	MTF - No. of Transactions by High Risk Customers	<p>State the total number of transactions by high-risk customers which took place on your institutions Multilateral Trading Facility in the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ECW	MTF - Total Value from High Risk Customers	<p>State the total value of transactions by high-risk customers which took place on your institutions Multilateral Trading Facility in the preceding calendar year</p> <p>Variable name: DecimalValue If not applicable enter 0</p>

8.3.7 Organised Trading Facility

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

<A03021 Identifier="ECX" IntegerValue="415"></A03021>

REF	Field	Description
ECX	OTF - No. Retail clients	<p>State the total number of retail clients availing of your institutions Organized Trading Facility services</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ECY	OTF - No. Non-Retail clients	<p>State the total number of non-retail clients who avail of your institutions Organized Trading Facility services</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ECZ	OTF - No. of transactions	<p>State the total number of transactions which took place on your institutions Organized Trading Facility in the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EDA	OTF - Total Value	<p>State the total value of transactions which took place on your institutions Organized Trading Facility in the preceding calendar year</p>

		Variable name: DecimalValue If not applicable enter 0
EDB	OTF - No. High Risk Retail clients	State the total number of high-risk retail clients availing of your institutions Organized Trading Facility services Variable name: IntegerValue If not applicable enter 0
EDC	OTF - No. High Risk Non-Retail clients	State the total number of high-risk non-retail clients who avail of your institutions Organized Trading Facility services Variable name: IntegerValue If not applicable enter 0
EDD	OTF - No. of Transactions by High Risk Customers	State the total number of transactions by high-risk customers which took place on your institutions Organized Trading Facility in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
EDE	OTF - Total Value from High Risk Customers	State the total value of transactions by high-risk customers which took place on your institutions Organized Trading Facility in the preceding calendar year Variable name: DecimalValue If not applicable enter 0

8.3.8 Regulated Market

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

<A03021 Identifier="EDF" IntegerValue="204"></A03021>

REF	Field	Description
EDF	RM - No. Retail clients	State the total number of <u>retail clients</u> availing of your institutions Regulated Market services Variable name: IntegerValue If not applicable enter 0
EDG	RM - No. Non-Retail clients	State the total number of non-retail clients who avail of your institutions Regulated Market services Variable name: IntegerValue If not applicable enter 0

EDH	RM - No. of transactions	<p>State the total number of transactions which took place on your institutions Regulated Market in the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EDI	RM - Total Value	<p>State the total value of transactions which took place on your institutions Regulated Market in the preceding calendar year</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
EDJ	RM - No. High Risk Retail clients	<p>State the total number of high-risk retail clients availing of your institutions Regulated Market services</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EDK	RM - No. High Risk Non-Retail clients	<p>State the total number of high-risk non-retail clients who avail of your institutions Regulated Market services</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EDL	RM - No. of Transactions by High Risk Customers	<p>State the total number of transactions by high-risk customers which took place on your institutions Regulated Market in the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EDM	RM - Total Value from High Risk Customers	<p>State the total value of transactions by high-risk customers which took place on your institutions Regulated Market in the preceding calendar year</p> <p>Variable name: DecimalValue If not applicable enter 0</p>

8.3.9 Custody Account Keeping

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

<A03021 Identifier="EDN" IntegerValue="21"></A03021>

REF	Field	Description
EDN	CAK - No. Retail clients	<p>Total number of <u>retail clients</u> who avail of your institution's custody account keeping services</p> <p>Variable name: IntegerValue</p>

		If not applicable enter 0
EDO	CAK - No. Non-Retail clients	Total number of non-retail clients who avail of your institution's custody account keeping services Variable name: IntegerValue If not applicable enter 0
EDP	CAK - Proportion without direct relation with final investor	State the total proportion of customers availing of your institution's custody account keeping services where you don't have a direct relation with the final investor Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0
EDQ	CAK - No. AML/CFT regulated customers outside EEA	Total number of customers availing of your institution's custody account keeping services who AML/CFT regulated entities located outside the EEA Variable name: IntegerValue If not applicable enter 0

8.3.10 Exchange Crypto-Fiat

This section pertains to transactions carried out by your institution with respect to exchanging crypto currencies for fiat currencies

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

<A03021 Identifier="EDR" DecimalValue="367.35"></A03021>

REF	Field	Description
EDR	Crypto Fiat Value	Total amount (EUR) crypto-fiat in the previous year. Variable name: DecimalValue If not applicable enter 0
EDS	Crypto Fiat Trans number	Total number of transactions crypto-fiat in the previous year. Variable name: IntegerValue If not applicable enter 0
EDT	Crypto Fiat Customers	Number of customers using this type of service in the previous year. Variable name: IntegerValue If not applicable enter 0

EDU	Crypto Fiat to Unhosted	Total number of transactions crypto-fiat to unhosted wallets in the previous year. Variable name: IntegerValue If not applicable enter 0
EDV	Crypto Fiat From Unhosted	Total number of transactions crypto-fiat from unhosted wallets in the previous year. Variable name: IntegerValue If not applicable enter 0

8.3.11 Exchange Fiat-Crypto

This section pertains to transactions carried out by your institution with respect to exchanging fiat currencies for crypto currencies

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

<A03021 Identifier="EDW" DecimalValue="746.15"></A03021>

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

		If not applicable enter 0
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8.3.12 Exchange Crypto-Crypto

This section pertains to transactions carried out by your institution with respect to exchanging crypto currencies for other crypto currencies

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

<A03021 Identifier="EEB" DecimalValue="358.94"></A03021>

REF	Field	Description
EEB	Crypto Crypto Value	Number of customers using this type of service in the previous year. Variable name: DecimalValue If not applicable enter 0
EEC	Crypto Crypto Customers	Total amount (EUR) crypto-crypto in the previous year. Variable name: IntegerValue If not applicable enter 0
EED	Crypto Crypto Transaction Numbers	Total number of transactions from crypto to crypt in the preceding calendar year Variable name: IntegerValue If not applicable enter 0
EEE	Crypto Crypto To Unhosted	Total number of transactions crypto-crypto to unhosted wallets in the previous year. Variable name: IntegerValue If not applicable enter 0
EEF	Crypto Crypto From Unhosted	Total number of transactions crypto-crypto from unhosted wallets in the previous year. Variable name: IntegerValue If not applicable enter 0

8.3.13 Transfer Crypto Assets

This section pertains to transactions carried out by your institution with respect to transfer of crypto-assets from one distributed ledger address or account to another

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

<A03021 Identifier="EEG" DecimalValue="859.17"></A03021>

REF	Field	Description
EEG	Transfer Crypto Value	Total amount (EUR) that customers transferred in the previous year Variable name: DecimalValue If not applicable enter 0
EEH	Transfer Crypto Customers	Number of customers using this type of service in the previous year Variable name: IntegerValue If not applicable enter 0
EEI	Transfer Crypto Number	Total number of transactions where the customer transfers crypto-assets from one distributed ledger address or account to another Variable name: IntegerValue If not applicable enter 0
EEJ	Transfer Crypto To Unhosted	Total number of transactions to unhosted wallets in the previous year. Variable name: IntegerValue If not applicable enter 0
EEK	Transfer Crypto From Unhosted	Total number of transactions from unhosted wallets in the previous year Variable name: IntegerValue If not applicable enter 0

8.3.14 Custody of Crypto Assets

This section pertains to customers of your institution for whom you provide regarding custody of crypto assets

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

<A03021 Identifier="EEL" IntegerValue="799"></A03021>

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

		Variable name: DecimalValue If not applicable enter 0
--	--	--

8.3.15 Crowdfunding

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

<A03021 Identifier="EEN" DecimalValue="343.19"></A03021>

REF	Field	Description
EEN	Crowdfunding Value	Total Value (EUR) of funding projects in the previous year. Variable name: DecimalValue If not applicable enter 0
EEO	Crowdfunding Projects	Total Number of projects being funded in the previous year. Variable name: IntegerValue If not applicable enter 0
EEP	Crowdfunding Donor HRJ	Total Number of donors from high-risk countries. Variable name: IntegerValue If not applicable enter 0
EEQ	Crowdfunding Projects HRJ	Total Number of projects where the owner is from a high-risk country. Variable name: IntegerValue If not applicable enter 0

8.3.16 Funding Methods

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

<A03026 EER="Funding_cash" EES="884" EET="987.41"></A03026>

REF	Field	Description
EER	FM - Funding Method	Select each Funding Method. Each method much be selected. Data Type: EnumerationValue Select from FundingMethodPaymentInstrument
EES	FM - No. of Transactions	For a specific funding method/ payment instrument, state the total number of transactions by active customers availing of a specific product/service in the preceding calendar year. A customer may avail of multiple methods Data Type: IntegerValue

		If not applicable enter 0
EET	FM - Total Value of Transactions	<p>For specific funding method/ payment instrument, state the total value of transactions (EUR) by active customers availing of a specific product/service in the preceding calendar year. A customer may avail of multiple methods.</p> <p>Data Type: DecimalValue If not applicable enter 0</p>

8.3.17 Intermediaries and Distribution Channels

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

<A03021 Identifier="EEU" EnumerationYesNo="Yes"></A03021>

REF	Field	Description
EEU	Intermediary Used	<p>Does your institution use intermediaries in the provision of services to your customers?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EEV	Intermediary Total Number	<p>State the total number of intermediaries that your institution has a relationship as of 31 December of the preceding calendar year</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EEW	Intermediary Non Designated	<p>State the number of the intermediaries above that are not themselves obliged entities under Regulation (EU) 2024/1624 or national legislation</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EEX	Intermediary No AML	<p>Number of new customers onboarded in the preceding calendar year by third parties not directly subject to AML/CTF supervision.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EEY	Intermediary Commission	<p>What was the total value of paid commissions and fees (EUR) in the preceding calendar year?</p> <p>The total should be all fees and commission based payments made to intermediaries your institution has had a relationship with regarding to the provision of services over the entirety of</p>

		<p>the preceding calendar year even if at 31 December of the year that contract or relationship has ended.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
EEZ	Intermediary Customer Proportion	<p>Of the new customers introduced to your institution in the preceding calendar year, what percentage were introduced through an intermediary with which you have a relationship with regarding the provision of services?</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>

8.3.18 Remote Onboarding

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

<A03021 Identifier="EFA" PercentageValue="1.0"></A03021>

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

		<p>High customer risk rating (or a rating that is appropriately similar internally)?</p>
		<p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>

8.4 Mitigation and Control

8.4.1 Business Wide Risk Assessment

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.

```
<A03031 Identifier="EFE" EnumerationBWRAConducted="Exemption_applies"></A03031>
```

REF	Field	Description
EFE	BWRA Conducted	<p>State whether your institution conducts a Business Wide Risk Assessment (BWRA).</p> <p>Select from BWRAConducted Variable name: EnumerationBWRAConducted</p>
EFF	BWRA Senior Management Approval	<p>State whether Senior Management of your institution approved the latest version of the BWRA.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EFG	BWRA Last Approval Date	<p>State the approval date of your institution's most recent BWRA in the format of YYYY-MM-DD.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EFH	BWRA Review Frequency	<p>Select the frequency of BWRA review by your institution.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
EFI	BWRA Business Change	<p>State whether the most recent BWRA review identified any areas for improvement or changes such as to your institution's policies, procedures, oversight measures, or risk appetite.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFJ	BWRA Business Change Description	<p>Describe (briefly) the changes that have been implemented in relation to the BWRA and why the changes have been made.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
EFK	BWRA Money Laundering	<p>State whether risks of money laundering are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFL	BWRA Terrorist Financing	<p>State whether risks of terrorist financing are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFM	BWRA Sanctions	<p>State whether risks of circumvention of sanctions regulations are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFN	BWRA Corruption	<p>State whether risks of corruption (bribery) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFO	BWRA Conflicts of Interest	<p>State whether risks of conflicts of interests are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFP	BWRA Tax Evasion	<p>State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFQ	BWRA Internal Fraud	<p>State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

