



ISLE OF MAN
FINANCIAL SERVICES AUTHORITY

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Guidance for the AML/CFT Annual Statistical Return - STRIX

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CONTENTS

1. GLOSSARY OF TERMS	3
2. ABOUT THIS GUIDANCE	5
2.1 Purpose	5
2.2 Useful links and FAQs	5
2.2.1 How to access STRIX?	5
2.2.2 How to register more users?	5
2.2.3 How to cease users?	5
2.2.4 Can the return data be extracted from STRIX?	6
3. RETURN GUIDANCE - INHERENT RISK	6
3.1 Firm Information	6
3.1.1 Building your Survey	6
3.1.2 Incidental Business	7
3.2 Customer Risk	7
3.2.1 Deposit Taking, Payment Services & E-money – Size and Significance of the Customer Base	7
3.2.2 Deposit Taking, Payment Services & E-money – New Customer Relationships	8
3.2.3 Investment Business, Crowdfunding & Insurance Intermediaries – Size and Significance of the Customer Base	9
3.2.4 Investment Business, Crowdfunding & Insurance Intermediaries – New Customer Relationships	10
3.2.5 Services to CISs – Size and Significance of Scheme (Customer) Base	11
3.2.6 Services to CISs – New Scheme (Customer) Relationships	12
3.2.7 Investing in CISs – Size and Significance of Investor Base Investing into the Schemes	12
3.2.8 Investing in CISs – New Investor Relationships	13
3.2.9 TCSPs – Size and Significance of Customer Base	13
3.2.10 TCSPs – New Customer Relationships	14
3.2.11 TCSPs – Legal Form of Customer Entities	15
3.2.12 TCSPs – Principal Activity of Customer Entities	16
3.2.13 Credit Unions – Size and Significance of the Customer Base	16
3.2.14 Credit Unions – New Customer Relationships	17
3.2.15 Insurance – Long Term Business (including Reinsurance) – Size & Significance of Customer Base	18
3.2.16 Insurance – Long Term Business (including Reinsurance) – New Customer Relationships	20
3.2.17 Insurance – General Business (including Reinsurance) or Restricted (Class 12) only or ISPV Class 13 – Size & Significance of Customer Base	20
3.2.18 Insurance – General Business (including Reinsurance) or Restricted (Class 12) only or ISPV Class 13 – New Customer Relationships	21
3.2.19 Insurance Manager – Size & Significance of Customer Base	22
3.2.20 Insurance Manager – New Customer Relationships	22
3.2.21 Registered Schemes Administrators – Size & Significance of Customer Base (Schemes, Members and Employers)	23
3.2.22 Registered Schemes Administrators – New Customer Relationships (Schemes, Members and Employers)	25
3.2.23 Registered Schemes Administrators – ML/FT/PF Risk Profile of Customer Base	25
3.2.24 Registered Schemes Administrators – ML/FT/PF Risk Profile of New Customer Relationships	27
3.2.25 Designated Business – Size & Significance of Customer Base	28
3.2.26 Designated Businesses – New Customer Relationships	29
3.2.27 Politically Exposed Persons (“PEPs”)	29
3.2.28 Commercially Exposed Persons (“CEPs”)	32
3.2.29 Comments	32
3.3 Geographical Risk	33
3.3.1 Residency of Customers – Jurisdictional Analysis of Customers	33
3.3.2 Residency of UBOs – Jurisdictional Analysis of Ultimate Beneficial Owners	33
3.3.3 Comments	34
3.4 Products & Services Risk	35
3.4.1 Understanding the Firm – Payment Methods	35
3.4.2 Products and Services Scenarios	36
3.4.3 Incidental Business	38
3.4.4 Insurance Activity	38
3.4.5 Comments	39

3.5	Distribution & Due Diligence Risk.....	39
3.5.1	Building this Section.....	39
3.5.2	Customer Base – Reliance and Concessions – Use of Simplified Due Diligence.....	39
3.5.3	New Business Relationships – Reliance and Concessions – Use of Simplified Due Diligence	42
3.5.4	New Business Relationships – Reliance and Concessions – Face-to-Face Business.....	44
3.5.5	New Business Relationships – Reliance and Concessions – Reliance on Third Parties for Elements of CDD	45
3.5.6	New Business Relationships – Sources and Introducers – Sources of Business	47
3.5.7	Comments	48
4.	RETURN GUIDANCE – CONTROLS.....	48
4.1	Controls	48
4.1.1	Entity Control Questions.....	48
4.1.2	Understanding the Firm – Employees, Workers and Contractors	49
4.1.3	AML/CFT Staff Training – During the Reporting Period	50
4.1.4	Activities Undertaken or Outsourced – During the Reporting Period.....	50
4.1.5	Monitoring and Testing Compliance with the AML/CFT Requirements	51
4.1.6	Screening and Monitoring – Screening Provider	52
4.1.7	Screening – New Customers	52
4.1.8	Screening – Continuing Business Relationship on a Regular Basis.....	54
4.1.9	Screening – Continuing Business Relationship when Sanctions Lists are Published / Updated.....	56
4.1.10	Screening – Continuing Business Relationship at a Trigger Event	58
4.1.11	Screening – Continuing Business Relationship at an Unusual Activity Event	60
4.1.12	Screening – Continuing Business Relationship at Suspicious Activity Event	62
4.1.13	Screening – Beneficial Owners – New Customers.....	64
4.1.14	Screening – Beneficial Owners – Continuing Business Relationship on a Regular Basis.....	66
4.1.15	Screening – Beneficial Owners – Cont. Business Relationship, when Sanctions Lists are Published / Updated ...	67
4.1.16	Screening – Beneficial Owners – Continuing Business Relationship at a Trigger Event	69
4.1.17	Screening – Beneficial Owners – Continuing Business Relationship at an Unusual Activity Event.....	71
4.1.18	Screening – Beneficial Owners – Continuing Business Relationship at a Suspicious Activity Event.....	73
4.1.19	Ongoing Monitoring	75
4.1.20	Scrutiny of Transactions	78
4.1.21	Payment Screening – SWIFT	81
4.1.22	Payment Screening – BACS.....	85
4.1.23	Payment Screening – FASTER	88
4.1.24	Disclosures and Reporting – THEMIS.....	91
4.1.25	Disclosures and Reporting – Disclosures to the MLRO, Sanctions Officer and FIU	91
4.1.26	Disclosures and Reporting – International	93
4.1.27	Disclosures and Reporting – ML / FT / PF / Sanctions Enquiries Received.....	93
4.1.28	Disclosures and Reporting – Blocked or Frozen Assets for Sanctions Purposes.....	94
4.1.29	Disclosures and Reporting – Blocked or Frozen Assets for Reasons other than for Financial Sanctions Purposes	95
4.1.30	Disclosures and Reporting – Declined and Terminated Relationships (ML / TF / PF / Sanctions)	95
4.1.31	Comments	96
5.	SIGNATORIES PAGE	97
6.	VERSION / CONTROL HISTORY	98

1. Glossary of Terms

<u>Term</u>	<u>Meaning in this Guidance</u>
AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
BRA	Business Risk Assessment
CDD	Customer Due Diligence
CEP	Commercially Exposed Person
CIS	Collective Investment Scheme
Code	The Anti-Money Laundering and Countering the Financing of Terrorism Code 2019
CRA	Customer Risk Assessment
Customer	Should be interpreted as having the same meaning as in paragraph 3 of the AML/CFT Code ¹
DBRO15	Designated Businesses (Registration and Oversight) Act 2015
DMLRO	Deputy Money Laundering Reporting Officer
DB	Defined Benefit
EU	European Union
FATF	Financial Action Task Force
FIU	Isle of Man Financial Intelligence Unit
FSA08	Financial Services Act 2008
FT / TF	Financing of Terrorism / Terrorist Financing
Handbook	The Anti-Money Laundering and Countering the Financing of Terrorism Handbook
HNWI	High Net Worth Individual
IA08	Insurance Act 2008
IC	Incorporated Companies
ICC	Incorporated Cell Companies
IOM	Isle of Man

¹ Further and elaborated relevant sector-specific definitions of a “customer” can be found in the Authority’s Handbook and various Sector-Specific Guidance documents available

ISPV	Insurance Special Purpose Vehicle
MLRO	Money Laundering Reporting Officer
ML	Money Laundering
MP	Money Purchase
NPO	Non-Profit Organisation (other than a registered charity)
NRA	National Risk Assessment
OFAC	Office of Foreign Assets Control
PCC	Public Cell Company
PEP	Politically Exposed Person
PLC	Public Limited Company
PF	Proliferation Financing
Reporting Period	1 st January to 31 st December inclusive
SDN	Specially Designated Nationals
The Authority	The Isle of Man Financial Services Authority
TCSPs	Trust and Corporate Service Providers
UBOs	Ultimate Beneficial Owners
UK	United Kingdom
UHNWI	Ultra High Net Worth Individual
UN	United Nations
US	United States

2. About this Guidance

2.1 Purpose

This guidance document is designed to further assist firms with the completion of the Isle of Man Financial Services Authority (“the Authority”) AML/CFT Annual Statistical Return within the STRIX system. It gives firms the full list of questions and data being requested, guidance around the questions and in some areas the required format of the requested values. Sections 3 and 4 of this guidance detail each question within the return. The colour key/ format used in this document is as follows:

Question Number	Question	Reference number
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Any questions within this guidance document highlighted in green, as shown below, consist of new questions added within the Return for the year ending 2024:

Question Number	Question	Reference number
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Should you have any further questions or queries which are not covered in this guidance, please contact the AML/CFT Supervision Division by email – amlreturns@iomfsa.im

2.2 Useful links and FAQs

- [IOMFSA - What is STRIX?](#)
- [STRIX Q&As from November 2023 Presentation](#)
- [IOMFSA AML/CFT Requirements and Guidance](#)

2.2.1 How to access STRIX?

You will receive an email from the Authority advising you that the return is available for you to complete. You can also access STRIX by visiting <https://fsareturns.im/>.

2.2.2 How to register more users?

Regulated firms must complete the [F&P2 Notification Only Form](#), ticking the ‘R17b’ box. Once completed the form should be returned to the firm’s relevant supervisory division.

DNFBP firms must complete the [New Strix User Form](#) and return it by email to amlreturns@iomfsa.im.

The users will then be added to STRIX once the form is processed. It is important to note the form must be fully completed in order for the Authority to process it, including the email address of the new user. Please note that new users will be sent an invitation to create their STRIX account only when and once a new questionnaire/return is live.

2.2.3 How to cease users?

Regulated firms should complete the [F&P5 Form](#) and return this to the firm’s relevant supervisory division.

DNFBP firms should submit their request by email to amlreturns@iomfsa.im, ensuring the [designated business portal](#) is updated accordingly where the person is named primary contact for the firm in their latest approved ‘Business Details’ form.

2.2.4 Can the return data be extracted from STRIX?

A STRIX user can extract data from the return by starting the survey and saving it (either part way through completing the return or when complete). Once the return is opened and saved, the user will have to go back to the home screen where there will be an option to download the return or survey in either a Microsoft Excel or PDF format.

Please note however that if the extracted version of the return is used to gather data to collate and answer questions within the survey, depending on the number of conditional questions answered, the extracted version may not detail all the drop-down options available to some of the questions within the return.

Firms should first complete the 'Building your Survey' Risk tab and 'Entity Control Questions' Controls tab as a minimum before downloading, which would allow for the majority of relevant questions to first appear.

It should be noted that a return completed in this format cannot be accepted as a submission and all submission must be through STRIX.

3. Return Guidance - Inherent Risk

3.1 Firm Information

3.1.1 Building your Survey

Q1 to Q11	Selection of permissions	1.1.1 to 1.1.11
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This section of the return will appear for all firms and requires firms to select each of the exact Class(es) and/or Permission(s) that applies to the regulated or registered business under the following Acts:

- [Financial Services Act 2008](#);
- [Insurance Act 2008](#);
- [Retirement Benefits Schemes Act 2000](#); and
- [Designated Businesses \(Registration and Oversight\) Act 2015](#).

Where a firm undertakes multiple regulated or registered activities, all activities undertaken must be selected. This includes where a firm may have or consider some secondary or ancillary regulated or registered activities, classes and/or permissions. Please note that each question must be answered as 'Yes' or 'No'.

Where a licenceholder carries out designated business activity and is exempt from registration under Schedule 1 to the DBRO15, these firms should answer 'No' to Q11 under the '**Building your Survey**' section of the return, which asks if the firm holds a registration under the DBRO15. For clarity, where a firm does undertake incidental designated business activities under (and as part of) their licence, this will be captured in Q12.

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" for Q3, the permission "Services to CIS - Classes 3 (1), (2) and (9)-(12)", to enable the relevant questions to appear.

3.1.2 Incidental Business

Q12	Have you conducted any incidental designated business activities under your licence or registration during the reporting period?	1.2.1
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This question will appear for those firms who have answered 'No' to Q11, which asks whether the business holds a registration under the DBRO15.

Please answer 'Yes' or 'No'. For clarity, this question refers to the Activities as per Schedule 1, Part 1 of the [DBRO15](#), in line with the exemption Schedule 1, Part 2. This question is only applicable for licenced or registered firms under the FSA08, IA08, CIS08 or RBS00.

3.2 Customer Risk

3.2.1 Deposit Taking, Payment Services & E-money – Size and Significance of the Customer Base

This section of the return will appear for those firms who have selected that they hold a Class 1 – Deposit Taking or Class 8 – Money Transmission Services licence within the '**Building your Survey**' section of the return.

Q13	Provide the total number of customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.1.1
Q14	Provide the total number of customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.1.2
Q15	Provide the total number of customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.1.3

For the above questions, input the **total number of customers** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q16	Provide the total number of customer accounts that have been assessed as higher risk at the end of the reporting period, by customer type	2.1.5
Q17	Provide the total number of customer accounts that have been assessed as standard risk at the end of the reporting period, by customer type	2.1.6
Q18	Provide the total number of customer accounts that have been assessed as lower risk at the end of the reporting period, by customer type	2.1.7

For the above questions, input the **total number of customer accounts** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

For clarity, the total number of customer accounts should include all customer accounts, including any new customer accounts established/ on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.2 Deposit Taking, Payment Services & E-money – New Customer Relationships

This section of the return will only appear for those firms who have selected they hold a Class 1 – Deposit Taking or Class 8 – Money Transmission Services licence within the **'Building your Survey'** section of the return.

Q19	Provide the number of new customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.2.1
Q20	Provide the number of new customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.2.2
Q21	Provide the number of new customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.2.3

For the above questions, input the **total number of new customers** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q22	Provide the number of new customer accounts that have been assessed as higher risk at the end of the reporting period, by customer type	2.2.5
Q23	Provide the number of new customer accounts that have been assessed as standard risk at the end of the reporting period, by customer type	2.2.6
Q24	Provide the number of new customer accounts that have been assessed as lower risk at the end of the reporting period, by customer type	2.2.7

For the above questions, input the **total number of new customer accounts** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.3 Investment Business, Crowdfunding & Insurance Intermediaries – Size and Significance of the Customer Base

This section of the return will appear for those firms who have selected the following Class(es) or Permission(s) within the '**Building your Survey**' section of the return; FSA08 Class 2 (3), (6-7): Financial Advisors only, FSA08 Class 6: Crowdfunding Platforms and IA08 General Insurance Intermediary.

Q25	Provide the total number of customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.3.1
Q26	Provide the total number of customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.3.2
Q27	Provide the total number of customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.3.3

For the above questions, input the **total number of customers** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q28	Provide the total number of customer accounts that have been assessed as higher risk at the end of the reporting period, by customer type	2.3.5
Q29	Provide the total number of customer accounts that have been assessed as standard risk at the end of the reporting period, by customer type	2.3.6
Q30	Provide the total number of customer accounts that have been assessed as lower risk at the end of the reporting period, by customer type	2.3.7

For the above questions, input the **total number of customer accounts** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

For clarity, the total number of customer accounts should include all customer accounts, including any new customer accounts established/ on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q31	Provide the total number of customers, from whom 20% or more of the annual fee income of the firm is derived	2.3.9
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This question relates to where a significant part (20% or higher) of the firm's regulated or registered activity annual income is derived from one or a small number of customers.

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 can be zero, and the maximum can be five.***

3.2.4 Investment Business, Crowdfunding & Insurance Intermediaries – New Customer Relationships

This section of the return will appear for those firms who have selected the following Class(es) or Permission(s) within the '**Building your Survey**' section of the return; FSA08 Class 2 (3), (6-7): Financial Advisors only, FSA08 Class 6: Crowdfunding Platforms and IA08 General Insurance Intermediary.

Q32	Provide the number of new customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.4.1
Q33	Provide the number of new customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.4.2
Q34	Provide the number of new customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.4.3

For the above questions, input the **total number of new customers** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q35	Provide the number of new customer accounts that have been assessed as higher risk at the end of the reporting period, by customer type	2.4.5
Q36	Provide the number of new customer accounts that have been assessed as standard risk at the end of the reporting period, by customer type	2.4.6
Q37	Provide the number of new customer accounts that have been assessed as lower risk at the end of the reporting period, by customer type	2.4.7

For the above questions, input the **total number of new customer accounts** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.5 Services to CISs – Size and Significance of Scheme (Customer) Base

This section of the return will only appear for those firms who have selected they hold a Class 3 – Services to Collective Investment Schemes licence within the '**Building your Survey**' section of the return.

Q38	Provide the total number of customers ('being schemes') that have been assessed as higher risk at the end of the reporting period, while distinguishing between IOM and Non-IOM	2.5.1
Q39	Provide the total number of customers ('being schemes') that have been assessed as standard risk at the end of the reporting period, while distinguishing between IOM and Non-IOM	2.5.2
Q40	Provide the total number of customers ('being schemes') that have been assessed as lower risk at the end of the reporting period, while distinguishing between IOM and Non-IOM	2.5.3

For the above questions, input the **total number of customers ('being schemes')** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- IOM Customer
- Non-IOM Customer

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q41	Provide the total number of customers from whom 20% or more of the annual fee income of the firm is derived	2.5.5
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This question relates to where a significant part (20% or higher) of the firm's regulated activity annual income is derived from one or a small number of customers.

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 can be zero, and the maximum can be 5.**

3.2.6 Services to CIs – New Scheme (Customer) Relationships

This section of the return will only appear for those firms who have selected they hold a Class 3 – Services to Collective Investment Schemes licence within the **'Building your Survey'** section of the return.

Q42	Provide the number of new customers ('being schemes') that have been assessed as higher risk at the end of the reporting period, while distinguishing the customer as IOM and Non-IOM	2.6.1
Q43	Provide the number of new customers ('being schemes') that have been assessed as standard risk at the end of the reporting period, while distinguishing the customer as IOM and Non-IOM	2.6.2
Q44	Provide the number of new customers ('being schemes') that have been assessed as lower risk at the end of the reporting period, while distinguishing the customer as IOM and Non-IOM	2.6.3

For the above questions, input the **total number of new customers ('being schemes')** established/ onboarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating and categorised using the following 'customer type' dropdowns:

- IOM Customer
- Non-IOM Customer

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.7 Investing in CIs – Size and Significance of Investor Base Investing into the Schemes

This section of the return will appear for those firms who have selected they hold a Class 3 – Services to Collective Investment Schemes licence within the **'Building your Survey'** section of the return.

Q45	Provide the total number of customers ('being investors of the schemes') that have been assessed as higher risk at the end of the reporting period, by customer type	2.7.1
Q46	Provide the total number of customers ('being investors of the schemes') that have been assessed as standard risk at the end of the reporting period, by customer type	2.7.2
Q47	Provide the total number of customers ('being investors of the schemes') that have been assessed as lower risk at the end of the reporting period, by customer type	2.7.3

For the above questions, input the **total number of customers ('being investors of the schemes')** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- Corporate / Trusts / Nominees managed by IOM financial institutions
- Other corporate and trust customers
- Other customers including public sector

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.8 Investing in CISs – New Investor Relationships

This section of the return will only appear for those firms who have selected they hold a Class 3 – Services to Collective Investment Schemes licence within the **‘Building your Survey’** section of the return.

Q48	Provide the number of new customers (<i>‘being investors of the schemes’</i>) that have been assessed as higher risk at the end of the reporting period, by customer type	2.8.1
Q49	Provide the number of new customers (<i>‘being investors of the schemes’</i>) that have been assessed as standard risk at the end of the reporting period, by customer type	2.8.2
Q50	Provide the number of new customers (<i>‘being investors of the schemes’</i>) that have been assessed as lower risk at the end of the reporting period, by customer type	2.8.3

For the above questions, input the **total number of new customers** (*‘being investors of the schemes’*) established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following ‘customer type’ dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- Corporate / Trusts / Nominees managed by IOM financial institutions
- Other corporate and trust customers
- Other customers including public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.9 TCSPs – Size and Significance of Customer Base

This section of the return will appear for those firms who have selected they hold a Class 4 – Corporate Services and/ or a Class 5 – Trust Services licence within the **‘Building your Survey’** section of the return.

Q51	Provide the total number of customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.9.1
Q52	Provide the total number of customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.9.2
Q53	Provide the total number of customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.9.3

For the above questions, input the **total number of customers** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating and categorised using the following ‘customer type’ dropdowns:

- Companies on a fully managed basis
- Companies on a mixed board basis
- Companies on a registered office / registered agent basis*
- Trusts on a fully managed basis

- Trusts on a joint trustee basis
- Trust – admin only
- Exempt schemes
- Foundation on a fully managed basis
- Foundation joint council basis
- Foundation admin only
- Partnerships

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period.

* For “Companies on a registered office / registered agent basis”, this includes where firm’s may also provide administrative services short of mixed board or fully managed (for example, accounts preparation and statutory work).

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q54	Provide the total number of principals from whom 20% or more of the annual fee income of the firm is derived	2.9.5
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This question relates to where a significant part (20% or higher) of the firm’s regulated activity annual income is derived from one or a small number of customers.

The Authority is seeking high-level information about the number of customers that are material to the firm’s income. 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 can be zero, and the maximum can be 5.**

For clarity, the term ‘**principal**’ within this question refers to the unique person(s) (generally the UBO, being a natural person) who the T/CSP initially engages with for services prior to the client onboarding. For example, one principal may engage a T/CSP to form multiple customer entities during the reporting period.

3.2.10 TCSPs – New Customer Relationships

This section of the return will appear for those firms who have selected they hold a Class 4 – Corporate Services and/ or a Class 5 – Trust Services licence within the ‘**Building your Survey**’ section of the return.

Q55	Provide the number of new customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.10.1
Q56	Provide the number of new customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.10.2
Q57	Provide the number of new customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.10.3

For the above questions, input the **total number of new customers** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating and categorised using the following ‘customer type’ dropdowns:

- Companies on a fully managed basis
- Companies on a mixed board basis
- Companies on a registered office / registered agent basis*
- Trusts on a fully managed basis

- Trusts on a joint trustee basis
- Trust – admin only
- Exempt schemes
- Foundation on a fully managed basis
- Foundation joint council basis
- Foundation admin only
- Partnerships

*For “Companies on a registered office / registered agent basis”, this includes where firm’s may also provide administrative services short of mixed board or fully managed (for example, accounts preparation and statutory work).

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q58	Provide the number of new principals on-boarded in the reporting period	2.10.5
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Please input the total number of new principals on-boarded in the reporting period (1st January to 31st December). For clarity, the term ‘**principal**’ within this question refers to the unique person(s) (generally the UBO, being a natural person) who the T/CSP initially engages with for services prior to the client onboarding. For example, one principal may engage a T/CSP to form multiple customer entities during the reporting period.

3.2.11 TCSPs – Legal Form of Customer Entities

This section of the return will only appear for those firms who have selected they hold a Class 4 – Corporate Services and/ or a Class 5 – Trust Services licence within the ‘**Building your Survey**’ section of the return.

Q59	Provide the total number of Isle of Man entities incorporated under the Isle of Man Companies Act 1931 , by type of legal form	2.11.1
Q60	Provide the total number of Isle of Man entities incorporated under the Isle of Man Companies Act 2006 , by type of legal form	2.11.2
Q61	Provide the total number of ‘ other ’ incorporated entities in the Isle of Man	2.11.3
Q62	Provide the total number of non-Isle of Man incorporated entities, by type of legal form	2.11.5

For the above questions, input the **total number of customer entities** incorporated as at the end of the reporting period (as at the 31st December), categorised using the following ‘legal form type’ dropdowns:

- ICCs
- ICs
- Other Private
- PCCs
- PLCs

Q61 captures ‘other’ IOM incorporated entities, this includes Industrial Societies, Limited Liability Companies, Limited Partnerships and Foundations.

Q63	For customers who are non-Isle of Man incorporated entities, provide the number registered on the Foreign Companies Registry	2.11.7
Q64	For customers who are non-Isle of Man incorporated entities, provide the number not registered on the Foreign Companies Registry	2.11.8

For the above questions, input the **total number of non-Isle of Man customer entities**, split out by those which are registered and not registered on the Foreign Companies Registry, as at the end of the reporting period (as at the 31st December), categorised using the following dropdowns:

- Limited Liability Companies
- Overseas Companies

Q65	Provide the total number of non-incorporated entities with the legal form of Partnerships	2.11.10
Q66	Provide the total number of non-incorporated entities with the legal form of Trusts	2.11.11
Q67	Provide the total number of non-incorporated entities with the legal form of Foundations	2.11.12
Q68	Provide the total number of non-incorporated entities with the legal form of Other	2.11.13

For the above questions, input the **total number of non-incorporated entities** as at the end of the reporting period (as at the 31st December), assessed by their legal form (Partnerships, Trusts, Foundations and Other) and categorised by the following dropdowns:

- Isle of Man established entities
- Non-Isle of Man established entities

3.2.12 TCSPs – Principal Activity of Customer Entities

This section of the return will only appear for those firms who have selected they hold a Class 4 – Corporate Services and/ or a Class 5 – Trust Services licence within the ***‘Building your Survey’*** section of the return.

Q69	Provide an analysis of the principal activity of the customer entities to which services are provided by the firm that are: Corporates	2.12.1
Q70	Provide an analysis of the principal activity of the customer entities to which services are provided by the firms that are: Trusts	2.12.2
Q71	Provide an analysis of the principal activity of the customer entities to which services are provided by the firm that are: Foundations	2.12.3
Q72	Provide an analysis of the principal activity of the customer entities to which services are provided by the firm that are: Partnerships	2.12.4

For the above questions, input the **total number of customer entities** to which services are provided by the firm, split out by the relevant legal form (Corporates, Trusts, Foundations and Partnerships), as at the end of the reporting period (as at the 31st December), categorised using the following ‘principal activity’ dropdowns:

- Asset Holding;
- Charitable Activities;
- Other; or
- Trading.

Where it is unclear to firms which principal activity category a customer entity falls into, or which entity type a customer should be categorised as, the firm should use its best judgement and apply a consistent methodology in the allocation for all their customers.

3.2.13 Credit Unions – Size and Significance of the Customer Base

This section of the return will only appear for those firms who have selected they hold a Class 9 – Credit Union licence within the ***‘Building your Survey’*** section of the return.

Q73	Provide the total number of customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.13.1
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Q74	Provide the total number of customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.13.2
Q75	Provide the total number of customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.13.3

For the above questions, input the **total number of customers** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q76	Provide the total number of customer accounts that have been assessed as higher risk at the end of the reporting period, by customer type	2.13.5
Q77	Provide the total number of customer accounts that have been assessed as standard risk at the end of the reporting period, by customer type	2.13.6
Q78	Provide the total number of customer accounts that have been assessed as lower risk at the end of the reporting period, by customer type	2.13.7

For the above questions, input the **total number of customer accounts** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

For clarity, the total number of customer accounts should include all customer accounts, including any new customer accounts established/ on-boarded in the reporting period.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.14 Credit Unions – New Customer Relationships

This section of the return will appear for those firms who have selected they hold a Class 9 – Credit Union licence within the '**Building your Survey**' section of the return.

Q79	Provide the number of new customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.14.1
Q80	Provide the number of new customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.14.2
Q81	Provide the number of new customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.14.3

For the above questions, input the **total number of new customers** established/ on-boarded in the reporting period, assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q82	Provide the number of new customer accounts that have been assessed as higher risk at the end of the reporting period, by customer type	2.14.5
Q83	Provide the number of new customer accounts that have been assessed as standard risk at the end of the reporting period, by customer type	2.14.6
Q84	Provide the number of new customer accounts that have been assessed as lower risk at the end of the reporting period, by customer type	2.14.7

For the above questions, input the **total number of new customer accounts** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons – IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.15 Insurance – Long Term Business (including Reinsurance) – Size & Significance of Customer Base

This section of the return will only appear for those firms who have selected Classes 1, 2, & 10: Long Term Business within the '**Building your Survey**' section of the return.

Q85	Provide the total number of customers with in-force policies that have been assessed as higher risk at the end of the reporting period, by customer type	2.15.1
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Q86	Provide the total number of customers with in-force policies that have been assessed as standard risk at the end of the reporting period, by customer type	2.15.2
Q87	Provide the total number of customers with in-force policies that have been assessed as lower risk at the end of the reporting period, by customer type	2.15.3

For the above questions, input the **total number of customers with in-force policies** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Single Premium Investment
- Portfolio Bond
- Portfolio Bond (private company shares permitted)
- Single Premium Capital Redemption Bond
- Regular Premium Capital Redemption Bond
- Regular Premium Savings
- Pure Protection

'In-force' policies are those which are live and active, which typically have value and the ability to receive additional premiums. This excludes those policies which are either closed, surrendered or terminated.

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period. Where a customer has multiple policies/ contracts please ensure that all of these are recorded and reflected in the above questions Q85 to Q87.

For example, where 1 customer has been assessed as higher risk and has the following multiple contracts:

- 1x Portfolio Bond
- 2x Regular Premium Capital Redemption Bond
- 1x Regular Premium Savings

Please report 4 higher risk customers in Q85.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q88	Provide the total number of customers from whom 20% or more of the annual fee income of the firm is derived	2.15.5
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This question relates to where a significant part (20% or higher) of the firm's annual income coming from their regulated activity is derived from one or a small number of customers.

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 can be zero, and the maximum can be 5.**

3.2.16 Insurance – Long Term Business (including Reinsurance) – New Customer Relationships

This section of the return will appear for those firms who have selected Classes 1, 2, & 10: Long Term Business within the ***‘Building your Survey’*** section of the return.

Q89	Provide the number of new customers that have been assessed as higher risk at the end of the reporting period, by customer type	2.16.1
Q90	Provide the number of new customers that have been assessed as standard risk at the end of the reporting period, by customer type	2.16.2
Q91	Provide the number of new customers that have been assessed as lower risk at the end of the reporting period, by customer type	2.16.3

For the above questions, input the **total number of new customers** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following ‘customer type’ dropdowns:

- Single Premium Investment
- Portfolio Bond
- Portfolio Bond (private company shares permitted)
- Single Premium Capital Redemption Bond
- Regular Premium Capital Redemption Bond
- Regular Premium Savings
- Pure Protection

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.17 Insurance – General Business (including Reinsurance) or Restricted (Class 12) only or ISPV Class 13 – Size & Significance of Customer Base

This section of the return will appear for those firms who have selected the following Class(es) or Permission(s) within the ***‘Building your Survey’*** section of the return; Classes 3-9 & 11 – General Business (including Reinsurance), Class 12 Only / Class 13 Only – Restricted (all insurance types) or ISPV Class 13.

Q92	Provide the total number of customers with in-force policies that have been assessed as higher risk at the end of the reporting period, by customer type	2.17.1
Q93	Provide the total number of customers with in-force policies that have been assessed as standard risk at the end of the reporting period, by customer type	2.17.2
Q94	Provide the total number of customers with in-force policies that have been assessed as lower risk at the end of the reporting period, by customer type	2.17.3

For the above questions, input the **total number of customers with in-force policies** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following ‘customer type’ dropdowns:

- Natural persons IOM resident
- Natural persons Non-IOM resident
- Corporate and trust customers
- Other policyholders including public sector

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period. **‘In-force’** policies are those which are live and active, which typically

have value and the ability to receive additional premiums. This excludes those policies which are either closed, surrendered or terminated.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q95	Number of customers from whom 20% or more of the annual fee income of the firm is derived	2.17.5
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This question relates to where a significant part (20% or higher) of the firm's regulated activity annual income is derived from one or a small number of customers.

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 can be zero, and the maximum can be 5.**

3.2.18 Insurance – General Business (including Reinsurance) or Restricted (Class 12) only or ISPV Class 13 – New Customer Relationships

This section of the return will appear for those firms who have selected the following Class(es) or Permission(s) within the '**Building your Survey**' section of the return; Classes 3-9 & 11 – General Business (including Reinsurance), Class 12 Only / Class 13 Only – Restricted (all insurance types) or ISPV Class 13.

Q96	Provide the number of new customers with in-force policies that have been assessed as higher risk at the end of the reporting period, by customer type	2.18.1
Q97	Provide the number of new customers with in-force policies that have been assessed as standard risk at the end of the reporting period, by customer type	2.18.2
Q98	Provide the number of new customers with in-force policies that have been assessed as lower risk at the end of the reporting period, by customer type	2.18.3

For the above questions, input the **total number of new customers with in-force policies** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural persons - IOM resident
- Natural persons Non-IOM resident
- Corporate and trust customers
- Other policyholders including public sector

For clarity, '**in-force**' policies are those which are live and active, which typically have value and the ability to receive additional premiums. This excludes those policies which are either closed, surrendered or terminated.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.19 Insurance Manager – Size & Significance of Customer Base

This section of the return will appear for those firms who have selected they hold the permission/registration of an Insurance Manager within the **'Building your Survey'** section of the return.

Q99	Provide the total number of customers with in-force policies that have been assessed as higher risk at the end of the reporting period, by customer type	2.19.1
Q100	Provide the total number of customers with in-force policies that have been assessed as standard risk at the end of the reporting period, by customer type	2.19.2
Q101	Provide the total number of customers with in-force policies that have been assessed as lower risk at the end of the reporting period, by customer type	2.19.3

For the above questions, input the **total number of customers with in-force policies** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Self-Insurer of PLC Group
- Self-Insurer of Mutuals
- Self-Insurer of Private Groups
- Producer Owned (re) Insurer
- Third Party Writer
- Insurance Manager – Other

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period. **'In-force'** policies are those which are live and active, which typically have value and the ability to receive additional premiums. This excludes those policies which are either closed, surrendered or terminated.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q102	Number of customers from whom 20% or more of the annual fee income of the firm is derived	2.19.5
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This question relates to where a significant part (20% or higher) of the firm's regulated or registered activity annual income is derived from one or a small number of customers.

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 can be zero, and the maximum can be 5.**

3.2.20 Insurance Manager – New Customer Relationships

This section of the return will appear for those firms who have selected they hold the permission/registration of an Insurance Manager within the **'Building your Survey'** section of the return.

Q103	Provide the number of new customers with in-force policies that have been assessed as higher risk at the end of the reporting period, by customer type	2.20.1
Q104	Provide the number of new customers with in-force policies that have been assessed as standard risk at the end of the reporting period, by customer type	2.20.2

Q105	Provide the number of new customers with in-force policies that have been assessed as lower risk at the end of the reporting period, by customer type	2.20.3
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For the above questions, input the total number of **new customers with in-force policies** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following ‘customer type’ dropdowns:

- Self-Insurer of PLC Group
- Self-Insurer of Mutuals
- Self-Insurer of Private Groups
- Producer Owned (re) Insurer
- Third Party Writer
- Insurance Manager – Other

For clarity, ‘**in-force**’ policies are those which are live and active, which typically have value and the ability to receive additional premiums. This excludes those policies which are either closed, surrendered or terminated.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.21 Registered Schemes Administrators – Size & Significance of Customer Base (Schemes, Members and Employers)

This section of the return will appear for those firms who have selected they hold the permission/ registration of a Retirement Benefits Scheme Administrator within the ‘**Building your Survey**’ section of the return.

Q106	Total number of administered Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes at the end of the reporting period, broken down by scheme type	2.21.1
Q107	Total number of members of Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes at the end of the reporting period, broken down by scheme type	2.21.2
Q108	Total number of participating employers to Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes at the end of the reporting period, broken down by scheme type	2.21.3

For the above questions, input the **total number of defined benefit or mixed occupational pension schemes administered/members/participating employers** as at the end of the reporting period (as at the 31st December), categorised using the following ‘scheme type’ dropdowns:

- Defined Benefit Only Occupational Schemes, Domestic
- Defined Benefit Only Occupational Schemes, International
- Mixed Occupational Schemes, Domestic
- Mixed Occupational Schemes, International

Mixed schemes refers to being both defined benefit (“DB”) and Money Purchase (“MP”).

Q109	Total number of Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes from whom 20% or more of the annual fee income of the firm is derived at the end of the reporting period, broken down by scheme type	2.21.4
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This question relates to where a significant part (20% or higher) of the firm's regulated activity annual income is derived from one or a small number of customers, categorised by the following 'scheme type' dropdowns:

- Domestic, Defined Benefit Only Occupational Schemes
- International, Defined Benefit Only Occupational Schemes
- Domestic, Mixed Occupational Schemes
- International, Mixed Occupational Schemes

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 across the dropdowns can be zero, and the maximum can be 5.***

Mixed schemes refers to being both defined benefit ("DB") and Money Purchase ("MP").

Q110	Total number of administered Money Purchase pension schemes at the end of the reporting period, broken down by scheme type	2.21.5
Q111	Total number of members of Money Purchase pension schemes at the end of the reporting period, broken down by scheme type	2.21.6
Q112	Total number of contributing employers to Money Purchase pension schemes at the end of the reporting period, broken down by scheme type	2.21.7

For the above questions, input the **total number of Money Purchase pension schemes administered/members/contributing employers** as at the end of the reporting period (as at the 31st December), categorised using the following 'scheme type' dropdowns:

- Occupational MP, Domestic
- Occupational MP, International
- Personal MP, Domestic
- Personal MP, International

Q113	Total number of Money Purchase pension schemes from whom 20% or more of the annual fee income of the firm is derived at the end of the reporting period, broken down by scheme type	2.21.8
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This question relates to where a significant part (20% or higher) of the firm's regulated activity annual income is derived from one or a small number of customers, categorised by the following 'scheme type' dropdowns:

- Occupational MP, Domestic
- Occupational MP, International
- Personal MP, Domestic
- Personal MP, International

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 across the dropdowns can be zero, and the maximum can be 5.***

3.2.22 Registered Schemes Administrators – New Customer Relationships (Schemes, Members and Employers)

This section of the return will appear for those firms who have selected they hold the permission/registration of a Retirement Benefits Scheme Administrator within the **‘Building your Survey’** section of the return.

Q114	Number of new administered Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes at the end of the reporting period, broken down by scheme type	2.22.1
Q115	Number of new members of Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes at the end of the reporting period, broken down by scheme type	2.22.2
Q116	Number of new participating employers to Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes at the end of the reporting period, broken down by scheme type	2.22.3

For the above questions, input the **total number of new defined benefit or mixed occupational pension schemes administered/members/participating employers** as at the end of the reporting period (as at the 31st December), categorised using the following ‘scheme type’ dropdowns:

- Defined Benefit Only Occupational Schemes, Domestic
- Defined Benefit Only Occupational Schemes, International
- Mixed Occupational Schemes, Domestic
- Mixed Occupational Schemes, International

Mixed schemes refers to being both defined benefit (“DB”) and Money Purchase (“MP”).

Q117	Number of new administered Money Purchase pension schemes at the end of the reporting period, broken down by scheme type	2.22.4
Q118	Number of new members of Money Purchase pension schemes at the end of the reporting period, broken down by scheme type	2.22.5
Q119	Number of new contributing employers to Money Purchase pension schemes at the end of the reporting period, broken down by scheme type	2.22.6
Q120	Number of other third parties paying into Money Purchase pension schemes at the end of the reporting period, broken down by scheme type	2.22.7

For the above questions, input the **total number of new Money Purchase pension schemes administered/members/contributing employers/other paying in third parties** as at the end of the reporting period (as at the 31st December), categorised using the following ‘scheme type’ dropdowns:

- Occupational MP, Domestic
- Occupational MP, International
- Personal MP, Domestic
- Personal MP, International

3.2.23 Registered Schemes Administrators – ML/FT/PF Risk Profile of Customer Base

This section of the return will appear for those firms who have selected they hold the permission/registration of a Retirement Benefits Scheme Administrator within the **‘Building your Survey’** section of the return.

Q121	Provide the total number of Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes customers ('being schemes') that have been assessed as higher risk at the end of the reporting period, by customer type	2.23.1
Q122	Provide the total number of Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes customers ('being schemes') that have been assessed as standard risk at the end of the reporting period, by customer type	2.23.2
Q123	Provide the total number of Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes customers ('being schemes') that have been assessed as lower risk at the end of the reporting period, by customer type	2.23.3

For the above questions, input the **total number of defined benefit or mixed occupational pension schemes customers ('being schemes')** as at the end of the reporting period (as at the 31st December), categorised using the following 'scheme type' dropdowns:

- Defined Benefit Only Occupational Schemes, Domestic
- Defined Benefit Only Occupational Schemes, International
- Mixed Occupational Schemes, Domestic
- Mixed Occupational Schemes, International

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Mixed schemes refers to being both defined benefit ("DB") and Money Purchase ("MP").

Q124	Provide the total number of Money Purchase pension schemes customers ('being schemes') that have been assessed as higher risk at the end of the reporting period, by customer type	2.23.5
Q125	Provide the total number of Money Purchase pension schemes customers ('being schemes') that have been assessed as standard risk at the end of the reporting period, by customer type	2.23.6
Q126	Provide the total number of Money Purchase pension schemes customers ('being schemes') that have been assessed as lower risk at the end of the reporting period, by customer type	2.23.7

For the above questions, input the **total number of Money Purchase pension schemes customers ('being schemes')** as at the end of the reporting period (as at the 31st December), categorised using the following 'scheme type' dropdowns:

- Occupational MP, Domestic
- Occupational MP, International
- Personal MP, Domestic
- Personal MP, International

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.24 Registered Schemes Administrators – ML/FT/PF Risk Profile of New Customer Relationships

This section of the return will appear for those firms who have selected they hold the permission/registration of a Retirement Benefits Scheme Administrator within the **'Building your Survey'** section of the return.

Q127	Provide the number of new Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes customers (<i>'being schemes'</i>) that have been assessed as higher risk at the end of the reporting period, by customer type	2.24.1
Q128	Provide the number of new Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes customers (<i>'being schemes'</i>) that have been assessed as standard risk at the end of the reporting period, by customer type	2.24.2
Q129	Provide the number of new Defined Benefit or Mixed (both DB and Money Purchase) occupational pension schemes customers (<i>'being schemes'</i>) that have been assessed as lower risk at the end of the reporting period, by customer type	2.24.3

For the above questions, input the **total number of new defined benefit or mixed occupational pension schemes customers ('being schemes')** as at the end of the reporting period (as at the 31st December), categorised using the following 'scheme type' dropdowns:

- Defined Benefit Only Occupational Schemes, Domestic
- Defined Benefit Only Occupational Schemes, International
- Mixed Occupational Schemes, Domestic
- Mixed Occupational Schemes, International

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Mixed schemes refers to being both defined benefit ("DB") and Money Purchase ("MP").

Q130	Provide the number of new Money Purchase pension schemes customers (<i>'being schemes'</i>) that have been assessed as higher risk at the end of the reporting period, by customer type	2.24.5
Q131	Provide the number of new Money Purchase pension schemes customers (<i>'being schemes'</i>) that have been assessed as standard risk at the end of the reporting period, by customer type	2.24.6
Q132	Provide the number of new Money Purchase pension schemes customers (<i>'being schemes'</i>) that have been assessed as lower risk at the end of the reporting period, by customer type	2.24.7

For the above questions, input the **total number of new Money Purchase pension schemes customers ('being schemes')** as at the end of the reporting period (as at the 31st December), categorised using the following 'scheme type' dropdowns:

- Occupational MP, Domestic
- Occupational MP, International
- Personal MP, Domestic
- Personal MP, International

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

3.2.25 Designated Business – Size & Significance of Customer Base

This section of the return will only appear for those firms who have selected they hold the permission/registration of a Designated Business within the **'Building your Survey'** section of the return.

Q133	Provide the total number of customers assessed as higher risk at the end of the reporting period, by customer type	2.25.1
Q134	Provide the total number of customers assessed as standard risk at the end of the reporting period, by customer type	2.25.2
Q135	Provide the total number of customers assessed as lower risk at the end of the reporting period, by customer type	2.25.3

For the above questions, input the **total number of customers** as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following 'customer type' dropdowns:

- Natural Persons - IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPO's
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

For clarity, the total number of customers should include all existing customers, including any new customers on-boarded in the reporting period.

Where a firm may operate on a 'matters' basis, for example in the case of legal professionals, the data reported in the above questions should be based on customers rather than matters. For example, if two individuals engage a law firm for one conveyancing matter, the two individuals should be classed as customers in the above questions and therefore recorded separately.

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

Q136	Provide the number (if any) of customers from whom 20% or more of the annual fee income of the firm is derived	2.25.5
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This question relates to where a significant part (20% or higher) of the firm's annual income coming from their registered activity is derived from one or a small number of customers.

The Authority is seeking high-level information about the number of customers that are material to the firm's income. 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 can be zero, and the maximum can be 5.**

Q137	Provide the income received over the past 12 months from Designated Business activities	2.25.6
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Please input the total income in GBP received from designated business activity(ies) in the reporting period (1st January to 31st December). 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 period.

3.2.26 Designated Businesses – New Customer Relationships

This section of the return will only appear for those firms who have selected they hold the permission/ registration of a Designated Business within the ***‘Building your Survey’*** section of the return.

Q138	Provide the total number of new customers assessed as higher risk in the reporting period, by customer type	2.26.1
Q139	Provide the total number of new customers assessed as standard risk in the reporting period, by customer type	2.26.2
Q140	Provide the total number of new customers assessed as lower risk in the reporting period, by customer type	2.26.3

For the above questions, input the **total number of new customers** established/ on-boarded as at the end of the reporting period (as at the 31st December), assessed by the relevant risk rating, and categorised using the following ‘customer type’ dropdowns:

- Natural Persons - IOM Resident
- Natural Persons – Non-IOM Resident
- IOM Charities / NPOs
- Non-IOM Charities / NPOs
- Corporate / Trusts managed by IOM TCSPs
- Other corporate and trust customers
- Other customers including banks and public sector

The Authority understands firms may not currently use all three available risk scoring options. If the firm utilises different risk ratings, please choose the equivalent risk score from the options available (higher, standard, lower).

For clarity for the above questions, ‘new customers’ includes returning customers where the firm has had to re-engage with any customers and subsequently on-boarded them again within the reporting period (i.e. new CDD, terms of business etc.).

3.2.27 Politically Exposed Persons (“PEPs”)

Q141	Did the firm have any PEP customers during the reporting period?	2.27.1
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The above question will appear for all firms for completion and is seeking confirmation on whether the firm has had any Politically Exposed Persons customers throughout the reporting period (1st January to 31st December).

Please answer ‘Yes’ or ‘No’. If answered ‘Yes’ the below questions Q142 to Q150 will appear.

Q142	Number of customers associated with a domestic PEP	2.27.2
Q143	Number of customers associated with a foreign PEP	2.27.3

For the above questions, input the **total number of customers associated with a PEP**, split out by domestic and foreign PEPs. For clarity, customers may be natural or non-natural persons, and this question seeks to understand how many customer relationships a firm has where there is an association to an individual who is classed as a PEP.

It is important to recognise that the definitions of domestic PEP and foreign PEP are based on where the individual PEP’s prominent functions are undertaken, and not the residency of the individual:

- A **Domestic PEP** is an individual who is either a PEP (being an individual who is entrusted with a prominent public function), or a PEP by association (being any family members or close associates of a PEP) whereby the prominent public function is **in the Isle of Man.**
- A **Foreign PEP** is an individual who is either a PEP (being an individual who is entrusted with a prominent public function), or a PEP by association (being any family members or close associates of a PEP) whereby the prominent public function is **outside of the Isle of Man** (including the United Kingdom and Channel Islands).

Q144	Of the above reported customers with a domestic PEP connection, how many unique PEPs are a domestic PEP ?	2.27.4
Q145	Of the above reported customers with a foreign PEP connection, how many unique PEPs are a foreign PEP ?	2.27.5

For the above questions input the total number of unique PEPs (being PEPs and PEPs by association), split out by domestic and foreign PEPs. A unique PEP is an individual classified as a PEP as defined in the Code; they may be a customer, or they may be an individual within a customer structure / relationship.

“PEP Customer” vs “Unique PEP”

A PEP customer is any customer (natural or legal person) of the firm having an association or connection to a PEP, as defined by the Code.

A unique PEP is an individual natural person.

For example;

- One unique PEP could have multiple customer relationships/accounts; or
- One unique PEP could be a director or trustee across multiple companies/trusts; or
- Multiple unique PEPs could have one customer relationship/account; or
- Multiple unique PEPs could have one company/trust.

Q146	For the unique domestic PEP relationships reported above, please indicate the PEP position held and numbers of position held using the drop-down list	2.27.6
Q147	For the unique foreign PEP relationships reported above, please indicate the PEP position held and numbers of position held using the drop-down list	2.27.7

For the above questions, input the **number of unique PEPs** reported, split out by domestic and foreign PEPs and categorised using the following ‘**position type**’ dropdown list:

- Head of state, head of government, minister or deputy / assistant minister
- Senior government official
- Member of parliament
- Senior politician
- Important political party official
- Senior judicial official
- Member of court of auditors or the board of a central bank
- Ambassador, chargé d'affaires or another high-ranking officer in a diplomatic service
- High-ranking officer in an armed force
- Senior member of an administrative, management or supervisory body of a state-owned enterprise
- Senior member of management of, or a member of, the governing body of an international entity or organisation
- Other*

A PEP is any person who is (or has been) entrusted with any prominent public functions such as the above.

A customer may also be a PEP due to being associated to a PEP, for example family members or close associates of such a person. In this case, please select the most appropriate dropdown option to record the position of the PEP they are connected to. For example, where a customer is classed as a PEP due to being a family member of a member of parliament, for the position please select 'member of parliament'.

*'Other' being a politically exposed position/role which is not prescribed by the Code and included in the available dropdown list.

Q148	Provide the nationality for all unique PEPs reported above (domestic and foreign)	2.27.8
Q149	Provide the residency for all unique PEPs reported above (domestic and foreign)	2.27.9

For the above questions, input the nationality and residency of the reported **unique** PEPs.

Please ensure that you report the total number of unique PEPs reported in Q144 and Q145.

Q150	Does the firm declassify PEPs?	2.27.11
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Please answer 'Yes' or 'No'. If answered 'Yes' the below questions Q151 to Q154 will appear.

This question seeks to understand whether or not firms 'declassify' individuals as PEPs (i.e. going from a PEP status to a non-PEP status). Declassified PEPs are those individuals who match and fit the definition of a PEP, as defined by the Code, but the firm has chosen to no longer classify them as a PEP.

Q151	Number of domestic PEPs declassified in the reporting period	2.27.12
Q152	Total number of domestic PEPs declassified	2.27.13
Q153	Number of foreign PEPs declassified in the reporting period	2.27.14
Q154	Total number of foreign PEPs declassified	2.27.15

If the firm does declassify PEPs, the above questions seek to understand how many have been declassified, split out by domestic and foreign, in both the reporting period (the last 12 months) and in total.

It is important to recognise that the definitions of domestic PEP and foreign PEP are based on where the PEP's prominent functions are undertaken, rather than the residency of the individual:

- **Domestic PEP** is a PEP who is (or has been) entrusted with a prominent public function **in the Island**. This includes any family members or close associates of the PEP regardless of the location of that PEP, or the PEPs family members or close associates.
- **Foreign PEP** is a PEP who is (or has been) entrusted with a prominent public function **outside of the Island** (including the United Kingdom and Channel Islands). This includes any family members or close associates of the PEP regardless of the location of that PEP, or the PEPs family members or close associates.

3.2.28 Commercially Exposed Persons (“CEPs”)

Q155	Please confirm the number of commercially exposed customers; being customers associated with persons who are in, or associated with, the following occupational activities	2.28.1
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This question will appear for all firms to complete and asks for the **total number of commercially exposed persons** who are connected to customers, who are employed in or associated with, the occupational activities listed below, as at the end of the reporting period (as at the 31st December).

- Arms / weapons trading, dealing and defence
- Casinos, gambling and betting
- Construction / development industry
- Dating / adult entertainment industry
- Decision-making members of high-profile sporting bodies
- Import/export companies/industry
- Money services businesses
- Oil and gas industry
- Pharmaceuticals and healthcare
- Precious metals and stones mining and trading
- Shipping and transport of goods
- Virtual asset service providers

CEPs are individuals who are associated with a specific industry activity which typically has a higher exposure to bribery and corruption, which, in turn, may increase the ML/FT/PF risk posed to the firm by such individuals where they are connected to a customer. An individual would be regarded as a CEP due to their position as a senior executive of a commercial enterprise in an industry posing a higher risk of financial crime.

For example, a Board member, senior executive, or person with decision-making power or influence (such as an Owner, CEO or Senior Manager) in one of the listed occupational activities would be considered a CEP. However, an administrator or employee with no decision-making power or influence would not be classed as a CEP.

3.2.29 Comments

Q156	Do you have any comments to the previous sections?	2.29.1
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This section of the return will appear for all firms. Please select ‘Yes’ or ‘No’. If answered ‘Yes’ the below comment box will appear:-

Q157	This section is provided to allow firms to provide any commentary that is relevant to the completion of this form	2.29.2
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3.3 Geographical Risk

3.3.1 Residency of Customers – Jurisdictional Analysis of Customers

Q158	Does the firm have any natural persons customers?	3.1.1
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This question will appear for all firms for completion. Please answer 'Yes' or 'No'. If answered 'Yes' question Q159 will appear.

Q159	For each jurisdiction in which a customer of the firm resides, please indicate the number of natural persons customers in that jurisdiction	3.1.2
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For the above question, input the total number and jurisdiction of all customers which are natural persons.

Q160	Does the firm have any non-natural persons customers?	3.1.3
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This question will appear for all firms for completion. Please answer 'Yes' or 'No'. If answered 'Yes' questions Q161 to Q163 will appear.

For clarity, a **non-natural person** consists of legal person or arrangement for example a:

- 1931 Act Company
- 2006 Act Company
- Limited Liability Company
- Foreign Company
- Limited Partnership
- Trust
- Foundation

Q161	For each jurisdiction in which a customer of the firm resides, please indicate the number of non-natural persons customers in that jurisdiction	3.1.4
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For the above question, input the total number and jurisdiction of all customers which are non-natural persons (a legal person or arrangement).

Q162	Provide the total number of customers	3.1.5
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For the above question, input the sum total of both natural and non-natural persons across all aspects of the licenced or registered business.

Please note the number provided in this question should add up to those figures provided in questions Q159 and Q161.

