



Guidance for the Annual AML/CFT Statistical Return - STRIX

Issue Date	Version	Changes
15/01/2024	1.0	Initial Release
01/02/2024	2.0	Enhancements and further guidance throughout

Contact: AML/CFT Supervision Division

aml@iomfsa.im

Isle of Man Financial Services Authority
Finch Hill House, Bucks Road
Douglas, IM99 1DT

CONTENTS

1. GLOSSARY OF TERMS	3
2. ABOUT THIS GUIDANCE.....	5
2.1 Purpose.....	5
2.2 Useful Links.....	5
3. INHERENT RISK.....	6
3.1 Firm Information.....	6
3.1.1 Building your Survey.....	6
3.1.2 Licence(s) Held.....	6
3.2 Customer Risk.....	7
3.2.1 Deposit Taking, Credit Unions, Payment Services & E-money - Size and Significance of the Customer Base	7
3.2.2 Deposit Taking, Credit Unions, Payment Services & E-money – New Customer Relationships	7
3.2.3 Investment Business, Crowdfunding & Insurance Intermediaries - Size and Significance of the Customer Base.....	8
3.2.4 Investment Business, Crowdfunding & Insurance Intermediaries – New Customer Relationships	9
3.2.5 Services to CISs - Size and Significance of Scheme (Customer) Base	10
3.2.6 Services to CISs - New Scheme (Customer) Relationships	10
3.2.7 Investing in CISs - Size and Significance of Investor Base Investing into the Schemes	11
3.2.8 Investing in CISs – New Investor Relationships	11
3.2.9 TCSPs – Size and Significance of Customer Base	12
3.2.10 TCSPs – New Customer Relationships.....	12
3.2.11 TCSPs – Legal Form of Customer Entities	13
3.2.12 TCSPs - Principal Activity of Customer Entities	13
3.2.13 Insurance – Long Term Business (including Reinsurance) – Size & Significance of Customer Base.....	14
3.2.14 Insurance – Long Term Business (including Reinsurance) – New Customer Relationships.....	14
3.2.15 Insurance – General Business (including Reinsurance) or Restricted (Class 12) only or ISPV Class 13 – Size & Significance of Customer Base.....	15
3.2.16 Insurance – General Business (including Reinsurance) or Restricted (Class 12) only or ISPV Class 13 – New Customer Relationships	15
3.2.17 Insurance Manager – Size & Significance of Customer Base.....	16
3.2.18 Insurance Manager – New Customer Relationships.....	16
3.2.19 Registered Schemes Administrators –Size & Significance of Customer Base (Schemes, Members and Employers) 17	17
3.2.20 Registered Schemes Administrators – New Customer Relationships (Schemes, Members and Employers)	18
3.2.21 Registered Schemes Administrators –ML/FT/PF Risk Profile of Customer Base.....	19
3.2.22 Registered Schemes Administrators - ML/FT/PF Risk Profile of New Customer Relationships.....	20
3.2.23 Designated Business – Size & Significance of Customer Base	21
3.2.24 Designated Businesses – New Customer Relationships.....	21
3.2.25 Designated Businesses – Declaration	22
3.2.26 Politically Exposed Persons (“PEPs”).....	23
3.2.27 Residency of Customers – Jurisdictional Analysis of Customers	24
3.2.28 Residency of UBOs – Jurisdictional Analysis of Ultimate Beneficial Owners	24
3.3 Products & Services Risk.....	25
3.3.1 Understanding the Firm – Payment Methods.....	25
3.3.2 Commercially Exposed Persons (“CEPs”).....	25
3.3.3 Insurance Activity.....	26
3.4 Distribution Channel Risk	27
3.4.1 Services to Collective Investment Schemes - Declined and Terminated schemes	27
3.4.2 New Business Relationships - Reliance and Concessions - Face to Face Business.....	27
3.4.3 New Business Relationships - Reliance and Concessions - Reliance on Third Parties for Elements of Customer Due Diligence	27
3.4.4 New Business Relationships - Reliance and Concessions – Use of Simplified Due Diligence	28
3.4.5 New Business Relationships - Sources and Introducers – Sources of Business.....	28
3.5 Financial Crime Risk.....	29
3.5.1 Blocked or Frozen Assets for Sanctions Purposes.....	29

3.5.2	<i>Blocked or Frozen Assets for Reasons Other Than for Financial Sanctions Purposes</i>	29
3.5.3	<i>Declined and Terminated Relationships (ML / TF / PF / Sanctions)</i>	30
4.1	Entity Control Questions	31
4.2	Understanding the Firm - Employees, Workers and Contractors	31
4.3	Control Environment – Outsourced Activities – during the reporting period.....	32
4.4	Control Environment – Monitoring and Testing Compliance with the AML/CFT Requirements.....	32
4.5	Screening and Monitoring – Screening Provider.....	33
4.6	Screening – New Customer	33
4.7	Screening – Continuing Business Relationship On a Regular Basis	34
4.8	Screening – Continuing Business Relationship When Sanctions Lists Are Published / Updated	34
4.9	Screening – Continuing Business Relationship at a Trigger Event.....	34
4.10	Screening – Continuing Business Relationship at an Unusual Activity Event.....	35
4.11	Screening – Continuing Business Relationship at Suspicious Activity Event	35
4.12	Screening – Beneficial Owners – New Customers.....	35
4.13	Screening – Beneficial Owners – Continuing Business Relationship on a Regular Basis.....	36
4.14	Screening – Beneficial Owners – Cont. Business Relationship, When Sanctions Lists Are Published / Updated	36
4.15	Screening – Beneficial Owners – Continuing Business Relationship at a Trigger Event.....	36
4.16	Screening – Beneficial Owners – Continuing Business Relationship at an Unusual Activity Event.....	37
4.17	Screening – Beneficial Owners – Continuing Business Relationship at a Suspicious Activity Event	37
4.18	Ongoing Monitoring	37
4.19	Scrutiny of Transactions	38
4.20	Payment Screening – Swift	39
4.21	Payment Screening – BACS.....	39
4.22	Payment Screening – FASTER	40
4.23	Designated Business – Declaration.....	40
4.24	Disclosures and Reporting – THEMIS.....	41
4.25	Disclosures and Reporting – Disclosures to the MLRO, Sanctions Officer and FIU	41
4.26	Disclosures and Reporting – International	41
4.27	Disclosures and Reporting – ML / FT / PF Enquiries Received	42
4.28	Disclosures and Reporting – Blocked or Frozen Assets for Sanctions Purposes	42
4.29	Disclosures and Reporting – Blocked or Frozen Assets for Reasons Other Than for Financial Sanctions Purposes	42
4.30	Disclosures and Reporting – Declined and Terminated Relationships (ML / TF / PF / Sanctions)	43
5.	SIGNATORIES PAGE	44