EFR	BWRA External Fraud	<p>State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFS	BWRA Cybercrime	<p>State whether risks of cybercrime/ransomware are explicitly identified and assessed in your most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFT	BWRA Market Abuse	<p>State whether risks of market abuse are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFU	BWRA Customer Groups	<p>State whether customer groups are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFV	BWRA Geographies	<p>State whether geographies are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFW	BWRA Product Groups	<p>State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EFX	BWRA Distribution Channel	<p>State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's most recent BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

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

		Variable name: EnumerationYesNoNA
EGF	Other Risk Assessment Process - Conflicts of interests	<p>State whether risks of conflicts of interests are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EGG	Other Risk Assessment Process - Evasion of tax regulations	<p>State whether risks of evasion of tax regulations are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EGH	Other Risk Assessment Process - Internal fraud and embezzlement (by employees/management of your institution)	<p>State whether risks of internal fraud and embezzlement (by employees/management of your institution) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EGI	Other Risk Assessment Process - External fraud and embezzlement (by customers or other business relations)	<p>State whether risks of external fraud and embezzlement (by customers or other business relations) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EGJ	Other Risk Assessment Process - Cybercrime/Ransomware	<p>State whether risks of cybercrime/ransomware are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EGK	Other Risk Assessment Process - Market abuse	<p>State whether risks of market abuse are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>

EGL	Other Risk Assessment Process - Customer groups	<p>State whether customer groups are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EGM	Other Risk Assessment Process - Geographies	<p>State whether geographies are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EGN	Other Risk Assessment Process - Product groups	<p>State whether product groups (e.g. certain products and services are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EGO	Other Risk Assessment Process - Distribution channels	<p>State whether distribution channels (e.g. use of intermediaries or agents, their geographic locations and associated risks, etc.) are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EGP	Other Risk Assessment Process - Cryptos	<p>State whether cryptos as an asset, payment method, source of funds, or any other exposure your institution may have are explicitly identified and assessed in your institution's risk assessment processes other than the BWRA.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EGQ	BWRA Risk Appetite	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's risk appetite.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EGR	BWRA Policy Procedure	<p>State whether the outcomes of the BWRA were used for determining or adjusting your institution's policies and procedures.</p> <p>Select from YesNoNA</p>

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

8.4.2 Policies and Procedures

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

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

<A03031 Identifier="EGX" DateValue="2019-02-13"></A03031>

REF	Field	Description
EGX	Pol & Proc - Customer onboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer onboarding (e.g. steps to be taken in setting up an account, or requirements before being able to transact, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EGY	Pol & Proc - Ongoing Customer Due Diligence	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer review (e.g. the frequency of review on high risk customers).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EGZ	Pol & Proc - Ongoing monitoring of business relationships	<p>Enter the date when your institution's management approved the last version of policies and procedures for ongoing monitoring of business relationships.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHA	Pol & Proc - Customer Offboarding	<p>Enter the date when your institution's management approved the last version of policies and procedures for customer offboarding (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHB	Pol & Proc - Politically Exposed Persons	<p>Enter the date when your institution's management approved the last version of policies and procedures for Politically Exposed Persons (PEPs).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>

EHC	Pol & Proc - High risk customers	<p>Enter the date when your institution's management approved the last version of policies and procedures for high risk customers.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHD	Pol & Proc - Transaction monitoring	<p>Enter the date when your institution's management approved the last version of policies and procedures for transaction monitoring (e.g. monitoring rule review, maximum time for an alert in backlog, alert escalation processes, customer risk review in result of positive alerts, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHE	Pol & Proc - Suspicious transaction reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for the suspicious transaction reporting ('STR') process.</p> <p>This means clearly laid out steps to facilitate the identification, escalation and reporting of any suspicions of ML/TF, formed in the conducts of your institution's business to both Revenue and the FIU of any STR generated within your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHF	Pol & Proc - Evasion of tax regulations	<p>Enter the date when your institution's management approved the last version of policies and procedures for evasion of tax regulations by customers (e.g. closing an account, offboarding due to AML/CFT concerns, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHG	Pol & Proc - Bribery	<p>Enter the date when your institution's management approved the last version of policies and procedures for bribery (e.g. monitoring and reporting of bribery instances).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>

EHH	Pol & Proc - Conflicts of interest	<p>Enter the date when your institution's management approved the last version of policies and procedures for conflicts of interest.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHI	Pol & Proc - Fraud within or outside the organisation	<p>Enter the date when your institution's management approved the last version of policies and procedures for fraud within or outside your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EJH	Pol & Proc - Sanctions screening	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanctions screening (e.g. monitoring and detecting instances of financial sanctions evasion).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHK	Pol & Proc - Sanction hits handling	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanction hits handling (e.g. escalating, recording, and investigating instances of financial sanctions evasion).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHL	Pol & Proc - Sanction hits reporting	<p>Enter the date when your institution's management approved the last version of policies and procedures for sanction hits reporting (e.g. in the case of a sanction "hit", the Sanctions Return Form is correctly completed and reported to the Central Bank Sanctions Team as required).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHM	Pol & Proc - Treating and reporting of ML/TF & Financial Sanctions incidents	<p>Enter the date when your institution's management approved the last version of policies and procedures for identification, investigation and where required, reporting of potential instances of money laundering, terrorist financing, and</p>

		<p>confirmed financial sanctions evasion matches.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHN	Pol & Proc - Whistleblowing	<p>Enter the date when your institution's management approved the last version of policies and procedures for whistleblowing.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHO	Pol & Proc - Compliance function	<p>Enter the date when your institution's management approved the last version of policies, procedures and resourcing for the compliance function, so it operates to an acceptable standard.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHP	Pol & Proc - Internal Audit/Assurance Testing	<p>Enter the date when your institution's management approved the last version of policies, procedures and resourcing for the internal audit or assurance testing, so it operates to an acceptable standard.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHQ	Pol & Proc - Separation of functions (Three Lines of Defence)	<p>Enter the date when your institution's management approved the last version of policies and procedures for separation of functions (i.e. Three Lines of Defence).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHR	Pol & Proc - Training	<p>Enter the date when your institution's management approved the last version of policies and procedures for training (e.g. staff members of your institution complete relevant required training).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>

EHS	Pol & Proc - Geographic Risk Factors	<p>Enter the date when your institution's management approved the last version of policies and procedures for geographic risk factors (e.g. business activity in high risk jurisdictions, enhanced customer due diligence due to geographic risk, etc.).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHT	Pol & Proc - AML/CFT Record Keeping	<p>Enter the date when your institution's management approved the last version of policies and procedures for record keeping (e.g. provisions in Section 55 of the CJA 2010).</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHU	Pol & Proc - Business wide risk assessment process	<p>Enter the date when your institution's management approved the last version of policies and procedures to support business wide risk assessment processes.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHV	Pol & Proc - Customer risk assessment process	<p>Enter the date when your institution's management approved the last version of policies and procedures to support customer risk assessment processes.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHW	Pol & Proc - Legislation changes/regulatory guidance	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EHX	Pol & Proc - Review Frequency	<p>Select the frequency that your institution reviews/updates your institution's AML/CFT policies and procedures.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>

8.4.3 Onboarding

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

<A03031 Identifier="EHY" EnumerationYesNo="Yes"></A03031>

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

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

		<p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
EIM	Onboarding - Purpose Questions Specify	<p>If Yes to Purpose Questions, briefly specify the subject matter of these questions.</p> <p>List the subject matter of these questions asked separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EIN	Onboarding - Excluded Customer	<p>State whether your institution has specific customer groups that may not be remotely onboarded.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EIO	Onboarding - Excluded Customer Specify	<p>If Yes to Excluded Customer, briefly specify these customer groups.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EIP	Onboarding - Verify Irish Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from an Irish bank account in the customer's own name.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EIQ	Onboarding - Verify Foreign Transfer NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a nominal amount, e.g. €1.00, transfer from a foreign bank account in the customer's own name.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EIR	Onboarding - Verify Upload Photo NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via uploading a photo or photocopy of the customer's ID document.</p> <p>Select from YesNoNA</p>

		Variable name: EnumerationYesNoNA
EIS	Onboarding - Verify Person Photo NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via scan of ID document and image of the customer to be authenticated by a natural person.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EIT	Onboarding - Verify Upload Doc NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity with uploading a photo of a bank account statement, payslip, or other documents with the customer's proof of address.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EIU	Onboarding - Verify Chip Doc NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via a scan of an ID documents with a chip device.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EIV	Onboarding - Verify Passport NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via request for passport details in an online application form.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EIW	Onboarding - Verify At Desk NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via verification of the customer's identity at the counter/desk.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EIX	Onboarding - Verify other Human intervention NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other methods of human intervention not listed above.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

EIY	Onboarding - Other Human intervention NP Detail	<p>If Yes to Verify other Human Intervention NP, briefly describe the method of other human intervention (natural person customer). List the other methods of human intervention used separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EIZ	Onboarding - Verify Other NP	<p>In your institution's remote onboarding process, state whether your institution verifies natural person customer identity via other procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EJA	Onboarding - Other NP Detail	<p>If Yes to Verify Other NP, briefly specify the other procedures (natural person customer).</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EJB	Onboarding - Verify Other Human Intervention Legal entity customer	<p>In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other human intervention not listed above.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EJC	Onboarding - Other Human intervention Legal entity customer Detail	<p>If Yes to Verify Other Human Intervention Legal entity customer, briefly describe the method of other human intervention (legal entity customer).</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EJD	Onboarding - Verify Other Legal entity customer	<p>In your institution's remote onboarding process, state whether your institution verifies legal entity customer identity via other procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EJE	Onboarding - Other Legal entity customer Detail	<p>If Yes to Verify Other Legal entity customer, briefly specify the other procedures (legal entity customer).</p>

		<p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
EJF	Onboarding - Verify Upload Photo Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo or photocopy of the customer representative's ID document.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EJG	Onboarding - Verify Person Photo Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via scan of ID document and image of the customer representative to be authenticated by a natural person.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EJH	Onboarding - Verify Upload Doc Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via uploading a photo of a bank account statement, payslip or other documents with the representative's proof of address.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EJI	Onboarding - Verify Chip Doc Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies representative identity via a scan of an ID document with a chip device.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EJJ	Onboarding - Verify Passport Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via request for passport details in an online application form.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EJK	Onboarding - Verify At Desk Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via verification of the representative's identity at the counter/desk.</p> <p>Select from YesNoNA</p>

		Variable name: EnumerationYesNoNA
EJL	Onboarding - Verify other Human intervention Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies a customer representative's identity via other human intervention not listed above.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EJM	Onboarding - Other Human intervention Representatives Detail	<p>If Yes to Verify other Human intervention Representatives, briefly describe the method of other human intervention (representatives).</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EJN	Onboarding - Verify Other Representatives	<p>In your institution's remote onboarding process, state whether your institution verifies representative identity with other procedures.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EJO	Onboarding - Other Representatives Detail	<p>If Yes to Verify Other Representative, briefly specify the other procedures (representatives).</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EJP	Onboarding - Verify Human intervention BO	<p>In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other human intervention.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EJQ	Onboarding - Other Human Intervention BO Detail	<p>If Yes to Verify Human Intervention BO, briefly describe the method of other human intervention (beneficial owners).</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EJR	Onboarding - Verify Other BO	<p>In your institution's remote onboarding process, state whether your institution verifies a beneficial owner's identity via other</p>

