

**Guidance for the
Annual AML/CFT Statistical Return
Designated Businesses**

(updated 31 March 2021)

Contents

General information and Control Sheet	3
Firm Information Sheet	4
Simplified entry form	5
Form CO – Understanding the customer base	7
Form CLS – Understanding the customer base – legal services	11
Form E – Suspicious activity reports, etc	15
Form F – Residency of customer	17
Form G – Residency of beneficial owners	18

General information and Control Sheet

This guidance is provided to assist designated businesses (“firms”) in the completion of the Annual AML/CFT Statistical Return

Not all sections of this guidance are applicable to all firms. The “Firm Information Sheet” on the Return should be completed, to identify which forms are required. These are detailed on the Control Sheet.

Scope

Every designated business with the exception of Specified Not for Profit Organisations is required to complete the Annual AML/CFT Statistical Return (the **Return**). Submissions should not be combined with firms within the same group or like activities. Combined submissions will be rejected.

Best endeavours

It is recognised by the Authority that some of the information requested in the Return may not be in an easily extractable format from the systems of the firm. If this is the case, the Authority will accept a firm providing the information on a “best endeavours” basis using its detailed understanding and knowledge of its customers and new business processing.

Control Sheet

The **Control Sheet** provides information on the construct of the **Return**.

The **Control Sheet** details all the forms contained within the **Return** and indicates which forms are required to be completed and the status of each of those forms. Hyperlinks are also provided to enable the user to ‘jump’ to forms elsewhere in the return. Similar links are available on each form to return the user to the Control Sheet.

The forms to be completed depend upon the permissions held by the firm and these are input in the **Firm Information Sheet**. When the **Return** is first opened only one form is shown as being required being the **Firm Information Sheet**. The list of required forms is updated dynamically and is dependent upon the input variable entered in other forms, but primarily by the **Firm Information Sheet**.

There are four possible status of forms and individual questions within forms:

- | | |
|--|--|
| <input type="checkbox"/> Complete | All required entry fields have been populated |
| <input type="checkbox"/> Possibly Complete | All required entry fields have been populated but the data may be inconsistent with other entries. If this is the case an appropriate message will be displayed on the relevant question and the entries made should be checked. |
| <input type="checkbox"/> Incomplete | Not all required entry fields are populated – the form will indicate which questions are not completed. |
| <input type="checkbox"/> N/A | The question or form is not required. |

When the status of the **Control Sheet** is showing as complete the **Return** is ready for submission and should be sent to business.change@iomfsa.im. Submissions should not be combined with firms within the same group or like activities. Combined submissions will be rejected.

Completed submissions are requested by 30 June each year at the latest. Earlier submission is encouraged.

Firm Information Sheet

This form consists of three sections together with a comments section and completion section.

CI-1. Firm information

Firm name

Input the full name of the firm here. This will carry through to all other forms within the **Return**.

As detailed in the **Scope** above, the Authority requires the Return to be completed by nearly all businesses registered under the Designated Businesses (Registration and Oversight) Act 2015. Submissions combining the data of two or more firms will be rejected.

CI-2. Return information

Date of submission

The date of submission is the date that the form is completed and submitted to the Authority.

Reporting reference date

The information requested in the Return is with reference to the relevant year ended 31 December, however it is recognised that some firms are unable to extract information at a historical point in time. You must enter 31 December YYYY or such other date as is used as the reporting reference date of the **Return**.

The entry in this field will be carried through to other aspects of the Return where data is requested by reference to this date.

Contact name

Input the name of the person who the Authority should contact if any queries arise in relation to the Return.

Email address

Input the email address of the person who the Authority should contact if any queries arise in relation to the Return.

CI-3. Designated business activities

This section records the business activities of the firm and, based on the input, the **Control Sheet** is updated to reflect the forms required to be completed by the firm.

CI - Comments

This section is provided to allow firms to provide any commentary that is relevant to the completion of the form.

Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will be indicated here.

Simplified entry form

Background

This form requests certain simplified background information in relation to the size of the firm and the extent of operations locally as well as some high level insight into the compliance and control mechanisms adopted which assist the governing body in managing AML/CFT risks.