1. Glossary of Terms

Term	Meaning in this Guidance
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
IA08	Insurance Act 2008
IC	Incorporated Companies
ICC	Incorporated Cell Companies
IOM	Isle of Man
ISPV	Insurance Special Purpose Vehicle

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

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
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's ("the Authority") AML/CFT Annual Statistical Return within the Strix system. It gives firms an indication of the data being requested, and in some areas the required format. 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

- [IOM FSA AML/CFT Requirements and Guidance](#)
- [IOM FSA - What is Strix?](#)
- [Insurance Act 2008](#)
- [Financial Services Act 2008](#)
- [Retirement Benefits Schemes Act 2000](#)
- [Designated Businesses \(Registration and Oversight\) Act 2015](#)

3. Inherent Risk

3.1 Firm Information

3.1.1 Building your Survey

This section requires firms to select all applicable types of permissions/registration held under the following Acts:

Q1 to Q9

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

Where a licence holder carries out a designated business activity and is exempt from registration under Schedule 1 of the DBRO15, these firms should select '*Designated Businesses (Registration and Oversight) Act 2015*' under the '**Building your Survey**' section to subsequently document and record the split of customers and services provided accurately for the various activities carried out.

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

FSA08 Class 4 service providers - for the avoidance of doubt, firms whose main activity is corporate services, but who also provide management or administration services to collective investment schemes under FSA08 Class 3 (11), must select "Yes" (NOT "No") for the permission "Services to CIS - Classes 3 (1), (2) and (9)-(12)", to enable the relevant questions to appear.

3.1.2 Licence(s) Held

This section requires firms to select each of the exact Class(es) or Permission(s) that applies to the regulated or registered business under the following Acts. Where a firm undertakes two or more regulated or registered activities, all activities undertaken must be selected.

Q10 to Q42

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

3.2 Customer Risk

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

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) how many total customers the firm has, split by risk rating and customer type from the available dropdown options:

Q43 – Q44 – Q45

- Total number of customers assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

Q46 – Q47 – Q48

- Total number of customer accounts assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

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

This section seeks information about the number of new customers established/ on-boarded in the reporting period. Firms should therefore confirm as at the end of the reporting period (as at the 31st December) how many new customers the firm has on-boarded in the previous 12 months, split by risk rating and customer type from the available dropdown options:

Q49 – Q50 – Q51

- Number of new customers assessed by risk rating (higher standard, lower) and categorised by customer type:
 - 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

Q52 – Q53 – Q54

- Number of new customer accounts assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

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

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) how many total customers the firm has, split by risk rating and customer type from the available dropdown options:

Q55 – Q56 – Q57

- Total number of customers assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

Q58 – Q59 – Q60

- Total number of customer accounts assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

Q61

- Provide the total number of natural persons that are IOM residents from whom 20% or more of the annual fee income of the firm is derived.

Q62

- Provide the total number of natural persons that are Non-IOM residents from whom 20% or more of the annual fee income of the firm is derived.

These questions are in relation to where a significant part (20% or higher) of the firm's annual income coming from their regulated or 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 should be zero, and the maximum should be 5.**

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

This section seeks information about the number of new customers established/ on-boarded in the reporting period. Firms should therefore confirm as at the end of the reporting period (as at the 31st December) how many new customers the firm has on-boarded in the previous 12 months, split by risk rating and customer type from the available dropdown options:

Q63 – Q64 – Q65

- Number of new customers assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

Q66 – Q67 – Q68

- Number of new customer accounts assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

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

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) how many total customers the firm has, split by risk rating and customer type from the available dropdown options:

Q69 – Q70 – Q71

- Total number of customers assessed by risk rating (higher, standard, lower) and categorised by either:
 - IOM Customers
 - Non-IOM Customers

Firms are required to supply the number of customers risked assessed as either higher, standard or lower risk. The Authority understands firms may not currently use all three available risks scoring options. This question should also be split by Isle of Man resident customers and non-Isle of Man resident customers.

Q72 – Q73

- Total number of customers by:
 - IOM Customers
 - Non-IOM Customers

Q74 – Q75

- Total number of customers from whom 20% or more of the annual fee income of the firm is derived and categorised by:
 - IOM Customers
 - Non-IOM Customers

This question is in relation to where a significant part (20% or higher) of the firm's annual income coming from their regulated or 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 should be zero, and the maximum should be 5.**

3.2.6 Services to CISs - New Scheme (Customer) Relationships

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) how many new customers the firm has on-boarded in the previous 12 months, split by risk rating and customer type from the available dropdown options:

Q76 – Q77 – Q78

- Number of new customers assessed by risk rating (higher, standard, lower) and categorised by:
 - IOM Customers
 - Non-IOM Customers

Q79 – Q80

- Total number of new customers by:
 - IOM Customers
 - Non-IOM Customers

3.2.7 Investing in CISs - Size and Significance of Investor Base Investing into the Schemes

This section seeks information on the ML/FT risk profile of the investors in schemes to which the firm provides services. Firms are to confirm as at the end of the reporting period (as at the 31st December) how many total investors the firm has, split by risk rating and customer type from the available dropdown options:

Q81 – Q82 – Q83

- Total number of customers assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

3.2.8 Investing in CISs – New Investor Relationships

This section seeks information on the ML/TF risk profile of the schemes' new investor relationships established in the reporting period as assessed by the schemes and/or by the firm. Firms should confirm as at the end of the reporting period (as at the 31st December) how many new investors the firm has onboarded in the previous 12 months, split by risk rating and customer type from the available dropdown options:

Q84 – Q85 – Q86

- Number of new customers assessed by risk rating (higher, standard, lower) and categorised by customer type:
 - 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

3.2.9 TCSPs – Size and Significance of Customer Base

This section seeks information on the ML/FT risk profile of the firm's client entities as assessed by the firm. Firms should therefore confirm as at the end of the reporting period (as at the 31st December) how many total customers the firm has, split by risk rating and customer type from the available dropdown options:

Q87 – Q88 – Q89

- Total number of customers assessed by risk (higher, standard, lower) and split by customer type:
 - 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

Q90

- Total number of principals from whom 20% or more of the annual fee income of the firm is derived.