		<p>procedures.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EJS	Onboarding - Other BO Detail	<p>If Yes to Verify Other BO, briefly specify the other procedures (beneficial owners).</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>

8.4.4 Offboarding

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

<A03031 Identifier="EJT" IntegerValue="394"></A03031>

REF	Field	Description
EJT	Customer Offboarding Number	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to AML/CFT/FS concerns.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EJU	Customer Offboarding Number ML	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to money laundering or related risks/concerns</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EJV	Customer Offboarding Number TF	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to terrorist financing or related risks/concerns.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EJW	Customer Offboarding Number FS	<p>State the total number of customers whose business relationships with your institution were terminated in the preceding calendar year due to financial sanctions evasion or related risks/concerns.</p>

		Variable name: IntegerValue If not applicable enter 0
EJX	Customer Offboarding Number HR	State the total number of customers rated high risk as per your institution's customer risk assessment prior to offboarding, whose business relationships with your institution were terminated in the preceding calendar year. Variable name: IntegerValue If not applicable enter 0

8.4.5 Customer Due Diligence

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

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

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

<A03031 Identifier="EJY" EnumerationCDD="No"></A03031>

REF	Field	Description
EJY	Identity Verification NP	State whether the identity of natural person customers is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
EJZ	Identity Verification LE	State whether the identity of legal entity customers is verified prior to providing services. Select from CDD Variable name: EnumerationCDD
EKA	Identity Verification BO LE	State whether the identity of the beneficial owner of legal entity customers is established and verified prior to providing services. Select from CDD Variable name: EnumerationCDD
EKB	Ownership Structure Identified LE	State whether ownership and/or control structure is identified for legal entity customers prior to providing services. Select from CDD

		Variable name: EnumerationCDD
EKC	Nature Of Relationship NP	<p>State whether the purpose and intended nature of the business relationship is established prior to providing services to natural person customers</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKD	Nature Of Relationship LE	<p>State whether the purpose and intended nature of the business relationship is established prior to providing services to legal entity customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKE	Source Of Funds NP	<p>State whether source/origin of the funds/assets is identified prior to providing services to natural person customers</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKF	Source Of Funds LE	<p>State whether source/origin of the funds/assets is identified prior to providing services to legal entity customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKG	Customer Rep Identified NP	<p>State whether a customer's representative is identified prior to providing services to natural person customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKH	Customer Rep Identified LE	<p>State whether a customer's representative is identified prior to providing services to legal entity customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKI	Tax Motive Identified NP	<p>State whether tax motives are identified prior to providing services to natural person customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>

EKJ	Tax Motive Identified LE	<p>State whether tax motives are identified prior to providing services to legal entity customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKK	Geos Identified NP	<p>State whether geographies involved are identified prior to providing services to natural person customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKL	Geos Identified LE	<p>State whether geographies involved are identified prior to providing services to legal entity customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKM	Group Activities LE	<p>State whether intragroup activities (such as activities among entities within a group which are non-transactional in nature) are identified prior to providing services to legal entity customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKN	Group Transactions LE	<p>State whether intragroup transactions (such as transactions among entities within a group) are identified prior to providing services to legal entity customers.</p> <p>Select from CDD Variable name: EnumerationCDD</p>
EKO	CDD Review NP	<p>State whether your institution periodically reviews its customers' risk profiles for natural person.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EKP	CDD Review LE	<p>State whether your institution periodically reviews its customers' risk profiles for legal entity customers.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EKQ	CDD Review NP Low	<p>If Yes to CDD Review NP, state the Frequency of these reviews for low-risk natural person customers.</p>

		<p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
EKR	CDD Review LE Low	<p>If Yes to CDD Review LE, state the Frequency of these reviews for low-risk legal entity customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
EKS	CDD Review NP Medium	<p>If Yes to CDD Review NP, state the Frequency of these reviews for medium-risk natural person customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
EKT	CDD Review LE Medium	<p>If Yes to CDD Review LE, state the Frequency of these reviews for medium-risk legal entity customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
EKU	CDD Review NP High	<p>If Yes to CDD Review NP, state the Frequency of these reviews for high-risk natural person customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
EKV	CDD Review LE High	<p>If Yes to CDD Review LE, state the Frequency of these reviews for high-risk legal entity customers.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
EKW	CDD Review NP PEP	<p>State the Frequency of these reviews for customers who are politically exposed persons, their family members or persons that are close associates.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
EKX	CDD Review NP Unacceptable	<p>If Yes to CDD Review NP, state the Frequency of these reviews for unacceptable-risk natural person customers (e.g. yet to be exited).</p> <p>Select from Frequency</p>

		Variable name: EnumerationFrequency
EKY	CDD Review LE Unacceptable	<p>If Yes to CDD Review LE, state the Frequency of these reviews for unacceptable-risk legal entity customers (e.g. yet to be exited).</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
EKZ	CDD CRA Update	<p>Date when your institution updated the Customer Risk Assessment for the last time</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ELA	CDD Low Customer	<p>Number of all customers per ML/TF risk category (low risk).</p> <p>If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk</p> <p>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</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ELB	CDD Medium-Low Customer	<p>Number of all customers per ML/TF risk category (medium-low risk).</p> <p>If your institution uses three risk categories then, Low risk -> Low risk Medium risk -> Medium-low risk High risk -> High risk</p> <p>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</p> <p>Variable name: IntegerValue If not applicable enter 0</p>

ELC	CDD MH Customer	<p>Number of all customers per ML/TF risk category (medium-high risk).</p> <p>If your institution uses three risk categories, you may enter 0 for medium-high risk.</p> <p>If your institution uses five risk categories then</p> <p>Low risk -> Low risk</p> <p>Medium-low risk -> Low risk</p> <p>Medium-high risk -> Medium-low risk</p> <p>High risk -> Medium-high risk</p> <p>Ultra/very high risk -> High risk</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
ELD	CDD High Customer	<p>Number of all customers per ML/TF risk category (high-risk).</p> <p>If your institution uses three risk categories then,</p> <p>Low risk -> Low risk</p> <p>Medium risk -> Medium-low risk</p> <p>High risk -> High risk</p> <p>If your institution uses five risk categories then</p> <p>Low risk -> Low risk</p> <p>Medium-low risk -> Low risk</p> <p>Medium-high risk -> Medium-low risk</p> <p>High risk -> Medium-high risk</p> <p>Ultra/very high risk -> High risk</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
ELE	CDD customers Due NP	<p>Number of natural person customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
ELF	CDD customers Due LE	<p>Number of legal entity customers for whom updates of customer information were due in the preceding calendar year, in accordance with your institution's policies and procedures.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
ELG	CDD customers Reviewed NP	<p>Number of natural person customers for whom customer information was reviewed and updated in the preceding calendar year.</p> <p>Variable name: IntegerValue</p>

		If not applicable enter 0
ELH	CDD customers Reviewed LE	<p>Number of legal entity customers for whom customer information was reviewed and updated in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ELI	Backlog Prop NP Total	<p>Specify the proportion of backlogs of all natural person customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>
ELJ	Backlog Prop LE Total	<p>Specify the proportion of backlogs of all legal entity customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>
ELK	Backlog Prop NP High	<p>Specify the proportion of backlogs of high-risk natural person customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>
ELL	Backlog Prop LE High	<p>Specify the proportion of backlogs of high-risk legal entity customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>
ELM	Backlog Prop NP PEP	<p>Specify the proportion of backlogs of customers who are politically exposed persons, their family members or persons to be close associates.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>
ELN	Backlog Prop NP Unacceptable	<p>Specify the proportion of backlog made up of unacceptable-risk natural person customers (e.g. yet to be exited).</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>
ELO	Backlog Prop LE Unacceptable	<p>Specify the proportion of backlog made up of unacceptable-risk legal entity customers (e.g. yet to be exited).</p>

		<p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p>
ELP	Concrete Timelines NP	<p>State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for natural persons.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
ELQ	Concrete Timelines LE	<p>State whether your institution has drawn up a plan with concrete timelines to address its periodic review backlogs for legal entities.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
ELR	No Ident Total	<p>What proportion of total active customers have no CDD documentation/information.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
ELS	No Ident High	<p>What proportion of high risk active customers have no CDD documentation/information.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
ELT	No Ident PEP	<p>What proportion of active customers who are PEPs have no CDD documentation/information</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
ELU	Incomplete Total	<p>Specify the proportion of total active customers with incomplete CDD documentation over the overall active customers.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>

ELV	Incomplete High	<p>Specify the proportion of high-risk active customers with incomplete CDD documentation over the overall active customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
ELW	Incomplete PEP	<p>Specify the proportion of active customers who are politically exposed persons, their family members or persons known to be close associates with incomplete CDD documentation over the overall active customers.</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
ELX	CDD BO not Identified	<p>Number of customers that are legal entities /trusts whose beneficial owners have not been identified.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ELY	CDD BO not Verified HR	<p>Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ELZ	CDD no Purpose	<p>Number of customers for whom no information on the purpose and intended nature of the business relationship has been obtained (excluding customers with whom your institution does not have a business relationship).</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EMA	Customer Data not in Line With Article 20	<p>Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EMB	Customer Number Without Risk Profile	<p>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)</p>

Variable name: IntegerValue
If not applicable enter 0

8.4.6 Transaction Monitoring

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

<A03031 Identifier="EMC" EnumerationYesNoNA="N/A"></A03031>

REF	Field	Description
EMC	TM Profile	<p>Does your institution draw up a transaction profile for customers at the initiation of services?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMD	TM Profile Review	<p>What is the frequency of review of the transaction profile?</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
EME	TM Profile Number Transactions	<p>Does your institution include number of transactions in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMF	TM Profile Value of Aggregated Transactions	<p>Does your institution include the value of total transactions in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMG	TM Profile Value of Single Transactions	<p>Does your institution include the value of single transactions in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMH	TM Profile Counterparties	<p>Does your institution include counterparties in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

EMI	TM Profile Geographies	<p>Does your institution include geographies in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMJ	TM Profile Group Transactions	<p>Does your institution include intra-group transactions in an expected transactions profile, i.e. do you include the expected movement of customer funds between their group companies?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMK	TM Profile Banks	<p>Does your institution include banks and payment institutions involved in an expected transactions profile?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EML	TM Alert Number of Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual number of transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMM	TM Alert Value of Aggregated Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of aggregated transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMN	TM Alert Value of Single Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual value of single transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMO	TM Alert Counterparties	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual counterparties?</p>

		<p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EMP	TM Alert Geographies	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual geographies?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EMQ	TM Alert Group Transactions	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual intra-group transactions?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EMR	TM Alert Banks	<p>If your transaction monitoring system is automatic, can it generate alerts in case of inconsistencies between the expected transactions profile relating to the customer and the actual banks/payment institutions involved?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EMS	TM How Monitor	<p>State whether your institution monitors transactions and how this is done.</p> <p>Select from MonitoringApproach</p> <p>Variable name: EnumerationMonitoringApproach</p>
EMT	TM Model Validation	<p>Are formal steps taken after creating the rules for an automated transaction monitoring system in which the rules are tested for appropriateness and efficacy?</p> <p>Select from ModelValidation</p> <p>Variable name: EnumerationModelValidation</p>
EMU	TM AI	<p>Does your institution use artificial intelligence (including machine learning) technology in its transaction monitoring process?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>