SE-1. Employees, workers and contractors

- a) Provide the number of employees, officers, principals, workers and contractors (collectively, the firm's personnel) in respect of the Isle of Man business operations who are resident in the Isle of Man and the number who are resident outside the Island.
- b) Provide the total number of compliance personnel including the MLRO which are engaged by the firm.
- c) Provide the number of AML/CFT training places filled by the firm's personnel in the year under review.

For the avoidance of doubt outsourced services should not be included within the above statistics.

SE-2. Banking facilities

This section seeks information on the extent to which the firm's transactions are undertaken through banks located within the Isle of Man and the extent to which they are undertaken outside of the Island.

This information helps the Authority to understand the degree to which activities are banked in the Island.

SE-3. Payment methods

The Authority seeks to understand the payment methods accepted or utilised by the firm for incoming and outgoing transfer of wealth to and from customers in respect of designated business carried on.

The Authority appreciates that some payment methods are utilised or accepted as part of 'business as usual', others are accepted on a case-by-case basis after due consideration of the risks presenting, and others are not acceptable due to the firm's policy.

For each of the following payment methods, and for each of the incoming and outgoing flows, please provide the payment method and frequency:

- *Usual* – This method is used frequently as part of business as usual
- *Occasional* – Whilst considered to be a method within business as usual the frequency is less
- *By exception* – Not a method utilised within business as usual and requires consideration of risk and senior sign off before accepted
- *Never* – Method is not utilised by the business
- *Unknown* – Indicate here if a payment type not otherwise indicated above has been made, but not identified

Annual AML/CFT Statistical return

Guidance for designated businesses

SE-4. Screening

Screening of customers, the beneficial owner and other parties to the business relationship is a key component of the customer due diligence process, the nature and extent of which will vary according to risk.

This question seeks to collate statistical information about the timing and frequency of PEP and sanctions screening.

PEP screening is where a firm seeks to establish whether a customer is, or is associated with, a PEP by comparing the identity of the customer and other parties to the business relationship (including beneficial owners) to a database of politically exposed persons.

Sanction screening is where a firm compares the identity of the customer, beneficial owner and other parties to the business relationship to sanction lists in issue in order to identify a person or entity on any sanctions list.

- a) Indicate whether PEP screening is undertaken at the commencement of the business relationship. Firms should respond “Y” where procedures have been in place and used for the whole of the year under review, and “N” where they have not.

The firm is also required to state whether it undertakes PEP screening of existing clients and indicate the frequency at which it is undertaken.

- b) Indicate whether sanctions screening is undertaken at the commencement of the business relationship. Firms should respond “Y” where procedures have been in place and used for the whole of the year under review and “N” where they have not.

The firm is also required to state whether it undertakes sanctions screening of existing clients and indicate the frequency at which it is undertaken.

SE - Comments

This section is provided to allow firms to provide any commentary that is relevant to the completion of the *Simplified entry form*.

Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will be indicated here.

Form C0 – Understanding the customer base

This form should be completed in respect of all business activities **with the exception of legal services**.

Customer should be interpreted as having the same meaning as in the AML/CFT Code.

It is recognised that some of the information requested on this form may not be in an easily extractable format from the systems of the firm. If this is the case the Authority will accept a firm providing the information on a “best endeavours” basis using its detailed understanding and knowledge of its customers and new business processing.

C0-1. Size and significance of customer base of the firm

High-level information about the size of the firm’s customer base as at the reporting reference date and the number of customers that are material to the firm’s income should be provided. In this context the Authority is interested to understand how many customers exist which, alone or with associates, individually account for more than 20% of the firm’s income (being a material concentration). *By definition the minimum reported should be zero, and the maximum should be 5.*

Firms should indicate the basis upon which responses to this question have been provided.

C0-2. New customer relationships and terminations

High-level information about the number of new business relationships that have been established in the year under review and the number of relationships closed in the year (ons and offs) should be provided.

The number of new applications declined for ML/FT purposes and the number of existing accounts terminated for ML or FT purposes in the year should also be reported.

Firms should indicate the basis upon which responses to this question have been provided.

C0-3. ML/FT risk profile of all customers

This question seeks information on the ML/FT risk profile of the firm’s customers as assessed by the firm.

Indicate the number of customers, as at the reporting reference date, which fall into each risk category. The answer to this question should reconcile to the number of customers detailed in C0-1.

