

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

*(reissued 15 February 2023)*

# Annual AML/CFT Statistical Return

## Guidance for firms

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## General Information & Cover Sheet

### General information

The AML/CFT statistical return (the “return”) is applicable to all regulated entities<sup>1</sup> and designated businesses<sup>2</sup> (together “firms”), with the exception of the following:-

- Representative offices of foreign banks (FSA08 class 1(3) regulated activity).
- Professional Officers (FSA08 class 4 or 5 regulated activity);
- Those firms that only conduct FSA08 class 8(1) (bureau de change) and / or class 8(2)(b) (payment services as agent) regulated activity<sup>3</sup>;
- Any firm that has agreed with the Authority that the return is not required<sup>4</sup>.

This guidance document provides direction on how to complete the return. All firms must complete all relevant forms and sections of the return, in accordance with this guidance. Once the **Cover Sheet** has been completed, the relevant forms are shown on the **Control Sheet**.

The spreadsheet workbook is “protected” to prevent alterations to the return structure and content. You must not tamper with the spreadsheet protection and validation or alter the structure or validation by adding or removing spreadsheet tabs or fields.

Any enquiries regarding completion of the return, or the interpretation of this guidance, should be sent to [amlreturns@iomfsa.im](mailto:amlreturns@iomfsa.im).

### Cover Sheet

Completion of the Cover Sheet is mandatory and should be completed as follows:-

#### *Firm information*

Firm name field: input the full registered name of the firm here.

Date Return from / to fields: input the reporting period in the format 01/01/YYYY (date from) and 31/12/YYYY (date to). New firms should input the date of licensing / authorisation / registration for the “date return from” field.

#### *Declaration*

Return signed off by fields: input the name of the person(s) who are signing off the return for it to be submitted to the Authority.

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<sup>1</sup> Those licensed / registered / authorised under the Financial Services Act 2008 (“FSA08”), the Insurance Act 2008 (“IA08”), and the Retirement Benefits Schemes Act 2000 (“RBSA00”).

<sup>2</sup> Those registered under the Designated Businesses (Registration & Oversight) Act 2015 (“DBROA”).

<sup>3</sup> These firms are required to submit a different annual return including AML/CFT information.

<sup>4</sup> This is very much “by exception”.

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Note that the return must be signed off by at least one individual, and that this individual must be a “Notified and Accepted” Controlled Function role-holder (for FSA08, IA08 and RBSA00 firms), or a “Specified Person” in relation to a DBROA firm. There is also space to include the details of a 2<sup>nd</sup> individual, should the firm operate a dual sign off process.

Position fields: input the Controlled Function / Specified Person position held (e.g. MLRO, director, etc).

Firm name fields: input the full registered name of the firm here.

Date fields: input the date in the format DD/MM/YYYY, being the date the return is signed off as “complete” by the persons identified above.

#### *Regulated business permissions / registrations*

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

Where the firm undertakes two or more regulated / registered activities and the customer base of one activity (Activity A) is drawn predominantly from the customer base of the other activity (Activity B), in the context of this return “Activity A” is incidental to “Activity B”. For the purposes of this form, a business activity cannot be considered to be incidental to an activity outside of the regulated / designated business sectors.

***FSA08 Class 4 service providers - for the avoidance of doubt, firms whose main activity is corporate services, but who also provide management or administration services to collective investment schemes under FSA08 Class 3 (11), must select “yes” (NOT “Incidental”) for the permission “Services to CIS - Classes 3 (1), (2) and (9)-(12)”, to enable the relevant forms C3a and C3b to be populated as well as C4.***

#### *Form completion*

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Control Sheet

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

Grey areas within the tables in the return are input cells. The default value (where a value is required) in these cells for completion must be zero (where no other value is entered) and must not be left blank. Other coloured cells or shaded areas are calculated fields or fields where no entry is required.

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.

The forms to be completed depend upon the permissions held by the firm and these are input in the **Cover Sheet**.

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

- Complete                      All required entry fields have been populated
- Incomplete                    Not all required entry fields are populated – the form will indicate which questions are not completed.
- 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 [amlreturns@iomfsa.im](mailto:amlreturns@iomfsa.im).

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

## Form A – Understanding the Firm

### Background and scope

Form A applies to all firms. It provides the Authority with some basic information about the firm's staff numbers (its size of operations), its compliance personnel, and AML/CFT training undertaken in the year under review. In addition, certain other information about payment methods is requested.

### A-1 Employees, workers and contractors

**This question relates only to personnel engaged in respect of the Isle of Man business operations.**

- a) Provide the number of Isle of Man resident directors, officers, employees, workers and contractors (including through group service companies where applicable) in respect of the Isle of Man business operations, including the full time equivalent number, and the number of those positions that were vacant as at the reporting period end. For example, if a firm employs two staff members and one of those only works for 25% of the hours of a full time employee, the FTE would be 1.25.
- b) Provide the number of compliance personnel engaged by the firm and the full time equivalent of those persons (including the MLRO) and the number of those positions that were vacant at the reporting period end. For example, if a firm employs two compliance personnel and one of those only works for 25% of the hours of a full time employee, the FTE would be 1.25.
- c) Details of AML/CFT training provided in the year under review: in part (i) provide the number of individuals who received **annual education / training**, and in part (ii) provide the number of individuals who received **specialist / more detailed training**. For the latter, this should reflect any training provided to the MLRO / DMLRO, and to any individuals who have decision making responsibility or oversight for the AML/CFT risk and control framework adopted by the firm, which is in addition to annual education / training.

### A-2 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 all regulated business carried out.

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.

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For each of the stated payment methods, and for each of the incoming and outgoing flows, please provide the payment method and frequency using the drop down menu options:

- *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

### **A-3 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form A.

### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Form B1 – AML/CFT Control Environment - General

### Background and scope

Form B1 applies to all firms. It provides the Authority with some basic information about outsourced activity, and the approach to monitoring and testing compliance of the AML/CFT internal control environment.

### B1-1 Outsourced activities

In respect of each of the specified activities, indicate whether the activity was undertaken by the firm, outsourced to a fellow group entity or was outsourced to a third party at any point throughout the year under review. Where activities were undertaken by both the firm and an outsourced provider then this should be shown by selecting “Yes” for all applicable instances.

### B1-2 Monitoring and testing compliance with the AML/CFT requirements

The Authority wishes to understand which functions (1<sup>st</sup> line, 2<sup>nd</sup> line, 3<sup>rd</sup> line) undertake the monitoring and testing of compliance of the AML/CFT internal control environment and whether those functions or persons are independent (or not) from AML/CFT operational functions.

For the purposes of completing this section, firms should note the following:-

- 1<sup>st</sup> line (of defence) generally means functions that own and manage the risks and where managers / staff have responsibility for identifying and managing risk
- 2<sup>nd</sup> line (of defence) generally means the functions in the firm that oversee or specialise in compliance or the management of risk, and undertake monitoring
- 3<sup>rd</sup> line (of defence) means independent assurance functions, for example internal audit
- Other – this a free text box; state the name of any persons / bodies who provide other testing or assurance not covered elsewhere for AML/CFT only

Firms **may** wish to include within the comments section in B1-3 any additional information that they feel could be relevant to the assessments made.

### B1-3 Comments

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form B1.

### Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.



## Form B2 – AML/CFT Control Environment – Screening and Monitoring

### Background and scope

Form B2 applies to all firms. It provides the Authority with information about the monitoring and screening of customer relationships, including in respect of beneficial owners of customers. It also asks for information in relation to the ongoing monitoring of customer risk assessments, customer due diligence and transactions.

'Customer' should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### B2-1 / B2-2 Screening – Customer / Screening – Beneficial Owners

Screening of customers 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. B2-1 is focused on the screening of the customer more generally, whilst B2-2 is specifically focused on beneficial owners of the customers.

**Part (a) of B2-1 and B2-2** both seek to collate information about the timing and frequency of four different screening objectives in respect of each type of customer risk category:-

- *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.
- *Sanctions 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.
- *Money Laundering and Financing of Terrorism screening* is where a firm seeks to establish whether a customer, beneficial owner, or any other party to the business relationship has links to money laundering or terrorism.
- *Adverse media screening* is where a firm seeks to establish whether a customer, beneficial owner, or any other party to the business relationship is negatively portrayed in the press or other public arena.

*Sub-part i)* requires firms to indicate, for each risk category of customer and each of the four screening objectives, whether screening is undertaken at the commencement of the business relationship. Firms should use the drop down box to select the most correct option as applicable.

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*Note: there is also the option to select “N/A” in case a firm does not utilise that customer risk category, or does not have any customers in that risk category (for example if the customer base is very limited).*

*Sub -part ii)* is in respect of existing customers, and requires firms to indicate the frequency at which screening of existing clients is undertaken for each risk category of customer and each screening objective. Firms should select the frequency that best reflects the frequency adopted by the firm.

Screening may also be applied when certain events occur. The Authority is interested to understand whether additional screening is applied, in addition to the frequency of screening applied above, when sanction lists are updated or published, at the occurrence of a trigger event, at an unusual activity event (as defined by the AML/CFT Code), or upon a suspicious activity event (as defined by the AML/CFT Code).

Firms should select the frequency that best reflects the frequency adopted by the firm.

*Note: there is also the option to select “N/A” in case a firm does not utilise that customer risk category, or does not have any customers in that risk category (for example if the customer base is very limited).*

**Part (b) of B2-1** seeks to collate some additional information in connection with screening. Firms should input the names of screening providers utilised, and also indicate (Yes or No) whether they are subscribed to a sanctions notification service (and if so, the name of that service provider).

### **B2-3 Ongoing Monitoring**

The nature and extent of ongoing monitoring procedures (for reviewing customer risk assessments, customer due diligence information, and scrutinising transactions) can vary according to customer risk and type. This question seeks information on each customer type listed below along with the risk categorisation of that customer, the type of ongoing monitoring performed, and the frequency of that monitoring.

The customer types are split into:

- i. **PEPs** - being those customers who are, or are associated with a PEP (as defined by paragraph 3 of the AML/CFT Code), within the meaning of paragraph 14(1) of the AML/CFT Code, whether the customer is an individual (natural person) or legal person or legal arrangement.
- ii. **Natural persons not associated with PEPs** – being any customer that is an individual or a number of individuals that are not PEPs, or associated with a PEP.
- iii. **Other customers not associated with PEPs** – being any customer who is not a natural person who is also not associated with a PEP.

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The responses required are to indicate for each of the ongoing monitoring activities listed (review of customer risk assessment, review of customer due diligence, and scrutiny of transactions), the frequency of monitoring by risk categorisation. The possible responses (using the drop down boxes) are:

- At least annually;
- At least once every three years;
- At trigger events only; or
- Constant automated review.

*Note: there is also the option to select “no lower risk clients”, “no standard risk clients”, or “no higher risk clients” in case a firm does not utilise that customer risk category, or does not have any customers in that risk category (for example if the customer base is very limited).*

#### **B2-4 Scrutiny of transactions**

This question requires a more in-depth analysis of the response to B2-3 (scrutiny of transactions).

The firm is required to indicate (using the drop down selections) whether, for each risk category of customer (including PEPs), transactions are scrutinised:

- i. Via a transactional monitoring system (automated and / or non-automated);
- ii. Through system-generated exception reports;
- iii. At trigger events;
- iv. With reference to a pre-determined value limit;
- v. As a result of cash activity;
- vi. By reference to the geographic origin or destination of transaction;
- vii. As a result of an external event, e.g. the update by FATF of the high-risk jurisdictions list; or
- viii. As a result of scheduled periodic reviews and sampling.

*Note: there is also the option to select “N/A” in the drop down selections.*

#### **B2-5 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form B2.

#### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## **Form B3 – AML/CFT Control Environment – Payment Screening – Deposit Takers and MTS**

### **Background and scope**

Form B3 only applies to deposits takers (FSA08 class 1(1) and class 1(2) firms) and MTS firms that hold FSA08 class 8(2)(a) or 8(4) permissions. It provides the Authority with some further detailed information in respect of payment screening undertaken by these firms.

### **B3-1 Payment screening**

In addition to the screening of customers, parties to payments are also screened to identify persons or entities on sanctions lists thereby reducing the risk of payments being made to, or received from, a person on a sanctions list or relating to restricted activities.

- a) Provide, for each of SWIFT, BACs and FASTER payment types, whether the sender, beneficiary, or other party to the payment is screened and if so, whether the screening is performed on a real-time transactional basis, prior to the transaction occurring, or after the transaction has completed. Information is also sought as to which sanctions lists are utilised for both incoming and outgoing payments.
- b) Where screening is undertaken subsequent to the completion of the payment transaction, state in the box provided the timeframe in which screening is performed.
- c) Where published lists are used other than the sanctions lists published by the Isle of Man, United Kingdom, European Union or United States, state in the box provided which public lists those are.

### **B3-2 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form B3.

### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## **Form C1 – Customer Base – Deposit Taking, Credit Unions, Payment Services and E-money**

### **Background and scope**

Form C1 only applies to deposits takers (FSA08 class 1(1) and class 1(2) firms), credit unions, and payment services / e-money firms (those that hold FSA08 class 8(2)(a) or 8(4) permissions). It provides the Authority with information about the **customer risk profile** of the firm split across different customer types.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### **C1-1 Size and significance of customer base of the firm**

#### **a) Total number of customers broken down by risk rating**

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

For each of the customer category types state the number of customers, as at the reporting reference date, which fall into each risk category.

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

#### **b) Number of customer accounts**

This question seeks information about the number of customer accounts as at the reporting reference date.

For each of the customer category types state the number of such customer accounts, as at the reporting reference date.

Where it is unclear into which customer category type a customer account falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

### **C1-2 New customer relationships**

#### **a) Total number of new customers broken down by risk rating**

This question seeks information on the ML/TF risk profile of the firm’s new customer relationships established in the reporting period as assessed by the firm.

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For each of the customer category types state the number of new customer relationships, established in the year, which fall into each risk category.

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

### b) Number of new customer accounts

This question seeks information about the number of new customer accounts established in the reporting period.

For each of the customer category types state the number of such new accounts.

Where it is unclear into which customer category type a customer account falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

### C1-3 Comments

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form C1.

### Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## **Form C2 – Customer Base – Investment business, Crowdfunding, and Insurance Intermediaries**

### **Background and scope**

Form C2 only applies to investment business firms (FSA08 class 2), crowdfunding firms (FSA08 class 6) and general insurance intermediaries. It provides the Authority with information about the **customer risk profile** of the firm split across different customer types.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### **C2-1 Size and significance of customer base of the firm**

#### **a) Total number of customers broken down by risk rating**

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

For each of the customer category types state the number of customers, as at the reporting reference date, which fall into each risk category.

Where it is unclear into which customer category type a customer falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis. Note that charities and NPOs should be reported in “other clients”.

#### **b) Number of customer accounts**

This question seeks information about the number of customer accounts operated by the firm as at the reporting reference date.

For each of the customer category types state the number of such accounts, as at the reporting reference date.

Where it is unclear into which customer category type a customer account falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### **c) Number of customers from whom >20% of fee income is derived**

High-level information about 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.***

### **C2-2 New customer relationships**

#### a) Total number of new customers broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm's new customer relationships established in the reporting period as assessed by the firm.

For each of the customer category types state the number of new customer relationships, established in the year, which fall into each risk category.

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

#### b) Number of new customer accounts

This question seeks information about the number of new customer accounts established in the reporting period.

For each of the customer category types state the number of such new accounts.

Where it is unclear into which customer category type a customer account falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

### **C2-3 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form C2.

### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as "incomplete".



## **Form C3a – Customer Base – Services to Collective Investment Schemes (CISs)**

### **Background and scope**

Form C3a only applies to firms that hold FSA08 class 3 (services to CIS) permissions. It seeks to collate information about the risk profile of the schemes (as customers of the firm) themselves (as opposed to the investor profile, which is set out in Form C3b), together with some basic information about declined and terminated business in relation to schemes only.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code; for the purpose of form C3a, it means the CISs.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

***For those firms which provide management or administration services to another party (FSA08 Class 3(9) or 3(10)), the information requested in this form relates to the underlying schemes that the firm indirectly provides services to.***

### **C3a-1 Size and significance of scheme (customer) base**

#### **a) Total number of schemes broken down by risk rating**

This question seeks information on the ML/TF risk profile of the firm’s customers (schemes) as assessed by the firm.

For each of the scheme types (IOM domiciled vs non-IOM domiciled) state the number of customers, as at the reporting reference date, which fall into each risk category.

#### **b) Number of schemes from whom >20% of fee income is derived**

High-level information about the number of schemes that are material to the firm’s income should be provided. In this context, the Authority is interested to understand how many schemes exist which, alone or with sub or umbrella funds, 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.*

### **C3a-2 New scheme (customer) relationships**

#### **a) Total number of new schemes (customers) broken down by risk rating**

This question seeks information on the ML/TF risk profile of the firm’s new scheme (customer relationships) established in the reporting period as assessed by the firm.

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For each of the scheme types (IOM domiciled vs non-IOM domiciled) state the number of new scheme (customer) relationships, established in the year, which fall into each risk category.

#### **C3a-3 Declined and terminated schemes**

##### *Declined business*

This section seeks information on the number of potential new schemes that were declined for either ML, TF, or sanctions purposes in the reporting period.

For each of the scheme types (IOM domiciled vs non-IOM domiciled) state the number of potential new scheme (customer) relationships that were declined in the reporting period for each of categories (a), (b) and (c).

##### *Terminated business*

This section seeks information on the number of existing scheme relationships that were terminated in the reporting period, for either ML, TF, or sanctions purposes.

For each of the scheme types (IOM domiciled vs non-IOM domiciled) state the number of existing scheme (customer) relationships that were terminated in the reporting period for each of categories (d), (e) and (f).

#### **C3a-4 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form C3a.

#### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Form C3b – Investor Customer Base – Investing in CISs

### Background and scope

Form C3b only applies to firms with the permissions to undertake services to collective investment schemes (FSA08 - Class 3) within the subclasses (1), (2), and (9)-(12). It provides the Authority with information about the **risk profile of the investors into the schemes (being the customers of the schemes)** (as opposed to the risk profile of the schemes). This includes the risk profile of customers of schemes where services are provided under Class 3(9) and Class 3(10), if that information is held by the firm.

‘Customer’ (in this case the investor) should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### C3b-1 Size and significance of investor base investing into the schemes

#### a) Total number of investors broken down by risk rating

This question seeks information on the ML/TF risk profile of the investors in schemes to which the firm provides services.

For each of the investor category types state the number of investors, as at the reporting reference date, which fall into each risk category.

Where it is unclear into which customer category type an investor falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis. Note that charities and NPOs should be reported in “other clients”.

### C3b-2 Size and significance of new investor base investing into the schemes

#### a) Total number of new customers (investors) broken down by risk rating

This question seeks information on the ML/TF risk profile of the schemes’ new investor relationships established in the reporting period as assessed by the schemes and/or by the firm.

For each of the investor (customer) category types state the number of new investor relationships, established in the year, which fall into each risk category.

Where it is unclear into which investor category type an investor falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

**C3b-3 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form C3b.

**Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Form C4 – Customer Base – Trust and Corporate Service Providers

### Background and scope

Form C4 only applies to trust and corporate service firms (class 4 or 5 activities under the FSA08). It provides the Authority with information about the client entities to which the firm provides services to, including the **client entity (customer) risk profile**.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

This form considers the trust and corporate services provided by firms from two separate perspectives:

- from the perspective of the **Principal**, being the person with whom the firm contracts for the provision of services. The Principal may be acting on their own behalf or acting under the instructions of another; and
- from the perspective of the **client entities**, being the corporate and trust entities for which services are provided.

### C4-1 Size and significance of customer base of the firm

#### a) Total number of client entities broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm's client entities as assessed by the firm.

For each of the client entity category types state the number of client entities, as at the reporting reference date, which fall into each risk category.

Where it is unclear into which client entity category type a customer falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis (for example in relation to foundations and partnerships).

#### b) Number of principals from whom >20% of fee income is derived

High-level information about the **number of principals** that are material to the firm's income should be provided. In this context the Authority is interested to understand how many principals 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.**

#### **C4-2 New customer relationships**

a) Total number of newly established client entities broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm's new client entity relationships established in the reporting period as assessed by the firm.

For each of the client entity category types, state the number of new client entities established in the year, which fall into each risk category.

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

b) Number of principals on-boarded in the year

This question is in relation to the *principals* with whom the firm contracts. State the number of new principals on-boarded in the year.

#### **C4-3 Legal form of client entities**

This question seeks information on the *legal form of all client entities reported in section C4-1(a)* of the form.

For each of legal form types, state the number of IOM incorporated entities, non-IOM incorporated entities, and non-incorporated entities (IOM vs non-IOM), as at the reporting reference date, which fall into each legal form category.

Where it is unclear into which legal form type an entity falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### **C4-4 Principal activity of client entities**

This question seeks information on the *activity profile of the corporate and trust entities to which the firm provides services, as reported in section C4-1(a) of the form.*

For each of the four principal activity types, state the number of corporate and trust entities, as at the reporting reference date, which fall into each category.

Where it is unclear into which activity type a corporate or trust entity falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### **C4-5 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form C4.

#### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as "incomplete".

## Form CLT – Customer Base – Insurance – Long-term Business (including Reinsurance)

### Background and scope

Form CLT only applies to firms who are authorised to undertake **long-term insurance business** under the IA08 (class 1, 2, or 10). It does not apply to any Class 12 (restricted) insurance firms who write long-term business contracts. It provides the Authority with information about the **customer (policyholder) risk profile** of the firm split across different customer types.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### CLT-1 Size and significance of customer base of the firm

#### a) Total number of policyholders (within in-force policies) broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm’s customers (policyholders) as assessed by the firm.

For each of the product category types state the number of policyholders, as at the reporting reference date, which fall into each risk category.

Where it is unclear into which product category type a customer falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### b) Total number of policies in issue

This question seeks information about the number of policies in issue as at the reporting reference date.

For each of the product category types state the number of policies, as at the reporting reference date.

Where it is unclear into which product category type a policy falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### c) Number of policyholders from whom >20% of fee income is derived

High-level information about the number of policyholders that are material to the firm’s income should be provided. In this context the Authority is interested to understand how many policyholders 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.***

#### **CLT-2 New customer relationships**

a) Total number of new policyholders broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm's new customer (policyholder) relationships established in the reporting period as assessed by the firm.

For each of the product category types state the number of new customer (policyholder) relationships, established in the year, which fall into each risk category.

Where it is unclear into which product category type a policyholder falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

b) Number of new policies issued

This question seeks information about the number of new policies issued in the reporting period. For each of the product category types state the number of such new accounts.

Where it is unclear into which product category type a policy falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### **CLT-3 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form CLT.

#### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as "incomplete".



## Form CGI – Customer Base – Insurance – General Business (including Reinsurance) or Restricted (Class 12) only or ISPV Class 13

### Background and scope

Form CGI only applies to firms who are authorised to undertake **general business** within IA08 classes 3-9, and 11, or those firms that are authorised to undertake **only restricted activity** (IA08 class 12 only) or **only class 13 activity**. It provides the Authority with information about the **customer (policyholder) risk profile** of the firm split across different customer types.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### CGI-1 Size and significance of customer base of the firm

#### a) Total number of policyholders (within in-force policies) broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm’s customers (policyholders) as assessed by the firm.

For each of the customer category types state the number of policyholders, as at the reporting reference date, which fall into each risk category.

Where it is unclear into which customer category type a policyholder falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### b) Total number of policies in issue

This question seeks information about the number of policies in issue as at the reporting reference date.

For each of the customer category types state the number of policies, as at the reporting reference date.

Where it is unclear into which customer category type a policy falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### c) Number of policyholders from whom >20% of fee income is derived

High-level information about the number of policyholders that are material to the firm’s income should be provided. In this context the Authority is interested to understand how many policyholders 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.**

#### **CGI-2 New customer relationships**

a) Total number of new policyholders broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm's new customer (policyholder) relationships established in the reporting period as assessed by the firm.

For each of the customer category types state the number of new customer (policyholder) relationships, established in the year, which fall into each risk category.

Where it is unclear into which customer category type a policyholder falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

b) Number of new policies issued

This question seeks information about the number of new policies issued in the reporting period. For each of the customer category types state the number of such new accounts.

Where it is unclear into which customer category type a policy falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### **CGI-3 Insurance activity**

This question seeks information on the type of insurance written that best reflects the activity of the firm, as follows:

- *Self insurer* – a firm that underwrites the insurance risks of its own group.
- *Producer owned* – a firm that underwrites the risks of customers of a company within the same ownership structure of the firm. The insurance may be written through a fronting insurer in the first instance.
- *Third party writer* – a firm that underwrites the insurance risks of parties that are not related parties.
- *Combination*

Select the most appropriate responses using the drop down boxes provided.

#### **CGI-4 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form CGI.

#### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as "incomplete".

## Form CIM – Customer Base – Insurance Manager

### Background and scope

Form CIM only applies to firms registered as **insurance managers**. It provides the Authority with information about the **customer risk profile** of the firm split across different insurer types.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### CIM-1 Size and significance of customer base of the firm

#### a) Total number of customers broken down by risk rating

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

For each of the insurer category types state the number of customers, as at the reporting reference date, which fall into each risk category.

Where it is unclear into which insurer category type a customer falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

#### b) Number of customers from whom >20% of fee income is derived

High-level information about 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.**

### CIM-2 New customer relationships

#### a) Total number of new customers broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm’s new customer relationships established in the reporting period as assessed by the firm.

For each of the insurer category types state the number of new customer relationships, established in the year, which fall into each risk category.

Where it is unclear into which insurer category type a customer falls, the firm should use its best judgement and apply a consistent methodology in the allocation basis.

**CIM-3 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form CIM.

**Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Form CPEN – Customer and Member Base – Registered Schemes Administrators

### Background and scope

Form CPEN only applies to firms who are registered as a schemes administrator under the RBSA00. It provides the Authority with information about the **customer and member base, including risk profiles**, of the firm.

The form also provides a split between defined benefit and money purchase schemes, and allows for firms to report on the numbers of ‘customers’, as defined by paragraph 3 of the AML/CFT Code

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### CPEN-1 Size and significance of customer base (schemes, members and employers) of the firm

#### a) Defined Benefit or mixed occupational pension schemes

This question seeks information about the number of **defined benefit or mixed occupational pension schemes administered by the firm** as at the reporting reference date, as well as the number of members and participating employers to those schemes.

For each of the parts (i), (ii) and (iii) state the applicable number of schemes / members / employers, split between the different schemes categories provided.

For part (iv), high-level information about the number of defined benefit or mixed schemes that are material to the firm’s income should be provided. In this context the Authority is interested to understand how many schemes 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.**

#### b) Money purchase pension schemes

This question seeks information about the number of **money purchase pension schemes administered by the firm** as at the reporting reference date, as well as the number of members and contributing employers to those schemes.

For each of the parts (i), (ii) and (iii) state the applicable number of schemes / members / employers, split between the different schemes categories provided.

For part (iv), high-level information about the number of money purchase pension schemes that are material to the firm’s income should be provided. In this context the Authority is

interested to understand how many schemes 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.**

#### **CPEN-2 New customer relationships (schemes, members and employers)**

##### a) Defined Benefit or mixed occupational pension schemes

This question seeks information about the number of **new defined benefit or mixed occupational pension schemes administered by the firm** established by the firm in the reporting period, as well as the number of members and participating employers to those schemes.

For each of the parts (i), (ii) and (iii) state the applicable number of new schemes / new participating employers (to new and existing schemes) / new members (in new schemes), split between the different schemes categories provided.

##### b) Money purchase pension schemes

This question seeks information about the number of **new money purchase pension schemes administered by the firm** established by the firm in the reporting period, as well as the number of members, contributing employers and third parties paying into those schemes.

For each of the parts (i), (ii), (iii) and (iv) state the applicable number of new schemes / new members (in new schemes) / new contributing employers / third parties paying into the new schemes, split between the different schemes categories provided.

#### **CPEN-3 Risk profile of all customers**

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

##### *Defined benefit or mixed occupational schemes*

For each of the scheme types state the number of customers (for this purpose the participating employers), as at the reporting reference date, which fall into each risk category.

##### *Money purchase pension schemes*

For each of the scheme types state the number of customers, as at the reporting reference date, which fall into each risk category.

#### **CPEN-4 Risk profile of new customer relationships**

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

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### *Defined benefit or mixed occupational schemes*

For each of the scheme types state the number of new customers (for this purpose the new participating employers), established in the year, which fall into each risk category.

### *Money purchase pension schemes*

For each of the scheme types state the number of new customers, established in the year, which fall into each risk category.

### **CPEN-5 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form CPEN.

### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Form C-DNFBP – Customer Base – Designated Businesses

### Background and scope

Form C-DNFBP applies to all firms who are registered as designated businesses. It provides the Authority with information about the **customer risk profile** of the firm.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

*Note: The AML/CFT Code only differentiates between higher risk customers and other customers. The Authority recognises that the majority of firms categorise the risk of their customers into one of three categories. Reflecting this, three categories of ML/TF risk are utilised in this form, being higher, standard or lower.*

### C-DNFBP-1 Size and significance of customer base of the firm

#### a) Total number of customers broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm’s customers as assessed by the firm. State the number of customers, as at the reporting reference date, which fall into each risk category.

#### b) Number of customers from whom >20% of fee income is derived

High-level information about 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.**

#### c) Income received over the past 12 months from Designated Business activities

Input the income received, in GBP, relation to the provision of designated business activities. This can be based on the most recent annual audited accounts data. If no audited accounts are prepared, input the approximate income for the 12 month time period.

### C-DNFBP-2 New customer relationships

#### a) Total number of new customers broken down by risk rating

This question seeks information on the ML/TF risk profile of the firm’s new customer relationships established in the reporting period as assessed by the firm. State the number of new customer relationships, established in the year, which fall into each risk category.

### C-DNFBP-3 Declaration

This declaration is a requirement under s13(2)(a) of the DBROA (“the annual return must include a declaration as to the extent to which the registered person meets the requirements



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of AML/CFT legislation”). Firms should select either “Yes” or “No” from the drop down list. If “Yes” is selected a free text box is available for further information to be provided.

### **C-DNFBP-4 Comments**

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form C-DNFBP.

### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Form C-PEPS – PEP Relationships

### Background and scope

Form C-PEPS applies to all firms. It provides the Authority with information about the **PEP profile** of the firm.

### C-PEP-1 Overview of PEPs

#### a) Customers associated with domestic and foreign PEPs

This question seeks information on the **number of customers**<sup>5</sup> who are PEPs, or are associated with a PEP.

State the number of customers as at the reporting reference date who are, or are associated with, a domestic PEP (i) and the number who are, or are associated with, a foreign PEP (ii).

*Explanatory note: for example, if Mr X, who has been identified as a PEP, is a director for 5 companies the firm has a relationship with, then the number to be input would be 5.*

*Conversely, if Mrs Y is a director of company A (a company the firm has a relationship with) and Mr Z is a beneficial owner of company A, and both Mrs Y and Mr Z have been identified as PEPs, then the number input would be 1.*

#### b) Unique PEPs (domestic and foreign)

This question seeks information on how many **unique PEPs** (natural persons) are connected to the customers reported in part (a) above.

State the number of unique PEPs as at the reporting reference date who are a domestic PEP (i) and the number who are a foreign PEP (ii).

*Explanatory note: for example, if Mr X, who has been identified as a PEP, is a director for 5 companies the firm has a relationship with, then the number to be input would be 1.*

*Conversely, if Mrs Y is a director of company A (a company the firm has a relationship with) and Mr Z is a beneficial owner of company A, and both Mrs Y and Mr Z have been identified as PEPs, then the number input would be 2.*

### C-PEP-2 Type of PEP

#### a) Unique domestic PEPs – PEP positions

For the number of unique domestic PEPs reported in C-PEP-1 part (b)(i) above, provide a breakdown of that number by PEP position using the categories provided.

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<sup>5</sup> For TCSPs, “customers” means client entities. For class 3 FSA08 firms, “customers” means the schemes and, for firms that complete form C3b, the investors in schemes.

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### b) Unique foreign PEPs – PEP positions

For the number of unique foreign PEPs reported in C-PEP-1 part (b)(ii) above, provide a breakdown of that number by PEP position using the categories provided.

#### **C-PEP-3 PEP location**

This question seeks information on the nationality and residency of **all unique PEPs** reported in C-PEP-1, part (b) (domestic and foreign).

For each jurisdiction, state the number of unique PEPs who are resident, and the number who are nationals of that jurisdiction.

*Explanatory note: for example, a firm has 10 unique domestic PEPs and 30 unique foreign PEPs (so 40 unique PEPs).*

*Of the 10 unique domestic PEPs, all 10 are resident in the Isle of Man, but 5 are classified as IOM nationality and 5 are classified as UK nationality.*

*Of the 30 unique foreign PEPs, 8 are resident in the UK and also UK nationality, a further 10 are resident in the UK but are of various non-UK nationality, and the remaining 12 are resident and nationals of countries other than the IOM or UK.*

*For reporting purposes, the information would be disclosed as follows:-*

<b>Country</b>	<b>Nationality of PEP</b>	<b>Residency of PEP</b>
Isle of Man	5	10
United Kingdom	13	18
Various other countries	22	12

#### **Form completion**

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## **Form D1 – New Business Relationships – Reliance and Concessions**

### **Background and scope**

Form D1 applies to all firms. It provides the Authority with information about new customer relationships, including the level of face to face business, and the extent to which a firm utilises third parties and AML/CFT Code concessions. Further information is also sought in Form D2.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

### **D1-1 Face-to-face business**

This section seeks information about the face-to-face nature, or otherwise, of the new customer business relationships (or, in the case of FSA08 Class 4 & 5 licenceholders, client entities) established in the year across all regulated activity or designated business activity.

State the number of new customer relationships entered into in the year under review, split between those the firm met face-to-face, those met by a related party of the same group, and those not met face-to-face (including through introducers).

The total number of new customer relationships reported here should be consistent with the breakdown in section D1-2 below.

### **D1-2 Reliance on third parties for elements of customer due diligence**

This section seeks information about the extent of reliance on third parties for elements of CDD for new customer relationships established in the year (being those reported in D1-1 above) across all regulated activity or designated business activity.

#### *(i) Reliance is placed on third parties – evidence obtained and held by the firm*

State here the number of new customers where the CDD is collected by a third party, split between those cases 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; or
- 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.

Also indicate, using the drop down lists, whether the firm understands in all cases who has met the customer on a face-to-face basis.

*(ii) Reliance is placed on the eligible introducer to verify the identity and hold that evidence*

State here the number of new customers where the evidence of verification of the identity of the customer is held by an eligible introducer (through the utilisation of the concession permitted under the AML/CFT Code).

Also indicate, using the drop down list, whether the firm understands in all cases who has met the customer on a face-to-face basis.

*(iii) No reliance is placed on third parties*

State here the number of new customers where the CDD is collected by the firm either direct from the customer on a face to face basis, or via remote means (e.g. via email, postal etc).

*(iv) No reliance – other concessions not requiring verification are utilised*

State here the number of new customers where the firm utilises concessions which permit the delay of verification of identity, or do not require the verification of identity.

**D1-3 Use of simplified due diligence**

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

This section seeks information about the extent of application of these concessions used by firms.

In respect of new customer business relationships established in the year under review, state whether any concession applicable to your firm **and available under the AML/CFT Code** has been utilised (using the drop down lists), 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 client, the form would be completed as follows:

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

### D1-4 Comments

This section is free text and allows firms to provide any commentary that is relevant to the completion of Form D1.

### Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## Form D2 – New Business Relationships – Sources and Introducers

### Background and scope

Form D2 applies to all firms. It provides the Authority with information about new customer relationships, and the split of those relationships between introduced and non-introduced, together with a jurisdictional analysis of where new customers have been sourced from (when introduced).

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

### Part (a) – split of business – direct, referred, introduced

This section seeks information about whether the new customer business relationships established in the year were direct business, referred by existing customers, or introduced. For this purpose, “referred” includes business referred by related parties.

State the number of new customer relationships entered into in the year under review, split between the three types shown in (i), (ii) and (iii). For (iii), also provide the number of introducers.

The total number of new customer relationships reported here should be consistent with the numbers in form D1.

### Part (b) – jurisdictional analysis – introduced business

For the new customers reported in part (a) (iii) (introduced business), provide a breakdown of these by jurisdiction **with reference to the correspondence address / location of the introducer**. For example, if there were 10 new customers introduced from firms / persons based in Country Y, then “10” should be input against Country Y in the table.

### Form completion

The firm is required to identify if the form is complete. Any errors identified in the completion of the form will show as “incomplete”.

## **Form E – Disclosures and Reporting**

### **Background and scope**

Form E applies to all firms. It provides the Authority with information about internal and external disclosures, blocked / frozen accounts, and declined / terminated relationships.

‘Customer’ should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

### **E-1 THEMIS**

Using the drop down list, indicate whether or not the firm is registered with THEMIS.

### **E-2 Disclosures to MLRO and FIU**

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.

In this section state the number of internal and external disclosures made in the year split between ML SARS and FT SARS, together with the number of s24 disclosures made to the FIU during the year.

### **E-3 ML/FT enquiries received**

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

In this section state the number of enquiries received in the year from law enforcement, and other competent authorities, split between ML, FT, financial sanctions and others.

### **E-4 Disclosures made to the sanctions officer**

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.

In this section state the number of internal and external disclosures made in the year in relation to sanctions matters, and also state the number of disclosures made for suspected breaches of sanctions (if any). For each category, also provide the aggregate value, in GBP, of the applicable monetary amount relevant to the reported disclosures.



#### **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.

In this section state:

- (a) the number, and value in GBP, of accounts / assets blocked or frozen during the reporting period for sanctions reasons (being accounts / assets that were not previously blocked or frozen);
- (b) the number, and value in GBP, of accounts / assets released during the reporting period, which had previously blocked / frozen for sanctions reasons (these accounts / assets could relate to those reported in part (a) above, or also relate to older assets / accounts previously reported);
- (c) the number, and value in GBP, of accounts / assets blocked / frozen for sanctions reasons as at the end of the reporting period (these accounts / assets could include those reported in part (a) above, and also relate to older assets / accounts previously reported).

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

This section seeks information about any accounts blocked or frozen for purposes other than for sanctions.

In this section state:

- (a) the number, and value in GBP, of accounts / assets blocked or frozen as at the end of the reporting period for ML purposes;
- (b) the number, and value in GBP, of accounts / assets blocked or frozen as at the end of the reporting period for TF purposes;
- (c) the number, and value in GBP, of accounts / assets blocked or frozen as at the end of the reporting period for any other purpose (comments can be provided in section E-8).

#### **E-7 Declined and terminated relationships (ML / TF / Sanctions)**

##### *Declined business*

This section seeks information on the number of potential new customer relationships that were declined for either ML, TF, or sanctions purposes in the reporting period.

State the number of potential new customer relationships that were declined in the reporting period for each category, and also provide the aggregate value of assets in GBP for that declined business (if known).

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*Notes: for those firms that are required to complete Form C3a and C3b, the information in this section should be in relation to investors in schemes only. For TCSPs, the information here should relate to any new potential principals that were declined.*

#### *Terminated business*

This section seeks information on the number of existing customer relationships that were terminated in the reporting period, for either ML, TF, or sanctions purposes.

State the number of existing customer relationships that were terminated in the reporting period for each category, and also provide the aggregate value of assets in GBP for that terminated business (if known).

*Notes: for those firms that are required to complete Form C3a and C3b, the information in this section should be in relation to investors in schemes only. For TCSPs, the information here should relate to client entities terminated.*

#### **E-8 Comments**

This section is free text and allows 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 show as “incomplete”.

## **Form F - Residency of Customer**

### **Background and scope**

Form F applies to all firms. It provides the Authority with information about the firm's customers by jurisdiction so that a picture of the geographical location of the customer base can be understood. The data should be as at the end of the reporting period.

'Customer' should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code.

### **F-1 Unique customers**

Form F relates to all customers of the firm as at the reporting reference date. State the total number of unique customer business relationships across all regulated activities or designated business activities. This figure should only be different to the total number of customers reported in the relevant "C" Forms when there are common customers across different classes of business.

***For TCSPs (FSA08 class 4 and 5 firms), "customers" are the client entities. For FSA08 class 3 firms that are required to complete form C3b, the information in this section should relate to investors in schemes only.***

### **F-2 Jurisdictional analysis of customers**

For each jurisdiction in which a customer of the firm resides, state the number of customers resident in that jurisdiction split between natural and non-natural persons. Note that, for non-natural persons, the jurisdiction should normally be the country of incorporation / establishment unless there are sound grounds to report on a different basis (e.g. country of operation for a branch).

For TCSPs (FSA08 class 4 and 5 firms), customers means client entities for this purpose.

### **F-3 Comments**

This section is free text and allows 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 show as "incomplete".

## **Form G - Residency of Ultimate Beneficial Owners**

### **Background and scope**

Form G applies to all firms that have “non-natural customers”. It provides the Authority with information about the jurisdiction of the residency of the beneficial owners of a firm’s non-natural customer book. The data should be as at the end of the reporting period.

### **G-1 Jurisdictional analysis of ultimate beneficial owners**

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

For each jurisdiction in which a beneficial owner of a non-natural customer of the firm resides, state the number of beneficial owners resident in that jurisdiction.

### **G-2 Comments**

This section is free text and allows 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 show as “incomplete”.

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