EMV	TM Rule	<p>Does your institution use rules as part of its transaction monitoring process?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMW	TM High Risk Geographies	<p>Does your institution have rules in its transaction monitoring process with respect to high risk geographies?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMX	TM Offshore Jurisdictions	<p>Does your institution have rules in its transaction monitoring process with respect to offshore jurisdictions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMY	TM BR Customer Segments	<p>Does your institution have rules in its transaction monitoring process with respect to Customer Segments?</p> <p>Customer segments can be any internal definition of customer groupings, retail or corporate customers, risk levels, associated sector, high value customer etc.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EMZ	TM Sectors	<p>Does your institution have transaction monitoring rules which take into account risks associated with specific sectors?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
ENA	TM PEP	<p>Are there rules or conditions in your institution's transaction monitoring system to account for risk associate with PEPs and PEP close associates?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
ENB	TM Cash	<p>Does your institution have rules in its transaction monitoring process with respect to cash transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

ENC	TM Text	<p>Are transaction description fields / bodies of text considered in any of the rules your institution has in its transaction monitoring system</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
END	TM Complex	<p>Does your institution have rules in its transaction monitoring process with respect to complex structures?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
ENE	TM Banks	<p>Does your institution have rules in its transaction monitoring process with respect to what banks / payment institutions are involved in transactions?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
ENF	TM Other	<p>Other than those mentioned above, are there any other factors/topics/patterns/risks your institution takes into account as part of their rules?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
ENG	TM Other Detail	<p>Detail briefly any other factors/topics included in rules in your institution's rules as part of your transaction monitoring system.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ENH	TM Review	<p>Does your institution periodically review its rules in its transaction monitoring process?</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
ENI	TM Review Latest	<p>Please give completion date of the review. If a repeating review process is in place, please give the most recent date for a rule which has been reviewed.</p> <p>Variable name: DateValue Format YYYY-MM-DD</p>

		If not applicable enter 2000-01-01
ENJ	TM Review Latest Changes	<p>Did the most recent review lead to any changes in rules?</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
ENK	TM Real Time or Post Event	<p>State whether detection of (possible) suspicious financial transactions takes place in real-time or post-event.</p> <p>In this context, real-time detection means monitoring which is carried out live and can react to transactions as they take place as opposed to post-event detection which is done in batches at certain points in time after the transactions take place.</p> <p>Select from DetectionTime</p> <p>Variable name: EnumerationDetectionTime</p>
ENL	TM Insufficient Info	<p>How many transactions did your institution reject on the basis of insufficient information* about the payer or the payee in the preceding calendar year?</p> <p>*Information as referred to in Regulation (EU) 2023/1113 on information accompanying transfers of funds and certain crypto assets.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
ENM	Distributed Ledger System for Risk in Place	<p>State whether your institution has implemented a tool that enables it to analyse the information available on distributed ledgers and generate alerts where unusual patterns or risk factors are identified, in relation to the transactions carried out by the customers.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>

8.4.7 Alerts

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

<A03031 Identifier="ENN" IntegerValue="624"></A03031>

REF	Field	Description
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ENN	Rule Count - Automated	<p>How many rules were in place in your institution's automated transaction monitoring system in the preceding calendar year?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENO	Total Alert Count - Automated	<p>How many alerts were generated by the automated transaction monitoring system in the preceding calendar year?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENP	Percent Alerts - Automated	<p>What is the proportion of automated transaction monitoring alerts to total transactions?</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
ENQ	Alerts Investigated - Automated	<p>How many automated alerts were investigated by an AML/transaction monitoring staff member?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENR	Alerts Escalated - Automated	<p>How many automated alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENS	Alert Investigated FP - Automated	<p>How many automated alerts were closed as false positives following investigation?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENT	Rule Count Manual	<p>How many rules were in place in your institution's manual transaction monitoring process in the preceding calendar year?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENU	Total Alert Count - Manual	<p>How many alerts were generated by the manual transaction monitoring process in the preceding calendar year?</p> <p>Variable name: IntegerValue</p>

		If not applicable enter 0
ENV	Percent Alerts - Manual	<p>What is the proportion of manual transaction monitoring alerts to total transactions?</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
ENW	Alerts Investigated - Manual	<p>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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENX	Alerts Escalated - Manual	<p>How many manual alerts were then subsequently subject to escalation, i.e. filed as a Suspicious Transaction Report?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENY	Alert Investigated FP - Manual	<p>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.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
ENZ	Alert TP Review - Automated	<p>How many true positive alerts (STR filed from automated alerts) led to a review of the customer's risk, CDD or otherwise.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EOA	Alert Backlog - Automated	<p>At 31 December of the preceding calendar year, how many alerts (automated alerts) from that year were still not closed?</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EOB	Alert Mean Time To Close - Automated	<p>Over the course of the preceding calendar year, what was the average time in days to close an alerts (account for automated alerts only), from the initial alert generation?</p> <p>Variable name: DecimalValue</p>

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

8.4.8 Suspicious Alerts and Transaction Rejections

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

1. How many of those transaction alerts were due to each of the risk scenarios listed

2. How many of those transactions were rejected on the grounds of the risk scenario listed

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

<A03032 EOH="Alert_ML" EOI="553" EOJ="531"></A03032>

REF	Field	Description
EOH	Alert Type	Select specific suspicious AlertType . Data Type: EnumerationValue Select from AlertType
EOI	Transaction Alert Number	For a specific suspicious alert type, state the total number of transaction alerts generated in the preceding calendar year Data Type: IntegerValue If not applicable enter 0
EOJ	Transaction Reject Number	For a specific suspicious alert type, state the total number of transactions rejected in the preceding calendar year. Data Type: IntegerValue If not applicable enter 0

8.4.9 Suspicious Transaction Reporting

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

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

<A03031 Identifier="EOK" EnumerationYesNo="Yes"></A03031>

REF	Field	Description
EOK	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
EOL	Number STR	State the total number of suspicious transaction reports (STRs) reported to the FIU in the preceding calendar year.

		<p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EOM	Number STs	<p>State the total number of suspicious transactions contained in STRs reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EON	Number STR Bribe	<p>State the total number of suspicious transaction reports (STRs) based on bribery/corruption reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EOO	FIU Number STs Bribe	<p>State the total number of suspicious transactions contained in STRs based on bribery/corruption reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EOP	FIU Number STR HT	<p>State the total number of suspicious transaction reports (STRs) based on human trafficking reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EOQ	FIU Number STs HT	<p>State the total number of suspicious transactions contained in STRs based on human trafficking reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EOR	FIU Number STR LWE	<p>State the total number of suspicious transaction reports (STRs) based on left wing extremism reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EOS	FIU Number STs LWE	<p>State the total number of suspicious transactions contained in STRs based on left wing extremism reported to the FIU in the preceding calendar year.</p>

		Variable name: IntegerValue If not applicable enter 0
EOT	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
EOU	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
EOV	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
EOW	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
EOX	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
EOY	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

EOZ	FIU Number STR RWE	<p>State the total number of suspicious transaction reports (STRs) based on right wing extremism reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPA	FIU Number STs RWE	<p>State the total number of suspicious transactions contained in STRs based on right wing extremism reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPB	FIU Number STR Sanctions	<p>State the total number of suspicious transaction reports (STRs) based on sanctions list match reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPC	FIU Number STs Sanctions	<p>State the total number of suspicious transactions contained in STRs based on sanctions list match reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPD	FIU Number STR SE	<p>State the total number of suspicious transaction reports (STRs) based on sexual exploitation reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPE	FIU Number STs SE	<p>State the total number of suspicious transactions contained in STRs based on sexual exploitation reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPF	FIU Number STR SWF	<p>State the total number of suspicious transaction reports (STRs) based on social welfare fraud reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue</p>

		If not applicable enter 0
EPG	FIU Number STs SWF	<p>State the total number of suspicious transactions contained in STRs based on social welfare fraud reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPH	FIU Number STR TE	<p>State the total number of suspicious transaction reports (STRs) based on tax evasion reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPI	FIU Number STs TE	<p>State the total number of suspicious transactions contained in STRs based on tax evasion reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPJ	FIU Number STR TF	<p>State the total number of suspicious transaction reports (STRs) based on terrorist financing reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPK	FIU Number STs TF	<p>State the total number of suspicious transactions contained in STRs based on terrorist financing reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPL	FIU Number STR TBML	<p>State the total number of suspicious transaction reports (STRs) based on trade based money laundering reported to the FIU in the preceding calendar year.</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
EPM	FIU Number STs TBML	<p>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.</p>

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

8.4.10 Sanctions Screening

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

<A03031 Identifier="EPO" EnumerationYesNo="Yes"></A03031>

REF	Field	Description
EPO	Sanctions Prior To Service	State whether your institution verifies, prior to providing services, whether or not customers or potential customers and their beneficial owners are included on sanction list. Select from YesNo Variable name: EnumerationYesNo
EPP	Sanction Max Hours	Maximum number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools. Variable name: DecimalValue If not applicable enter 0
EPQ	Sanction EU	Specify if customers and beneficial owners are checked against EU sanctions lists. Select from YesNo Variable name: EnumerationYesNo
EPR	Sanction National List	Specify if customers and beneficial owners are checked against national sanctions lists (e.g. UK OFSI, US OFAC). Select from YesNo Variable name: EnumerationYesNo

EPS	Sanction UN	<p>Specify if customers and beneficial owners are checked against UN sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EPT	Sanction Other	<p>Specify if customers and beneficial owners are checked against any other sanctions lists</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EPU	Sanction Other Specify	<p>If your institution uses any other sanctions lists not mentioned above, please specify</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EPV	Sanction Transact Check	<p>At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when executing a transaction.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EPW	Sanction List Update	<p>At and after the start of service provision, state whether your institution checks whether customers and their beneficial owners are included on sanctions lists when sanctions listing updated.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EPX	Sanction Periodic Customer	<p>At the start of service provision and afterwards, state whether your institution periodically checks whether customers are included on sanctions lists.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EPY	Sanction Periodic Customer Frequency	<p>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.</p> <p>Variable name: IntegerValue</p>

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

		<p>the individual or company was in fact present on a sanctions list. In the case of currency conversions, conversion at time of transaction or exchange rate as of 31 December of the preceding calendar year is acceptable.</p> <p>Variable name: DecimalValue If not applicable enter 0</p>
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8.4.11 Outsourcing

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

<A03031 Identifier="EQG" EnumerationOutsource="Yes_completely_or_partially_to_non_group_entities"></A03031>

REF	Field	Description
EQF	Outsource CDD Onboarding	<p>State whether CDD customer acceptance (e.g. CDD activities related to customer onboarding checks) has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQG	Outsource CDD Review	<p>State whether CDD periodic customer review (e.g. recurring process of reviewing customer CDD status/documentation/risk) has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQH	Outsource TM	<p>State whether transaction monitoring has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQI	Outsource Alert Processing	<p>State whether alerts processing has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQJ	Outsource STR Reporting	<p>State whether reporting of suspicious transactions has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource</p>