Firms should indicate the basis upon which responses to this question have been provided.

C0-4. ML/FT risk profile of all new customers relationships only

This question is only required to be completed in respect of the following business activities:

- virtual currencies or
- audit services or external accountants where the number of firm’s personnel exceed 5.

Where these activities are not undertaken this question will not be visible.

This question seeks information on the ML/FT risk profile of the firm’s new customer business relationships established in the year as assessed by the firm.

Annual AML/CFT Statistical return

Guidance for designated businesses

Indicate the number of new customer business relationships, as at the reporting reference date, which fall into each risk category. The answer to this question should reconcile to the number of new customer business relationships detailed in [C0-2](#).

Firms should indicate the basis upon which responses to this question have been provided.

C0-5. PEPs

This question seeks information on the number of customers who are PEPs, or are associated with a PEP. Indicate the number of customers as at the reporting reference date who are, or are associated with, a domestic PEP and how many are, or are associated with, a foreign PEP. The answer to this question should reconcile to the number of customers detailed in [C0-1](#).

Firms should indicate the basis upon which responses to this question have been provided.

C0-6. Face-to-face business

Information about the face-to-face nature, or otherwise, of the new customer business relationships established in the year should be provided. Indicate, in respect of new customer relationships entered into in the year under review, the number of customers which the firm met face-to-face, those met by a related party of the same group and those not met face-to-face. The answer to this question should reconcile to the number of new customer business relationships detailed in [C0-2](#).

Firms should indicate the basis upon which responses to this question have been provided.

C0-7. Reliance on third parties for CDD collection

This question is only required to be completed in respect of the following business activities:

- virtual currencies or
- audit services or external accountants where the number of firm's personnel exceed 5.

Where these activities are not undertaken this question will not be visible.

The Authority seeks to understand the extent of reliance on third parties for the collection of CDD and verification of identity of the customer of the firm.

In relation to new customer business relationships established in the year under review, indicate the number for which the firm has placed reliance for the collection of CDD or verification of identity on third parties, and whether the firm understands in all cases who has met the customer on a face-to-face basis. This information is requested via the following categories:

Reliance is placed on third parties – in this category CDD has been collected by a third party and:

- where the firm collects, via the third party, CDD to verify the identity of the customer and the evidence of identity has been certified and the firm holds an original certification of the copy of the original documents;
- where the firm collects, via the third party, CDD to verify the identity of the customer and the evidence of identity has been certified and the firm holds a copy of the original certification of the copy of the original documents; or
- is retained by the eligible introducer, through the utilisation of the concession permitted under the AML/CFT Code.

Annual AML/CFT Statistical return

Guidance for designated businesses

No reliance is placed on third parties – in this category the CDD is collected by the firm direct from the customer and:

- the CDD is provided to the firm via remote means (not on a face-to-face basis) likely by email or the postal service; or
- the CDD is provided to the firm on a face-to-face basis.

No reliance is placed on third parties as other concessions are utilised – in this category the firm utilises concessions which permit the delay of verification of identity or do not require the verification of identity.

It is not anticipated that the answer to this question will reconcile to the number of new customer business relationships detailed in **C0-2**, and therefore this reconciliation is not checked.

Firms should indicate the basis upon which responses to this question have been provided.

C0-8. Use of simplified due diligence

This question is only required to be completed in respect of the following business activities:

- virtual currencies or
- audit services or external accountants where the number of firm's personnel exceed 5.

Where these activities are not undertaken this question will not be visible.

The AML/CFT Code allows firms to apply concessions in the CDD procedures applied to certain customers with the use of each concession being subject to certain qualifying criteria.

The Authority seeks to understand the extent of application of the concessions allowed across industry sectors.

In respect of new customer business relationships established in the year under review, indicate whether any concession applicable to your firm **and available under the AML/CFT Code** has been utilised, and if so the number of new customer business relationships it was applied to.

It is recognised that for some customers with a number of related parties that more than one concession may be applied when considering CDD (e.g. No CDD applied for party A, acceptable applicant concession for parties B and D and eligible introducer concession for party C).