3.3.2 Residency of UBOs – Jurisdictional Analysis of Ultimate Beneficial Owners

This section of the return will appear for those firms who have answered 'Yes' to question Q160, confirming to have non-natural person customers.

Q163	Provide the total number of ultimate beneficial owners resident in each jurisdiction for all non-natural persons customers (e.g. legal persons or arrangements)	3.2.1
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For the above question, input the total number of ultimate beneficial owners and their country of residence for all non-natural person(s) customers reported in question Q161. For clarity, this question is referring to the ultimate beneficial owners identified in line with paragraph 12 of the AML/CFT Code.

Q164	Provide the total number of unique ultimate beneficial owners resident in each jurisdiction for all non-natural persons customers (e.g. legal persons or arrangements)	3.2.2
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For the above question, input the total number of unique ultimate beneficial owners and their country of residence for all non-natural person(s) customers reported in question Q161.

The purpose of this question is to understand where one unique UBO from a jurisdiction may be reported multiple times, if they are the UBO of multiple non-natural persons (i.e. legal persons or arrangements). The number of unique UBOs will always be equal to or lower than the total number of UBOs resident in each jurisdiction for each customer.

Examples of how 5 non-natural persons UBOs could be reported as unique UBOs:

- **Example 1** - 5 non-natural persons and the UBO is 1 unique natural person = **1 unique UBO**
- **Example 2** - 4 non-natural persons are shared by 2 unique UBOs and 1 non-natural person has 1 unique UBO = **3 unique UBOs**
- **Example 3** - 1 non-natural person is shared by 3 unique UBOs and 4 separate non-natural persons each has 1 unique UBO = **7 unique UBOs**

3.3.3 Comments

Q165	Do you have any comments to the previous sections?	3.3.1
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This section of the return will appear for all firms. Please select 'Yes' or 'No'. If answered 'Yes' the below comment box will appear:

Q166	This section is provided to allow firms to provide any commentary that is relevant to the completion of this form	3.3.2
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3.4 Products & Services Risk

3.4.1 Understanding the Firm – Payment Methods

Q167	In relation to the regulated activities or designated business please confirm if you: Accept incoming cash and their frequency	4.1.1
Q168	Utilise outgoing cash and their frequency	4.1.2
Q169	Accept incoming bank transfer (incl. DD/SO) and their frequency	4.1.3
Q170	Utilise outgoing bank transfer (incl. DD/SO) and their frequency	4.1.4
Q171	Accept incoming cheque / bankers draft and their frequency	4.1.5
Q172	Utilise outgoing cheque / bankers draft and their frequency	4.1.6
Q173	Accept incoming debit / credit card and their frequency	4.1.7
Q174	Utilise outgoing debit / credit card and their frequency	4.1.8
Q175	Accept incoming prepaid card and their frequency	4.1.9
Q176	Utilise outgoing prepaid card and their frequency	4.1.10
Q177	Accept incoming online e-money payments system (e.g. PayPal or similar) and their frequency	4.1.11
Q178	Utilise outgoing online e-money payments system (e.g. PayPal or similar) and their frequency	4.1.12
Q179	Accept incoming crypto / virtual asset and their frequency	4.1.13
Q180	Utilise outgoing crypto / virtual asset and their frequency	4.1.14
Q181	Accept incoming in-specie transfer of property with monetary value (e.g. shares) and their frequency	4.1.15
Q182	Utilise outgoing in-specie transfer of property with monetary value (e.g. shares) and their frequency	4.1.16

This section of the return will appear for all firms for completion and asks to confirm as at the end of the reporting period (as at 31st December) what payment methods are utilised and their frequency in relation to the firms regulated activities or designated business activities.

For each of the above questions, please answer using the following dropdowns:

- **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

The Authority seeks to understand the payment methods accepted or utilised by the firm for incoming and outgoing transfer of funds to and from customers in respect of all regulated or registered 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.

3.4.2 Products and Services Scenarios

This section of the return will appear for all firms for completion.

Q183	Does the firm send/receive any third party payments for products or services on behalf of any customers?	4.2.1
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For the above question, indicate if the firm accepts or transfers monies and/or assets for any of the products and services offered by the firm to or from a third party who is not the customer. Please answer 'Yes' or 'No'.

For example, a third party including a related entity or family member paying on behalf of the customer.

Q184	Does the firm offer any online, no contact, non-face-to-face products or services?	4.2.2
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For the above question, indicate if the firm has any products or services where a customer is onboarded and approved/accepted through an online, no contact system. E.g. via an online system with automated decision making/approval onboarding function. Please answer 'Yes' or 'No'.

This may be related to applying for a product or service which is offered through an online system which automatically onboards the customer. Examples of products and services which could be applicable include; bank accounts, lending products, life/investment policies, pension products, pre-approved rental agreements or VASP accounts/wallets. Please note that this list is non-exhaustive.

For clarity, **non-face-to-face** customer relationships occur without the customer being physically present or who have been met virtually face-to-face. Non-visual mediums such as telephone calls or emails do not qualify as meeting the customer.

Q185	Does the firm offer any products or services designed specifically for HNWI's?	4.2.3
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For the above question, indicate if the firm's products and services are specifically designed to be targeted, offered to and/or attract HNWI's or UHNWI's. The criteria and definition of HNWI's or UHNWI's may vary across sectors, as per firm's own procedures and controls. Please answer 'Yes' or 'No'.

Where a firm's products or services may not specifically target HNWI's or UHNWI's, if the firm offers a more tailored service to HNWI's or UHNWI's customers the above question should be answered as 'Yes'.

Q186	Does the firm offer any products or services it considers to be complex or multi-layered?	4.2.4
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For the above question, indicate if the firm provides products and services it considers to be complex and multi-layered when considering the firm's risk assessment of their own products and services within its BRA. Please answer 'Yes' or 'No'.

Q187	Does the firm offer products or services to family office arrangements?	4.2.5
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For the above question, indicate if the firm offers any products or services to family offices. Please answer 'Yes' or 'No'. If answered 'Yes' the below questions Q188 to Q189 will appear.

Where a firm offers products or services which may be operated by family offices but does not offer bespoke products or services to family office arrangements, the above question should be answered as 'Yes'.

For clarity, a family office is a private wealth management advisory firm which services U/HNWIs and/or provides services to a family.

Q188	Number of Isle of Man resident family office customers	4.2.6
Q189	Number of non-Isle of Man resident family office customers	4.2.7

Please provide the total number of family office customers split out by those which are Isle of Man and non-Isle of Man resident.

Q190	Does the firm hold, collect or manage any client monies/assets with the products or services offered (except in the form of payments)?	4.2.8
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This question is seeking information on whether the firm holds collects or manages any client monies or assets as part of the products and services offered, not including being in receipt of payments for services. Many financial services and designated business firms typically hold, collect and manage client monies and assets.

Those firms which do not hold, collect or manage client monies/assets could include the following; tax advisors, estate agents, independent financial advisors and general insurance intermediaries. Please note this list is not exhaustive.

Please answer 'Yes' or 'No'.

Q191	Does the firm consider customers, inclusive of all products or services offered, when assessing ML/FT/PF risk, instead of separately and individually?	4.2.9
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For the above question, indicate if the firm considers or would consider the multiple products/ services utilised by a customer when assessing the risk of that customer. Please answer 'Yes' or 'No'.

This question seeks to understand whether the firm choose to risk rate customers inclusive of, or risk rate isolated accounts, where firms have customers who may hold multiple accounts.

For example, a bank with multiple customer accounts, an accountant where businesses are owned by the same UBO, investment or life firms where you have multiple family/solo/corporate accounts, legal advice looking beyond just the current matter.

Q192	Does the firm document, record and monitor possible red flags, actions or alerts in relation to specific products or services offered?	4.2.10
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When considering red flags of any products and services offered by the firm, indicate if the firm documents these within its risk assessments, policies, procedures, controls and guidance documentation.

Please answer 'Yes' or 'No'.

Q193	Does the firm establish trusts?	4.2.11
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This question will appear for those firms who have selected 'no' to holding a Class 4 – Corporate Services and/ or a Class 5 – Trust Services licence within the **'Building your Survey'** section of the return

Please answer 'Yes' or 'No'.

Q194	Number of trusts established in the reporting period	4.2.12
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Please input the number of trusts established in the reporting period (1st January to 31st December).

3.4.3 Incidental Business

This section of the return will only appear for those firms who have answered 'Yes' to question Q12, which asks firms whether they have conducted any incidental designated business activities under their licence.

Q195	Total number of customers receiving incidental designated business activities services via the firm?	4.3.1
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For the above question, input the **total number of customers** for which the firm has been providing incidental designated business activities services as at the end of the reporting period (as at the 31st December).

Designated business activities being those as per schedule 1 to the DBRO15.

Q196	Does the firm provide any incidental designated business services exclusively to customers whom are not customers of the firm for its primary licenced/registered permission(s)	4.3.2
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Please answer 'Yes' or 'No'.

3.4.4 Insurance Activity

This section of the return will appear for those firms who have selected the following permissions/registrations within the '**Building your Survey**' section of the return; Classes 3-9 & 11: General Business (including Reinsurance) and Class 12 Only / Class 13 Only: Restricted (all insurance types) or ISPV Class 13.

Q197	In respect of the type of insurance written by the firm, please indicate the activity that best reflects the business of the firm	4.4.1
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For the above question, indicate the type of insurance written that best reflects the activity of the firm, using the following dropdown options:

- **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** – a firm that underwrites a combination of the above.

Select the most appropriate response using the dropdown boxes provided.

Q198	Indicate whether the firm performs the activity of Self Insurer	4.4.2
Q199	Indicate whether the firm performs the activity of Producer Owned	4.4.3
Q200	Indicate whether the firm performs the activity of Third Party Writer	4.4.4
Q201	Indicate whether the firm performs the activity of Combination	4.4.5

For the above questions please answer 'Yes' or 'No'. For a definition of the different activities please see the above question Q197.

3.4.5 Comments

Q202	Do you have any comments to the previous sections?	4.6.1
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This section of the return will appear for all firms. Please select 'Yes' or 'No'. If answered 'Yes' the below comment box will appear:

Q203	This section is provided to allow firms to provide any commentary that is relevant to the completion of this form	4.6.2
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3.5 Distribution & Due Diligence Risk

3.5.1 Building this Section

Q204	Have you taken on any new business during the reporting period? <i>The reporting period for this return being:- 1st January to 31st December inclusive</i>	5.1.1
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This section of the return will appear for all firms. Please answer 'Yes' or 'No'. If answered 'Yes' questions Q217 to Q244 will appear.

3.5.2 Customer Base – Reliance and Concessions – Use of Simplified Due Diligence

This section of the return will appear for all firms for completion. The AML/ CFT Code provides certain exemptions and simplifications from the standard CDD requirements, this section of the return therefore seeks information about the use and reliance of concessions and simplified due diligence measures in relation to the firm's entire customer base.

Q205	In respect of the firm's entire customer / business relationship base, indicate whether any of the following concessions were utilised by the firm: Acceptable Applicants (Paragraph 16 of the Code)	5.2.1
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This question will appear for all firms for completion. Please answer 'Yes' or 'No'. If answered 'Yes' the below question Q206 will appear.

For '**Acceptable Applicants**', the Code provides an exemption from certain identification and verification requirements where a customer is acting on its own behalf, is of a particular category (a trusted person or is a company listed on a recognised stock exchange), and meets the specified criteria.

For full details on the 'Acceptable Applicants' concession please refer to paragraph 16 of the AML/CFT Code.

Q206	Total number of customers utilising the Acceptable Applicants (Paragraph 16 of the Code) concession, if known	5.2.2
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For the above question, input **the total number of known customers** across the customer base where the 'Acceptable Applicants' concession (as per paragraph 16 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

For this new question, if the exact figure is not known, please submit a best endeavours estimation.

Q207	In respect of the firm's entire customer / business relationship base, indicate whether any of the following concessions were utilised by the firm: Acting on Behalf of (Paragraph 17 of the Code)	5.2.4
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This question will appear for all firms for completion. Please answer 'Yes' or 'No'. If answered 'Yes' the below question Q208 will appear.

The '**Acting on Behalf of**' concession provides an exemption for a restricted group of regulated persons (Class 1, Class 2, Class 3 and Class 8 licenceholders) from the requirement to look through certain types of customers to the customer's underlying clients and the beneficial owners of those underlying clients where the allowed business is acting for another person.

Please refer to paragraph 17 of the AML/CFT Code for full details and requirements around this concession.

Q208	Total number of customers utilising the Acting on Behalf of (Paragraph 17 of the Code) concession, if known	5.2.5
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For the above question, input the **total number of known customers** across the customer base where the 'Acting on Behalf of' concession (as per paragraph 17 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

For this new question, if the exact figure is not known, please submit a best endeavours estimation.

Q209	In respect of the firm's entire customer / business relationship base, indicate whether any of the following concessions were utilised by the firm: Generic Designated Business (Paragraph 18 of the Code)	5.2.7
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The above question will only appear for those firms who have selected they hold the permission/ registration of a Designated Business within the '**Building your Survey**' section of the return.

If answered 'Yes' the below question Q210 will appear.

The '**Generic Designated Business**' concession provides that, if certain conditions are met (as detailed in paragraph 18(3) of the Code), a firm does not have to verify the identity of the customer or comply with paragraph 12(2)(a)(ii) of the Code, taking reasonable measures to verify identity of any beneficial owner.

Please refer to paragraph 18 of the AML/CFT Code for full details and requirements around this concession.

Q210	Total number of customers utilising the Generic Designated Business (Paragraph 18 of the Code) concession, if known	5.2.8
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For the above question, input the **total number of known customers** across the customer base where the 'Generic Designated Business' concession (as per paragraph 18 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

For this new question, if the exact figure is not known, please submit a best endeavours estimation.

Q211	In respect of the firm's entire customer / business relationship base, indicate whether any of the following concessions were utilised by the firm: Eligible Introducers (Paragraph 19 of the Code)	5.2.10
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This question will appear for all firms for completion. Please answer 'Yes' or 'No'. If answered 'Yes' the below question Q212 will appear.

The Code allows firms to rely on certain third parties, '**Eligible Introducers**', to undertake and hold verification of identity on the customers they introduce to the firm and the beneficial owners of those customers. Firms can rely on the eligible introducer to retain the verification of identity documents, data or information without passing it on to the relevant person at the outset of the business relationship/occasional transaction. For clarity, eligible introducers can either be a restricted category of "trusted persons" as defined in the Code, or group companies subject to listed conditions.

Please refer to paragraph 19 of the AML/CFT Code for full details and requirements around this concession.

Q212	Total number of customers utilising the Eligible Introducers (Paragraph 19 of the Code) concession, if known	5.2.11
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For the above question, input the **total number of known customers** across the customer base where the 'Eligible Introducers' concession (as per paragraph 19 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

For this new question, if the exact figure is not known, please submit a best endeavours estimation.

Q213	In respect of the firm's entire customer / business relationship base, indicate whether any of the following concessions were utilised by the firm: Insurer Concessions (Paragraph 20 of the Code)	5.2.13
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This section of the return will appear for all firms. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q214 will appear.

The '**Insurance**' concession allows an insurer or insurance intermediary to either not undertake the requirements of Parts 4 (Customer Due Diligence) and 5 (Enhanced Measures) of the Code or to defer such compliance provided certain criteria is met; the annual premium is less than €1,000 or the single premium, or series of linked premiums, is less than €2,500; or there is neither a surrender value nor a maturity value (for example, term insurance).

For full details and requirements around the use of this concession please refer to paragraph 20 of the Code or the [Non-Life Secor Specific AML/CFT Guidance](#).

Q214	Total number of customers utilising the Insurer (Paragraph 20 of the Code) concession, if known	5.2.14
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For the above question, input the **total number of known customers** across the customer based where the 'Insurer' concession (as per paragraph 20 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

For this new question; if the exact figure is not known, please submit a best endeavours estimation.

Q215	In respect of the firms entire customer / business relationship base, indicate whether any of the following concessions were utilised by the firm: Scheme Concessions (Paragraph 21 of the Code)	5.2.16
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This section of the return will appear for all firms. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q216 will appear.

In respect of a pension, superannuation or similar scheme that provides retirement benefits to employees, if contributions are made by way of deduction from wages and the scheme rules do not permit the assignment of a member's interest under the scheme, the '**Scheme**' concession allows firms to treat the employer, trustee or any other person who has control over the business relationship, including the

administrator or the scheme manager, as the customer; and need not comply with paragraph 12(2)(b) of the Code.

For full details and requirements around the use of this concession please refer to paragraph 21 of the Code or the [Private Pensions Sector Specific AML/CFT Guidance](#).

Q216	Total number of customers utilising the Scheme (Paragraph 21 of the Code) concession, if known	5.2.17
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For the above question, input the **total number of known customers** across the customer base where the 'Scheme' concession (as per paragraph 21 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

For this new question, if the exact figure is not known, please submit a best endeavours estimation.

3.5.3 New Business Relationships – Reliance and Concessions – Use of Simplified Due Diligence

This section of the return will appear for those firms who have taken on new business during the reporting period (this being 1st January to 31st December) as confirmed in question Q204. This section of the return seeks information about the use and reliance of concessions and simplified due diligence measures in relation to the firm's new customers.

Q217	In respect of the new customer / business relationships entered into during the reporting period, indicate whether any of the following concessions were utilised by the firm: Acceptable Applicants (Paragraph 16 of the Code)	5.3.1
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The information requested in this question is only in respect of new customer relationships established in the reporting period. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q218 will appear.

For '**Acceptable Applicants**', the Code provides an exemption from certain identification and verification requirements where a customer is acting on its own behalf, is of a particular category (a trusted person or is a company listed on a recognised stock exchange), and meets the specified criteria.

For full details on the 'Acceptable Applicants' concession please refer to paragraph 16 of the AML/CFT Code.

Q218	How many new customers were they applied to?	5.3.2
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For the above question, input the number of new customers where the 'Acceptable Applicants' concession (as per paragraph 16 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

Q219	In respect of the new customer / business relationships entered into during the reporting period, indicate whether any of the following concessions were utilised by the firm: Acting on Behalf of (Paragraph 17 of the Code)	5.3.3
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The information requested in this question is only in respect of new customer relationships established in the reporting period. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q220 will appear.

The '**Acting on Behalf of**' concession, provides an exemption for a restricted group of regulated persons (Class 1, Class 2, Class 3 and Class 8 licenceholders) from the requirement to look through certain types of customers to the customer's underlying clients and the beneficial owners of those underlying clients where the allowed business is acting for another person.

Please refer to paragraph 17 of the AML/CFT Code for full details and requirements around this concession.

Q220	How many new customers were they applied to?	5.3.4
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For the above question, input the number of new customers where the 'Acting on Behalf of' concession (as per paragraph 17 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

Q221	In respect of the new customer / business relationships entered into during the reporting period, indicate whether any of the following concessions were utilised by the firm: Generic Designated Business (Paragraph 18 of the Code)	5.3.5
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The information requested in this question is only in respect of new customer relationships established in the reporting period. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q222 will appear.

The '**Generic Designated Business**' concession provides that, if certain conditions are met (as detailed in paragraph 18(3) of the Code), a firm does not have to verify the identity of the customer or comply with paragraph 12(2)(a)(ii) of the Code, taking reasonable measures to verify identity of any beneficial owner.

Please refer to paragraph 18 of the AML/CFT Code for full details and requirements around this concession.

Q222	How many new customers were they applied to?	5.3.6
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For the above question, input the number of new customers where the 'Generic Designated Business' concession (as per paragraph 18 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

Q223	In respect of the new customer / business relationships entered into during the reporting period, indicate whether any of the following concessions were utilised by the firm: Eligible Introducers (Paragraph 19 of the Code)	5.3.7
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The information requested in this question is only in respect of new customer relationships established in the reporting period. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q224 will appear.

The Code allows firms to rely on certain third parties, '**Eligible Introducers**', to undertake and hold verification of identity on the customers they introduce to the firm and the beneficial owners of those customers. Firms can rely on the eligible introducer to retain the verification of identity documents, data or information without passing it on to the relevant person at the outset of the business relationship/occasional transaction. For clarity, eligible introducers can either be a restricted category of "trusted persons" as defined in the Code, or group companies subject to listed conditions.

Please refer to paragraph 19 of the AML/CFT Code for full details and requirements around this concession.

Q224	How many new customers were they applied to?	5.3.8
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For the above question, input the number of new customers where the 'Eligible Introducers' concession (as per paragraph 19 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

Q225	In respect of the new customer / business relationships entered into during the reporting period, indicate whether any of the following concessions were utilised by the firm: Insurer Concessions (Paragraph 20 of the Code)	5.3.9
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The information requested in this question is only in respect of new customer relationships established in the reporting period. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q226 will appear.

The '**Insurance**' concession allows an insurer or insurance intermediary to either not undertake the requirements of Parts 4 (Customer Due Diligence) and 5 (Enhanced Measures) of the Code or to defer such compliance provided certain criteria is met; the annual premium is less than €1,000 or the single premium, or series of linked premiums, is less than €2,500; or there is neither a surrender value nor a maturity value (for example, term insurance).

For full details and requirements around the use of this concession please refer to paragraph 20 of the Code or the [Non-Life Sector Specific AML/CFT Guidance](#).

Q226	How many new customers were they applied to?	5.3.10
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For the above question, input the number of new customers where the 'Insurer' concession (as per paragraph 20 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

Q227	In respect of the new customer / business relationships entered into, indicate whether any of the following concessions were utilised by the firm: Scheme Concessions (Paragraph 21 of the Code)	5.3.11
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The information requested in this question is only in respect of new customer relationships established in the reporting period. Please select 'Yes' or 'No'. If answered 'Yes' the below question Q228 will appear.

In respect of a pension, superannuation or similar scheme that provides retirement benefits to employees, if contributions are made by way of deduction from wages and the scheme rules do not permit the assignment of a member's interest under the scheme, the '**Scheme**' concession allows firms to treat the employer, trustee or any other person who has control over the business relationship, including the administrator or the scheme manager, as the customer; and need not comply with paragraph 12(2)(b) of the Code.

For full details and requirements around the use of this concession please refer to paragraph 21 of the Code or the [Private Pensions Sector Specific AML/CFT Guidance](#).

Q228	How many new customers were they applied to?	5.3.12
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For the above question, input the number of new customers where the 'Scheme' concession (as per paragraph 21 of the Code) has been applied, as at the end of the reporting period (as at the 31st December).

3.5.4 New Business Relationships – Reliance and Concessions – Face-to-Face Business

This section of the return will appear for those firms who have taken on new business during the reporting period (this being 1st January to 31st December) as confirmed in question Q204.

Q229	For new customer relationships established in the reporting period, provide the number of customers met face-to-face by the firm	5.4.1
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For the above question, input the total number of new customers established/on-boarded in the reporting period who have been met face-to-face by the firm.

For clarity, face-to-face customer relationships occur when the customer is physically present and a non-visual medium such as a telephone call or email does not qualify as meeting the customer.

Q230	For new customer relationships established in the reporting period, provide the number of customers met face-to-face by a related party of the firm	5.4.2
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For the above question, input the total number of new customers established/ on-boarded in the reporting period who have been met face-to-face by a related party of the firm. A related party being a linked firm with a legal outsourcing or servicing agreement.

Q231	For customer relationships established in the reporting period, provide the number of non-face-to-face customer relationships	5.4.3
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For the above question, input the total number of new customers established/ on-boarded in the reporting period who have **not** been met face-to-face by the firm. This includes where the customer has not been met by the supervised firm, but may have been met by an introducer or sales referrer.

For clarity, non-face-to-face customer relationships occur without the customer being physically present, a non-visual medium such as a telephone call or email does not qualify as meeting the customer.

3.5.5 New Business Relationships – Reliance and Concessions – Reliance on Third Parties for Elements of CDD

This section of the return will appear for those firms who have taken on new business during the reporting period (this being 1st January to 31st December) as confirmed in question Q204. This section of the return is seeking information on whether and to what extent third parties are utilised in the due diligence process.

Q232	For new customer relationships, indicate the extent to which third parties are utilised in the due diligence process where; (i) Reliance has been placed on third parties (including introducers) - evidence obtained and held by the firm; <u>and</u> (a) Original certified copies of verification of identity documentation is retained by the firm	5.5.1
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period where reliance was placed on third parties (including introducers) as part of the due diligence process, the evidence was obtained and held by the firm and original certified copies of verification of identity documentation is retained by the firm.

Q233	Does the firm, in all cases, understand who has met the customer face-to-face regarding the above (i)-(a) process?	5.5.2
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Please answer 'Yes' or 'No'.

Q234	For new customer relationships, indicate the extent to which third parties are utilised in the due diligence process where; (i) Reliance has been placed on third parties (including introducers) - evidence obtained and held by the firm; <u>and</u> (b) Certified copies of certified copies of verification of identity documentation is retained by the firm	5.5.3
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period where reliance was placed on third parties (including introducers) as part of the due diligence process, the evidence was obtained and held by the firm and certified copies of verification of identity documentation is retained by the firm.

Q235	Does the firm, in all cases, understand who has met the customer face-to-face regarding the above (i)-(b) process?	5.5.4
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Please answer 'Yes' or 'No'.

Q236	For new customer relationships, indicate the extent to which third parties are utilised in the due diligence process where; (ii) Reliance is placed on the eligible introducer ('EI') to verify the identity and hold that evidence	5.5.5
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period where reliance was placed on the eligible introducer ('EI') to verify the identity of the customer, and the EI hold the evidence obtained.

Q237	Does the firm, in all cases, understand who has met the customer face-to-face regarding the above (ii) process?	5.5.6
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Please answer 'Yes' or 'No'.

Q238	For new customer relationships, indicate the extent to which third parties are utilised in the due diligence process where; (iii) No reliance was placed on third parties; <u>and</u> (a) CDD is collected directly from the customer face-to-face	5.5.7
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period where no reliance was placed on third parties as part of the due diligence process and CDD was collected directly from the customer face-to-face.

Q239	For new customer relationships, indicate the extent to which third parties are utilised in the due diligence process where; (iii) No reliance was placed on third parties; <u>and</u> (b) CDD is collected directly from the customer but remotely	5.5.8
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period where no reliance was placed on third parties for the CDD process and CDD was collected directly from the customer but remotely.

For clarity remotely, meaning non-face-to-face and includes CDD being obtained by email for example.

Q240	For new customer relationships, indicate the extent to which third parties are utilised in the due diligence process where; (iv) No reliance - other concessions not requiring verification utilised i.e. No verification of identity held by the firm - other simplified due diligence concession taken (other than EI)	5.5.9
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period where no reliance was placed on third parties for the CDD process due to the firm not requiring verification of identity from the customer. This for example could be where the firm has utilised simplified measures by applying a concession as per the AML/CFT Code.

3.5.6 New Business Relationships – Sources and Introducers – Sources of Business

This section of the return will appear for those firms who have taken on new business during the reporting period (this being 1st January to 31st December) as confirmed in question Q204.

Q241	In relation to the new customer relationships established in the reporting period, provide details on how many of these customers are direct business	5.6.1
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period who have been direct business.

For clarity, direct business meaning the customer approaching the firm directly, with no third-party involvement.

Q242	In relation to the new customer relationships established in the reporting period, provide details on how many of these customers are existing customer referrals , including referrals from related parties	5.6.2
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period who have been existing customer referrals.

For clarity, a referral is for example, where a third party informs a prospective customer to go to a particular relevant person and the third party does not provide any CDD to the relevant person.

Q243	In relation to the new customer relationships established in the reporting period, provide details on how many of these customers are introduced business	5.6.3
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For the above question, input the **total number of new customers** established/ on-boarded in the reporting period who have been introduced.

For clarity, an introducer includes any third party(ies), who is not the customer, that is involved in the provision of CDD to the relevant person, whether or not that third party is bringing the customer to the relevant person in a broader introductory sense. This can include, but is not limited to;

- A financial adviser (whether in the Island or elsewhere): for example, establishing an investment relationship for a customer with an investment management firm or life insurer in the Island (relevant person), where the adviser provides elements of the CDD to the investment manager / life insurer;
- A lawyer or accountant (individual or firm, whether in the Island or elsewhere): for example, introducing / bringing a customer to a TCSP in the Island (relevant person) for the purpose of establishing / transferring a structure, where the lawyer (including a family office) provides elements of the CDD in respect of the customer;
- A TCSP (whether in the Island or elsewhere): for example, establishing a banking relationship for a client company with a bank in the Island (relevant person), where the TCSP provides elements of the CDD in respect of the client company;
- Any other employee(s) of a third party or non-trusted persons engaged to act on behalf of a beneficial owner(s).

Q244	For introduced business in the reporting period, provide the number of introducers , by jurisdiction	5.6.5
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For those customers that have been introduced in the reporting period, input the **total number of introducers** used in the reporting period (1st January to 31st December).

The jurisdiction should be based on the correspondence address / residency of the introducer.

3.5.7 Comments

Q245	Do you have any comments to the previous sections?	5.7.1
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This section of the return will appear for all firms. Please select 'Yes' or 'No'. If answered 'Yes' the below comment box will appear:

Q246	This section is provided to allow firms to provide any commentary that is relevant to the completion of this form.	5.7.2
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4. Return Guidance – Controls

4.1 Controls

4.1.1 Entity Control Questions

This controls section of the return will appear for all firms. Please answer 'Yes' or 'No' to the following C1-C9 questions. When answered, these questions will influence and tailor the firm's controls questions to only the relevant and applicable questions. The Authority note that some of these questions are repeated from the previous sections of the return, however it is the most effective way for firms to only need to answer those questions which will be applicable to them.

C1	Does the firm hold any of the following permissions under the Financial Services Act 2008? <ul style="list-style-type: none">• Class 1 - Deposit Taking• Class 8 - Money Transmission Services	1.1.1
C2	Did the firm have any higher risk rated customers during the reporting period?	1.1.2
C3	Did the firm have any standard risk rated customers during the reporting period?	1.1.3
C4	Did the firm have any lower risk rated customers during the reporting period?	1.1.4
C5	Did the firm have any PEP customers during the reporting period?	1.1.5
C6	Does the firm have established, documented and recorded AML/CFT policies, procedures and controls? <i>In line with paragraph 4 of the Code</i>	1.1.6
C7	Have you identified any areas within the business/firm where you have not complied with the AML/CFT Legislation? <i>In relation to any areas of the business activities during the reporting period</i>	1.1.7

If C7 is answered as 'Yes' the below comment box C8 will appear in order for firms to provide some context and further detail around the areas where the firm has not complied with the AML/CFT legislation.

C8	If selected 'Yes' provide details	1.1.8
C9	From the BRA, what is the firm's estimation of ML/TF risk posed by your business and customers? <i>In line with paragraph 5 of the Code</i>	1.1.9

For the above question, please provide the residual risk score as assessed within the firm's BRA as at the end of the reporting period (as at 31st December), using the following dropdown list:

- Low
- Medium-Low
- Medium
- Medium-High
- High

The Authority understands firms may not currently use these five available risk scoring options. If the firm utilises different risk ratings, please choose the most relevant risk score from the options available.

4.1.2 Understanding the Firm – Employees, Workers and Contractors

This section of the return will appear for all firms for completion.

C10	Total number of staff engaged by the firm whether directly or through a contract for services	1.2.1
C11	Total number of full-time equivalent staff engaged by the firm whether directly or through a contract for services	1.2.2
C12	Total number of full-time equivalent staff <u>vacancies</u> at the firm whether directly or through a contract for services	1.2.3

The above questions relate only to personnel engaged in respect of the Isle of Man business operations.

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 end of the reporting period (as at the 31st December). 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

Where multiple entities share staff or employees across a group of firms or linked firms, firms must document all staff correctly within this section of the return for all relevant entities. An answer of 0 members of staff is not acceptable. The number of staff must equal the total number of individual staff, employees and/or contractors of the firm supporting and conducting the operations/activities of the firm, in line with the definition of employee below. The FTE staff numbers will then reflect the percentage of time these staff members dedicate to the firm when completing the return, considering part-time or shared staff.

“employee” of a person, has the same meaning as in section 173 of the Employment Act 2006 and includes an individual who, in relation to the business carried on by that person, —

- (a) works under a contract of employment or any other contract of service;*
- (b) practises alone or with others under the terms of a partnership agreement;*
- (c) is otherwise engaged within the business of a person, in all cases where the individual undertakes to do or perform, directly or indirectly, work or service in relation to the business of that relevant person, whether or not engaged directly by the person or through another entity forming part of the group of entities of which the person is a part, and the person is not by virtue of the contract a customer of the individual; or*
- (d) is a director or officer of a relevant person;*

Example: Using a firm of estate agents as an example, sales and lettings negotiators would be roles in relation to that designated business, where an office cleaner would not.

C13	Total number of individual compliance staff (including the MLRO) engaged by the firm whether directly or through a contract for services	1.2.4
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C14	Total number of full-time equivalent compliance staff (including the MLRO) engaged by the firm whether directly or through a contract for services	1.2.5
C15	Total number of full-time equivalent compliance staff <i>vacancies</i> (including the MLRO) at the firm whether directly or through a contract for services	1.2.6

The above questions relate only to personnel engaged in respect of the Isle of Man business operations.

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 end of the reporting period (as at the 31st December). 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.

4.1.3 AML/CFT Staff Training – During the Reporting Period

This section of the return will appear for all firms for completion.

C16	Total number of staff who received annual AML/CFT education / training	1.3.1
C17	Total number of staff who received specialist / more detailed AML/CFT education / training	1.3.2

For the above questions, provide details of the AML/CFT training provided in the year (1st January to 31st December).

For C16 provide the number of individuals who have received annual AML/CFT education / training in line with paragraph 32 of the Code.

For C17 provide the number of individuals who have received specialist / more detailed training in the reporting period. Specialist training being advanced level training of a particular task, function or aspect. For example, a relevant paid qualification provided in addition to annual education / training.

C18	Did staff receive specific training related to money laundering ("ML")?	1.3.4
C19	Did staff receive specific training related to financing of terrorism ("FT")?	1.3.5
C20	Did staff receive specific training related to proliferation financing ("PF")?	1.3.6
C21	Did staff receive specific training related to sanctions ?	1.3.7
C22	Did staff receive specific training related to fraud ?	1.3.8
C23	Did staff receive specific training related to human trafficking/slavery ?	1.3.9
C24	Did staff receive specific training related to bribery and corruption ?	1.3.10

For the above questions, indicate if the annual AML/CFT education / training provided within the reporting period (1st January to 31st December) included the above aspects. Please answer 'Yes' or 'No'.

4.1.4 Activities Undertaken or Outsourced – During the Reporting Period

This section of the return will appear for all firms for completion.

C25	Who undertook and carried out customer risk assessments ?	1.4.1
C26	Who undertook and carried out the collection of customer due diligence ?	1.4.2
C27	Who undertook and carried out screening ?	1.4.3
C28	Who undertook and carried out the acceptance of the business ?	1.4.4

C29	Who undertook and carried out the ongoing monitoring ?	1.4.5
C30	How was the activity / position of MLRO managed?	1.4.6
C31	How was the activity / position of DMLRO managed?	1.4.7
C32	How was the activity of the compliance function (AML/CFT only) managed?	1.4.8
C33	How was the activity of the staff screening and recruitment managed?	1.4.9

In respect of each of the specified activities above, 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 (1st January to 31st December). Please answer using the below dropdown options:

- ☐ Undertaken by the Firm
- ☐ Outsourced to Group
- ☐ Outsourced to a Third Party

For where the activity is undertaken by multiple parties, please select the most applicable by way of business option.

4.1.5 Monitoring and Testing Compliance with the AML/CFT Requirements

This section of the return will appear for all firms for completion.

C34	Indicate if the 1st line of defence undertakes the monitoring and testing of compliance of the internal control environment in accordance with paragraph 30 of the AML/CFT Code <i>1st line of defence typically being onboarding, sales or administrative staff</i>	1.5.1
C35	Indicate if the 2nd line of defence undertakes the monitoring and testing of compliance of the internal control environment in accordance with paragraph 30 of the AML/CFT Code <i>2nd line of defence typically being compliance or risk staff</i>	1.5.2
C36	Indicate if the 3rd line of defence undertakes the monitoring and testing of compliance of the internal control environment in accordance with paragraph 30 of the AML/CFT Code <i>3rd line of defence typically being internal audit staff</i>	1.5.3

The Authority wishes to understand which functions (1st line, 2nd line, 3rd 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 each of the questions above please select from the following dropdown list:

- ☐ Yes – Independent
- ☐ Yes – Not Independent
- ☐ No

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

- 1st line (of defence) generally means functions that own and manage the risks and where managers / staff have responsibility for identifying and managing risk
- 2nd line (of defence) generally means the functions in the firm that oversee or specialise in compliance or the management of risk, and undertake monitoring
- 3rd line (of defence) means independent assurance functions, for example internal audit

C37	Are there any others who undertake the monitoring and testing of compliance of the internal control environment in accordance with paragraph 30 of the AML/CFT Code? <i>Others typically being external audit, compliance consultants or outsourced staff</i>	1.5.4
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Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C38 and C39 will appear.

C38	Indicate if any others undertake the monitoring and testing of compliance of the internal control environment in accordance with paragraph 30 of the AML/CFT Code	1.5.5
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Please select the appropriate answer from the dropdown list:

- ☐ Yes – Independent
- ☐ Yes – Not independent

C39	Please specify 'others'	1.5.6
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This is a comment box, please state the name of any persons / bodies who provide other testing or assurance not covered elsewhere for AML/CFT only.

4.1.6 Screening and Monitoring – Screening Provider

C40	Does the firm carry out screening and monitoring? <i>E.g. open-source, third party screening or search tools for adverse media, PEP or sanction checks</i>	1.6.1
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This question within the return will appear for all firms for completion. Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C41 to C43 will appear.

C41	Which screening provider(s) do you utilise?	1.6.2
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This is a comment box, please state the screening provider(s) used.

C42	What type of search logic is used when screening is undertaken?	1.6.3
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For the above question answer using the following dropdown list:

- ☐ Fuzzy
- ☐ Exact
- ☐ Combination (both Exact and Fuzzy)

C43	Is the firm subscribed to a sanctions notification service?	1.6.4
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Please answer 'Yes' or 'No'. If answered 'Yes' the below question C44 will appear.

C44	Please confirm the name of the service provider	1.6.5
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This is a comment box, please state the service provider used for sanctions.

4.1.7 Screening – New Customers

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on new customer/ business relationships.

C45	Indicate if the firm screens higher risk new customer / business relationships for PEPs	1.7.1
C46	Indicate if the firm screens standard risk new customer / business relationships for PEPs	1.7.2
C47	Indicate if the firm screens lower risk new customer / business relationships for PEPs	1.7.3

For the above questions, indicate whether **new customer/ business relationships** are screened for PEPs, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

C48	Indicate if the firm screens higher risk new customer / business relationships for sanctions	1.7.4
C49	Indicate if the firm screens standard risk new customer / business relationships for sanctions	1.7.5
C50	Indicate if the firm screens lower risk new customer / business relationships for sanctions	1.7.6

For the above questions, indicate whether **new customer/ business relationships** are screened for sanctions, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

C51	Indicate if the firm screens higher risk new customer / business relationships for ML/FT/PF	1.7.7
C52	Indicate if the firm screens standard risk new customer / business relationships for ML/FT/PF	1.7.8

C53	Indicate if the firm screens lower risk new customer / business relationships for ML/FT/PF	1.7.9
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For the above questions, indicate whether **new customer/ business relationships** are screened for ML/FT/PF, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

C54	Indicate if the firm screens higher risk new customer / business relationships for adverse media	1.7.10
C55	Indicate if the firm screens standard risk new customer / business relationships for adverse media	1.7.11
C56	Indicate if the firm screens lower risk new customer / business relationships for adverse media	1.7.12

For the above questions, indicate whether **new customer/ business relationships** are screened for adverse media, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

4.1.8 Screening – Continuing Business Relationship on a Regular Basis

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on continuing customer business relationships.

C57	Indicate if the firm screens its higher risk continuing customer / business relationships for PEPs , on a regular basis	1.8.1
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C58	Indicate if the firm screens its standard risk continuing customer / business relationships for PEPs , on a regular basis	1.8.2
C59	Indicate if the firm screens its lower risk continuing customer / business relationships for PEPs , on a regular basis	1.8.3

For the above questions, indicate whether **continuing customer/ business relationships** are screened on a regular basis for PEPs, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C60	Indicate if the firm screens its higher risk continuing customer / business relationships for sanctions , on a regular basis	1.8.4
C61	Indicate if the firm screens its standard risk continuing customer / business relationships for sanctions , on a regular basis	1.8.5
C62	Indicate if the firm screens its lower risk continuing customer / business relationships for sanctions , on a regular basis	1.8.6

For the above questions, indicate whether **continuing customer/ business relationships** are screened on a regular basis for sanctions, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C63	Indicate if the firm screens its higher risk continuing customer / business relationships for ML/FT/PF , on a regular basis	1.8.7
C64	Indicate if the firm screens its standard risk continuing customer / business relationships for ML/FT/PF , on a regular basis	1.8.8
C65	Indicate if the firm screens its lower risk continuing customer / business relationships for ML/FT/PF , on a regular basis	1.8.9

For the above questions, indicate whether **continuing customer/ business relationships** are screened on a regular basis for ML/FT/PF, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C66	Indicate if the firm screens its higher risk continuing customer / business relationships for adverse media , on a regular basis	1.8.10
C67	Indicate if the firm screens its standard risk continuing customer / business relationships for adverse media , on a regular basis	1.8.11
C68	Indicate if the firm screens its lower risk continuing customer / business relationships for adverse media , on a regular basis	1.8.12

For the above questions, indicate whether **continuing customer/ business relationships** are screened on a regular basis for adverse media, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.9 Screening – Continuing Business Relationship when Sanctions Lists are Published / Updated

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on continuing customer business relationships when sanctions lists are published / updated.

C69	Indicate if the firm screens its higher risk continuing customer / business relationships for PEPs , when sanctions lists are published / updated	1.9.1
C70	Indicate if the firm screens its standard risk continuing customer / business relationships for PEPs , when sanctions lists are published / updated	1.9.2
C71	Indicate if the firm screens its lower risk continuing customer / business relationships for PEPs , when sanctions lists are published / updated	1.9.3

For the above questions, indicate whether **continuing customer/ business relationships** are screened for PEPs when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C72	Indicate if the firm screens its higher risk continuing customer / business relationships for sanctions , when sanctions lists are published / updated	1.9.4
C73	Indicate if the firm screens its standard risk continuing customer / business relationships for sanctions , when sanctions lists are published / updated	1.9.5
C74	Indicate if the firm screens its lower risk continuing customer / business relationships for sanctions , when sanctions lists are published / updated	1.9.6

For the above questions, indicate whether **continuing customer/ business relationships** are screened for sanctions when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C75	Indicate if the firm screens its higher risk continuing customer / business relationships for ML/FT/PF , when sanctions lists are published / updated	1.9.7
C76	Indicate if the firm screens its standard risk continuing customer / business relationships for ML/FT/PF , when sanctions lists are published / updated	1.9.8
C77	Indicate if the firm screens its lower risk continuing customer / business relationships for ML/FT/PF , when sanctions lists are published / updated	1.9.9

For the above questions, indicate whether **continuing customer/ business relationships** are screened for ML/FT/PF when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C78	Indicate if the firm screens its higher risk continuing customer / business relationships for adverse media , when sanctions lists are published / updated	1.9.10
C79	Indicate if the firm screens its standard risk continuing customer / business relationships for adverse media , when sanctions lists are published / updated	1.9.11
C80	Indicate if the firm screens its lower risk continuing customer / business relationships for adverse media , when sanctions lists are published / updated	1.9.12

For the above questions, indicate whether **continuing customer/ business relationships** are screened for adverse media when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.10 Screening – Continuing Business Relationship at a Trigger Event

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on continuing customer business relationships at a trigger event.

For clarity, a **trigger event** consists of administrative tasks defined by the firm which could be reasonably expected during the course of the customer / business relationship. This can include changes in the customer profile or activity, with things such as the customer looking to take on a new product or service, a subsequent business transaction, change in address etc.

C81	Indicate if the firm screens its higher risk continuing customer / business relationships for PEPs , at a trigger event	1.10.1
C82	Indicate if the firm screens its standard risk continuing customer / business relationships for PEPs , at a trigger event	1.10.2
C83	Indicate if the firm screens its lower risk continuing customer / business relationships for PEPs , at a trigger event	1.10.3

For the above questions, indicate whether **continuing customer/ business relationships** are screened for PEPs at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C84	Indicate if the firm screens its higher risk continuing customer / business relationships for sanctions , at a trigger event	1.10.4
C85	Indicate if the firm screens its standard risk continuing customer / business relationships for sanctions , at a trigger event	1.10.5

C86	Indicate if the firm screens its lower risk continuing customer / business relationships for sanctions , at a trigger event	1.10.6
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For the above questions, indicate whether **continuing customer/ business relationships** are screened for sanctions at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C87	Indicate if the firm screens its higher risk continuing customer / business relationships for ML/FT/PF , at a trigger event	1.10.7
C88	Indicate if the firm screens its standard risk continuing customer / business relationships for ML/FT/PF , at a trigger event	1.10.8
C89	Indicate if the firm screens its lower risk continuing customer / business relationships for ML/FT/PF , at a trigger event	1.10.9

For the above questions, indicate whether **continuing customer/ business relationships** are screened for ML/FT/PF at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C90	Indicate if the firm screens its higher risk continuing customer / business relationships for adverse media , at a trigger event	1.10.10
C91	Indicate if the firm screens its standard risk continuing customer / business relationships for adverse media , at a trigger event	1.10.11
C92	Indicate if the firm screens its lower risk continuing customer / business relationships for adverse media , at a trigger event	1.10.12

For the above questions, indicate whether **continuing customer/ business relationships** are screened for adverse media at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.11 Screening – Continuing Business Relationship at an Unusual Activity Event

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the ‘**Entity Control Questions**’ of this return.

As part of this section of the return, the Authority is interested to understand whether additional screening is applied if unusual activity (as defined by the Code) is identified.

‘**Unusual activity**’ meaning any activity including the receipt of information during the course of a business relationship, occasional transaction or attempted transaction where –

- a) the transaction has no apparent economic or lawful purpose, including a transaction which is —
 - (i) complex;
 - (ii) both large and unusual; or
 - (iii) of an unusual pattern
- b) the relevant person becomes aware of anything that causes the relevant person to doubt the identity of a person it is obliged to identify; or
- c) the relevant person becomes aware of anything that causes the relevant person to doubt the good faith of a customer, beneficial owner, beneficiary, introducer or eligible introducer.

C93	Indicate if the firm screens its higher risk continuing customer / business relationships for PEPs , at an unusual activity event	1.11.1
C94	Indicate if the firm screens its standard risk continuing customer / business relationships for PEPs , at an unusual activity event	1.11.2
C95	Indicate if the firm screens its lower risk continuing customer / business relationships for PEPs , at an unusual activity event	1.11.3

For the above questions, indicate whether **continuing customer/ business relationships** are screened for PEPs at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C96	Indicate if the firm screens its higher risk continuing customer / business relationships for sanctions , at an unusual activity event	1.11.4
C97	Indicate if the firm screens its standard risk continuing customer / business relationships for sanctions , at an unusual activity event	1.11.5

C98	Indicate if the firm screens its lower risk continuing customer / business relationships for sanctions , at an unusual activity event	1.11.6
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For the above questions, indicate whether **continuing customer/ business relationships** are screened for sanctions at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C99	Indicate if the firm screens its higher risk continuing customer / business relationships for ML/FT/PF , at an unusual activity event	1.11.7
C100	Indicate if the firm screens its standard risk continuing customer / business relationships for ML/FT/PF , at an unusual activity event	1.11.8
C101	Indicate if the firm screens its lower risk continuing customer / business relationships for ML/FT/PF , at an unusual activity event	1.11.9

For the above questions, indicate whether **continuing customer/ business relationships** are screened for ML/FT/PF at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C102	Indicate if the firm screens its higher risk continuing customer / business relationships for adverse media , at an unusual activity event	1.11.10
C103	Indicate if the firm screens its standard risk continuing customer / business relationships for adverse media , at an unusual activity event	1.11.11
C104	Indicate if the firm screens its lower risk continuing customer / business relationships for adverse media , at an unusual activity event	1.11.12

For the above questions, indicate whether **continuing customer/ business relationships** are screened for adverse media at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.12 Screening – Continuing Business Relationship at Suspicious Activity Event

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

As part of this section of the return, the Authority is interested to understand whether additional screening is applied if a suspicious activity event is identified.

'Suspicious activity' meaning any activity including the receipt of information, which in the course of a business relationship, occasional transaction or attempted transaction which causes the relevant person to—

- (a) know or suspect; or
- (b) have reasonable grounds for knowing or suspecting,

that the activity is ML/FT or that the information is related to ML/FT.

C105	Indicate if the firm screens its higher risk continuing customer / business relationships for PEPs , at a suspicious activity event	1.12.1
C106	Indicate if the firm screens its standard risk continuing customer / business relationships for PEPs , at a suspicious activity event	1.12.2
C107	Indicate if the firm screens its lower risk continuing customer / business relationships for PEPs , at a suspicious activity event	1.12.3

For the above questions, indicate whether **continuing customer/ business relationships** are screened for PEPs at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C108	Indicate if the firm screens its higher risk continuing customer / business relationships for sanctions , at a suspicious activity event	1.12.4
C109	Indicate if the firm screens its standard risk continuing customer / business relationships for sanctions , at a suspicious activity event	1.12.5
C110	Indicate if the firm screens its lower risk continuing customer / business relationships for sanctions , at a suspicious activity event	1.12.6

For the above questions, indicate whether **continuing customer/ business relationships** are screened for sanctions at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C111	Indicate if the firm screens its higher risk continuing customer / business relationships for ML/FT/PF , at a suspicious activity event	1.12.7
C112	Indicate if the firm screens its standard risk continuing customer / business relationships for ML/FT/PF , at a suspicious activity event	1.12.8
C113	Indicate if the firm screens its lower risk continuing customer / business relationships for ML/FT/PF , at a suspicious activity event	1.12.9

For the above questions, indicate whether **continuing customer/ business relationships** are screened for ML/FT/PF at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C114	Indicate if the firm screens its higher risk continuing customer / business relationships for adverse media , at a suspicious activity event	1.12.10
C115	Indicate if the firm screens its standard risk continuing customer / business relationships for adverse media , at a suspicious activity event	1.12.11
C116	Indicate if the firm screens its lower risk continuing customer / business relationships for adverse media , at a suspicious activity event	1.12.12

For the above questions, indicate whether **continuing customer/ business relationships** are screened for adverse media at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.13 Screening – Beneficial Owners – New Customers

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on the beneficial owners for new business relationships.

C117	Indicate if the firm screens the beneficial owners of its customers for PEPs in each of the higher risk new business relationships	1.13.1
C118	Indicate if the firm screens the beneficial owners of its customers for PEPs in each of the standard risk new business relationships	1.13.2
C119	Indicate if the firm screens the beneficial owners of its customers for PEPs in each of the lower risk new business relationships	1.13.3

For the above questions, indicate whether the **beneficial owners of new customers** are screened for PEPs, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

C120	Indicate if the firm screens the beneficial owners of its customers for sanctions in each of the higher risk new business relationships	1.13.4
C121	Indicate if the firm screens the beneficial owners of its customers for sanctions in each of the standard risk new business relationships	1.13.5
C122	Indicate if the firm screens the beneficial owners of its customers for sanctions in each of the lower risk new business relationships	1.13.6

For the above questions, indicate whether the **beneficial owners of new customers** are screened for sanctions, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

C123	Indicate if the firm screens the beneficial owners of its customers for ML/FT/PF in each of the higher risk new business relationships	1.13.7
C124	Indicate if the firm screens the beneficial owners of its customers for ML/FT/PF in each of the standard risk new business relationship	1.13.8
C125	Indicate if the firm screens the beneficial owners of its customers for ML/FT/PF in each of the lower risk new business relationships	1.13.9

For the above questions, indicate whether the **beneficial owners of new customers** are screened for ML/FT/PF, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

C126	Indicate if the firm screens the beneficial owners of its customers for adverse media in each of the higher risk new business relationships	1.13.10
C127	Indicate if the firm screens the beneficial owners of its customers for adverse media in each of the standard risk new business relationships	1.13.11
C128	Indicate if the firm screens the beneficial owners of its customers for adverse media in each of the lower risk new business relationships	1.13.12

For the above questions, indicate whether the **beneficial owners of new customers** are screened for adverse media, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

If the firm has not had any new customers in the reporting period, please answer as per the firm's procedures and controls.

4.1.14 Screening – Beneficial Owners – Continuing Business Relationship on a Regular Basis

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on the beneficial owners for continuing customer/ business relationships.

C129	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for PEPs , on a regular basis	1.14.1
C130	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for PEPs , on a regular basis	1.14.2
C131	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for PEPs , on a regular basis	1.14.3

For the above questions, indicate whether the **beneficial owners of customers** are screened on a regular basis for PEPs, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C132	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for sanctions , on a regular basis	1.14.4
C133	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for sanctions , on a regular basis	1.14.5
C134	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for sanctions , on a regular basis	1.14.6

For the above questions, indicate whether the **beneficial owners of customers** are screened on a regular basis for sanctions, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C135	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for ML/FT/PF , on a regular basis	1.14.7
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C136	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for ML/FT/PF , on a regular basis	1.14.8
C137	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for ML/FT/PF , on a regular basis	1.14.9

For the above questions, indicate whether the **beneficial owners of customers** are screened on a regular basis for ML/FT/PF, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C138	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for adverse media , on a regular basis	1.14.10
C139	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for adverse media , on a regular basis	1.14.11
C140	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for adverse media , on a regular basis	1.14.12

For the above questions, indicate whether the **beneficial owners of customers** are screened on a regular basis for adverse media, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.15 Screening – Beneficial Owners – Cont. Business Relationship, when Sanctions Lists are Published / Updated

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on the beneficial owners when sanctions lists are published/updated.

C141	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for PEPs , when sanctions lists are published / updated	1.15.1
C142	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for PEPs , when sanctions lists are published / updated	1.15.2

C143	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for PEPs , when sanctions lists are published / updated	1.15.3
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For the above questions, indicate whether the **beneficial owners of customers** are screened for PEPs when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C144	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for sanctions , when sanctions lists are published / updated	1.15.4
C145	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for sanctions , when sanctions lists are published / updated	1.15.5
C146	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for sanctions , when sanctions lists are published / updated	1.15.6

For the above questions, indicate whether the **beneficial owners of customers** are screened for sanctions when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C147	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for ML/FT/PF , when sanctions lists are published / updated	1.15.7
C148	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for ML/FT/PF , when sanctions lists are published / updated	1.15.8
C149	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for ML/FT/PF , when sanctions lists are published / updated	1.15.9

For the above questions, indicate whether the **beneficial owners of customers** are screened for ML/FT/PF when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)

- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C150	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for adverse media , when sanctions lists are published / updated	1.15.10
C151	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for adverse media , when sanctions lists are published / updated	1.15.11
C152	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for adverse media , when sanctions lists are published / updated	1.15.12

For the above questions, indicate whether the **beneficial owners of customers** are screened for adverse media when sanctions lists are published / updated, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.16 Screening – Beneficial Owners – Continuing Business Relationship at a Trigger Event

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on the beneficial owners at a trigger event.

For clarity, a **trigger event** consists of administrative tasks defined by the firm which could be reasonably expected during the course of the customer / business relationship. This can include changes in the customer profile or activity, with things such as the customer looking to take on a new product or service, a subsequent business transaction, change in address etc.

C153	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for PEPs , at a trigger event	1.16.1
C154	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for PEPs , at a trigger event	1.16.2

C155	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for PEPs , at a trigger event	1.16.3
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For the above questions, indicate whether the **beneficial owners of customers** are screened for PEPs at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C156	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for sanctions , at a trigger event	1.16.4
C157	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for sanctions , at a trigger event	1.16.5
C158	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for sanctions , at a trigger event	1.16.6

For the above questions, indicate whether the **beneficial owners of new customers** are screened for sanctions at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C159	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for ML/FT/PF , at a trigger event	1.16.7
C160	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for ML/FT/PF , at a trigger event	1.16.8
C161	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for ML/FT/PF , at a trigger event	1.16.9

For the above questions, indicate whether the **beneficial owners of new customers** are screened for ML/FT/PF at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C162	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for adverse media , at a trigger event	1.16.10
C163	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for adverse media , at a trigger event	1.16.11
C164	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for adverse media , at a trigger event	1.16.12

For the above questions, indicate whether the **beneficial owners of new customers** are screened for adverse media at a trigger event, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.17 Screening – Beneficial Owners – Continuing Business Relationship at an Unusual Activity Event

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the **‘Entity Control Questions’** of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on the beneficial owners, at an unusual activity (as defined by the Code) event.

‘Unusual activity’ meaning any activity including the receipt of information during the course of a business relationship, occasional transaction or attempted transaction where –

- a) the transaction has no apparent economic or lawful purpose, including a transaction which is —
 - (i) complex;
 - (ii) both large and unusual; or
 - (iii) of an unusual pattern
- b) the relevant person becomes aware of anything that causes the relevant person to doubt the identity of a person it is obliged to identify; or
- c) the relevant person becomes aware of anything that causes the relevant person to doubt the good faith of a customer, beneficial owner, beneficiary, introducer or eligible introducer.

C165	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for PEPs , at an unusual activity event	1.17.1
C166	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for PEPs , at an unusual activity event	1.17.2

C167	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for PEPs , at an unusual activity event	1.17.3
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For the above questions, indicate whether the **beneficial owners of customers** are screened for PEPs at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C168	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for sanctions , at an unusual activity event	1.17.4
C169	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for sanctions , at an unusual activity event	1.17.5
C170	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for sanctions , at an unusual activity event	1.17.6

For the above questions, indicate whether the **beneficial owners of new customers** are screened for sanctions at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C171	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for ML/FT/PF , at an unusual activity event	1.17.7
C172	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for ML/FT/PF , at an unusual activity event	1.17.8
C173	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for ML/FT/PF , at an unusual activity event	1.17.9

For the above questions, indicate whether the **beneficial owners of new customers** are screened for ML/FT/PF at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C174	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for adverse media , at an unusual activity event	1.17.10
C175	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for adverse media , at an unusual activity event	1.17.11
C176	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for adverse media , at an unusual activity event	1.17.12

For the above questions, indicate whether the **beneficial owners of new customers** are screened for adverse media at an unusual activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.18 Screening – Beneficial Owners – Continuing Business Relationship at a Suspicious Activity Event

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the **‘Entity Control Questions’** of this return.

This section of the return is seeking information specifically relating to the extent and type of screening undertaken on the beneficial owners, at a suspicious activity event.

‘Suspicious activity’ meaning any activity, including the receipt of information, which in the course of a business relationship, occasional transaction or attempted transaction which causes the relevant person to–

- (a) know or suspect; or
- (b) have reasonable grounds for knowing or suspecting,
that the activity is ML/FT or that the information is related to ML/FT.

C177	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for PEPs , at a suspicious activity event	1.18.1
C178	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for PEPs , at a suspicious activity event	1.18.2
C179	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for PEPs , at a suspicious activity event	1.18.3

For the above questions, indicate whether the **beneficial owners of customers** are screened for PEPs at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)

- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C180	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for sanctions , at a suspicious activity event	1.18.4
C181	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for sanctions , at a suspicious activity event	1.18.5
C182	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for sanctions , at a suspicious activity event	1.18.6

For the above questions, indicate whether the **beneficial owners of new customers** are screened for sanctions at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

C183	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for ML/FT/PF , at a suspicious activity event	1.18.7
C184	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for ML/FT/PF , at a suspicious activity event	1.18.8
C185	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for ML/FT/PF , at a suspicious activity event	1.18.9

For the above questions, indicate whether the **beneficial owners of new customers** are screened for ML/FT/PF at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- **Yes – Automatic** (screening is carried out by a system/ screening tool)
- **Yes – Manual** (screening is undertaken manually by a person)
- **No** (no screening is undertaken by the firm)

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.

For clarity, ML/FT/PF 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, financing of terrorism or proliferation.

C186	Indicate if the firms screens the beneficial owners of its higher risk continuing customer / business relationships for adverse media , at a suspicious activity event	1.18.10
C187	Indicate if the firms screens the beneficial owners of its standard risk continuing customer / business relationships for adverse media , at a suspicious activity event	1.18.11
C188	Indicate if the firms screens the beneficial owners of its lower risk continuing customer / business relationships for adverse media , at a suspicious activity event	1.18.12

For the above questions, indicate whether the **beneficial owners of new customers** are screened for adverse media at a suspicious activity event, split by the relevant risk rating. Please answer using the following dropdown list:

- ☐ **Yes – Automatic** (screening is carried out by a system/ screening tool)
- ☐ **Yes – Manual** (screening is undertaken manually by a person)
- ☐ **No** (no screening is undertaken by the firm)

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.

For clarity, 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.

4.1.19 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 section of the return seeks information on each customer type, along with the risk categorisation of that customer, the type of ongoing monitoring performed, and the frequency of that monitoring.

C189	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for higher risk PEP customers	1.19.1
C190	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for standard risk PEP customers	1.19.2
C191	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for lower risk PEP customers	1.19.3

The above three questions will appear for those firms who have reported to have PEP customers throughout the reporting period within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- ☐ At least every 1 year
- ☐ At least every 3 years
- ☐ Trigger event
- ☐ Constant

In the instance where a firm does not have a PEP customer in one of the risk categories (higher, standard or lower), please input the frequency of ongoing monitoring processes regarding the firm's non-PEP customers of that risk category, or the nearest relevant answer.

For example;

If the firm only has higher and standard risk PEPs – Please input the frequency of ongoing monitoring processes for those PEP customers; and then input the frequency of ongoing monitoring processes for non-PEP customers for the remaining lower risk.

C192	Indicate the frequency of ongoing monitoring processes regarding -	1.19.4
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	Review of customer risk assessment for higher risk natural persons customers , not associated with PEPs	
C193	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for standard risk natural persons customers , not associated with PEPs	1.19.5
C194	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for lower risk natural persons customers , not associated with PEPs	1.19.6

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

C195	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for higher risk non-natural persons customers , not associated with PEPs	1.19.7
C196	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for standard risk non-natural persons customers , not associated with PEPs	1.19.8
C197	Indicate the frequency of ongoing monitoring processes regarding - Review of customer risk assessment for lower risk non-natural persons customers , not associated with PEPs	1.19.9

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

C198	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for higher risk PEP customers	1.19.10
C199	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for standard risk PEP customers	1.19.11
C200	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for lower risk PEP customers	1.19.12

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

C201	Indicate the frequency of ongoing monitoring processes regarding -	1.19.13
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	Review of customer due diligence for higher risk natural persons customers , not associated with PEPs	
C202	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for standard risk natural persons customers , not associated with PEPs	1.19.14
C203	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for lower risk natural persons customers , not associated with PEPs	1.19.15

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

C204	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for higher risk non-natural persons customers , not associated with PEPs	1.19.16
C205	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for standard risk non-natural persons customers , not associated with PEPs	1.19.17
C206	Indicate the frequency of ongoing monitoring processes regarding - Review of customer due diligence for lower risk non-natural persons customers , not associated with PEPs	1.19.18

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

C207	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for higher risk PEP customers	1.19.19
C208	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for standard risk PEP customers	1.19.20
C209	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for lower risk PEP customers	1.19.21

The above three questions will appear for those firms who have reported to have PEP customers throughout the reporting period within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

C210	Indicate the frequency of ongoing monitoring processes regarding -	1.19.22
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	Scrutiny of transactions for higher risk natural persons customers , not associated with PEPs	
C211	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for standard risk natural persons customers , not associated with PEPs	1.19.23
C212	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for lower risk natural persons customers , not associated with PEPs	1.19.24

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

C213	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for higher risk non-natural persons customers , not associated with PEPs	1.19.25
C214	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for standard risk non-natural persons customers , not associated with PEPs	1.19.26
C215	Indicate the frequency of ongoing monitoring processes regarding - Scrutiny of transactions for lower risk non-natural persons customers , not associated with PEPs	1.19.27

This section of the return will appear for all firms, with the specific questions around higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return. Please answer using the following dropdown list:

- At least every 1 year
- At least every 3 years
- Trigger event
- Constant

4.1.20 Scrutiny of Transactions

This section of the return will appear for all firms, with the specific questions around PEP, higher, standard and lower risk customers appearing accordingly based on the answers provided within the '**Entity Control Questions**' of this return.

This section of the return is seeking information on whether, for each risk category of customer (including PEPs), transactions are scrutinised.

C216	Does the firm undertake automated transactional monitoring for PEP customers?	1.20.1
C217	Does the firm undertake automated transactional monitoring for higher risk customers?	1.20.2
C218	Does the firm undertake automated transactional monitoring for standard risk customers?	1.20.3
C219	Does the firm undertake automated transactional monitoring for lower risk customers?	1.20.4

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No

An example of an **automated transactional monitoring system** includes an automated system which analyses all transactions and flags results for consideration and review.

C220	Does the firm undertake non-automated transactional monitoring for PEP customers?	1.20.5
C221	Does the firm undertake non-automated transactional monitoring for higher risk customers?	1.20.6
C222	Does the firm undertake non-automated transactional monitoring for standard risk customers?	1.20.7
C223	Does the firm undertake non-automated transactional monitoring for lower risk customers?	1.20.8

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No

An example of a **non-automated transactional monitoring system** includes where a manual review of a business transaction is undertaken.

C224	Does the firm undertake system generated exception reports monitoring (if applicable) for PEP customers?	1.20.9
C225	Does the firm undertake system generated exception reports monitoring (if applicable) for higher risk customers?	1.20.10
C226	Does the firm undertake system generated exception reports monitoring (if applicable) for standard risk customers?	1.20.11
C227	Does the firm undertake system generated exception reports monitoring (if applicable) for lower risk customers?	1.20.12

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No
- ☐ N/A

An example of **system generated exception report** monitoring could be where a firms system produces a report on a set criteria (e.g. situations that are out of range), and these are considered and reviewed.

C228	Does the firm undertake trigger events monitoring for PEP customers?	1.20.13
C229	Does the firm undertake trigger events monitoring for higher risk customers?	1.20.14
C230	Does the firm undertake trigger events monitoring for standard risk customers?	1.20.15
C231	Does the firm undertake trigger events monitoring for lower risk customers?	1.20.16

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No

For clarity, '**trigger events**' consist of administrative matters defined by the firm which could be reasonably expected during the course of the customer / business relationship. This could include changes in the

customer profile or activity; such as the customer looking to take on a new product or service, a unexpected or unusual transaction or, change of address etc.

Trigger event monitoring identifies, assesses and re-risk rates a customer's risk profile reviewing the current CDD, ECDD and KYC held, to ensure sufficient and suitable information and documentation is held according to the risk rating of the customer.

C232	Does the firm undertake value driven monitoring for PEP customers?	1.20.17
C233	Does the firm undertake value driven monitoring for higher risk customers?	1.20.18
C234	Does the firm undertake value driven monitoring for standard risk customers?	1.20.19
C235	Does the firm undertake value driven monitoring for lower risk customers?	1.20.20

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No

An example of **value driven monitoring** could include scrutiny of transactions over a set value.

C236	Does the firm undertake cash transaction monitoring (if applicable) for PEP customers?	1.20.21
C237	Does the firm undertake cash transaction monitoring (if applicable) for higher risk customers?	1.20.22
C238	Does the firm undertake cash transaction monitoring (if applicable) for standard risk customers?	1.20.23
C239	Does the firm undertake cash transaction monitoring (if applicable) for lower risk customers?	1.20.24

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No
- ☐ N/A

An example of **cash transaction monitoring** includes scrutiny of cash transactions.

C240	Does the firm undertake geographic origin / destination of transaction monitoring for PEP customers?	1.20.25
C241	Does the firm undertake geographic origin / destination of transaction monitoring for higher risk customers?	1.20.26
C242	Does the firm undertake geographic origin / destination of transaction monitoring for standard risk customers?	1.20.27
C243	Does the firm undertake geographic origin / destination of transaction monitoring for lower risk customers?	1.20.28

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No

An example of **geographic origin / destination of transaction monitoring** includes reviews of transactions from set jurisdictions.

C244	Does the firm undertake event driven monitoring for PEP customers?	1.20.29
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C245	Does the firm undertake event driven monitoring for higher risk customers?	1.20.30
C246	Does the firm undertake event driven monitoring for standard risk customers?	1.20.31
C247	Does the firm undertake event driven monitoring for lower risk customers?	1.20.32

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No

For clarity, '**event driven**' refers to unexpected undefined trigger events, for example a country list change, a global event or adverse media on an individual.

C248	Does the firm undertake scheduled periodic reviews and sampling monitoring for PEP customers?	1.20.33
C249	Does the firm undertake scheduled periodic reviews and sampling monitoring for higher risk customers?	1.20.34
C250	Does the firm undertake scheduled periodic reviews and sampling monitoring for standard risk customers?	1.20.35
C251	Does the firm undertake scheduled periodic reviews and sampling monitoring for lower risk customers?	1.20.36

For the above questions, please answer using the following dropdown list:

- ☐ Yes
- ☐ No

4.1.21 Payment Screening – SWIFT

This section of the return will only appear for those firms who have selected to be a Class 1 – Deposit Taking or Class 8 – Money Transmission Services licenceholder within the '**Entity Control Questions**' section of the return.

This section of the return is seeking information on which customer screening is applied to for outward and inward SWIFT payments.

C252	Are you a 'SWIFT' network member?	1.21.1
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Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C253 to C281 will appear. This section is applicable to **SWIFT network members only**.

C253	For outward SWIFT payments, indicate if the sender of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.21.2
C254	For outward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.21.3
C255	For outward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.21.4

For the above questions, please answer using the following dropdown list:

- ☐ **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- ☐ **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed

- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C256	For inward SWIFT payments, indicate if the sender of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.21.5
C257	For inward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.21.6
C258	For inward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.21.7

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C259	For outward SWIFT payments, indicate if the sender of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.21.8
C260	For outward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.21.9
C261	For outward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.21.10

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C262	For inward SWIFT payments, indicate if the sender of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.21.11
C263	For inward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.21.12
C264	For inward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.21.13

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed

- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C265	For outward SWIFT payments, indicate if the sender of the payment is screened regarding <u>other sanction lists</u>	1.21.14
C266	For outward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>other sanction lists</u>	1.21.15
C267	For outward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>other sanction lists</u>	1.21.16

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C268	For inward SWIFT payments, indicate if the sender of the payment is screened regarding <u>other sanction lists</u>	1.21.17
C269	For inward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>other sanction lists</u>	1.21.18
C270	For inward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>other sanction lists</u>	1.21.19

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C271	For outward SWIFT payments, indicate if the sender of the payment is screened regarding <u>proprietary lists</u>	1.21.20
C272	For outward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>proprietary lists</u>	1.21.21
C273	For outward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>proprietary lists</u>	1.21.22

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed

- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C274	For inward SWIFT payments, indicate if the sender of the payment is screened regarding <u>proprietary lists</u>	1.21.23
C275	For inward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>proprietary lists</u>	1.21.24
C276	For inward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>proprietary lists</u>	1.21.25

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C277	For inward SWIFT payments, indicate if the sender of the payment is screened regarding <u>FATF 16 (wire transfer) checks</u>	1.21.26
C278	For inward SWIFT payments, indicate if the beneficiary of the payment is screened regarding <u>FATF 16 (wire transfer) checks</u>	1.21.27
C279	For inward SWIFT payments, indicate if any other parties of the payment are screened regarding <u>FATF 16 (wire transfer) checks</u>	1.21.28

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C280	Where screening is undertaken subsequent to the transaction completion, detail the timeframe in which screening is undertaken or state N/A	1.21.29
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The above is a comment box, please state the timeframe if applicable, if not applicable input 'N/A'.

C281	Where published lists other than IOM, UK, EU, UN and US sanction lists are used, specify the lists utilised or state N/A	1.21.30
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The above is a comment box, please specify the lists used if applicable, if not applicable input 'N/A'.

4.1.22 Payment Screening – BACS

This section of the return will appear for those firms who have selected to be a Class 1 – Deposit Taking or Class 8 – Money Transmission Services licenceholder within the **‘Entity Control Questions’** section of the return.

This section of the return is seeking information on which customer screening is applied to for outward and inward BACS payments.

C282	Do you participate in the 'BACS' payments scheme?	1.22.1
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Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C283 to C309 will appear. This section is applicable to **BACS payments scheme participants only**.

C283	For outward BACS payments, indicate if the sender of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.22.2
C284	For outward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.22.3
C285	For outward BACS payments, indicate if any other parties of the payment are screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.22.4

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C286	For inward BACS payments, indicate if the sender of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.22.5
C287	For inward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.22.6
C288	For inward BACS payments, indicate if any other parties of the payment are screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.22.7

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C289	For outward BACS payments, indicate if the sender of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.22.8
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C290	For outward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.22.9
C291	For outward BACS payments, indicate if any other parties of the payment are screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.22.10

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C292	For inward BACS payments, indicate if the sender of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.22.11
C293	For inward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.22.12
C294	For inward BACS payments, indicate if any other parties of the payment are screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.22.13

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C295	For outward BACS payments, indicate if the sender of the payment is screened regarding <u>other sanction lists</u>	1.22.14
C296	For outward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>other sanction lists</u>	1.22.15
C297	For outward BACS payments, indicate if any other parties of the payment are screened regarding <u>other sanction lists</u>	1.22.16

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C298	For inward BACS payments, indicate if the sender of the payment is screened regarding <u>other sanction lists</u>	1.22.17
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C299	For inward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>other sanction lists</u>	1.22.18
C300	For inward BACS payments, indicate if any other parties of the payment are screened regarding <u>other sanction lists</u>	1.22.19

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C301	For outward BACS payments, indicate if the sender of the payment is screened regarding <u>proprietary lists</u>	1.22.20
C302	For outward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>proprietary lists</u>	1.22.21
C303	For outward BACS payments, indicate if any other parties of the payment are screened regarding <u>proprietary lists</u>	1.22.22

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C304	For inward BACS payments, indicate if the sender of the payment is screened regarding <u>proprietary lists</u>	1.22.23
C305	For inward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>proprietary lists</u>	1.22.24
C306	For inward BACS payments, indicate if any other parties of the payment are screened regarding <u>proprietary lists</u>	1.22.25

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C307	For inward BACS payments, indicate if the sender of the payment is screened regarding <u>FATF 16 (wire transfer) checks</u>	1.22.26
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C308	For inward BACS payments, indicate if the beneficiary of the payment is screened regarding <u>FATF 16 (wire transfer) checks</u>	1.22.27
C309	For inward BACS payments, indicate if any other parties of the payment are screened regarding <u>FATF 16 (wire transfer) checks</u>	1.22.28

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

4.1.23 Payment Screening – FASTER

This section of the return will appear for those firms who have selected to be a Class 1 – Deposit Taking or Class 8 – Money Transmission Services licenceholder within the **‘Entity Control Questions’** section of the return.

This section of the return is seeking information on which customer screening is applied to for outward and inward FASTER payments.

C310	Do you participate in the Faster Payment System?	1.23.1
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Please answer ‘Yes’ or ‘No’. If answered ‘Yes’ the below questions C311 to C337 will appear. This section is applicable **to Faster Payment System participants only**.

C311	For outward FASTER payments, indicate if the sender of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.23.2
C312	For outward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.23.3
C313	For outward FASTER payments, indicate if any other parties of the payment are screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.23.4

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C314	For inward FASTER payments, indicate if the sender of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.23.5
C315	For inward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.23.6

C316	For inward FASTER payments, indicate if any other parties of the payment are screened regarding <u>IOM/UK/EU/UN sanction lists</u>	1.23.7
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For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C317	For outward FASTER payments, indicate if the sender of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.23.8
C318	For outward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.23.9
C319	For outward FASTER payments, indicate if any other parties of the payment are screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.23.10

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C320	For inward FASTER payments, indicate if the sender of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.23.11
C321	For inward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.23.12
C322	For inward FASTER payments, indicate if any other parties of the payment are screened regarding <u>US sanction lists</u> (e.g. OFAC / SDN lists)	1.23.13

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C323	For outward FASTER payments, indicate if the sender of the payment is screened regarding <u>other sanction lists</u>	1.23.14
C324	For outward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>other sanction lists</u>	1.23.15

C325	For outward FASTER payments, indicate if any other parties of the payment are screened regarding <u>other sanction lists</u>	1.23.16
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For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C326	For inward FASTER payments, indicate if the sender of the payment is screened regarding <u>other sanction lists</u>	1.23.17
C327	For inward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>other sanction lists</u>	1.23.18
C328	For inward FASTER payments, indicate if any other parties of the payment are screened regarding <u>other sanction lists</u>	1.23.19

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C329	For outward FASTER payments, indicate if the sender of the payment is screened regarding <u>proprietary lists</u>	1.23.20
C330	For outward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>proprietary lists</u>	1.23.21
C331	For outward FASTER payments, indicate if any other parties of the payment are screened regarding <u>proprietary lists</u>	1.23.22

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C332	For inward FASTER payments, indicate if the sender of the payment is screened regarding <u>proprietary lists</u>	1.23.23
C333	For inward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>proprietary lists</u>	1.23.24

C334	For inward FASTER payments, indicate if any other parties of the payment are screened regarding <u>proprietary lists</u>	1.23.25
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For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

C335	For inward FASTER payments, indicate if the sender of the payment is screened regarding <u>FATF 16 (wire transfer) checks</u>	1.23.26
C336	For inward FASTER payments, indicate if the beneficiary of the payment is screened regarding <u>FATF 16 (wire transfer) checks</u>	1.23.27
C337	For inward FASTER payments, indicate if any other parties of the payment are screened regarding <u>FATF 16 (wire transfer) checks</u>	1.23.28

For the above questions, please answer using the following dropdown list:

- **Yes: Real time** – Yes screening against the list detailed for the party shown is applied as the transaction is processed but prior to it completing
- **Yes: Prior** – Yes screening against the list detailed for the party shown is undertaken prior to the transaction being completed
- **Yes: After** – Yes screening against the list detailed for the party shown is undertaken subsequent to the transaction being completed
- **No** – No screening is not applied against the list detailed in respect of the party shown

4.1.24 Disclosures and Reporting – THEMIS

This section of the return will appear for all firms for completion.

C338	Is the firm registered with THEMIS?	1.24.1
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Please answer 'Yes' or 'No'. For clarity, THEMIS is the online reporting system of the FIU, through which MLROs are able to report SARs, other disclosures, and receive advisory notices. The Authority strongly encourages that all firms and MLROs are signed-up and active use THEMIS where appropriate. Please contact the FIU for further guidance on steps to sign-up and register.

4.1.25 Disclosures and Reporting – Disclosures to the MLRO, Sanctions Officer and FIU

The first question of this section will appear for all firms for completion.

C339	Did the firm make any internal or external disclosures in the reporting period?	1.25.1
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Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C340 to C347 will appear.

C340	Number of internal disclosures made within the reporting period, by disclosure type	1.25.2
C341	Number of external disclosures made within the reporting period to Isle of Man Financial Intelligence Unit, by disclosure type	1.25.4

For the above questions, input the total number of internal and external disclosures made in the reporting period (1st January to 31st December) using the below 'disclosure type' dropdowns:

- Money Laundering Disclosures (POCA - Proceeds of Crime Act)
- Terrorism Disclosures (ATCA - Anti-Terrorism and Crime Act)

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.

C342	Number of Section 24 disclosures made under the FIU Act by the firm in the reporting period	1.25.5
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Input the total number of Section 24 disclosures made in the reporting period (1st January to 31st December). If no Section 24 disclosures have been made during the period, please input '0'.

Section 24 of the FIU Act allows any person to disclose information to the FIU if the disclosure is made for the purposes of the exercise by the FIU of any of its functions.

C343	Number of UN sanctions disclosures made under relevant legislation by the firm in the reporting period	1.25.6
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Input the total number of UN sanctions disclosures made in the reporting period (1st January to 31st December).

UN Sanctions being:

- UN sanctions (made by UN Security Council Resolutions)
- UK sanctions (made by Regulations under the Sanctions and Anti-Money Laundering Act 2018)
- Designations relating to terrorism (made under the Terrorism and Other Crime (Financial Restrictions) Act 2014)

If no UN sanctions disclosures have been made during the period, please input '0'.

C344	Number of non-UN sanctions disclosures made under the FIU Act by the firm in the reporting period	1.25.7
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Input the total number of non-UN sanctions disclosures made in the reporting period (1st January to 31st December). Non-UN sanctions being OFAC for example.

If no non-UN sanctions disclosures have been made during the period, please input '0'.

C345	Provide the aggregate value of assets (GBP) of internal disclosures	1.25.9
C346	Provide the aggregate value of assets (GBP) of external disclosures to the Isle of Man Financial Intelligence Unit	1.25.10
C347	Provide the aggregate value of assets (GBP) of disclosures made for suspected breaches of sanctions	1.25.11

For the above questions, please input the aggregate value of assets in GBP.

4.1.26 Disclosures and Reporting – International

The first question of this section will appear for all firms for completion.

C348	Did the firm make any ML / FT / PF / sanction disclosures to International Agencies in the reporting period?	1.26.1
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Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C349 to C351 will appear. For clarity, international agencies are those agencies outside the Isle of Man and this excludes the Isle of Man FIU.

C349	Number of disclosures made within the reporting period to International Agencies, by disclosure type	1.26.2
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For the above question, input the total number of disclosures made to international agencies in the reporting period (1st January to 31st December) using the below 'disclosure type' dropdowns:

- Money Laundering Disclosures (POCA - Proceeds of Crime Act)
- Terrorism Disclosures (ATCA - Anti-Terrorism and Crime Act)
- Sanctions Disclosures

C350	Of these disclosures to International Agencies, how many have been dual reported to the Isle of Man FIU?	1.26.3
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Please input the number of disclosures.

C351	Provide the aggregate value of assets (GBP) of disclosures to International Agencies	1.26.4
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For the above questions, please input the aggregate value of assets in GBP.

4.1.27 Disclosures and Reporting – ML / FT / PF / Sanctions Enquiries Received

C352	Did the firm receive any enquiries from law enforcement authorities on ML / FT / PF / sanctions in the reporting period?	1.27.1
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This question of the return will appear for all firms for completion. For clarity, firms are not required to record general advisory notices received in response to this question. This section of the return is seeking information in relation to any Section 18 notices and court orders received by the firm.

Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C353 to C357 will appear.

C353	Number of ML/FT/PF enquires received and recorded within the register (as required by Part 7 of the AML/CFT Code), in the reporting period from: Law enforcement authorities about money laundering	1.27.2
C354	Law enforcement authorities about financing of terrorism	1.27.3
C355	Law enforcement authorities about proliferation financing	1.27.4
C356	Law enforcement authorities about targeted financial sanctions	1.27.5
C357	Law enforcement authorities about other enquiries or reason not known	1.27.6

The AML/CFT Code requires firms to maintain a register of ML and FT enquiries received from law enforcement authorities. For the above questions, state the number of enquiries received in the year (1st January to 31st December) from law enforcement authorities, split between ML, FT, PF, financial sanctions and others.

C358	Did the firm receive any enquiries from other competent authorities on ML / FT / PF / sanctions in the reporting period?	1.27.8
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This question of the return will appear for all firms for completion. Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C359 to C363 will appear.

C359	Number of ML/FT/PF enquires received and recorded within the register (as required by Part 7 of the AML/CFT Code), in the reporting period from: Other competent authorities about money laundering	1.27.9
C360	Other competent authorities about financing of terrorism	1.27.10
C361	Other competent authorities about proliferation financing	1.27.11
C362	Other competent authorities about targeted financial sanctions	1.27.12
C363	Other competent authorities about other enquiries or reason not known	1.27.13

The AML/CFT Code requires firms to maintain a register of ML and FT enquiries received from other competent authorities. For the above questions, state the number of enquiries received in the year (1st January to 31st December) from other competent authorities, split between ML, FT, PF, financial sanctions and others.

4.1.28 Disclosures and Reporting – Blocked or Frozen Assets for Sanctions Purposes

C364	Has the firm had any blocked or frozen assets for sanctions purposes in or at the end of the reporting period?	1.28.1
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This question of the return will appear for all firms for completion. The reporting period being from 1st January to 31st December.

Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C365 to C370 will appear.

C365	Provide the number of accounts blocked or frozen for financial sanctions purposes in the reporting period	1.28.2
C366	Provide the aggregate value of assets (GBP) for accounts blocked or frozen for financial sanctions purposes in the reporting period	1.28.3
C367	Provide the number of blocked or frozen accounts for financial sanctions purposes released in the reporting period	1.28.4
C368	Provide the aggregate value of assets (GBP) for blocked or frozen accounts for financial sanctions purposes released in the reporting period	1.28.5
C369	Provide the total number of accounts blocked or frozen for financial sanctions purposes at the end reporting period	1.28.6
C370	Provide the total aggregate value of assets (GBP) for blocked or frozen accounts for financial sanctions purposes at the end of the reporting period	1.28.7

Please input the aggregate value of assets in GBP.

4.1.29 Disclosures and Reporting – Blocked or Frozen Assets for Reasons other than for Financial Sanctions Purposes

C371	Has the firm had any blocked or frozen assets for reasons other than for financial sanctions purposes in or at the end of the reporting period?	1.29.1
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This question of the return will appear for all firms for completion. The reporting period being from 1st January to 31st December.

Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C372 to C379 will appear.

C372	Provide the number of accounts blocked or frozen for ML purposes at the end of the reporting period <i>Subject to consent including restraint orders etc.</i>	1.29.2
C373	Provide the aggregate value of assets (GBP) of blocked or frozen accounts for ML purposes at the end of the reporting period <i>Subject to consent including restraint orders etc.</i>	1.28.3
C374	Provide the number of accounts blocked or frozen for FT purposes at the end of the reporting period <i>Subject to consent including restraint orders etc.</i>	1.28.4
C375	Provide the aggregate value of assets (GBP) of blocked or frozen accounts for FT purposes at the end of the reporting period <i>Subject to consent including restraint orders etc.</i>	1.28.5
C376	Provide the number of accounts blocked or frozen for PF purposes at the end of the reporting period <i>Subject to consent including restraint orders etc.</i>	1.28.6
C377	Provide the aggregate value of assets (GBP) of blocked or frozen accounts for PF purposes at the end of the reporting period <i>Subject to consent including restraint orders etc.</i>	1.28.7
C378	Provide the number of accounts blocked or frozen for other purposes at the end of the reporting period <i>E.g. gone away</i>	1.28.8
C379	Provide the aggregate value of assets (GBP) of blocked or frozen accounts for other purposes at the end of the reporting period <i>E.g. gone away</i>	1.28.9

Please input the aggregate value of assets in GBP.

4.1.30 Disclosures and Reporting – Declined and Terminated Relationships (ML / TF / PF / Sanctions)

C380	Did the firm decline any customer / business relationships for ML / FT / PF / Sanctions reasons in the reporting period?	1.30.1
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This question of the return will appear for all firms for completion. The reporting period being from 1st January to 31st December.

Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C381 to C388 will appear.

C381	Number of potential new customer relationships declined in the reporting period for ML reasons	1.30.2
C382	Number of potential new customer relationships declined in the reporting period for FT reasons	1.30.3
C383	Number of potential new customer relationships declined in the reporting period for PF reasons	1.30.4

C384	Number of potential new customer relationships declined in the reporting period for sanctions reasons	1.30.5
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Please input the number of new customer relationships declined in the reporting period (1st January to 31st December) split between ML, FT, PF, and sanctions reasons.

C385	Indicative value (GBP) of assets relating to the potential new customer relationships declined in the reporting period for ML reasons	1.30.6
C386	Indicative value (GBP) of assets relating to the potential new customer relationships declined in the reporting period for FT reasons	1.30.7
C387	Indicative value (GBP) of assets relating to the potential new customer relationships declined in the reporting period for PF reasons	1.30.8
C388	Indicative value (GBP) of assets relating to the potential new customer relationships declined in the reporting period for sanctions reasons	1.30.9

Please input the indicative value, in GBP, of those new customer relationships declined in the reporting period (1st January to 31st December) split between ML, FT, PF, and sanctions reasons.

C389	Did the firm terminate any customer / business relationships for ML / FT / PF / Sanctions reasons in the reporting period?	1.30.10
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This question of the return will appear for all firms for completion. The reporting period being from 1st January to 31st December.

Please answer 'Yes' or 'No'. If answered 'Yes' the below questions C390 to C397 will appear.

C390	Number of customer relationships terminated in the reporting period for ML reasons	1.30.11
C391	Number of customer relationships terminated in the reporting period for FT reasons	1.30.12
C392	Number of customer relationships terminated in the reporting period for PF reasons	1.30.13
C393	Number of customer relationships terminated in the reporting period for sanctions reasons	1.30.14

Please input the number of customer relationships terminated in the reporting period (1st January to 31st December) split between ML, FT, PF, and sanctions reasons.

C394	Value of assets (GBP) relating to the customer relationships which were terminated in the reporting period for ML reasons	1.30.15
C395	Value of assets (GBP) relating to the customer relationships which were terminated in the reporting period for FT reasons	1.30.16
C396	Value of assets (GBP) relating to the customer relationships which were terminated in the reporting period for PF reasons	1.30.17
C397	Value of assets (GBP) relating to the customer relationships which were terminated in the reporting period for sanctions reasons	1.30.18

Please input the value of assets, in GBP, relating to the customer relationships terminated in the reporting period (1st January to 31st December) split between ML, FT, PF, and sanctions reasons.

4.1.31 Comments

Q398	Do you have any comments to the previous sections?	1.31.1
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This section of the return will appear for all firms. Please select 'Yes' or 'No'. If answered 'Yes' the below comment box will appear:

Q399	This section is provided to allow firms to provide any commentary that is relevant to the completion of this form	1.31.2
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5. Signatories Page

S1	Do you declare this information, data collected and submitted to be correct and accurate? Please note the legislation references available here in relation to making false or misleading statements to the Authority.	1.1.1
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The above is a comment box. Please type 'Yes'.

The Authority is registered with the Information Commissioner as a data controller. The Authority collects and processes personal data to carry out its functions under relevant legislation and may share personal data with other parties where there is a legal basis for doing so. Information on how the Authority collects and processes personal data can be found in the [Privacy Notice](#).

S2	Name of the submitting individual, who does so on behalf of the firm	1.1.2
S3	Position of the submitting individual, who does so on behalf of the firm	1.1.3

The above are comment boxes, please type in the name and position of the individual submitting the return.

6. Version / Control History

Issue Date	Version	Changes Log
15/01/2024	1.0	Initial guidance release following the AML/CFT annual statistical return's migration from Excel to the STRIX system for the 2023 annual statistical return. Small number of additional questions such as commercially exposed persons, screening provider, sanctions notification service added.
01/02/2024	2.0	Enhancements and further guidance added throughout the document following the initial release.
06/12/2024	3.0	Full questions included with guidance provided for each. Updates added for release of the 2024 annual statistical return; 80 total questions removed, 27 new conditional questions and 35 new risk and control data questions.
23/12/2024	3.1	Small guidance enhancements. Added four further questions within the 'Products and Services Scenarios' section regarding trusts and the residency of family office customers.
08/01/2025	3.1.1	Guidance added to the following questions: Q133-Q135, Q138-Q140 and C189-C191.
14/02/2025	3.1.2	Further guidance added to the following questions: Q163, Q185, Q187 and C352. Section 2.2.4 added to '2.2 Useful links and FAQs'