		Variable name: EnumerationOutsource
EQK	Outsource Sanction Screen	<p>State whether sanctions screening has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQL	Outsource CDM	<p>State whether customer data management (e.g. external storage, management and handling of customer data) has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQM	Outsource Training	<p>State whether AML/CFT training has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQN	Outsource PEP	<p>State whether PEP detection has been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQO	Outsource Compliance	<p>State whether compliance monitoring checks have been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQP	Outsource Other AMLCFT	<p>State whether other processes related to risk management with regard to AML/CFT/proliferation financing have been outsourced to third parties (including within the Group).</p> <p>Select from Outsource Variable name: EnumerationOutsource</p>
EQQ	Outsource Other AMLCFT Specify	<p>If Yes to Outsource Other AML CFT, specify the other processes.</p> <p>List the other outsourced elements of your AML/CFT processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p>

		<p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
EQR	Outsource Provider Compliance Requirements	<p>State the proportion of outsourced AML/CFT tasks where your institution incorporates compliance requirements with respect to financial crime legislation within its outsourcing agreements (e.g. Criminal Justice Act).</p> <p>To calculate the percentage, obliged entities should apply the following process:</p> <p>Denominator: number of tasks (customer due diligence, training, transaction monitoring, etc.) that are at least partly outsourced.</p> <p>Numerator: number of such tasks for which compliance requirements with respect to financial crime legislation is in place.</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
EQS	Outsource Compliance Assessed	<p>Has your institution assessed outsource provider's compliance with the requirements in the preceding calendar year</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EQT	Outsource Assess Report Obligation	<p>State whether your institution ensures outsource provider compliance with the requirements via reporting obligation.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EQU	Outsource Assess Training	<p>State whether your institution ensures outsource provider compliance with the requirements via training (e.g. ensure outsource providers are sufficiently trained in topics relating to the compliance requirements).</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EQV	Outsource Assess Audit Rights	<p>State whether your institution ensures outsource provider compliance with the requirements via audit rights (e.g. retain rights to audit the outsource providers).</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>

EQW	Outsource Assess Other	<p>State whether your institution ensures outsource provider compliance with the requirements via any other methods.</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EQX	Other Outsource Compliance Check Approaches	<p>Please state, if any, which other processes your institution have in place to ensure outsourcing service providers (third party or intragroup) have complied with compliance requirements.</p> <p>List the processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
EQY	Outsource Tasks to High Risk Third Countries	<p>State the existence of AML/CFT tasks outsourced to an external service provider located in high risk third country (excluding outsourcing to other entities of the group located in high risk third countries)</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>
EQZ	Outsource Tasks to High Risk Third Countries Within Group	<p>State whether the existence of AML/CFT tasks outsourced to an external service provider located in high risk third country is part of the group structure of your institution</p> <p>Select from YesNoNA Variable name: EnumerationYesNoNA</p>

8.4.12 Education and Training

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

<A03031 Identifier="ERA" PercentageValue="0.2"></A03031>

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

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

8.4.13 Compliance and Assurance Testing

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

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

<A03031 Identifier="ERP" DateValue="2013-10-13"></A03031>

REF	Field	Description
ERG	Compliance SEBWRA	<p>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.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ERH	Compliance Training	<p>State the most recent date when AML/CFT-related awareness-raising and staff training measures were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ERI	Compliance Verification	<p>State the most recent date when identification and identity verification procedures were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ERJ	Compliance Sanctions	<p>State the most recent date when compliance with sanctions regulations was assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ERK	Compliance Resources	<p>State the most recent date when resources dedicated to AML/CFT were assessed by the compliance function in your institution.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ERL	Compliance Organisation	<p>State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was assessed by the compliance function in your institution.</p>

		<p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ERM	Compliance CDD	<p>State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was assessed by the compliance function.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ERN	Compliance TM	<p>State the most recent date when the monitoring processes for transactions and business relationships were assessed by the compliance.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ERO	Compliance STR	<p>State the most recent date when the reporting of suspicious transactions process was assessed by the compliance function.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ERP	Compliance Records	<p>State the most recent date when record keeping policies and procedures were assessed by the compliance function.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ERQ	Compliance TPDD	<p>State the most recent date when outsourcing arrangements were assessed by the compliance function.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ERR	Compliance Other	<p>State whether any other financial crime topics or processes were assessed by the compliance function in the preceding calendar year</p> <p>Select from YesNo</p>

		Variable name: EnumerationYesNo
ERS	Compliance Other Specify	<p>Specify the other financial crime topics or processes that were tested or monitored by the compliance function in your institution in the preceding calendar year. Provide a list of topics or processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ERT	Compliance BWRA Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ERU	Compliance Training Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of AML/CFT-related awareness-raising and staff training measures. Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ERV	Compliance Verification Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ERW	Compliance Sanctions Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
ERX	Compliance Resources Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of resources dedicated to AML/CFT.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ERY	Compliance Organisation Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the organisation of the AML/CFT system, governance and reporting to management bodies.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ERZ	Compliance CDD Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the determination of ML/TF risk profile of customers in a business relationship.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ESA	Compliance TM Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the transaction monitoring process.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ESB	Compliance STR Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of the suspicious transaction reporting process.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p>

		<p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
ESC	Compliance Records Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of record keeping policies and procedures.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
ESD	Compliance TPDD Descript	<p>Briefly describe any material findings/potential breaches identified from the last assessment of outsourcing arrangements.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
ESE	Compliance Other Process Descript	<p>If it is Yes to ComplianceOther, briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>
ESF	Compliance to Senior Management	<p>State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to senior management.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
ESG	Compliance to Board	<p>State the Frequency of compliance function reporting in this regard (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>

ESH	Compliance AML Staff	<p>Number of dedicated AML/CFT compliance staff (in Full Time Equivalent).</p> <p>Variable name: IntegerValue If not applicable enter 0</p>
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8.4.14 Audit

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

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

<A03031 Identifier="ESR" DateValue="2024-07-30"></A03031>

REF	Field	Description
ESI	Audit BWRA	<p>State the most recent date when the structure and effectiveness of Business Wide Risk Assessment (BWRA) was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ESJ	Audit Training	<p>State the most recent date when AML/CFT-related awareness-raising and staff training measures were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ESK	Audit Verification	<p>State the most recent date when identification and identity verification procedures were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ESL	Audit Sanctions	<p>State the most recent date when compliance with sanctions regulations was subject to an internal audit by your institution or assessed by an external expert.</p>

		<p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ESM	Audit Resources	<p>State the most recent date when resources dedicated to AML/CFT were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ESN	Audit Organisation	<p>State the most recent date when organisation of the AML/CFT system, governance and reporting to management bodies was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ESO	Audit CDD	<p>State the most recent date when the determination of ML/TF risk profile of customers in a business relationship was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ESP	Audit TM	<p>State the most recent date when the monitoring processes for transactions and business relationships were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p> <p>If not applicable enter 2000-01-01</p>
ESQ	Audit STR	<p>State the most recent date when the suspicious transactions reporting process was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue</p> <p>Format YYYY-MM-DD</p>

		If not applicable enter 2000-01-01
ESR	Audit Records	<p>State the most recent date when record keeping policies and procedures were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
ESS	Audit TPDD	<p>State the most recent date when outsourcing arrangements were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Variable name: DateValue Format YYYY-MM-DD If not applicable enter 2000-01-01</p>
EST	Audit Other	<p>State whether other financial crime processes were subject to an internal audit by your institution or assessed by an external expert.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
ESU	Audit Other Specify	<p>Briefly specify the other processes that were was subject to an internal audit by your institution or assessed by an external expert.</p> <p>Provide a list of other processes separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ESV	Audit BWRA Descript	<p>Briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ESW	Audit Training Descript	<p>Briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p>

		Variable name: String500 Character limit: 500 characters If not applicable enter N/A
ESX	Audit Verification Descript	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
ESY	Audit Sanctions Descript	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
ESZ	Audit Resources Descript	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
ETA	Audit Organisation Descript	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
ETB	Audit CDD Descript	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
ETC	Audit TM Descript	<p>Briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETD	Audit STR Descript	<p>Briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETE	Audit Records Descript	<p>Briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETF	Audit TPDD Descript	<p>Briefly describe any material findings/potential breaches identified.</p> <p>Provide a list of findings/gaps separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETG	Audit Other Process Descript	<p>If other financial crime topics were assessed by the Internal Audit function, then describe any material findings/potential breaches identified.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETH	Audit to Senior Management	State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to senior management.

		<p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
ETI	Audit to Board	<p>State the Frequency of internal audit function reporting (i.e. financial crime, AML, sanctions) to the Board.</p> <p>Select from Frequency</p> <p>Variable name: EnumerationFrequency</p>
ETJ	NCA ML	<p>State whether a foreign supervisory authority issued findings regarding your institution's anti-money laundering framework in the preceding calendar year.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
ETK	NCA TF	<p>State whether a foreign supervisory authority issued findings regarding your institution's countering the financing of terrorism framework in the preceding calendar year.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
ETL	NCA Sanctions	<p>State whether a foreign supervisory authority issued findings on your institution's prevention of circumvention of sanctions framework in the preceding calendar year.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
ETM	NCA Corruption	<p>State whether a foreign supervisory authority issued findings on your institution's management of anti-corruption (bribery) and prevention of conflicts of interests frameworks in the preceding calendar year.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>
ETN	NCA Other	<p>State whether a foreign supervisory authority issued findings on your institution's preventative frameworks with regard to other financial crime areas in the preceding calendar year.</p> <p>Select from YesNo</p> <p>Variable name: EnumerationYesNo</p>

ETO	NCA Other Specify	<p>If Yes to NCA Other, provide a list of other topics separated by semicolon (;) with no spaces either side.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETP	NCA ML Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETQ	NCA TF Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETR	NCA Sanctions Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETS	NCA Corruption Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters If not applicable enter N/A</p>
ETT	NCA Other Descript	<p>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.</p> <p>Variable name: String500 Character limit: 500 characters</p>

		If not applicable enter N/A
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8.4.15 Governance

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

<A03031 Identifier="ETU" EnumerationFrequency="Monthly"></A03031>

REF	Field	Description
ETU	Money Laundering Senior Management	<p>State the Frequency that money laundering is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
ETV	Terrorist Financing Senior Management	<p>State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
ETW	Sanction Circumvent Senior Management	<p>State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Senior Management/management body meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
ETX	Corruption Senior Management	<p>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.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
ETY	Money Laundering Board	<p>State the Frequency that money laundering is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
ETZ	Terrorist Financing Board	<p>State the Frequency that terrorist financing is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency</p>

		Variable name: EnumerationFrequency
EUA	Sanction Circumvent Board	<p>State the Frequency that the circumvention of sanctions is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
EUB	Corruption Board	<p>State the Frequency that corruption (bribery) and conflicts of interests is considered as a regular reporting item on the agenda at Board meetings.</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
EUC	Designated Responsibility	<p>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.</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EUD	Designated Compliance Officer	<p>Has your institution appointed an individual at management level (to be called a 'Compliance Officer') to monitor and manage compliance with, and the internal communication of, internal policies, controls and procedures adopted by your institution as required under Section 54(7) of the CJA 2010?</p> <p>Select from YesNo Variable name: EnumerationYesNo</p>
EUE	COR Frequency	<p>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?</p> <p>Select from Frequency Variable name: EnumerationFrequency</p>
EUF	Reported Shortcomings	<p>State whether the compliance officer has reported any AML/CFT compliance shortcomings in the preceding calendar year.</p> <p>Select from YesNo</p>

		Variable name: EnumerationYesNo
EUG	Shortcomings Recovery	<p>Where AML/CFT shortcomings were reported, state whether the report sets out recovery measures taken.</p> <p>Select from YesNoNA</p> <p>Variable name: EnumerationYesNoNA</p>
EUH	Shortcomings Recovery Details	<p>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.</p> <p>i.e. <shortcoming1><recovery1>;<shortcoming2><recovery2>; etc.</p> <p>Variable name: String500</p> <p>Character limit: 500 characters</p> <p>If not applicable enter N/A</p>

8.4.16 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, 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.