In this example, for a single customer, the form would be completed as follows:

Annual AML/CFT Statistical return

Guidance for designated businesses

	DO YOU USE THIS CONCESSION?	HOW MANY CUSTOMERS (NO.)
ACCEPTABLE APPLICANTS	Y	1
ACTING ON BEHALF OF	N	
GENERIC DESIGNATED BUSINESS	N	
ELIGIBLE INTRODUCERS	Y	1
INSURER CONCESSIONS	N	
SCHEME CONCESSIONS	N	

Firms should indicate the basis upon which responses to this question have been provided.

C0-9. Enhanced customer due diligence (ECDD)

This question is only required to be completed in respect of the following business activities:

- virtual currencies or
- audit services or external accountants where the number of firm's personnel exceed 5.

Where these activities are not undertaken this question will not be visible.

In respect of new customer business relationships established in the year under review, confirm if ECDD procedures were undertaken, and the number of new customer business relationships this was for. To assist the firm, the number of higher risk new customer business relationships, as entered in **C0-4**, are imported into this question.

Where the firm indicates that ECDD procedures have been undertaken indicate the type of procedures undertaken.

Enhanced customer due diligence includes **additional** procedures undertaken to provide **corroborative** evidence of the identity of the customer, the identity of the beneficial owner, the purpose and intended nature of the business relationship, and / or the source of funds and / or wealth. ECDD may also include additional monitoring procedures to ensure that the transactions undertaken are consistent with the firm's knowledge of the customer, their business and risk profile. ECDD must be undertaken where the firm has higher risk customers or foreign PEPs.

Firms should indicate the basis upon which responses to this question have been provided.

C0 - Comments

This section is provided to allow firms to provide any commentary that is relevant to the completion of **Form C0**.

Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will be indicated here.

Form CLS – Understanding the customer base – legal services

This form should **only be completed by firms who undertake legal services** as defined by Schedule 4 of POCA.

In completing this form firms are requested to only provide information relevant to business in the regulated sector. Where the control environment of the firm does not differentiate between business within and out-with the regulated sector then the firm may provide statistical information firm wide, provided this is clearly stated within the comments section of the form.

It is recognised that some of the information requested on this form may not be in an easily extractable format from the systems of the firm. If this is the case the Authority will accept a firm providing the information on a “best endeavours” basis using its detailed understanding and knowledge of its customers and new business processing.

CLS-1. Size and significance of customer base of the firm – matters opened in the year

The Authority seeks to understand the client base of the firm, insofar as it relates to designated business activities within the regulated sector.

CLS1 and CLS2 seek information from the firm from two perspectives: the client themselves and from the perspective of the services provided. **CLS1 considers the service provided.**

The firm should classify matters opened in the year into the classifications provided as set out in Schedule 4 to POCA and reproduced below:

- managing any assets belonging to a client;
- the provision of legal services which involves participation in a financial or real property transaction (whether by assisting in the planning or execution of any such transaction or otherwise) by acting for, or on behalf of, a client in respect of —
 - the sale or purchase of land;
 - managing bank, savings or security accounts;
 - organising contributions for the promotion, formation, operation or management of bodies corporate;
 - the sale or purchase of a business; or
 - the creation, operation or management of a legal person or legal arrangement.

Where it is unclear into which categorisation a client of the firm falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

High-level information about the number of matters opened in respect of business in the regulated sector within the year under review, how many matters were declined for ML/FT purposes, and how many were terminated for ML or FT purposes in the year, should be provided.

Information on the % of total fee income of the firm attributable to regulated business should also be reported. This information assists the Authority to understand the materiality of regulated business to the firm.

Firms should indicate the basis upon which responses to this question have been provided.

Annual AML/CFT Statistical return

Guidance for designated businesses

CLS-2. Size and significance of customer base of the firm – clients represented by matters opened in the year

The Authority seeks to understand the client base of the firm, insofar as it relates to designated business activities within the regulated sector.

For reporting purposes clients should be classified into the following client types:

- IOM resident natural persons
- Natural persons not resident in the IOM
- Corporates, trusts and nominees managed by IOM financial institutions
- Other corporate and trust customers
- Other customers, including charities and the public sector

Firms should indicate the basis upon which responses to this question have been provided.

CLS-3. ML/FT risk profile of clients

This question seeks information on the ML/FT risk profile of the firm's clients as assessed by the firm.

Indicate the number of clients, as at the reporting reference date, assessed by the firm as being a higher, standard or lower risk for ML/FT purposes. The answer to this question should reconcile to the number of new customer business relationships detailed in [CLS-2](#).

Firms should indicate the basis upon which responses to this question have been provided.

CLS-4. PEPs

This question seeks information on how many clients are PEPs, or are associated with a PEP.

Indicate the number of clients as the reporting reference date who are, or are associated with, a domestic PEP or foreign PEP and how many are not. The answer to this question should reconcile to the number of customers detailed in [CLS-2](#).

Firms should indicate the basis upon which responses to this question have been provided.

CLS-5. Face-to-face business

Information about the face-to-face nature, or otherwise, of the new customer business relationships established in the year should be provided.

Indicate, in respect of new matters opened in the year under review, the number of customers which the firm met face-to-face, those met by a related party of the same group, and those not met face-to-face. The answer to this question should reconcile to the number of customers detailed in [CLS-2](#).

Firms should indicate the basis upon which responses to this question have been provided.

CLS-6. Reliance on third parties for CDD collection

The Authority seeks to understand the extent of reliance on third parties for the collection of CDD and verification of identity of the customer of the firm.

In relation to new customer business relationships established in the year under review, indicate the number for which the firm has placed reliance for the collection of CDD or verification of identity on

Annual AML/CFT Statistical return

Guidance for designated businesses

third parties, and whether the firm understands in all cases who has met the customer on a face-to-face basis. This information is requested via the following categories:

Reliance is placed on third parties – in this category CDD has been collected by a third party and:

- where the firm collects, via the third party, CDD to verify the identity of the customer and the evidence of identity has been certified and the firm holds an original certification of the copy of the original documents;
- where the firm collects, via the third party, CDD to verify the identity of the customer and the evidence of identity has been certified and the firm holds a copy of the original certification of the copy of the original documents; or
- is retained by the eligible introducer, through the utilisation of the concession permitted under the AML/CFT Code.

No reliance is placed on third parties – in this category the CDD is collected by the firm direct from the customer and:

- the CDD is provided to the firm via remote means (not on a face-to-face basis) likely by email or the postal service; or
- the CDD is provided to the firm on a face-to-face basis.

No reliance is placed on third parties as other concessions are utilised – in this category the firm utilises concessions which permit the delay of verification of identity or do not require the verification of identity.

It is **not** anticipated that the answer to this question will reconcile to the number of customers detailed in **CLS-2**, and therefore this reconciliation is not checked.

Firms should indicate the basis upon which responses to this question have been provided.

CLS-7. Use of simplified due diligence

The AML/CFT Code allows firms to apply concessions in the CDD procedures applied to certain customers with the use of each concession being subject to certain qualifying criteria.

The Authority seeks to understand the extent of application of the concessions allowed across industry sectors.

In respect of new customer business relationships established in the year under review, indicate whether any concession applicable to your firm and **available under the AML/CFT Code** has been utilised, and if so the number of new customer business relationships it was applied to.

It is recognised that for some customers with a number of related parties that more than one concession may be applied when considering CDD (e.g. No CDD applied for party A, acceptable applicant concession for parties B and D, and eligible introducer concession for party C). In this example, for a single customer, the form would be completed as follows:

Annual AML/CFT Statistical return Guidance for designated businesses

	DO YOU USE THIS CONCESSION?	HOW MANY CUSTOMERS (NO.)
ACCEPTABLE APPLICANTS	Y	1
ACTING ON BEHALF OF	N	
GENERIC DESIGNATED BUSINESS	N	
ELIGIBLE INTRODUCERS	Y	1
INSURER CONCESSIONS	N	
SCHEME CONCESSIONS	N	

Firms should indicate the basis upon which responses to this question have been provided.

C2-8. Enhanced customer due diligence (ECDD)

In respect of new customer business relationships established in the year under review, confirm if ECDD procedures were undertaken, and the number of new customer business relationships this was for. To assist the firm, the number of higher risk new customer business relationships, as entered in CLS-3, are imported into this question.

Where the firm indicates that ECDD procedures have been undertaken indicate the type of procedures undertaken.

Enhanced customer due diligence includes **additional** procedures undertaken to provide **corroborative** evidence of the identity of the customer, the identity of the beneficial owner, the purpose and intended nature of the business relationship, and / or the source of funds and / or wealth. ECDD may also include additional monitoring procedures to ensure that the transactions undertaken are consistent with the firm's knowledge of the customer, their business and risk profile. ECDD must be undertaken where the firm has higher risk customers or foreign PEPs.

Firms should indicate the basis upon which responses to this question have been provided.

CLS - Comments

This section is provided to allow firms to provide any commentary that is relevant to the completion of Form CLS.

Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will be indicated here.

Form E – Suspicious activity reports, etc.

E-1. THEMIS

Indicate whether the firm is registered with THEMIS.

E-2. Suspicious activity reports

Firms are required under POCA and ATCA to submit a suspicious activity report to the FIU in respect of information that comes to them in the course of their business, if they know or suspect, or have reasonable grounds for knowing or suspecting, that a person is engaged in, or attempting, money laundering or terrorist financing.

This requirement is also set out in the AML/CFT Code.

A suspicious activity report, or external disclosure, must be submitted to the FIU as soon as practicable.

An external disclosure will usually, but not always, follow an internal disclosure to the MLRO of the firm.

The firm is required to detail the number of internal and external disclosures made in the year split between ML SARS and TF SARS together with the number of s24 disclosures made to the FIU during the year.

E-3. ML and FT enquiries

The AML/CFT Code requires firms to maintain a register of ML and FT enquiries received from law enforcement or other competent authorities.

Detail the number of enquiries received in the year split between ML and TF. Where the nature of the enquiry is not known this should be separately identified.

E-4. Financial sanctions

Individuals and firms have an obligation to notify the sanctions officer if they are aware of the presence of funds or other assets owned or controlled by, or on behalf of, a person or entity on any sanctions list. Indicate the number of such disclosures made in the period under review.

E-5. Blocked or frozen assets for sanctions purposes

Firms have specific obligations including an obligation to check whether they maintain accounts for any individual or organisation on a sanctions list, and if so to freeze or block the accounts and report findings to the Customs and Excise Division. This question seeks information about such accounts.

Firms should indicate the basis upon which responses to this question have been provided.

E-6. Blocked or frozen assets for reasons other than for sanctions purposes

Information about any accounts frozen for purposes other than for sanctions should also be reported here.

Firms should indicate the basis upon which responses to this question have been provided.

Annual AML/CFT Statistical return Guidance for designated businesses

E - Comments

This section is provided to allow firms to provide any commentary that is relevant to the completion of Form E.

Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will be indicated here.

Form F – Residency of customer

Form F records a breakdown of the firm's customers (in respect of designated business activities) by jurisdiction so that a picture of the geographical location of the firm's customer base can be understood. This data is requested as at the reporting reference date.

F-1. Unique customers

Form F relates to all customers of the firm as at the reporting reference date. To assist the firm a summary of the customer business relationships as entered into the Return is provided here.

Provide the number of unique customer business relationships across all activities.

Firms should indicate the basis upon which responses to this question have been provided.

F-2. Basis of completion

For each jurisdiction in which a customer of the firm resides, as at the reporting reference date, indicate the number of customers resident in that jurisdiction split between natural and non-natural persons.

Firms should indicate the basis upon which responses to this question have been provided.

F - Comments

This section is provided to allow firms to provide any commentary that is relevant to the completion of **Form F**.

Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will be indicated here.

Form G – Residency of beneficial owners

Form G records a breakdown of the beneficial owners of the firm's customers (in respect of designated business activities) by jurisdiction so that a picture of the geographical location of the beneficial owners of the firm's customer base can be understood. This data is requested as at the reporting reference date.

G-1. Jurisdictional analysis of ultimate beneficial owners

Form G relates to the beneficial owners of all of the customers of the firm as at the reporting reference date.

Customers who are natural persons are likely to be the beneficial owner of the customer. To assist firms this information is brought forward from **Form F** and is detailed in **Form G**, and may be amended by the firm if required.

Provide the jurisdictional analysis of the beneficial owners of the customers who are not natural persons.

Firms should indicate the basis upon which responses to this question have been provided.

G - Comments

This section is provided to allow firms to provide any commentary that is relevant to the completion of **Form G**.

Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will be indicated here.