This question is in relation to where a significant part (20% or higher) of the firm's annual income coming from their regulated or 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 should be zero, and the maximum should be 5.**

3.2.10 TCSPs – New Customer Relationships

This section asks firms to confirm as at the end of the reporting period the (as at the 31st December) how many new customers the firm has on-boarded in the previous 12 months, split by risk rating and customer type from the available dropdown options:

Q91 – Q92 – Q93

- Number of new customers assessed by risk (higher, standard, lower) and split by customer type:
 - 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

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

Q94

- The number of principals on-boarded in the year.

3.2.11 TCSPs – Legal Form of Customer Entities

Q95 – Q96 – Q97

This section asks firms to confirm as at the end of the reporting period (as at the 31st December):

- The total number of IOM entities incorporated under the IOM Companies Act 1931; and
- The total number of IOM entities incorporated under the IOM Companies Act 2006; categorised as
 - ICCs
 - ICs
 - Other Private
 - PCCs
 - PLCs
- Provide the total number of Non-Isle of Man incorporated entities within the following legal forms.

Q98 – Q99

- Numerical breakdown of non IOM registered entities categorised as;
 - Limited Liability Companies; or
 - Overseas companies.

Q100 – Q101 - Q102 - Q103

- Total number of Non-incorporated entities by;
 - Partnerships
 - Trusts
 - Foundations
 - Other

3.2.12 TCSPs - Principal Activity of Customer Entities

Q104 – Q105 - Q106 - Q107

This section asks firms to confirm as at the end of the reporting period (as at the 31st December), analysis breakdown of the principal activity of the customer entities to which services are provided by the firm for:

- Corporates;
- Trusts;
- Foundations; and
- Partnerships.

Further categorised as:

- 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 basis across all of their customers.

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

Q108 – Q109 - Q110

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) for the number of policyholders with in-force policies assessed by risk rating (higher, standard, lower) and split by customer type:

- 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

Q111 – Q112

- Total number of policies issued at the end of the reporting period (as at the 31st December), broken down by insurance type
- Number of policyholders from whom 20% or more of the annual fee income of the firm is derived

This question is in relation to where a significant part (20% or higher) of the firm's annual income coming from their regulated or 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 should be zero, and the maximum should be 5.**

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

Q113 – Q114 – Q115

This section asks firms to confirm as at the end of the reporting period (as at the 31st December):

- Number of new customers assessed by risk (higher, standard, lower) at the end of the reporting period and split by customer type:
 - 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

Q116

- Total number of new policies issued in the reporting period (1st January to 31st December).

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

Q117 – Q118 – Q119

This section asks firms to confirm as at the end of the reporting period (as at the 31st December):

- Total number of policyholders with in-force policies assessed by risk rating (higher, standard, lower) at the end of the reporting period and split by customer type:
 - Natural persons IOM resident
 - Natural persons Non-IOM resident
 - Corporate and trust customers
 - Other policyholders including public sector

Q120

- Total number of policies in force at the end of the reporting period

Q121

- Number of customers from whom 20% or more of the annual fee income of the firm is derived

This question is in relation to where a significant part (20% or higher) of the firm's annual income coming from their regulated or 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 should be zero, and the maximum should be 5.**

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

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) for the number of new policyholders with in-force policies assessed by risk (higher, standard, lower) and split by customer type:

Q122 – Q123 – Q124

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

Q125

- Total number of new policies issued at the end of the reporting period

3.2.17 Insurance Manager – Size & Significance of Customer Base

This section asks firms to confirm as at the end of the reporting period (as at the 31st December):

Q126 – Q127 – Q128

- Total number of policyholders with in-force policies that have been assessed by risk (higher, standard, lower) at the end of the reporting period and split by customer type:
 - Self-Insurer of PLC Group
 - Self-Insurer of Mutuels
 - Self-Insurer of Private Groups
 - Producer Owned (re) Insurer
 - Third Party Writer
 - Insurance Manager – Other

Q129

- Number of policyholders from whom 20% or more of the annual fee income of the firm is derived

This question is in relation to where a significant part (20% or higher) of the firm's annual income coming from their regulated or 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 should be zero, and the maximum should be 5.**

3.2.18 Insurance Manager – New Customer Relationships

Q130 – Q131 – Q132

This section asks firms to confirm as at the end of the reporting period the number of new policyholders with in-force policies assessed by risk (higher, standard, lower) and split by customer type:

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

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

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

Q133

- This section asks firms to confirm as at the end of the reporting period (as at the 31st December) the total number of occupational pension schemes administered, broken down by scheme type:
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - Domestic, Mixed Occupational Schemes
 - International, Mixed Occupational Schemes(Mixed refers to both defined benefit (“DB”) and Money Purchase (“MP”))

Q134

- Total number of members in the DB or Mixed schemes at the end of the reporting period
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - Domestic, Mixed Occupational Schemes
 - International, Mixed Occupational Schemes

Q135

- Total number of participating employers in the DB or Mixed schemes at the end of the reporting period
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - Domestic, Mixed Occupational Schemes
 - International, Mixed Occupational Schemes

Q136

- The number of schemes from whom 20% or more of the annual fee income is derived, broken down by scheme type
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - Domestic, Mixed Occupational Schemes
 - International, Mixed Occupational Schemes

Q137

- Number of DB & Mixed Schemes administered at the end of the reporting period in relation to MP
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

Q138

- In relation to MP the total number of members in those schemes at the end of the reporting period
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

Q139

- In relation to MP the total number of contributing employers in those schemes at the end of the reporting period
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

Q140

- In relation to MP schemes the number of schemes from whom 20% or more of the annual fee income of the firm is derived, broken down by scheme type
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

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

This section asks firms to confirm as at the end of the reporting period:

Q141

- Number of new occupational pension schemes in relation to DB or Mixed broken down by scheme type
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - International, Mixed Occupational Schemes
 - Domestic, Mixed Occupational Schemes

Q142

- Number of new participating employers to new and existing schemes in relation to DB or Mixed broken down by scheme type
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - International, Mixed Occupational Schemes
 - Domestic, Mixed Occupational Schemes

Q143

- Number of new members in relation to DB or Mixed broken down by scheme type
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - International, Mixed Occupational Schemes
 - Domestic, Mixed Occupational Schemes

Q144

- Number of new MP schemes broken down by scheme type
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

Q145

- Number of new members in relation to MP schemes broken down by scheme type
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

Q146

- Number of new contributing employers in relation to MP schemes broken down by scheme type
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

Q147

- Number of other third parties paying into those MP schemes broken down by scheme type
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

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

This section asks firms to confirm as at the end of the reporting period:

Q148 – Q149 – Q150

- Total number of customers that have been risk assessed as (higher, standard, lower) by customer type
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - Domestic, Mixed Occupational Schemes
 - International, Mixed Occupational Schemes

Q151 – Q152 – Q153 – Q154

- Regarding DB or Mixed (both DB and MP) occupational pension schemes, provide the total number of DB only occupational schemes, domestic
- Regarding DB or Mixed (both DB and MP) occupational pension schemes, provide the total number of DB only occupational schemes, international
- Regarding DB or Mixed (both DB and MP) occupational pension schemes provide the total number of Mixed occupational schemes, domestic
- Regarding DB or Mixed (both DB and MP) occupational pension schemes provide the total number of Mixed occupational schemes, international

Q155 – Q156 – Q157

- Total number of customers risk assessed as (higher, standard, lower) by customer type:
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

Q158 – Q159 – Q160 – Q161

- Regarding MP schemes – the total number of each type of customer in relation to the total customer relationships of the firm at the end of the reporting period:
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

3.2.22 Registered Schemes Administrators - ML/FT/PF Risk Profile of New Customer Relationships

Q162 – Q163 – Q164

This section asks firms to confirm as at the end of the reporting period (31 December):

- Number of new customers that have been risk assessed (higher, standard, lower) by customer type
 - Domestic, Defined Benefit Only Occupational Schemes
 - International, Defined Benefit Only Occupational Schemes
 - Domestic, Mixed Occupational Schemes
 - International, Mixed Occupational Schemes

Q165 – Q166 – Q167 – Q168

- Regarding DB or Mixed (both DB and MP) occupational pension schemes provide the number of new DB only occupational schemes **Domestic** - in relation to the total customer relationships of the firm at the end of the reporting period.
- Regarding DB or Mixed (both DB and MP) occupational pension schemes provide the number of new DB only occupational schemes **International** - in relation to the total customer relationships of the firm at the end of the reporting period.
- Regarding DB or Mixed (both DB and MP) occupational pension schemes provide the total number of new Mixed occupational schemes **Domestic** - in relation to the total customer relationships of the firm at the end of the reporting period.
- Regarding DB or Mixed (both DB and MP) occupational pension schemes provide the total number of new Mixed occupational schemes **International** - in relation to the total customer relationships of the firm at the end of the reporting period.

Q169 – Q170 – Q171

- Number of new customers that have been risk rated (higher, standard, lower) by customer type:
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP

Q172 – Q173 – Q174 – Q175

- Regarding MP schemes – the number of new customers by type, in relation to the existing customer relationships at the end of the reporting period:
 - Domestic, Occupational MP
 - International, Occupational MP
 - Domestic, Personal MP
 - International, Personal MP

3.2.23 Designated Business – Size & Significance of Customer Base

Q176 – Q177 – Q178

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) how many total customers the firm has, split by risk rating and customer type from the available dropdown options:

- Total number of customers risk assessed (higher, standard, lower) at the end of the reporting period by customer type;
 - 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

Q179

- Number of customers (if any) from whom 20% or more of the annual fee income is derived

This question is in relation to where a significant part (20% or higher) of the firm's annual income coming from their regulated or 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 should be zero, and the maximum should be 5.**

Q180

- Income received over the past 12 months from Designated Business Activities

DNFBPs should supply the total income received from their designated business activity(ies) in the reporting period, which for the purposes of this return is the previous calendar year. This can be based on the most recent annual audited accounts data. If no audited accounts are prepared, input the approximate income for the 12 month time period.

3.2.24 Designated Businesses – New Customer Relationships

Q181 – Q182 – Q183

This section asks firms to confirm as at the end of the reporting period (as at the 31st December) how many new customers the firm has on-boarded in the previous 12 months, split by risk rating and customer type from the available dropdown options:

- Total number of new customers risk assessed (higher, standard, lower) and categorised by the following customer types:
 - 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

3.2.25 Designated Businesses – Declaration

Q184

- Have you identified any areas where the registered person does not comply with the AML/CFT Legislation in relation to any areas of the designated business activities?

This declaration is a requirement under s13(2)(a) of the DBRO15 (*“the annual return must include a declaration as to the extent to which the registered person meets the requirements of AML/CFT legislation”*). Firms should select either “Yes” or “No” from the drop down list. If “Yes” is selected a free text box is available for further information to be provided.

Q185

- If Yes provide details

This is a free text box where as many details should be recorded as possible to give the Authority a clear understanding of any identified areas of non-compliance with the AML/CFT Legislation.

Q186

- Does the firm have documented, recorded and written AML/CFT policies and procedures in line with paragraph 4 of the Code?

Firms are required to confirm whether or not they have established and recorded policies, procedures and controls in accordance with paragraph 4 of the Code.

3.2.26 Politically Exposed Persons (“PEPs”)

Q187

This section asks all firms to confirm as at the end of the reporting period whether or not they have any PEP customers.

Q188 – Q189

If firms select “Yes”, they will need to provide a breakdown of:

- How many customers are associated with a domestic PEP
- How many customers are associated with a foreign PEP

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, split by whether that PEP is domestic or foreign.

Q190 – Q191

- Of those customers, how many unique PEPs are a domestic PEP
- Of those customers, how many unique PEPs are a foreign PEP

A unique PEP is an individual classified as a PEP; they may be a customer or they may be an individual within a customer structure / relationship. This question seeks to determine how many individuals a firm has who are classed as PEPs, split by domestic and foreign, avoiding any double-counting.

“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.

Examples;

- 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.

Q192 – Q193 - Q194 - Q195

- Breakdown of the PEP position held for all unique domestic PEPs.
- Breakdown of the PEP position held for all unique foreign PEPs.

- Nationality of all unique PEPs (domestic and foreign).
- Residency of all unique PEPs (domestic and foreign).

Q196 – Q197 – Q198 – Q199 – Q200

Declassification of PEPs

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 who the firm has chosen to not actively classify as a PEP. If the firm does declassify PEPs the question also seeks to understand how many have been in both the reporting period (the last 12 months) and in total.

- Do you declassify PEPs. If answered yes, the following questions will appear: -
 - Number of Domestic PEPs declassified in the reporting period
 - Total number of Domestic PEPs declassified
 - Number of Foreign PEPs declassified in the reporting period
 - Total number of Foreign PEPs declassified

3.2.27 Residency of Customers – Jurisdictional Analysis of Customers

Q201 – Q202

This section asks all firms to confirm as at the end of the reporting period:

- The number of Natural Persons residing in each jurisdiction
- The number of Non-Natural Persons residing in each jurisdiction

Q203

- Total number of unique customers, both natural and non-natural persons – This figure should equal the total of the two figures given in the previous two questions for natural and non-natural persons in each jurisdiction.

3.2.28 Residency of UBOs – Jurisdictional Analysis of Ultimate Beneficial Owners

Q204

This section asks all firms to confirm as at the end of the reporting period the number of ultimate beneficial owners resident in each jurisdiction.

3.3 Products & Services Risk

3.3.1 Understanding the Firm – Payment Methods

Q207 to Q222

This section asks all firms to confirm as at the end of the reporting period, in relation to the regulated activities or designated business what payment methods are utilised and their frequency:

- Accept Incoming / Employ Outgoing Cash
- Accept Incoming / Employ Outgoing Bank transfer
- Accept Incoming / Employ Outgoing Cheque / Bankers draft
- Accept Incoming / Employ Outgoing Debit / Credit card
- Accept Incoming / Employ Outgoing Prepaid card
- Accept Incoming / Employ Outgoing PayPal or similar
- Accept Incoming / Employ Outgoing Crypto / virtual currency
- Accept Incoming / Employ Outgoing In-specie transfer of property with monetary value (e.g. shares)

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

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

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

3.3.2 Commercially Exposed Persons ("CEPs")

Q223

This section asks all firms to confirm as at the end of the reporting period, the number of known commercially exposed persons who are connected to customers, who are employed in or associated with, the occupational activities listed below:

- 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.

3.3.3 Insurance Activity

Q224 – Q225 – Q226 – Q227 – Q228

The activity that best reflects the type of insurance written by the firm. Where it may be unclear into which customer entity category type a customer falls, the firm should use its best judgement and apply a consistent methodology. The available options are:

- Self-Insurer
- Producer Owned
- Third Party Writer
- Combination

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

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

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

3.4 Distribution Channel Risk

3.4.1 Services to Collective Investment Schemes - Declined and Terminated schemes

Q231 – Q232

This section asks all firms to confirm as at the end of the reporting period (as at the 31st December):

- Number of potential new schemes IOM customers and Non IOM customers relationship **declined** within the reporting period and broken down by reason;
 - ML purposes
 - Sanctions purpose
 - TF purposes

Q233 – Q234

- Number of schemes IOM customers and Non IOM customers relationship **terminated** within the reporting period and broken down by reason;
 - ML purposes
 - Sanctions purpose
 - TF purposes

3.4.2 New Business Relationships - Reliance and Concessions - Face to Face Business

Q235 – Q236 – Q237

This section asks all firms to confirm as at the end of the reporting period (as at the 31st December), in relation to the new customer relationships established, the number of new customers:

- Met face to face by the firm
- Met Face to face by a related party of the firm
- Non face to face including through introducers

3.4.3 New Business Relationships - Reliance and Concessions - Reliance on Third Parties for Elements of Customer Due Diligence

Q238 to Q246

This section asks all firms to confirm as at the end of the reporting period in relation to the new customer relationships established, the number of new customers:

- Where third Parties are utilised in the due diligence process, and the extent to which third parties are utilised in the due diligence process: -

(i) Reliance placed on third parties (including introducers) - evidence obtained and held by the firm, and either

(a) Original certified copies of verification of identity documentation is retained by the firm;
or

(b) Certified copies of certified copies of verification of identity documentation is retained by the firm

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

(iii) No reliance placed on third parties; and

(a) CDD is collected direct from the customer face to face; or

(b) CDD is collected directly from the customer but remotely

(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)

- Whether the firm, in all cases, understand who has met the customer face to face

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

Q247 to Q256

This section asks all firms to confirm as at the end of the reporting period (as at the 31st December) in respect of the new customer business relationships entered, to indicate whether any of the following concessions were utilised by the firm and, if so, how many customers were they applied to:

- Acceptable Applicants (Paragraph 16 of the Code)
- Acting on Behalf Of (Paragraph 17 of the Code)
- Eligible introducers (Paragraph 19 of the Code)
- Insurer Concessions (Paragraph 20 of the Code)
- Scheme Concessions (Paragraph 21 of the Code)

3.4.5 New Business Relationships - Sources and Introducers – Sources of Business

Q257 – Q258 - Q259

In relation to the new customer relationships established in the reporting period provide details of how many customers were:

- Direct Business
- Existing Customer Referrals
- Introduced Business

Q260

The section also asks for confirmation of the number of introducers used in relation to introduced business.

Q261

This section then requires, in relation to introduced business, a breakdown by the jurisdiction of residence of the person who introduced the new business to the firm.

3.5 Financial Crime Risk

3.5.1 Blocked or Frozen Assets for Sanctions Purposes

Q264 – Q265

- Number and aggregate value of assets for Blocked or Frozen accounts for financial sanctions in the reporting period

Q266 – Q267

- Number and aggregate value of assets for Blocked or Frozen accounts released for financial sanctions in the reporting period

Q268 – Q269

- Total number of accounts Blocked or Frozen for sanctions at the end of the reporting period
- Total aggregate value of assets for Blocked or Frozen accounts for sanctions at the end of the reporting period

3.5.2 Blocked or Frozen Assets for Reasons Other Than for Financial Sanctions Purposes

Q270 – Q277

This section asks all firms to confirm as at the end of the reporting period the number of accounts Blocked or Frozen for:

- ML Purposes (Subject to consent including restraint orders etc.)
- FT Purposes (Subject to consent including restraint orders etc.)
- PF Purposes (Subject to consent including restraint orders etc.)
- Any other purpose(for example, gone away)

This section asks all firms to confirm as at the end of the reporting period the Aggregate Value of assets of any Blocked or Frozen accounts for:

- ML Purposes (Subject to consent including restraint orders etc.)
- FT Purposes (Subject to consent including restraint orders etc.)
- PF Purposes (Subject to consent including restraint orders etc.)
- Any other purpose(for example, gone away)

3.5.3 Declined and Terminated Relationships (ML / TF / PF / Sanctions)

Q278 - Q279 - Q280 - Q281

Provide the number of potential new customer relationships declined in the reporting period for:

- ML reasons
- FT reasons
- PF reasons
- Sanctions reasons

Q282 - Q283 - Q284 - Q285

Indicative GBP value of assets relating to the potential new customer relationships declined in the reporting period for:

- ML reasons
- FT reasons
- PF reasons
- Sanctions reasons

Q286 - Q287 - Q288 - Q289

Number of customer relationships terminated in the reporting period for:

- ML reasons
- FT reasons
- PF reasons
- Sanctions reasons

Q290 - Q291 - Q292 - Q293

GBP value of assets relating to the customer relationships terminated in the reporting period for:

- ML reasons
- FT reasons
- PF reasons
- Sanctions reasons

Controls

4.1 Entity Control Questions

C1 – C2 – C3 – C4 – C5 – C6

The Controls section begins with six “Yes” or “No”, which when answered, influence and tailor the firm’s controls questions to only the relevant and applicable questions.

- Permissions held under the Financial Services Act 2008
- Registration under the Designated Businesses (Registration and Oversight) Act 2015
- Higher risk rated customers
- Standard risk rated customers
- Lower risk rated customer
- Any new customers during the reporting period

4.2 Understanding the Firm - Employees, Workers and Contractors

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

C7 – C8 – C9

- Number of staff engaged by the firm, whether directly or through a contract for services
- Number of **Full Time Equivalent** staff engaged directly or through a contract for services
- Number of **Full Time Equivalent** staff vacancies engaged by the firm or through a contract for services

C10 – C11 – C12

- Number of compliance staff (including the MLRO) engaged directly or through a contract for services
- Number of **Full Time Equivalent** compliance staff (including the MLRO) engaged directly or through a contract for services
- Number of **Full Time Equivalent** compliance staff vacancies (including the MLRO) engaged by the firm or through a contract for services

C13 – C14

- Details of annual AML/CFT education / training including numbers who received the training
- Details of specialist / more detailed AML/CFT training including numbers who received it

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

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

4.3 Control Environment – Outsourced Activities – during the reporting period

In respect of each of the specified activities, indicate whether the activity was undertaken by the firm, outsourced to a fellow group entity or was outsourced to a third party at any point throughout the year under review.

C15 – C16 – C17 – C18 – C19

- Customer Risk Assessments
- Collection of Customer Due Diligence
- Screening
- Acceptance of the Business
- Ongoing Monitoring

C20 – C21 – C23

1. How was the activity / positions of MLRO and DMLRO managed?
2. How was the activity of the Compliance Function (AML/CFT only) managed?
3. How was the activity of Staff Screening and Recruitment managed?

4.4 Control Environment – Monitoring and Testing Compliance with the AML/CFT Requirements

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.

C24 – C25 – C26 – C27 – C28 – C29

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
Other – this a free text box; state the name of any persons / bodies who provide other testing or assurance not covered elsewhere for AML/CFT only
- Indicate whether or not the 1st, 2nd, and 3rd Lines of Defence undertake monitoring and testing of compliance in line with paragraph 30 of the AML/CFT Code
- Indicate whether there are any others who undertake the monitoring and testing of compliance in accordance with paragraph 30 of the AML/CFT Code – Please specify

4.5 Screening and Monitoring – Screening Provider

C30

- Which screening provider(s) do you use?

C31 – C32

- Is the firm subscribed to a sanctions notification service?
 - If “Yes” - Name of Sanctions Service Provider

C33

- What type of search logic is used when screening is undertaken?
 - Fuzzy
 - Exact
 - Combination (both Exact and Fuzzy)

4.6 Screening – New Customer

C34 to C45

- Does the firm screen new customers for PEPs – split by Higher, Standard, and Lower risk
- Does the firm screen new customers for Sanctions – split by Higher, Standard, and Lower risk
- Does the firm screen new customers for ML/FT/PF – split by Higher, Standard, and Lower risk
- Does the firm screen new customers for Adverse Media – split by Higher, Standard, and Lower risk

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.

- **PEP screening** is where a firm seeks to establish whether a customer is, or is associated with, a PEP by comparing the identity of the customer and other parties to the business relationship (including beneficial owners) to a database of politically exposed persons.
- **Sanctions screening** is where a firm compares the identity of the customer, beneficial owner and other parties to the business relationship to sanction lists in issue in order to identify a person or entity on any sanctions list.
- **Money Laundering, Financing of Terrorism and Proliferation Financing 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.
- **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.

4.7 Screening – Continuing Business Relationship On a Regular Basis

C46 to C57

- Does the firm regularly screen customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships
- Does the firm regularly screen customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships
- Does the firm regularly screen customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships
- Does the firm regularly screen customers for adverse Media – split by Higher, Standard, and Lower risk continuing business relationships

4.8 Screening – Continuing Business Relationship When Sanctions Lists Are Published / Updated

C58 to C69

- Does the firm screen customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated
- Does the firm screen customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated
- Does the firm screen customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated
- Does the firm screen customers for adverse Media – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated

4.9 Screening – Continuing Business Relationship at a Trigger Event

C70 to C81

- Does the firm screen customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event
- Does the firm screen customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event
- Does the firm screen customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event
- Does the firm screen customers for Adverse Media – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event

4.10 Screening – Continuing Business Relationship at an Unusual Activity Event

C82 to C93

- Does the firm screen customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event
- Does the firm screen customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event
- Does the firm screen customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event
- Does the firm screen customers for Adverse Media – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event

The Authority is interested to understand whether additional screening is applied, whether or not at an unusual activity event (as defined by the AML/CFT Code), or upon a suspicious activity event (as defined by the AML/CFT Code).

4.11 Screening – Continuing Business Relationship at Suspicious Activity Event

C94 to C105

- Does the firm screen customers for PEPs – split by Higher, Standard, Lower risk continuing business relationships at a suspicious activity event
- Does the firm screen customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships at a suspicious activity event
- Does the firm screen customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships at a suspicious activity event
- Does the firm screen customers for Adverse Media – split by Higher, Standard, and Lower risk continuing business relationships at a suspicious activity event

4.12 Screening – Beneficial Owners – New Customers

C106 to C117

- Does the firm screen the beneficial owners of new customers for PEPs – split by Higher, Standard, and Lower risk new business relationships
- Does the firm screen the beneficial owners of new customers for Sanctions – split by Higher, Standard, and Lower risk new business relationships
- Does the firm screen the beneficial owners of new customers for ML/FT/PF – split by Higher, Standard, and Lower risk new business relationships
- Does the firm screen the beneficial owners of new customers for Adverse Media – split by Higher, Standard, and Lower risk new business relationships

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

C118 to C129

- Does the firm screen the beneficial owners of customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships on a regular basis
- Does the firm screen the beneficial owners of customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships on a regular basis
- Does the firm screen the beneficial owners of customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships on a regular basis
- Does the firm screen the beneficial owners of customers for Adverse Media – split by Higher, Standard, and Lower risk continuing business relationships on a regular basis

4.14 Screening – Beneficial Owners – Cont. Business Relationship, When Sanctions Lists Are Published / Updated

C130 to C141

- Does the firm screen the beneficial owners of customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated
- Does the firm screen the beneficial owners of customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated
- Does the firm screen the beneficial owners of customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated
- Does the firm screen the beneficial owners of customers for Adverse Media – split by Higher, Standard, and Lower risk continuing business relationships when sanctions lists are published / updated

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

C142 to C153

- Does the firm screen the beneficial owners of customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event
- Does the firm screen the beneficial owners of customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event
- Does the firm screen the beneficial owners of customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event
- Does the firm screen the beneficial owners of customers for Adverse Media – split by Higher, Standard, and Lower risk continuing business relationships at a trigger event

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

C154 to C165

- Does the firm screen the beneficial owners of customers for PEPs – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event
- Does the firm screen the beneficial owners of customers for Sanctions – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event
- Does the firm screen the beneficial owners of customers for ML/FT/PF – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event
- Does the firm screen the beneficial owners of customers for Adverse Media – split by Higher, Standard, and Lower risk continuing business relationships at an unusual activity event

The Authority is interested to understand whether additional screening is applied if suspicious or unusual activity (as defined by the AML/CFT Code) is identified.

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

C166 to C177

- Does the firm screen the beneficial owners of customers for PEPs – split by Higher, Standard, and Lower risk at a suspicious activity event
- Does the firm screen the beneficial owners of customers for Sanctions – split by Higher, Standard, and Lower risk at a suspicious activity event
- Does the firm screen the beneficial owners of customers for ML/FT/PF – split by Higher, Standard, and Lower risk at a suspicious activity event
- Does the firm screen the beneficial owners of customers for Adverse Media – split by Higher, Standard, and Lower risk at a suspicious activity event

4.18 Ongoing Monitoring

C178 to C204

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

- PEPs - Indicate the frequency of ongoing monitoring processes regarding the review of customer risk assessments – split by Higher, Standard, and Lower risk
- Natural persons not associated with PEPs - Indicate the frequency of ongoing monitoring processes regarding the review of customer risk assessments – split by Higher, Standard, and Lower risk
- Other customers not associated with PEPs - Indicate the frequency of ongoing monitoring processes regarding the review of customer risk assessments – split by Higher, Standard, and Lower risk

- PEPs – Indicate the frequency of ongoing monitoring processes regarding the review of customer due diligence – split by Higher, Standard, and Lower risk
- Natural persons not associated with PEPs – Indicate the frequency of ongoing monitoring processes regarding the review of customer due diligence – split by Higher, Standard, and Lower risk
- Other customers not associated with PEPs – Indicate the frequency of ongoing monitoring processes regarding the review of customer due diligence – split by Higher, Standard, and Lower risk
- PEPs – Indicate the frequency of ongoing monitoring processes regarding Scrutiny of transactions – split by Higher, Standard, and Lower risk
- Natural persons not associated with PEPs – Indicate the frequency of ongoing monitoring processes regarding Scrutiny of transactions – split by Higher, Standard, and Lower risk
- Other customers not associated with PEPs – Indicate the frequency of ongoing monitoring processes regarding Scrutiny of transactions – split by Higher, Standard, and Lower risk

4.19 Scrutiny of Transactions

C205 to C240

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

- **Automated transactional monitoring system** – is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **Non-automated transactional monitoring system** – is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **System generated exception reports** – is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **Trigger events** – is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **Value driven** – is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **Cash transactions** – is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **Geographic origin / destination of transaction** – is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **Event driven reviews** - is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers
- **Scheduled periodic reviews and sampling** - is monitoring undertaken by the Firm? – For:
 - PEPs, Higher, Standard and Lower risk customers

4.20 Payment Screening – Swift

C241 to C270

This section is applicable to **SWIFT network members only**

For the SWIFT payment method:

- **Outward payments** - IOM/UK/EU/UN sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** - IOM/UK/EU/UN sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – US sanction lists (e.g. OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – US sanction lists (e.g. OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – Other sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – Other sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – Proprietary lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – Proprietary lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – FATF 16 (wire transfer) checks - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – FATF 16 (wire transfer) checks (eg: OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- Timeframe – if screening is undertaken after the transaction, please detail the timeframe
- If published lists other than IOM, UK, EU, UN, US sanctions lists are utilised please state which one/s

4.21 Payment Screening – BACS

C271 to C298

This section is applicable to **BACS payments scheme participants only**

For the BACS payment method:

- **Outward payments** - IOM/UK/EU/UN sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** - IOM/UK/EU/UN sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – US sanction lists (e.g. OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – US sanction lists (e.g. OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – Other sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – Other sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties

- **Outward payments** – Proprietary lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – Proprietary lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – FATF 16 (wire transfer) checks - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – FATF 16 (wire transfer) checks (eg: OFAC / SDN lists) - please indicate to which customers screening is applied to. Sender, Beneficiary, Other Parties

4.22 Payment Screening – FASTER

C299 to C326

This section is applicable to Faster Payment System participants only

For the Faster payment method:

- **Outward payments** - IOM/UK/EU/UN sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** - IOM/UK/EU/UN sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – US sanction lists (e.g. OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – US sanction lists (e.g. OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – Other sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – Other sanction lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – Proprietary lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – Proprietary lists - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Outward payments** – FATF 16 (wire transfer) checks - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties
- **Inward payments** – FATF 16 (wire transfer) checks (e.g. OFAC / SDN lists) - please indicate to which customers screening is applied to: Sender, Beneficiary, Other Parties

4.23 Designated Business – Declaration

C327 – C328

Have you identified any areas where the registered person does not comply with the AML / CFT Legislation in relation to any areas of the designated business activities?

This declaration is a requirement under s13(2)(a) of the DBRO15 (*“the annual return must include a declaration as to the extent to which the registered person meets the requirements of AML/CFT legislation”*). Firms should select either “Yes” or “No” from the drop down list. If “Yes” is selected a free text box is available for further information to be provided.

4.24 Disclosures and Reporting – THEMIS

C329

This question asks whether the firm, completing the return, is registered with the THEMIS system?

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.

4.25 Disclosures and Reporting – Disclosures to the MLRO, Sanctions Officer and FIU

C330 to C335

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.

For the reporting period:

- How many and what sort of Internal Disclosures you have made
- How many and what sort of External Disclosures you have made
- Details of any Section 24 disclosure under the FIU Act made during the reporting year
- Number of disclosures and aggregate value of assets for reports (Internal / External / Sanctions)

4.26 Disclosures and Reporting – International

C336 – C337 – C338

For the reporting period:

- How many disclosures have been made to International Agencies
- How many of these have been dual reported to the IOM FIU
- Aggregate value of assets relating to external disclosures to International Agencies

4.27 Disclosures and Reporting – ML / FT / PF Enquiries Received

C339 to C348

The AML/CFT Code requires firms to maintain a register of ML and FT enquiries received from law enforcement or other competent authorities. In this section state the number of enquiries received in the year from law enforcement, and other competent authorities, split between ML, FT, financial sanctions and others.

For the reporting period:

- Provide details of ML/FT/PF enquiries received from **Law enforcement authorities** and recorded in the register required by Part 7 of the AML/CFT Code –
 - Money Laundering
 - Financing of Terrorism
 - Proliferation Financing
 - Targeted Financial Sanctions
 - Other enquiries or reasons not known
- Provide details of ML/FT/PF enquiries received from **Other competent authorities** and recorded in the register required by Part 7 of the AML/CFT Code –
 - Money Laundering
 - Financing of Terrorism
 - Proliferation Financing
 - Targeted Financial Sanctions
 - Other enquiries or reasons not known

4.28 Disclosures and Reporting – Blocked or Frozen Assets for Sanctions Purposes

C349 to C354

For financial sanctions purposes in the reporting period provide:

- The Number of Accounts - blocked or frozen
- The Aggregate Value of Assets in GBP for accounts - blocked or frozen
- The Number of Accounts – blocked or frozen accounts released
- The Aggregate Value of Assets in GBP for accounts – blocked or frozen accounts released
- The Number of blocked or frozen accounts for financial sanctions at the end of the reporting period
- The Aggregate Value of Assets in GBP for blocked or frozen accounts for financial sanctions at the end of the reporting period

4.29 Disclosures and Reporting – Blocked or Frozen Assets for Reasons Other Than for Financial Sanctions Purposes

C355 to C362

At the end of the reporting period please provide, (subject to consent including restraining orders):

- The Number of accounts - blocked or frozen accounts for **ML purposes**
- The Aggregate Value of assets in GBP – blocked or frozen accounts for **ML purposes**
- The Number of accounts - blocked or frozen accounts for **FT purposes**
- The Aggregate Value of assets in GBP – blocked or frozen accounts for **FT purposes**
- The Number of accounts - blocked or frozen accounts for **PF purposes**
- The Aggregate Value of assets in GBP – blocked or frozen accounts for **PF purposes**
- The Number of accounts - blocked or frozen for **any other purpose**
- The Aggregate Value of assets in GBP – blocked or frozen accounts for **any other purpose**

4.30 Disclosures and Reporting – Declined and Terminated Relationships (ML / TF / PF / Sanctions)

C363 to C378

- The number of potential new customer relationships declined in the reporting period for:
 - ML reasons
 - TF reasons
 - PF reasons
 - Sanctions reasons
- Indicative value of assets in GBP relating to the potential new customer relationships declined in the reporting period for:
 - ML reasons
 - TF reasons
 - PF reasons
 - Sanctions reasons
- The number of customer relationships terminated in the reporting period for;
 - ML reasons
 - TF reasons
 - PF reasons
 - Sanctions reasons
- Value of assets in GBP relating to the customer relationships which were terminated in the reporting period;
 - ML reasons
 - TF reasons
 - PF reasons
 - Sanctions reasons

5. Signatories Page

S1

- Do you declare this information and 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. (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 Policy](#).

S2

- Name of the submitting individual, who does so on behalf of the firm.

S3

- Position of the submitting individual, who does so on behalf of the firm.