<A03031 Identifier="EUI" PercentageValue="0.7"></A03031>

REF	Field	Description
EUI	Groupwide AML CDD	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
EUI	Groupwide AML Monitoring	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
EUK	Groupwide AML STRs	<p>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</p> <p>Variable name: PercentageValue Enter the percentage as a decimal, e.g. enter 4.7% as 0.047 If not applicable enter 0</p>
EUL	Groupwide AML High Risk Customers	<p>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</p>

		<p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
EUM	Groupwide Deficiencies	<p>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</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
EUN	Groupwide Jurisdiction AML Review	<p>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</p> <p>Variable name: PercentageValue</p> <p>Enter the percentage as a decimal, e.g. enter 4.7% as 0.047</p> <p>If not applicable enter 0</p>
EUO	Groupwide Deficiencies Identified by NCA EEA	<p>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</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>
EUP	Groupwide Deficiencies Identified by NCA non-EEA	<p>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</p> <p>Variable name: IntegerValue</p> <p>If not applicable enter 0</p>

8.5 Physical Presence

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

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

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

<A03041 EUQ="AF" EUR="851" EUS="827" EUT="414" EUU="307" EUV="22" EUW="85" EUX="42"></A03041>

REF	Field	Description
EUQ	PP - Country	Select from the list of Alpha-2 country codes, Country for each applicable country where the institution has subsidiaries, branches, agents, distributors, representative offices, and participating interests Data Type: EnumerationValue Select from Country
EUR	No. of subsidiaries	Number of subsidiaries in each country. Data Type: IntegerValue If not applicable enter 0
EUS	No. of branches	Number of branches in each country Data Type: IntegerValue If not applicable enter 0
EUT	No. of representative offices	Number of representative offices in each country Data Type: IntegerValue If not applicable enter 0
EUU	No. of other physical presences	Number of other physical presence in each country Data Type: IntegerValue If not applicable enter 0
EUV	No. of agents	Number of agents in each country Data Type: IntegerValue If not applicable enter 0
EUW	No. of distributors	Number of distributors in each country Data Type: IntegerValue If not applicable enter 0

EUX	Number of white labelling partners	<p>Number of white labelling partners in each country, where white labelling refers to a business arrangement where a product or service is provided by one company but is offered to customers by another company, regulated or non-regulated, under its own brand</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
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8.6 Residence and Establishment

The questions below concern the institution's customer base.

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

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

<A03051 EUY="AF" EUZ="508" EVA="48" EVB="204" EVC="511" EVD="526" EVE="320" EVF="442" EVG="578"></A03051>

REF	Field	Description
EUY	RE - Country	<p>Select from the list of Alpha-2 country codes, Country for each applicable country that has natural persons residing or legal entities established in that country.</p> <p>Data Type: EnumerationValue Select from Country</p>
EUZ	Natural person customers – Total Number	<p>Natural person customers – Total</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVA	Natural person customers – No. of which are New Customers	<p>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)</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVB	Natural person customers – No. of which are High Risk	<p>Natural person customers - Number of which are High Risk according to institution's customer risk assessment</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVC	Legal entity customers – Total Number	<p>Legal entity customers – Total</p> <p>Data Type: IntegerValue</p>

		If not applicable enter 0
EVD	Legal entity customers - No. of which are New Customers	<p>Legal entity customers - Number of which are New Customers (with whom a business relationship was entered into in the preceding calendar year)</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVE	Legal entity customers - No. of which are High Risk	<p>Legal entity customers - Number of which are High Risk according to institution's customer risk profiling</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVF	Legal entity customers - No. with at least one beneficial owner residing in non-EEA countries	<p>Legal entity customers - Number of which have at least 1 Beneficial Owner located in non-EEA countries (residence).</p> <p>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.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVG	Legal entity customers - No. of which have PEP Risk Identified	<p>Legal entity customers – Count of legal entity customers where PEP risk identified by legal entity country of establishment</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

8.7 Beneficial Owner

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

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

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

<A03061 EVH="00" EVI="0"></A03061>

REF	Field	Description
EVH	BO - Country	<p>Select from the list of Alpha-2 country codes, Country for each applicable country that has a legal entity BO residing in that country.</p> <p>Data Type: EnumerationValue Select from Country</p>
EVI	Number of beneficial owners	<p>Number of beneficial owners of your legal entity customers residing in the country.</p> <p>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.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

8.8 Politically Exposed Person

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

For the purposes of these questions, use the nationality of the PEPs.

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

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

<A03071 EVJ="IE" EVK="439" EVL="75"></A03071>

REF	Field	Description
EVJ	PEP - Country	<p>Select from the list of Alpha-2 country codes, each country where the following applies:</p> <p>A natural person customer of your institution is a PEP and has nationality/citizenship in the specified country.</p> <p>Or, a beneficial owner of your legal entity customers is a PEP and has nationality/citizenship in the specified country.</p> <p>Data Type: EnumerationValue Select from Country</p>
EVK	Number of NP PEPs	<p>State the number of natural person customers which are PEPs (including their family members or persons known to be close associates) and have nationality/citizenship in the specified country</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVL	Number of BO PEPs	<p>State the number your legal entity customers, established in the given country, which have one or more Beneficial Owners that are PEPs (their family members or persons known to be close associates)</p> <p>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.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

8.9 Order Execution

Order Execution here means acting to conclude agreements to buy or sell one or more financial instruments on behalf of clients and includes the conclusion of agreements to sell financial instruments issued by an investment firm or a credit institution at the moment of their issuance.

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

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

```
<A03081 EVM="AT" EVN="823.89" EVO="904" EVP="654" EVQ="286" EVR="224.22" EVS="545" EVT="668.77" EVU="939.88" EVV="601" EVW="920.25" EVX="637" EVY="989.39"></A03081>
```

REF	Field	Description
EVM	OE - Country	<p>Select from the list of Alpha-2 country codes, Country for each applicable country that has a customer residing in it, who is availing of your firms Order Execution services</p> <p>Data Type: EnumerationValue Select from Country</p>
EVN	OE - Overall Account Balance	<p>State the total value (EUR) in all customer accounts for your institution's Order Execution services</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EVO	OE - No. Retail clients	<p>Total number of retail clients availing of your institutions Order Execution services in the given country in the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVP	OE - No. Non-Retail clients	<p>Total number of non-retail clients availing of your institutions Order Execution services in the given country in the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVQ	OE - No. Buy Transactions	<p>Total number of buy transactions by all customers availing of your institutions Order Execution services in the given country during the preceding calendar year</p> <p>Data Type: IntegerValue</p>

		If not applicable enter 0
EVR	OE - Value Buy Transactions	<p>Total value of buy transactions carried out by all customers residing in the given country as part of your institutions Order Execution services in the preceding calendar year</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EVS	OE - No. Sell Transactions	<p>Total number of sell transactions by all customers availing of your institutions Order Execution services in the given country during the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVT	OE - Value Sell Transactions	<p>Total value of sell transactions carried out by all customers residing in the given country as part of your institutions Order Execution services in the preceding calendar year</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EVU	OE - Overall Account Balance High Risk	<p>State the total value (EUR) in high-risk customer accounts for your institution's Order Execution services</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EVV	OE - No. Buy Transactions High Risk	<p>Total number of buy transactions by high-risk customers availing of your institutions Order Execution services in the given country during the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVW	OE - Value Buy Transactions High Risk	<p>Total value of buy transactions carried out by high-risk customers residing in the given country as part of your institutions Order Execution services in the preceding calendar year</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EVX	OE - No. Sell Transactions High Risk	<p>Total number of sell transactions by high-risk customers availing of your institutions Order Execution services in the given country during the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EVY	OE - Value Sell Transactions High Risk	<p>Total value of sell transactions carried out by high-risk customers residing in the given country as part of your institutions Order Execution services in the preceding calendar year</p>

Data Type: DecimalValue
If not applicable enter 0

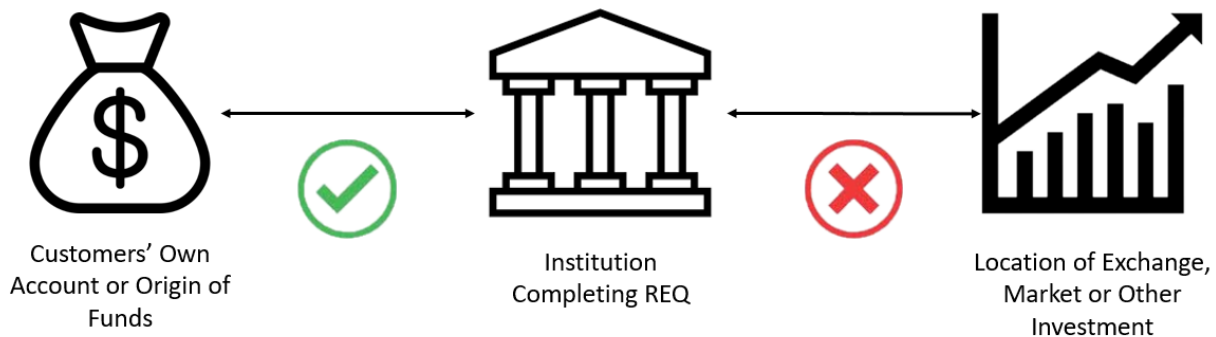
8.10 Portfolio Management

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

```
<A03091 EVZ="FR" EWA="392.56" EWB="734" EWC="675" EWD="870.17" EWE="68" EWF="623.56" EWG="571" EWH="44.05"
EWI="866.33" EWJ="216" EWK="534.36" EWL="281" EWM="252.51"></A03091>
```

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

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



REF	Field	Description
EVZ	PM - Country	<p>Select from the list of Alpha-2 country codes, Country for each applicable country that has a customer residing in it, who is availing of your firms Portfolio Management services</p> <p>Data Type: EnumerationValue Select from Country</p>
EWA	PM - Total AUM	<p>State the total value of assets under management as part of your institutions Portfolio Management services</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EWB	PM - No. Retail clients	<p>Total number of retail clients availing of your institutions Portfolio Management services in the given country in the preceding calendar year</p> <p>Data Type: IntegerValue</p>

		If not applicable enter 0
EWC	PM - No. Non-Retail clients	<p>Total number of non-retail clients availing of your institutions Portfolio Management services in the given country in the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EWD	PM - No. Customers more than 5million euro	<p>State the total number of customers availing of your institution's Portfolio Management services who have a portfolio valued at 5 million euro or more</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EWE	PM - No. Transactions Inward	<p>State the total number of inward transactions (from customers to your institution) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EWF	PM - Value Transactions Inward	<p>State the total value of inward transactions (from customers to your institution) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EWG	PM - No. Transactions Outward	<p>State the total number of outward transactions (from your institution to customers) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EWH	PM - Value Transactions Outward	<p>State the total value of outward transactions (from your institution to customers) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: DecimalValue If not applicable enter 0</p>
EWI	PM - Total AUM High Risk	<p>State the total value of assets under management of high-risk customers as part of your institutions Portfolio Management services</p>

		<p>Data Type: DecimalValue</p> <p>If not applicable enter 0</p>
EWJ	PM - No. Transactions Inward High Risk	<p>State the total number of inward transactions (from high-risk customers to your institution) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: IntegerValue</p> <p>If not applicable enter 0</p>
EWK	PM - Value Transactions Inward High Risk	<p>State the total value of inward transactions (from high-risk customers to your institution) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: DecimalValue</p> <p>If not applicable enter 0</p>
EWL	PM - No. Transactions Outward High Risk	<p>State the total number of outward transactions (from your institution to high-risk customers) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: IntegerValue</p> <p>If not applicable enter 0</p>
EWM	PM - Value Transactions Outward High Risk	<p>State the total value of outward transactions (from your institution to high-risk customers) as part of your Portfolio Management services in the preceding calendar year</p> <p>Data Type: DecimalValue</p> <p>If not applicable enter 0</p>

8.11 Geography of Funds Flow

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

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

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

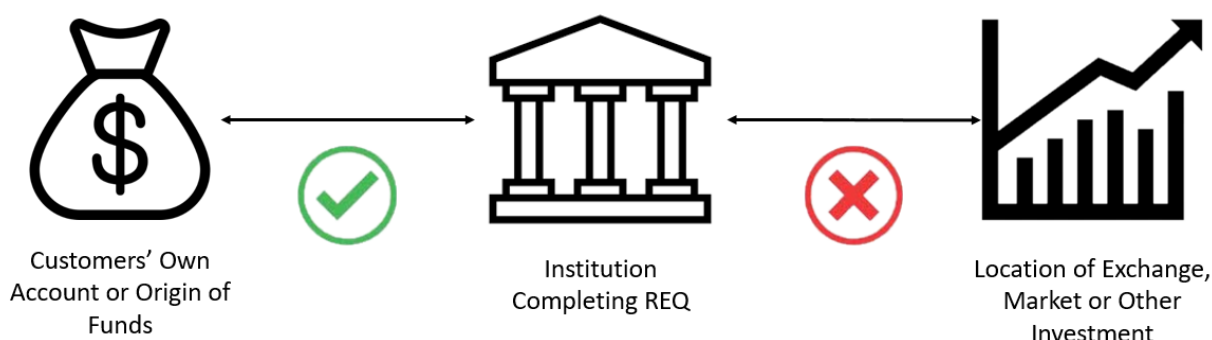


Table Structure A – XML only requires REFs, e.g

```
<A03101 EWN="IE" EWO="953" EWP="307" EWQ="551.49" EWR="364" EWS="400" EWT="981.22" EWU="66" EWV="705" EW
W="399.00" EWX="280" EWY="808" EWZ="30.97"></A03101>
```

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

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

EWX	of which High Risk - No. of customers (Destination)	Overall number of customers with outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue If not applicable enter 0
EWY	of which High Risk - No. of transactions (Destination)	Number of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: IntegerValue If not applicable enter 0
EWZ	of which High Risk - Value of transactions (Destination)	EUR Value of outgoing transactions to each country in the preceding calendar year for High Risk Customers, per your institution's Customer risk assessment. Data Type: DecimalValue If not applicable enter 0

8.12 Transaction Monitoring Rules

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

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

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

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

<A03111 EXA="EQSZcPfMEaDK" EXB="tzNOvShd46YT" EXC="967" EXD="845" EXE="288"></A03111>

REF	Field	Description
EXA	Rule Name / ID	<p>Unique Internal Rule ID. Please complete for each rule.</p> <p>Data Type: StringValue Character limit: 500 characters If not applicable enter N/A</p>
EXB	High Level Rule / Model Description	<p>High-level description of each Rule / Model.</p> <p>Data Type: StringValue Character limit: 2000 characters If not applicable enter N/A</p>
EXC	Number of Transaction Monitoring Alerts for Rule/Model	<p>Number of Transaction Monitoring Alerts for Rule/Model in the preceding calendar year.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EXD	Number of True Positive Alerts for Rule/Model	<p>Number of True Positive Alerts for Rule/Model in the preceding calendar year.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>
EXE	Number of False Positive Alerts for Rule/Model	<p>Number of False Positive Alerts for Rule/Model in the preceding calendar year.</p> <p>Data Type: IntegerValue If not applicable enter 0</p>

9 Appendices

9.1 Definitions

Term	Interpretation
Active customer	The customer is the natural or legal person or other legal arrangement with whom a business relationship is entered into, or who has at least one transaction initiated by the customer even if it is a periodic/automatic transaction, in the preceding calendar year but excludes any transactions which pertain to fee payments, services charges or similar.
AML/CFT regulated customers	All persons or entities of a similar nature to those listed in Article 3 of Regulation (EU) 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	<p>As per Article 2(1), point (28) of Regulation (EU) 2024/1624, with ownership thorough ownership interest or control as referred to in Article 52 and Article 53 of Regulation (EU) 2024/1624.</p> <p>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.</p>
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	<p>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:</p> <ul style="list-style-type: none"> Hospitality and Leisure Automotive and Transportation Retail and Consumer Goods Health and Personal Care Crafts and Trades Art, Luxury, and Collectibles Services and Education
Complex structure	The term complex structure (such as a long holding chain with use of front companies, or a lack of transparency) refers to an ownership structure that is comprised of more than two layers of ownership which often includes (but is not limited to) foundations,

	charities, non-profit organisations, offshore vehicles trusts, or other legal arrangements including bearer shares and nominee shareholding. Any additional internal definition of complex structure is also acceptable here.
Correspondent relationship	As per Article 2(1), point (22), of Regulation (EU) 2024/1624.
Credit institution	<p>(a) As per Article 2(1), point (5), of Regulation (EU) 2024/1624, or</p> <p>(b) An Post in respect of any activity that it carries out, whether as principal or agent, that would render it, or a principal for whom it is an agent, a credit institution as a result of the application of (a)</p>
Critical-rated actions	<p>Deficiencies that suggest the existence of one or more material weaknesses in the obliged entity's AML/CFT policies, systems and controls, identified by the internal auditor, external auditor or the supervisor.</p> <p>A material weakness is a weakness that has or will likely have a high impact on the compliance with AML/CFT regulatory requirements. The impact should be assessed based on the severity, duration and repetitiveness of the deficiency.</p>
Crypto Asset Service Provider	As per Article 2(1), point (9), of Regulation (EU) 2024/1624.
Crypto risks	Risks related to e.g. customers trading in cryptos but also risks related to your institution's activities in this area.
Crypto-asset	As per Article 2(1), point (7), of Regulation (EU) 2024/1624.
Crypto-asset services	As per Article 2(1), point (8), of Regulation (EU) 2024/1624.
Crypto token	A crypto token is a digital asset created on a blockchain that can represent ownership, rights, or access to a specific asset, service, or utility within a blockchain ecosystem.
Customer	The customer is the natural or legal person with whom a business relationship is entered into or who has a transaction effected.
Customer Representative	A customer representative is an individual authorised to act on behalf of the customer in managing their financial affairs and is responsible for acting in the best interests of the customer and following their instructions.
Depository Services	Offering custodian and fiduciary services to both Irish and non-Irish regulated funds. Custodian services include the safeguarding of assets of the customer/fund in question by controlling the monies the fund has to buy or sell securities or bonds for the fund. Fiduciary services include the depository 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.
Distributed ledger	As per Article 3(1), point (2), of Regulation (EU) 2023/1114.
Electronic money	As per Article 2(1), point (17), of Regulation (EU) 2024/1624.
E-Money Digital Accounts/Wallets	Digital accounts/wallets are an online payment tool. The account/wallet stores value(s) which may include multiple currencies and/or crypto and enables customers to make and receive online payments.
False positive alert	A false positive alert is a transaction monitoring alert which was automatically closed by a system without escalation or an escalated alert which was closed by an analyst as not being worthy of an STR.

	If the alert is a collection of several alerts, then all of these alerts are considered to be false positives.
Family members	As per Article 2(1), point (35), of Regulation (EU) 2024/1624.
Financial institution	As per Article 2(1), point (6), of Regulation (EU) 2024/1624.
Funds Transfer Regulation	Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015, as supplemented by S.I. No. 608/2017 (EU)
Group	As per Article 2(1), point (41), of Regulation (EU) 2024/1624.
High risk country	Jurisdictions are identified as having strategic deficiencies in their AML/CFT regimes as per the Commission Delegated Regulation (EU) 2024/163.
Hit (in sanctions screening)	In this context, “hit” means a true positive sanction alert in which the individual or company was in fact present on a sanctions list.
Human intervention	As mentioned in EBA/GL/2022/15 – Guidelines on use of Remote Onboarding Solutions under Article 13(1) of Directive (EU) 2015/849.
Intermediary	This includes brokers, agents, distributors, intermediaries and all other contracted third parties which constitute a link in the chain of service provision to your customers, or in the execution of customer transactions. This concerns intermediaries with which your institution has entered into an agreement.
Investment Services	Investment Services are any activity or service listed in Section A of annex 1 of MiFID II
Legal entity	Legal person or other legal arrangement.
Legal arrangement	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Management body	As per Article 2(1), point (32), of Regulation (EU) 2024/1624.
Merchant acquiring	Handling a merchant’s account so that they can accept credit or debit card payments and settlement of payments into a merchant’s account.
Merchant Services	Similar to payment institutions whereby the credit institutions facilitate the merchant’s customer transactions.
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.
Money remittance	As per Article 4(21), of Directive (EU) 2015/2366.
Nested account	An account where a financial institution (the nested financial institution) gains indirect access to services by transacting through another financial institution’s (the respondent institution) correspondent account
Occasional transaction	As defined under Section 24 of the CJA 2010.
Offshore	The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency.
Onboarded physically	Onboarding face-to-face where the customer is physical present, that is, in the same physical location as the institution or a persona acting on the institution’s behalf.
Parent entity	As per Article 2(42) of Regulation (EU) 2024/1624.

Payable-through account	A correspondent account that is used directly by third parties to transact business on their own behalf.
Payment institution	As per Article 4(4), of Directive (EU) 2015/2366.
Payment instrument	As per Article 4(14), of Directive (EU) 2015/2366.
Payment transaction	As per Article 4(5), of Directive (EU) 2015/2366.
Person known to be a close associate	As per Article 2(1), point (36), of Regulation (EU) 2024/1624.
Politically Exposed Person (PEP)	As per Article 2(1), point (34), of Regulation (EU) 2024/1624.
Pooled account	A bank account opened by a customer, for example a legal practitioner or notary, for holding their clients' money. The clients' money will be commingled, but clients will not be able directly to instruct the bank to carry out transactions.
Prepaid Cards/Vouchers	Cards & Vouchers are preloaded with e-money, allowing the customer to spend the value loaded on the card either online or at points of sale. These can be reloadable or non-reloadable.
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.
Residual risk	The level of risk that remains after mitigation.
Retail clients	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.
Securities Services	Facilitating their customers in the purchase, selling or management of securities such as bonds, mortgage backed securities, or money market products. Typical products and services are believed to be own account trading and traditional corporate banking activities and involves securities which are generally electronically traded on

	regulated markets and settled via regulated electronic settlement systems such as Clearstream and Euroclear. All payments to settlement systems are via regulated credit and financial institutions.
Self-hosted address	As per Article 3, point (20), of Regulation (EU) 2023/1113.
Senior management	As per Article 2(1), point (40), of Regulation (EU) 2024/1624.
Shell institution/bank	As per Article 2(1), point (23), of Regulation (EU) 2024/1624.
Terrorist financing	As per Article 2(1), point (2), of Regulation (EU) 2024/1624.
Third country	As per Article 2(1), point (21), of Regulation (EU) 2024/1624.
Trade finance	Financing of international goods and services trade transactions on behalf of customers importing into or exporting from Ireland. Examples of trade finance activities are: letters of credit, open account facilities, trade credit insurance and import/export collection and guarantees.
Transaction monitoring alert	<p>In this context a Transaction Monitoring Alert means one or more transactions which triggers or collectively trigger one or more Transaction Monitoring Rules in your monitoring system which is/are then sent for investigation by an investigator/analyst.</p> <p>E.g. 1: A rule is in place which detects large deposits of cash anomalous to customer behaviour and this rule triggers and is sent to an investigator. We would consider this 1 alert for this rule. After investigating, if the investigator files a STR report this is considered a True Positive Alert; otherwise, we consider it a False Positive Alert.</p> <p>E.g. 2: A scenario is in place to detect fast-moving transactions to high risk geographies. One model/rule detects placement of risky funds, and another detects fast movement of these funds to a high risk destination. Both of these models/rules identify behaviour creating a single alert containing 2 transactions along with both models/rules that identified the behaviour. When this is sent to an investigator, we consider it 1 alert for each of the rules/models which identified behaviour. If the investigator files an STR on this, we consider it a True Positive Alert for both rules/models; otherwise, we consider it a False Positive Alert for both rules/models.</p>
Transaction monitoring rule/model	A model/business rule used to detect a specific behaviour or scenario as part of a transaction monitoring system.
Transaction profile	Transaction profile in this context has the meaning of any measure of expected transactional behaviour for customers.
True positive alert	A true positive alert is a transaction monitoring alert which was escalated and led to the filing of an STR. If an STR is collection of several alerts, all of these alerts are considered to be true positive alerts.
Trust or company service provider	As per Article 2(1), point (11), of Regulation (EU) 2024/1624.
Unlisted financial instruments	Financial instruments that are not traded on a regulated market, multilateral trading facility or organised trading facility.

Virtual IBAN	An identifier causing payments to be redirected to a payment account identified by an IBAN different from that identifier.
Wealth Management	As per EBA/GL/2021/02, wealth management is the provision of banking and other financial services to high-net-worth individuals and their family or businesses. It is also known as private banking. Clients of wealth management firms can expect dedicated relationship management staff to provide tailored service covering, for example, banking (e.g., current accounts, mortgages and foreign exchange), investment management and advice, fiduciary services, safe custody, insurance, family office services, tax and estate planning and associated facilities, including legal support.

9.2 Enumerations

YesNo

Identifier
Yes
No

YesNoNA

Identifier
Yes
No
N/A

AlertType

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

CDD

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

Country

Alpha-2 code as per the [ISO 3166](#) plus XK - Kosovo

CustomerSegment1

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

CustomerSegment2

Identifier	Description
NP_blocked	Natural person customers that have been blocked/curtailed pending exit due to AML/CFT concerns
LE_blocked	Legal entity customers that have been blocked/curtailed pending exit due to AML/CFT concerns

CustomerSegment3

Identifier	Description
NP_wealth	Natural Person customers 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 customers that fall under the definition of private banking as per EBA Risk Factor Guidelines
NP_not_categorised	Natural person customers 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 customers 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 customers that are shell institutions
LE_TCSP	Legal Entities that used TCSP services provided by your institution in the preceding calendar year
CASP	Legal entity customers that are crypto-asset service providers
Credit_institution	Legal entity customers that are credit institutions
Financial_institution	Legal entity customers that are financial institutions
Government_body	Legal entity customers that are government bodies
SPV	Legal entity customers that are special purpose vehicles
Cust_non_EEA	Customers with at least one transaction over 250 euros from/to a non-EEA country in the previous year
Cust_FIU	Customers with information requests from the FIU

BWRAConducted

Identifier
Yes
No
Exemption_applies

DetectionTime

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

Frequency

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

FundingMethodPaymentInstrument

Identifier	Description
Funding_cash	Cash
Funding_bank_payment	Wire transfer, direct debit, etc. where money is forwarded directly from the sender's bank account to the receiver's bank account
Funding_debit_credit_card	Payment from a personal/business/corporate, etc. debit or credit card
Funding_prepaid_card	Use of a temporary E-Money prepaid card or voucher which requires funds to be loaded on it (possibly also reloadable), separated from credit and debit cards
Funding_other_emoney	Other electronic money payment methods and payment services not covered above (excluding crypto assets)
Funding_crypto	Payment using any crypto assets
Funding_other	Other funding method or payment instrument available/used not covered above

LegalStructure

Identifier	Description
------------	-------------

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

MonitoringApproach

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

Outsource

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

ProductServiceIncludingOverall

Identifier	Description
Overall_product_service	All products or services
Receipt_transmission_of_orders	Receipt and transmission of orders MiFID activity
Order_execution	Order execution MiFID activity
Portfolio_management	Portfolio management MiFID activity

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)

	<p>Suggested NACE Codes: B.5, B.7, B.8, B.9</p> <p>Suggested NAICS Codes: 212</p> <p>Suggested GICS Codes: 15104010, 15104020, 15104025, 15104050, 10102050</p> <p>Alternatively Appropriate Internal Classification</p>
Oil_gas	<p>Oil & Gas (onshore & offshore)</p> <p>Suggested NACE Codes: B.6</p> <p>Suggested NAICS Codes: 2111</p> <p>Suggested GICS Codes: 10101010, 10101020, 10102010, 10102020, 10102030, 10102040</p> <p>Alternatively Appropriate Internal Classification</p>
Energy	<p>Power/Energy (Production & Distribution)</p> <p>Suggested NACE Codes: D.35.11, D.35.12, D.35.13, D.35.14</p> <p>Suggested NAICS Codes: 2211</p> <p>Suggested GICS Codes: 5510</p> <p>Alternatively Appropriate Internal Classification</p>
Defence	<p>Defence Industry, Military Goods (manufacturing, wholesale and retail)</p> <p>Suggested NACE Codes: 0.84.22, C.25.4</p> <p>Suggested NAICS Codes: 92811</p> <p>Suggested GICS Codes: 20101010</p> <p>Alternatively Appropriate Internal Classification</p>
Precious_metal	<p>Precious Metals, Stones and Jewellery Traders</p> <p>Suggested NACE Codes: G.46.72, G.47.77</p> <p>Suggested NAICS Codes: 42394</p> <p>Suggested GICS Codes: 15104030, 15104040, 15104045, 25203010</p> <p>Alternatively Appropriate Internal Classification</p>
Art_dealer	<p>Art Dealers</p> <p>Suggested NACE Codes:</p>

	<p>G.47.78</p> <p>Suggested NAICS Codes: 45992</p> <p>Suggested GICS Codes: 25504040</p> <p>Alternatively Appropriate Internal Classification</p>
Crypto	<p>Virtual Assets/ Crypto Currency</p> <p>Suggested NACE Codes: <i>Not Available</i></p> <p>Suggested NAICS Codes: 523160</p> <p>Suggested GICS Codes: <i>Not Available</i></p> <p>Alternatively Appropriate Internal Classification</p>
Gambling	<p>Gambling</p> <p>Suggested NACE Codes: R.92.0</p> <p>Suggested NAICS Codes: 7132</p> <p>Suggested GICS Codes: 25301010</p> <p>Alternatively Appropriate Internal Classification</p>
Construction	<p>Construction</p> <p>Suggested NACE Codes: F</p> <p>Suggested NAICS Codes: 23</p> <p>Suggested GICS Codes: 201030</p> <p>Alternatively Appropriate Internal Classification</p>
Real_estate	<p>Real Estate</p> <p>Suggested NACE Codes: L.68</p> <p>Suggested NAICS Codes: 531</p> <p>Suggested GICS Codes: 6010</p> <p>Alternatively Appropriate Internal Classification</p>
TCSP	<p>Trust or Company Service Providers</p> <p>Suggested NACE Codes: K.64.30</p>

	<p>Suggested NAICS Codes: 52592</p> <p>Suggested GICS Codes: 40201040*</p> <p>Alternatively Appropriate Internal Classification</p>
Religion	<p>Religious Institutions & Charities</p> <p>Suggested NACE Codes: S.94.91, Q.88.99</p> <p>Suggested NAICS Codes: 81311, 81321</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Freight	<p>Freight, Haulage & Shipping</p> <p>Suggested NACE Codes: H.49, H.50, H.51, H.52.2, H.53</p> <p>Suggested NAICS Codes: 481, 482, 483, 484, 486, 488, 491, 492</p> <p>Suggested GICS Codes: 20301010, 20303010, 20304030, 20305030, 20305010, 20305020</p> <p>Alternatively Appropriate Internal Classification</p>
Advisory	<p>Advisory & Consultancy Services</p> <p>Suggested NACE Codes: M.70.22</p> <p>Suggested NAICS Codes: 5416</p> <p>Suggested GICS Codes: 20202020</p> <p>Alternatively Appropriate Internal Classification</p>
IP	<p>Intellectual Property/ Patents Leasing</p> <p>Suggested NACE Codes: N.77.40</p> <p>Suggested NAICS Codes: 53311</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
MTOPSP	<p>Money Transfer Organisations/ Payment Service Providers</p> <p>Suggested NACE Codes: K66.19</p>

	<p>Suggested NAICS Codes: 52232</p> <p>Suggested GICS Codes: 40201060</p> <p>Alternatively Appropriate Internal Classification</p>
Pharm	<p>Pharmaceuticals</p> <p>Suggested NACE Codes: C.21</p> <p>Suggested NAICS Codes: 3254</p> <p>Suggested GICS Codes: 3520</p> <p>Alternatively Appropriate Internal Classification</p>
Scrap_dealer	<p>Scrap Dealers</p> <p>Suggested NACE Codes: G.46.77</p> <p>Suggested NAICS Codes: 42393</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Sale_motor	<p>Sale of motor vehicles</p> <p>Suggested NACE Codes: G.45.11, G.45.19, G.45.4</p> <p>Suggested NAICS Codes: 423110</p> <p>Suggested GICS Codes: 25501010*</p> <p>Alternatively Appropriate Internal Classification</p>
Sale_boat	<p>Sale of boats</p> <p>Suggested NACE Codes: Not Available</p> <p>Suggested NAICS Codes: 441222</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Catering	<p>Catering</p> <p>Suggested NACE Codes: I.56.21</p>

	<p>Suggested NAICS Codes: 72232</p> <p>Suggested GICS Codes: 25301040</p> <p>Alternatively Appropriate Internal Classification</p>
Crowdfunding	<p>Crowdfunding Service Providers</p> <p>Suggested NACE Codes: S.94.99</p> <p>Suggested NAICS Codes: 813219</p> <p>Suggested GICS Codes: Not Available</p> <p>Alternatively Appropriate Internal Classification</p>
Sport	<p>Professional Sports</p> <p>Suggested NACE Codes: R.93.12, R.93.11</p> <p>Suggested NAICS Codes: 71121</p> <p>Suggested GICS Codes: 50202010</p> <p>Alternatively Appropriate Internal Classification</p>
Stockbroker	<p>Stockbrokers and Traders/ Trading Platforms</p> <p>Suggested NACE Codes: K.66.11, K.66.12</p> <p>Suggested NAICS Codes: 5231, 5232</p> <p>Suggested GICS Codes: 40203020, 40203030</p> <p>Alternatively Appropriate Internal Classification</p>
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.

ModelValidation

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

CountriesEEA

Identifier	Description
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czechia
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

CountriesEEANA

Identifier	Description
00	Not applicable
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czechia
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

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



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem