AMLA Anti-Money Laundering Authority

ANNEX I

Category of obliged entities: **Auditors, external accountants and tax advisors**, and any other natural or legal person including independent legal professionals such as lawyers, that undertakes to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity. (Article 3(3) a, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the entity have beneficial owners resident in high-risk third countries?
	3	Does the obliged entity have Politically Exposed Persons (PEPs) as beneficial owners?
	4	Number of branches and subsidiaries in high risk third countries
Customers	5	Total number of customers
	6	Total number of customers that are legal entities
	7	Number of customers that are legal entities/arrangements that are part of a complex structure
	8	Number of customers whose underlying transactions was paid fully or partially in crypto-assets to the obliged entity
	9	Number of customers whose underlying transactions was paid fully or partially in cash to the obliged entity
	10	Value (EUR) of the largest transaction
	11	Total number of beneficial owners of the obliged entity’s customers resident in high-risk third countries
Distribution channels	12	Number of customers whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: **Auditors, external accountants and tax advisors**, and any other natural or legal person including independent legal professionals such as lawyers, that undertakes to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity. (Article 3(3) a, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the Obliged Entity	1	Does the obliged entity have a complex structure?
	2	Does the entity have beneficial owners resident in high-risk third countries?
	3	Does the obliged entity have Politically Exposed Persons (PEPs) as beneficial owners?
	4	Is the parent undertaking located in high-risk third country?
	5	Number of branches and subsidiaries in high risk third countries
Customers	6	Total number of customers
	7	Total number of new customers
	8	Total number of customers that are legal entities
	9	Total number of customers that are legal arrangements
	10	Total number of customers which are Politically Exposed Persons
	11	Total number of beneficial owners
	12	Total number of beneficial owners that are PEPs
	13	Number of customers that are legal entities/arrangements that are part of a complex structure
Products and Services	14	Total number of customers for services provided
	15	Number of customers regarding payroll;
	16	Number of customers regarding Bookkeeping
	17	Number of customers regarding preparation of financial statements
	18	Number of customers regarding managing (on behalf of a client) the opening and/or management of bank accounts, saving accounts or other assets; or managing debt
	19	Number of customers regarding Managing (on behalf of a client) the creation, operation or management of companies, trusts, foundations or similar structures; including Mergers & Acquisition; as well as Liquidation of companies, including assisting liquidators in insolvency or winding up proceedings, whether appointed to do so by a court or otherwise
	20	Number of customers regarding external audit services
	21	Number of customers regarding assurance services
	22	Number of customers regarding tax litigation
	23	Number of customers regarding tax compliance

ANNEX I

Category of obliged entities: **Auditors, external accountants and tax advisors**, and any other natural or legal person including independent legal professionals such as lawyers, that undertakes to provide, directly or by means of other persons to which that other person is related, material aid, assistance or advice on tax matters as principal business or professional activity. (Article 3(3) a, Regulation (EU) 2024/1624)

	24	Number of customers regarding tax planning (e.g. corporate structure and transactions, succession and estate planning and repatriation of assets, etc.)
	25	Number of customers whose underlying transactions was paid fully or partially in crypto-assets to the obliged entity
	26	Number of customers whose underlying transactions was paid fully or partially in cash to the obliged entity
	27	Value (EUR) of the largest transaction
Geographies	28	Total number of customers that are non-resident or incorporated/created/governed under the law of a country other than the obliged entity's Member State
	29	Total number of customers that are resident or incorporated/ created/ governed under the law of a high-risk third country
	30	Number of customers where the major operations are in high-risk third countries
	31	Total number of beneficial owners of the obliged entity's customers resident in a country other than the obliged entity's Member State
	32	Total number of beneficial owners of the obliged entity's customers resident in high-risk third countries
Distribution channels	33	Number of customers whose identity was verified on a non-face-to-face basis
	34	Total number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities

ANNEX I

Category of obliged entities: **Notaries, lawyers and other independent legal professionals**, where they participate, whether by acting on behalf of and for their client in any financial or real estate transaction, or by assisting in the planning or carrying out of transactions for their client containing the following: (i) buying and selling of real property or business entities; (ii) managing of client money, securities or other assets, including crypto-assets; (iii) opening or management of bank, savings, securities or crypto-assets accounts; (iv) organisation of contributions necessary for the creation, operation or management of companies; (v) creation, setting up, operation or management of trusts, companies, foundations, or similar structures. (Article 3(3) b, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
Customers	4	Total number of customers
	5	Total number of customers that are legal entities or legal arrangements
Products and Services	6	Total number of relevant services
	7	Total value (EUR) of transactions
	8	Total value (EUR) of inbound and outbound transactions
	9	Total value (EUR) of transactions paid fully or partially in cash
	10	Total value (EUR) of transactions paid fully or partially in crypto assets
	11	Value (EUR) of the largest transaction
Geographies	12	Total number of customers that are resident/incorporated/created/governed under the law of a high-risk third country
Distribution channels	13	Total number of customers whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: **Notaries, lawyers and other independent legal professionals**, where they participate, whether by acting on behalf of and for their client in any financial or real estate transaction, or by assisting in the planning or carrying out of transactions for their client containing the following: (i) buying and selling of real property or business entities; (ii) managing of client money, securities or other assets, including crypto-assets; (iii) opening or management of bank, savings, securities or crypto-assets accounts; (iv) organisation of contributions necessary for the creation, operation or management of companies; (v) creation, setting up, operation or management of trusts, companies, foundations, or similar structures. (Article 3(3) b, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
	5	Number of branches and subsidiaries in high-risk third countries
Customers	6	Total number of customers
	7	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	8	Total number of customers that are legal entities or legal arrangements
	9	Total number of customers that are legal entities or legal arrangements that are part of a complex structure
	10	Total number of customers represented by third parties
Products and Services	11	Total number of relevant services
	12	Total value (EUR) of transactions
	13	Total value (EUR) of inbound and outbound transactions
	14	Total number of relevant services where the obliged entity acted on behalf of and for clients in financial transactions in the reference year
	15	Total number of relevant services, where the obliged entity acted on behalf of and for clients in real estate transactions
	16	Total number of relevant services, where the obliged entity acted on behalf of and for clients in real estate transactions related to a residence by investment program
	17	Total number of relevant services, where the obliged entity assisted in the planning or carrying out of transactions for clients concerning managing of client money, securities or other assets, including crypto-assets
	18	Total number of relevant services, where the obliged entity assisted in the planning or carrying out of transactions for clients concerning opening or management of bank, savings, securities or crypto-assets accounts
	19	Total number of relevant services, where the obliged entity assisted in the planning or carrying out of transactions for clients concerning creation, setting up, operation or management of trusts, companies, foundations, or similar structures
	20	Total value (EUR) of transactions paid fully or partially in cash
	21	Total value (EUR) of transactions paid fully or partially crypto-assets
	22	Total value (EUR) of transactions paid with funds sent from high-risk third countries
	23	Value (EUR) of the largest transaction

ANNEX I

Category of obliged entities: **Notaries, lawyers and other independent legal professionals**, where they participate, whether by acting on behalf of and for their client in any financial or real estate transaction, or by assisting in the planning or carrying out of transactions for their client containing the following: (i) buying and selling of real property or business entities; (ii) managing of client money, securities or other assets, including crypto-assets; (iii) opening or management of bank, savings, securities or crypto-assets accounts; (iv) organisation of contributions necessary for the creation, operation or management of companies; (v) creation, setting up, operation or management of trusts, companies, foundations, or similar structures. (Article 3(3) b, Regulation (EU) 2024/1624)

Geographies	24	Total number of customers that are resident/incorporated/created/governed under the law of a of a country other than the obliged entity's Member State
	25	Total number of customers that are resident/incorporated/created/governed under the law of a high-risk third country
Distribution channels	26	Total number of customers whose identity was verified on a non-face-to-face basis
	27	Number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities
	28	Does the obliged entity provide escrow accounts?

ANNEX I

Category of obliged entities: **Trust or company service providers** (Article 3(3) c, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
Customers	4	Total number of customers
	5	Total number of customers that are companies and other legal entities
	6	Total number of customers that are legal entities similar to express trusts
	7	Total number of customers that are express trusts and other similar legal arrangements
	8	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	9	Number of customers that are legal entities/arrangements that are part of a complex structure
Products and Services	10	Total number of companies and other legal entities that the obliged entity formed
	11	Total number of legal entities similar to express trusts that the obliged entity formed
	12	Total number of customers that are express trusts and other similar legal arrangements that the obliged entity created
	13	Total number of legal entities to whom the obliged entity provided registered office, business correspondence or administrative address services
	14	Total number of customers that are legal entities for whom the obliged entity acted as or arranged for another person to act as secretary or a similar position
	15	Total number of customers that are legal entities for which the obliged entity held directorship or equivalent positions
	16	Total number of customers that are trusts and other similar legal arrangements for which the obliged entity has acted, or arranged another person to act as a trustee or an equivalent function
	17	Value (EUR) of the largest transaction
Geographies	18	Total number of customers that are resident/incorporated/created/governed under the law of a high-risk third country
	19	Total number of beneficial owners of your customers resident in high-risk third countries
Distribution channels	20	Total number of customers whose identity was verified on a non-face-to-face basis
	21	Total number of customers introduced by third parties in high-risk third countries

AMLA Anti-Money Laundering Authority

ANNEX I

Category of obliged entities: **Trust or company service providers** (Article 3(3) c, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
	5	Number of branches and subsidiaries in high-risk third countries
Customers	6	Total number of customers
	7	Total number of new customers
	8	Total number of customers that are companies and other legal entities
	9	Total number of customers that are legal entities similar to express trusts
	10	Total number of customers that are express trusts and other similar legal arrangements
	11	Total number of beneficial owners of customers
	12	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	13	Number of customers that are legal entities/arrangements that are part of a complex structure
	14	Total number of customers where senior managing officials are identified as BOs
Products and Services	15	Total number of companies and other legal entities that the obliged entity formed
	16	Total number of legal entities similar to express trusts that the obliged entity formed
	17	Total number of customers that are express trusts and other similar legal arrangements that the obliged entity created
	18	Total number of customers that are express trusts and other similar legal entities/arrangements that are discretionary
	19	Number of legal entities and legal arrangements created/formed where no other relevant service was provided following their formation
	20	Total number of legal entities to whom the obliged entity provided registered office, business correspondence or administrative address services
	21	Total number of companies and other legal entities that are holding companies
	22	Total number of customers that are companies and other legal entities with bearer shares or having companies held by bearer shares in their shareholding structure
	23	Total number of legal entities/arrangements in which the obliged entity held shares in fiduciary/mandatary capacity
	24	Total number of customers that are legal entities for whom the obliged entity acted as or arranged for another person to act as secretary or a similar position
	25	Total number of customers that are legal entities for which the obliged entity held directorship or equivalent positions
	26	Total number of customers that are companies in which the obliged entity has acted, or arranged another person to act as, nominee shareholder

ANNEX I

Category of obliged entities: **Trust or company service providers** (Article 3(3) c, Regulation (EU) 2024/1624)

	27	Total number of customers that are trusts and other similar legal arrangements for which the obliged entity has acted, or arranged another person to act as a trustee or an equivalent function
	28	Total value (EUR) of assets held on a trust or similar legal arrangement as of the end of the reference year to whom the obliged entity provides services of trustee/co-trustee/equivalent positions
	29	Total value (EUR) of assets held on a trust or similar legal arrangement as of the end of the reference year to whom the obliged entity provides services of trustee/co-trustee/equivalent positions, broken down by the following types of assets: - Financial assets (cash and bank deposits, securities and financial instruments, loans, insurance-linked assets, others) - Ownership interests in legal entities (shares, partnership interests and others) - Immovable property (real estate) - Movable property (high-value goods, precious metals and stones, cultural goods, others) - Intangible assets (intellectual rights, brand rights, others) - Crypto-assets - Others
	30	Total value (EUR) of additional endowments made in respect of trusts or similar legal arrangements
	31	Total value (EUR) of payouts distributed to beneficiaries in respect of express trusts, similar legal arrangements or legal entities similar to express trusts
	32	Total value (EUR) of payouts distributed to beneficiaries of express trusts, other similar legal arrangements or legal entities similar to express trust resident in non-EU/EEA jurisdictions
	33	Total value (EUR) of payouts distributed to beneficiaries of express trusts, similar legal arrangements or legal entities similar to express trusts resident in high-risk third countries
	34	Total number of customers to whom the obliged entity provides management services that do not have a bank account
	35	Total number of customers to whom the obliged entity provides management services that only have bank accounts in non-EU/EEA jurisdictions
	36	Value of (EUR) the largest transaction
Geographies	37	Total number of customers that are non-resident or incorporated/created/governed under the law of a country other than your Member State
	38	Total number of customers that are resident/incorporated/created/governed under the law of a high-risk third country
	39	Total number of beneficial owners of your customers resident in a country other than your Member State
	40	Total number of beneficial owners of your customers resident in high-risk third countries
Distribution channels	41	Total number of customers whose identity was verified on a non-face-to-face basis
	42	Total number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities
	43	Total number of customers introduced by third parties in non-EU/EEA jurisdictions
	44	Total number of customers introduced by third parties in high-risk third countries

ANNEX I

Category of obliged entities: **Estate agents and other real estate professionals**, to the extent they act as intermediaries in real estate transactions, including in relation to the letting of immovable property for transactions for which the monthly rent amounts to at least EUR 10 000 or the equivalent in national currency, irrespective of the means of payment (Article 3(3) d, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
Customers	4	Total number of customers
	5	Total number of customers that are legal entities
	6	Total number of customers that are legal arrangements
	7	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	8	Total number of customers that are legal entities/arrangements that are part of a complex structure
Products and Services	9	Number of real estate transactions for which the obliged entity acted as an agent
	10	Number real estate transactions which, in the professional judgement of the obliged entity, involved a consideration below or above 30% of the average market values for comparable properties in the same area
	11	Total value (EUR) of real estate transactions for which the obliged entity acted as an agent
	12	Number of real estate transactions in which the obliged entity acted as an agent where the consideration was paid, in full or in part, in crypto-assets
	13	Total value (EUR) of real estate transactions in which the obliged entity acted as an agent where the consideration was paid, in full or in part, in crypto-assets
	14	Number of real estate transactions in which the obliged entity acted as an agent where the consideration was paid with funds sent from high-risk jurisdictions
	15	Value of the largest transaction
Geographies	16	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
	17	Total number of beneficial owners of the obliged entity's customers resident in high-risk third countries
Distribution channels	18	Total number of customers whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: **Estate agents and other real estate professionals**, to the extent they act as intermediaries in real estate transactions, including in relation to the letting of immovable property for transactions for which the monthly rent amounts to at least EUR 10 000 or the equivalent in national currency, irrespective of the means of payment (Article 3(3) d, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
	5	Number of branches and subsidiaries in high-risk third countries
Customers	6	Total number of customers
	7	Total number of new customers
	8	Total number of customers that are legal entities
	9	Total number of customers that are legal arrangements
	10	Total number of beneficial owners of customers
	11	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	12	Total number of customers that are legal entities/arrangements that are part of a complex structure
	13	Total number of customers that were represented by third parties
	14	Total number of customers with more than one real estate sale
Products and Services	15	Number of real estate transactions for which the obliged entity acted as an agent
	16	Number of real estate transactions for which the obliged entity acted as an agent where the buyer has changed before the conclusion of the agreement
	17	Number of property letting contracts with a monthly rent of at least EUR 10 000 or more for which the obliged entity acted as an agent
	18	Number real estate transactions for which the obliged entity acted as an agent involving the same customer
	19	Number real estate transactions which, in the professional judgement of the obliged entity, involved a consideration below or above 30% of the average market values for comparable properties in the same area
	20	Total value (EUR) of real estate transactions for which the obliged entity acted as an agent
	21	Number of real estate transactions for which the obliged entity acted as an agent where the value of the property was financed by third parties (i.e. not from loans/mortgages by financial/credit institutions)
	22	Number of real estate transactions for which the obliged entity acted as an agent involving the same property
	23	Number of real estate transactions in which the obliged entity acted as an agent where the consideration was paid, in full or in part, in crypto-assets
	24	Total value (EUR) of real estate transactions in which the obliged entity acted as an agent where the consideration was paid, in full or in part, in crypto-assets
	25	Number of real estate transactions in which the obliged entity acted as an agent where the consideration was paid with funds sent from high-risk jurisdictions

ANNEX I

Category of obliged entities: **Estate agents and other real estate professionals**, to the extent they act as intermediaries in real estate transactions, including in relation to the letting of immovable property for transactions for which the monthly rent amounts to at least EUR 10 000 or the equivalent in national currency, irrespective of the means of payment (Article 3(3) d, Regulation (EU) 2024/1624)

	26	Number of real estate transactions for which the obliged entity acted as an agent in which the property purchased is related to a residence by investment program
	27	Total value (EUR) of real estate transaction in which the obliged entity acted as an agent where the property purchased is related to a residence by investment program
	28	Value (EUR) of the largest transaction
Geographies	29	Total number of customers that are resident or incorporated/created/governed under the law of a country other than the obliged entity's Member State
	30	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
	31	Total number of non-resident beneficial owners of customers
	32	Total number of beneficial owners of the obliged entity's customers resident in high-risk third countries
Distribution channels	33	Total number of customers whose identity was verified on a non-face-to-face basis
	34	Total number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities
	35	Total number of customers introduced by third parties not subject to AML/CFT supervision

ANNEX I

Category of obliged entities: Persons trading, as a regular or principal activity, in **precious metals and stones** (Article 3 (3) e, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Is the parent undertaking located in a high-risk third country?
Customers	4	Total number of customers
	5	Total number of suppliers of goods
	6	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	7	Total number of suppliers of goods that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	8	Total value (EUR) of transactions
	9	Total number of transactions
	10	Total value (EUR) of transactions involving cash payments of at least 3 000 EUR
	11	Total value (EUR) of transactions in precious metals
	12	Total value (EUR) of transactions in precious stones
	13	Total value (EUR) of transactions paid partially or fully in crypto-assets
	14	Value (EUR) of the largest transaction
	15	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
	16	Total number of suppliers of goods that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	17	Total number of customers whose identity was verified on a non-face-to-face basis
	18	Total number of suppliers of goods whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: Persons trading, as a regular or principal activity, in **precious metals and stones** (Article 3 (3) e, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the entity have beneficial owners resident in high-risk third countries?
	3	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	4	Is the parent undertaking located in a high-risk third country?
	5	Number of branches and subsidiaries in high risk third countries
Customers	6	Total number of customers
	7	Total number of suppliers of goods
	8	Total number of customers that are legal entities or legal arrangements
	9	Total number of suppliers of goods that are legal entities or legal arrangements
	10	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	11	Total number of suppliers of goods that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	12	Total value (EUR) of transactions
	13	Total number of transactions
	14	Total value (EUR) of transactions involving cash payments of at least 3 000 EUR
	15	Total value (EUR) of transactions in precious metals
	16	Total value (EUR) of transactions in precious stones
	17	Total value (EUR) of transactions paid partially or fully in crypto-assets
	18	Value of the highest transaction
Geographies	19	Total number of customers that are resident or incorporated/created/governed under the law of a country other than your member state
	20	Total number of suppliers of goods resident or incorporated/created/governed under the law of a country other than your member state
	21	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
	22	Total number of suppliers of goods that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	23	Total number of customers whose identity was verified on a non-face-to-face basis
	24	Total number of suppliers of goods whose identity was verified on a non-face-to-face basis
	25	Does the obliged entity offer delivery through third parties not subject to AML/CFT requirements?

ANNEX I

Category of obliged entities: Persons trading, as a regular or principal activity, in **high-value goods** (Article 3 (3) f, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
Customers	5	Total number of customers
	6	Total number of suppliers of goods
	7	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	8	Total number of suppliers of goods that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	9	Total value (EUR) of transactions
	10	Total number of transactions
	11	Total value (EUR) of transactions involving cash payments of at least 3 000 EUR
	12	Total value (EUR) of transactions in jewellery, gold- or silversmith articles of a value exceeding EUR 10 000 or the equivalent in national currency
	13	Total value (EUR) of transactions in clocks and watches of a value exceeding EUR 10 000 or the equivalent in national currency
	14	Total value (EUR) of transactions in motor vehicles of a price exceeding EUR 250 000 or the equivalent in national currency
	15	Total value (EUR) of transactions in aircraft of a price exceeding EUR 7 500 000 or the equivalent in national currency
	16	Total value (EUR) of transactions in watercraft of a price exceeding EUR 7 500 000 or the equivalent in national currency
	17	Total value (EUR) of transactions paid partially or fully in crypto-assets
	18	Value (EUR) of the largest transaction
	19	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
	20	Total number of suppliers of goods that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	21	Total number of customers whose identity was verified on a non-face-to-face basis
	22	Total number of suppliers of goods whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: Persons trading, as a regular or principal activity, in **high-value goods** (Article 3 (3) f, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
	5	Number of branches and subsidiaries in high-risk third countries
Customers	6	Total number of customers
	7	Total number of suppliers of goods
	8	Total number of customers that are legal entities or legal arrangements
	9	Total number of suppliers of goods that are legal entities or legal arrangements
	10	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	11	Total number of suppliers of goods that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	12	Total value (EUR) of transactions
	13	Total number of transactions
	14	Total value (EUR) of transactions involving cash payments of at least 3 000 EUR
	15	Total value (EUR) of transactions in jewellery, gold- or silversmith articles of a value exceeding EUR 10 000 or the equivalent in national currency
	16	Total value (EUR) of transactions in clocks and watches of a value exceeding EUR 10 000 or the equivalent in national currency
	17	Total value (EUR) of transactions in motor vehicles of a price exceeding EUR 250 000 or the equivalent in national currency
	18	Total value (EUR) of transactions in aircraft of a price exceeding EUR 7 500 000 or the equivalent in national currency
	19	Total value (EUR) of transactions in watercraft of a price exceeding EUR 7 500 000 or the equivalent in national currency
	20	Total value (EUR) of transactions paid partially or fully in crypto-assets
	21	Value (EUR) of the largest transaction
Geographies	22	Total number of customers that are resident or incorporated/created/governed under the law of a country other than your member state
	23	Total number of suppliers of goods resident or incorporated/created/governed under the law of a country other than your member state
	24	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
	25	Total number of suppliers of goods that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	26	Total number of customers whose identity was verified on a non-face-to-face basis
	27	Total number of suppliers of goods whose identity was verified on a non-face-to-face basis
	28	Does the obliged entity offer delivery through third parties not subject to AML/CFT requirements?

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ANNEX I

Category of obliged entities: **Providers of gambling services (land based)** (Article 3(3) g, Regulation (EU) 2024/1624)

Reduced set			
Risk Category	**Sub-category**	**Data points**	
Structure of the obliged entity	Structure of the obliged entity	1	Does the obliged entity have a complex structure?
		2	Does the obliged entity have beneficial owners resident in high-risk third countries?
		3	Does the obliged entity have Politically Exposed Persons (PEPs) as beneficial owners?
		4	Is the parent undertaking located in high-risk third country?
Customers	Customers	5	Total number of customers
		6	Total number of customers which are PEPs
Products and Services	Size of gambling services	7	Total amount of money wagered (EUR)
	Size of transactions	8	Total deposits (EUR)
		9	Total withdrawals (EUR)
		10	Value (EUR) of the largest transaction
	Size of transactions non-resident customers	11	Total deposits (EUR) by customers that are non-resident in the obliged entity's Member State
		12	Total withdrawals (EUR) by customers that are non-resident in the obliged entity's Member State
	Cash transactions	13	Total value (EUR) of cash deposits
		14	Total value (EUR) of cash withdrawals
	Gambling accounts	15	Value (EUR) of funds held at gambling accounts at the end of reference year
	Crypto assets	16	Total value (EUR) of deposits using crypto assets
		17	Total value (EUR) of withdrawals using crypto assets
Distribution channels	Distribution channels	18	Number of customers whose identity was verified on a non-face-to-face basis
		19	Does the obliged entity use distribution networks (kiosks, retailers, points of sale) which are not subject to AML/CFT requirements?
Geographies	Geographies	20	Total number of customers that are non-resident in the obliged entity's Member State

ANNEX I

Category of obliged entities: **Providers of gambling services (land based)** (Article 3(3) g, Regulation (EU) 2024/1624)

Full set			
Risk Category	**Sub-category**	**Data points**	
Structure of the obliged entity	Structure of the obliged entity	1	Does the obliged entity have a complex structure?
		2	Does the obliged entity have beneficial owners resident in high-risk third countries?
		3	Does the obliged entity have Politically Exposed Persons (PEPs) as beneficial owners?
		4	Is the parent undertaking located in high-risk third country?
Customers	Customers	5	Total number of customers
		6	Total number of new customers
		7	Total number of customers which are PEPs
Products and Services	Size of gambling services	8	Total amount of money wagered (EUR)
		9	Land based betting total amount of money wagered (EUR)
		10	Land based bingo total amount of money wagered (EUR)
		11	Land based lotteries total amount of money wagered (EUR)
		12	Land based casinos total amount of money wagered (EUR)
		13	Land based gambling machines (outside of casinos) total amount of money wagered (EUR)
		14	Land based poker (outside of casinos) total amount of money wagered (EUR)
	Size of transactions	15	Total deposits (EUR)
		16	Total withdrawals (EUR)
		17	Total deposits number of transactions
		18	Total withdrawals number of transactions
		19	Total amount of money wagered by new customers
		20	Total deposits (EUR) by new customers
		21	Total withdrawals (EUR) by new customers
		22	Value (EUR) of the largest transaction
	Size of transactions anonymous play	23	Total amount (EUR) of money wagered through anonymous play
		24	Total cash deposits (EUR) linked to anonymous play
		25	Total cash withdrawals (EUR) linked to anonymous play
		26	Total deposits (EUR) by customers that are non-resident in the obliged entity's Member State

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Category of obliged entities: **Providers of gambling services (land based)** (Article 3(3) g, Regulation (EU) 2024/1624)

	Size of transactions non-resident customers	27	Total withdrawals (EUR) by customers that are non-resident in the obliged entity's Member State
	Cash transactions	28	Total value (EUR) of cash deposits
		29	Total number of cash deposits
		30	Total value (EUR) of cash withdrawals
		31	Total number of cash withdrawals
	Cash transactions non-residents	32	Total number of cash deposits performed by customers that are non-resident in the obliged entity's Member State
		33	Total value (EUR) of cash deposits performed by customers that are non-resident in the obliged entity's Member State"
		34	Total number of cash withdrawals performed by customers that are non-resident in the obliged entity's Member State
		34	Total value (EUR) of cash withdrawals performed by customers that are non-resident in the obliged entity's Member State"
	Pre-paid vouchers	36	Total number of deposits performed by pre-paid vouchers
		37	Total value (EUR) of deposits performed by pre-paid vouchers
		38	Total number of withdrawals performed by pre-paid vouchers
		39	Total value (EUR) of withdrawals performed by pre-paid vouchers
	Card transactions	40	Total value (EUR) of deposits using cards
		41	Total number of deposits using cards
		42	Total value (EUR) of withdrawals using cards
		43	Total number of withdrawals using cards
	Gambling accounts	44	Total number of customers holding a gambling account
		45	Value (EUR) of funds held at gambling accounts at the end of reference year
	Fund transfers	46	Total value (EUR) of incoming fund transfers§
		47	Total number of incoming fund transfers
		48	Total value (EUR) of outgoing funds transfers
		49	Total number of outgoing funds transfers
	Crypto assets	50	Total value (EUR) of deposits using crypto assets
		51	Total number of deposits using crypto assets
		52	Total value (EUR) of withdrawals using crypto assets
		53	Total number of withdrawals using crypto assets

ANNEX I

Category of obliged entities: **Providers of gambling services (land based)** (Article 3(3) g, Regulation (EU) 2024/1624)

	Certificates of winnings	54	Total number of certificates of winnings issued
Geographies	Geographies	55	Total number of customers that are non-resident in the obliged entity's Member State
		56	Total number of customers that are resident in a high-risk third country
Distribution channels	Distribution channels	57	Number of customers whose identity was verified on a non-face-to-face basis
		58	Number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities
		59	Does the obliged entity use distribution networks (kiosks, retailers, points of sale) which are not subject to AML/CFT requirements?

ANNEX I

Category of obliged entities: **Providers of gambling services (online)** (Article 3(3) g, Regulation (EU) 2024/1624)

Reduced set			
Risk Category	**Sub-category**	**Data points**	
Structure of the obliged entity	Structure of the obliged entity	1	Does the obliged entity have a complex structure?
		2	Does the obliged entity have beneficial owners resident in high-risk third countries?
		3	Does the obliged entity have Politically Exposed Persons (PEPs) as beneficial owners?
		4	Is the parent undertaking located in high-risk third country?
Customers	Customers	5	Total number of customers
		6	Total number of customers which are PEPs
Products and Services	Size of gambling services	7	Total amount of money wagered (EUR)
	Size of transactions	8	Total deposits (EUR)
		9	Total withdrawals (EUR)
		10	Total deposits (EUR) by customers that are non-resident in your Member State
		11	Total withdrawals (EUR) by customers that are non-resident in your Member State
		12	Value (EUR) of the highest transaction
	Crypto assets	13	Total value (EUR) of crypto assets incoming transactions
		14	Total value (EUR) of crypto assets outgoing transactions
Geographies	Geographies	15	Total number of customers that are non-resident in the obliged entity's Member State
		16	Does the obliged entity allow deposits and/or withdrawals from high risk third countries?
Distribution channels	Distribution channels	17	Does the obliged entity use any land-based intermediaries/agents?

ANNEX I

Category of obliged entities: **Providers of gambling services (online)** (Article 3(3) g, Regulation (EU) 2024/1624)

Full set			
Risk Category	**Sub-category**	**Data points**	
Structure of the obliged entity	Structure of the obliged entity	1	Does the obliged entity have a complex structure?
		2	Does the obliged entity have beneficial owners resident in high-risk third countries?
		3	Does the obliged entity have Politically Exposed Persons (PEPs) as beneficial owners?
		4	Is the parent undertaking located in high-risk third country?
Customers	Customers	5	Total number of customers
		6	Total number of new customers
		7	Total number of customers which are PEPs
Products and Services	Size of gambling services	8	Total amount of money wagered (EUR)
		9	Online betting total amount of money wagered (EUR)
		10	Online bingo total amount of money wagered (EUR)
		11	Online lotteries total amount of money wagered (EUR)
		12	Online casinos total amount of money wagered (EUR)
		13	Online poker total amount of money wagered (EUR)
	Size of transactions	14	Total deposits (EUR)
		15	Total withdrawals (EUR)
		16	Total deposits number of transactions
		17	Total withdrawals number of transactions
		18	Total deposits (EUR) by customers that are non-resident in your Member State
		19	Total withdrawals (EUR) by customers that are non-resident in your Member State
		20	Value (EUR) of the highest transaction
	Card transactions	21	Total value (EUR) of deposits using cards
		22	Total number of deposits using cards
		23	Total value (EUR) of withdrawals using cards
		24	Total number of withdrawals using cards
	Cash transactions	25	Total value (EUR) of deposits using cash
		26	Total number of deposits using cash

ANNEX I

Category of obliged entities: **Providers of gambling services (online)** (Article 3(3) g, Regulation (EU) 2024/1624)

		27	Total value (EUR) of withdrawals using cash
		28	Total number of withdrawals using cash
	Funds transfers	29	Total value (EUR) of incoming fund transfers
		30	Total number of incoming fund transfers
		31	Total value (EUR) of outgoing funds transfers
		32	Total number of outgoing funds transfers
	Crypto assets	33	Total value (EUR) of crypto assets incoming transactions
		34	Total number of crypto assets incoming transactions
		35	Total value (EUR) of crypto assets outgoing transactions
		36	Total number of crypto assets outgoing transactions
		37	Total number of customers using crypto assets
	Prepaid vouchers	38	Total value (EUR) of deposits using prepaid vouchers
		39	Total number of deposits using prepaid vouchers
	Pooled accounts	40	Does the obliged entity offer pooled accounts? Y/N
	Certificates of winnings	41	Total number of certificates of winnings issued
Geographies	Geographies	42	Total number of customers that are non-resident in the obliged entity's Member State
		43	Total number of customers that are resident in a high-risk third country
		44	Does the obliged entity allow deposits and/or withdrawals from high risk third countries?
Distribution channels	Distribution channels	45	Does the obliged entity use any land-based intermediaries/agents?
		46	Number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities
		47	Does the obliged entity use distribution networks (kiosks, retailers, points of sale) which are not subject to AML/CFT requirements?

ANNEX I

Category of obliged entities: **Crowdfunding service providers** and crowdfunding intermediaries (Article 3(3) h, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
Customers	4	Total number of customers
	5	Total number of project owners
	6	Total number of funders
	7	Total number of customers that are legal entities
	8	Total number of customers that are legal arrangements
	9	Total number of beneficial owners of customers
	10	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	11	Total number of customers that are legal entities/arrangements that are part of a complex structure
Products and Services	12	Total number of projects being funded
	13	Total number of projects being funded that have charitable purposes or are related to NGOs
	14	Total value (EUR) of funding projects
	15	Total value (EUR) of funding from/to high-risk third countries
	16	Total value (EUR) of payment transactions settled between funders and project owners using crypto-assets
	17	Total value (EUR) of payments made to project owners with anonymous cards
	18	Total value (EUR) of payments made to project owners with prepaid cards
	19	Value (EUR) of the largest transaction
Geographies	20	Total number of funders from high-risk third countries
	21	Total number or project owners from high-risk third countries
	22	Total number of beneficial owners of customers resident in high-risk third countries
Distribution channels	23	Total number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities

ANNEX I

Category of obliged entities: **Crowdfunding service providers** and crowdfunding intermediaries (Article 3(3) h, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
Customers	5	Total number of customers
	6	Total number of project owners
	7	Total number of funders
	8	Total number of new customers
	9	Total number of customers that are legal entities
	10	Total number of customers that are legal arrangements
	11	Total number of beneficial owners of customers
	12	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
	13	Total number of customers that are legal entities/arrangements that are part of a complex structure
Products and Services	14	Total number of projects being funded
	15	Total number of investment/lending-based projects funded
	16	Number of investment/lending-based projects funded involving the granting of loans
	17	Number of investment/lending-based projects funded involving the issuance of admitted instruments for crowdfunding purposes
	18	Number of investment/lending-based projects funded involving the issuance of equity instruments
	19	Number of investment/lending-based projects funded involving the issuance of debt instruments
	20	Number of investment/lending-based projects funded involving the issuance of other transferrable securities
	21	Total number of donation-based projects funded
	22	Total number of projects being funded that have charitable purposes or are related to NGOs
	23	Total number of projects being funded related to real estate or construction
	24	Total value (EUR) of funding projects
	25	Total value (EUR) of lending/investment-based projects funded
	26	Total value (EUR) of investment/lending-based projects funded involving the granting of loans
	27	Total value (EUR) of investment/lending-based projects funded involving the issuance of admitted instruments for crowdfunding purposes
	28	Total value (EUR) of investment/lending-based projects funded involving the issuance of equity instruments
	29	Total value (EUR) of investment/lending-based projects funded involving the issuance of debt instruments

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Category of obliged entities: **Crowdfunding service providers** and crowdfunding intermediaries (Article 3(3) h, Regulation (EU) 2024/1624)

	30	Total value (EUR) of investment/lending-based projects funded involving the issuance of other transferrable securities
	31	Total value (EUR) of donation-based projects funded
	32	Total value (EUR) of funding from/to high-risk third countries
	33	Total value (EUR) of investments that have been redeemed early or loans that have been repaid early
	34	Total value (EUR) of funding transactions not settled by a credit/financial institution
	35	Total value (EUR) of payment transactions settled between funders and project owners using crypto-assets
	36	Total value (EUR) of payments made to project owners with anonymous cards
	37	Total value (EUR) of payments made to project owners with prepaid cards
	38	Total value of funds (EUR) returned to funders without having been allocated to any crowdfunding project
	39	Total value of funds (EUR) held in funders' accounts not allocated to any crowdfunding project as of the end of the reference year
	40	Value (EUR) of the largest transaction
Geographies	41	Total number of funders from a country other than your Member State
	42	Total number of project owners from a country other than your Member State
	43	Total number of funders from high-risk third countries
	44	Total number or project owners from high-risk third countries
	45	Total number of beneficial owners of customers resident in a country other than your Member State
	46	Total number of beneficial owners of customers during the reference year resident in high-risk third countries
Distribution channels	47	Total number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities

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ANNEX I

Category of obliged entities: Persons trading or acting as intermediaries in the trade of **cultural goods, including when this is carried out by art galleries and auction houses, where the value of the transaction or linked transactions amounts to at least EUR 10 000** or the equivalent in national currency (Article 3 (3) i, Regulation (EU) 2024/1624)

Reduced set

Risk Category	Data points	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
Customers	5	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
	6	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
	7	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)
	8	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	9	Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
		Total number of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
	10	Total value (EUR) of transactions involving cash payments of at least 3 000 EUR
	11	Total value (EUR) of all transactions
	12	Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, paid partially or fully in crypto-assets
	13	Value (EUR) of largest transaction
	14	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country
	15	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	16	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: Persons trading or acting as intermediaries in the trade of **cultural goods, including when this is carried out by art galleries and auction houses, where the value of the transaction or linked transactions amounts to at least EUR 10 000** or the equivalent in national currency (Article 3 (3) i, Regulation (EU) 2024/1624)

	17	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, whose identity was verified on a non-face-to-face basis

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
Customers	5	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
	6	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
	7	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are legal entities or legal arrangements
	8	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are legal entities or legal arrangements
	9	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)
	10	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	11	Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
	12	Total number of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency,
	13	Total value (EUR) of transactions involving cash payments of at least 3 000 EUR
	14	Total value (EUR) of all transactions

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Category of obliged entities: Persons trading or acting as intermediaries in the trade of **cultural goods, including when this is carried out by art galleries and auction houses, where the value of the transaction or linked transactions amounts to at least EUR 10 000** or the equivalent in national currency (Article 3 (3) i, Regulation (EU) 2024/1624)

	15	Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, paid partially or fully in crypto-assets
	16	Value of largest transaction
Geographies	17	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a country other than your member state
	18	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, resident or incorporated/created/governed under the law of a country other than your member state
	19	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country
	20	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	21	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, whose identity was verified on a non-face-to-face basis
	22	Total number of suppliers of cultural goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, whose identity was verified on a non-face-to-face basis
	23	Does the obliged entity offer delivery through third parties not subject to AML/CFT requirements?

ANNEX I

Category of obliged entities: Persons trading or acting as intermediaries in the trade of **cultural goods** and **high-value goods**, when this is carried out **within free zones and customs warehouses**, **where the value of the transaction or linked transactions amounts to at least EUR 10 000** or the equivalent in national currency (Article 3 (3) j, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
Customers	5	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency
	6	Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency
	7	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)
	8	Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	9	Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency
	10	Total number of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency
	11	Total value (EUR) of transactions involving cash payments of at least 3 000 EUR
	12	Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, paid partially or fully in crypto-assets
	13	Value (EUR) of largest transaction
	14	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country
	15	Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country

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Category of obliged entities: Persons trading or acting as intermediaries in the trade of **cultural goods** and **high-value goods**, when this is carried out **within free zones and customs warehouses**, **where the value of the transaction or linked transactions amounts to at least EUR 10 000** or the equivalent in national currency (Article 3 (3) j, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	**1**	**Does the obliged entity have a complex structure?**
	2	**Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?**
	3	**Does the obliged entity have beneficial owners resident in high-risk third countries?**
	4	**Is the parent undertaking located in a high-risk third country?**
Customers	**5**	**Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency**
	6	**Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency**
	7	**Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are legal entities or legal arrangements**
	8	**Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are legal entities or legal arrangements**
	9	**Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)**
	10	**Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are, or have a beneficial owner that is, a politically exposed person (PEP)**
Products and Services	**11**	**Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency**
	12	**Total number of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency**
	13	**Total value (EUR) of transactions involving cash payments of at least 3 000 EUR**
	14	**Total value (EUR) of transactions, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, paid partially or fully in crypto-assets**
	15	**Value (EUR) of largest transaction**
Geographies	**16**	**Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a country other than your member state**
	17	**Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, resident or incorporated/created/governed under the law of a country other than your member state**

ANNEX I

Category of obliged entities: Persons trading or acting as intermediaries in the trade of **cultural goods** and **high-value goods**, when this is carried out **within free zones and customs warehouses**, **where the value of the transaction or linked transactions amounts to at least EUR 10 000** or the equivalent in national currency (Article 3 (3) j, Regulation (EU) 2024/1624)

	18	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country
	19	Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	20	Total number of customers, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, whose identity was verified on a non-face-to-face basis
	21	Total number of suppliers of high-value goods, where the value of the transaction or linked transactions amounts to at least EUR 10 000 or the equivalent in national currency, whose identity was verified on a non-face-to-face basis
	22	Does the obliged entity offer delivery through third parties not subject to AML/CFT requirements?

ANNEX I

Category of obliged entities: **Credit intermediaries** for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries (Article 3(3) k, AMLR)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the entity have a complex structure?
	2	Does the entity have politically exposed persons (PEPs) as beneficial owners?
	3	Is the parent undertaking located in a high-risk third country?
Customers	4	Total number of customers
	5	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	6	Total value (EUR) of mortgages intermediated
	7	Total value (EUR) of consumer credits intermediated
	8	Value (EUR) of largest transaction
Geographies	9	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
Distribution channels	10	Total number of customers whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: **Credit intermediaries** for mortgage and consumer credits, other than credit institutions and financial institutions, with the exception of the credit intermediaries carrying out activities under the responsibility of one or more creditors or credit intermediaries (Article 3(3) k, AMLR)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the entity have a complex structure?
	2	Does the entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
	5	Number of branches and subsidiaries in high-risk third countries
Customers	6	Total number of customers
	7	Total number of customers that are, or have a beneficial owner that is, a politically exposed person (PEP)
Products and Services	8	Total value (EUR) of mortgages intermediated
	9	Total value (EUR) of consumer credits intermediated
	10	Total value (EUR) of consumer credits intermediated that are not associated to the acquisition of any product/service
	11	Value (EUR) of largest transaction
Geographies	12	Total number of customers that are resident or incorporated/created/governed under the law of a high-risk third country
	13	Total number of customers that are non-resident in your Member State
Distribution channels	14	Total number of customers whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: **Investment migration operators** permitted to represent or offer intermediation services to third-country nationals seeking to obtain residence rights in a Member State in exchange for any kind of investment, including capital transfers, purchase or renting of property, investment in government bonds, investment in corporate entities, donation or endowment of an activity to the public good and contributions to the state budget (Article 3(3) l, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
Customers	5	Total number of customers
	6	Total number of customers that are a politically exposed person (PEP)
Products and Services	7	Total value (EUR) of investment in relation to residence by investment programs that you represented or intermediated
	8	Total value (EUR) of investment in relation to citizenship by investment programs that you represented or intermediated
	9	Number of customers to whom multiple residence by investment and/or citizenship by investment representation or intermediation services were provided across different countries
	10	Total value (EUR) of investment originating from high risk third countries
	11	Number of services where investment was paid in crypto assets
	12	Number of services where the origin of funds invested come from crypto assets
	13	Value (EUR) of the largest transaction
Geography	14	Total number of customers that are resident in a high-risk third country
	15	Number of marketing agencies, representatives and/or agents used to attract customers in high risk third countries

AMLA
Anti-Money Laundering Authority

ANNEX I

Category of obliged entities: **Investment migration operators** permitted to represent or offer intermediation services to third-country nationals seeking to obtain residence rights in a Member State in exchange for any kind of investment, including capital transfers, purchase or renting of property, investment in government bonds, investment in corporate entities, donation or endowment of an activity to the public good and contributions to the state budget (Article 3(3) l, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Is the parent undertaking located in a high-risk third country?
Customers	5	Total number of customers
	6	Total number of customers that are a politically exposed person (PEP)
	7	Total number of customers with previous rejection in the Member State or in other jurisdiction for citizenship by investment or residence by investment program
	8	Total number of customers that obtained citizenship by investment in a third country prior to applying for residence by investment in the EU
Products and Services	9	Total number of representation or intermediation services in relation to residence by investment services
	10	Total value (EUR) of investment in relation to residence by investment programs that you represented or intermediated
	11	Number of representation or intermediation services in relation to residence by investment offered in other countries that are not your Member State
	12	Number of countries in which you offered such services
	13	Number of representation or intermediation services offered in relation to citizenship by investment
	14	Total value (EUR) of investment in relation to citizenship by investment programs that you represented or intermediated
	15	Number of countries in which you offered such services
	16	Number of customers to whom multiple residence by investment and/or citizenship by investment representation or intermediation services were provided across different countries
	17	Number of services where source of investment originates from high risk third countries
	18	Total value (EUR) of investment originating from high risk third countries
	19	Number of services where investment was paid in crypto assets
	20	Number of services where the origin of funds invested come from crypto assets
	21	Total value (EUR) of investment originating from crypto assets
	22	Value (EUR) of the largest transaction
Geography	23	Total number of customers that are resident in a high-risk third country
	24	Total number of customers to whom residence by investment representation or intermediation services were provided in other countries that are not your Member State
	25	Number of marketing agencies, representatives and/or agents used to attract customers in high risk third countries
	26	Total number of customers whose identity was verified on a non-face-to-face basis

ANNEX I

Category of obliged entities: **Investment migration operators** permitted to represent or offer intermediation services to third-country nationals seeking to obtain residence rights in a Member State in exchange for any kind of investment, including capital transfers, purchase or renting of property, investment in government bonds, investment in corporate entities, donation or endowment of an activity to the public good and contributions to the state budget (Article 3(3) l, Regulation (EU) 2024/1624)

Distribution channels	27	Number of customers for which you relied on customer due diligence performed by other obliged entities

ANNEX I

Category of obliged entities: **Non-financial mixed activity holding companies** (Article 3(3) m, Regulation (EU) 2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Number of subsidiaries in high-risk third countries
	5	Value (EUR) of the largest transaction by any of the subsidiary that is an obliged entity - Value (EUR) corresponding to the sum of the largest transactions carried out by each subsidiary that is an obliged entity

ANNEX I

Category of obliged entities: **Non-financial mixed activity holding companies** (Article 3(3) m, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
	4	Number of subsidiaries in high-risk third countries
	5	Value (EUR) of the largest transaction by any of the subsidiary that is an obliged entity

ANNEX I

Category of obliged entities: **Football agents** Article 3(3) n, Regulation (EU) (2024/1624)

Reduced set		
Risk Category	**Data points**	
Structure of the obliged entity	1	Does the obliged entity have a complex structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Does the obliged entity have beneficial owners resident in high-risk third countries?
Customers	4	Total number of customers
	5	Total number of customers that are legal entities or legal arrangements
	6	Total number of customers which are PEPs or whose beneficial owners are PEPs
	7	Number of customers that are legal entities/arrangements that are part of complex structure
Products and Services	6	Total number of contracts, agreements and services intermediated
	7	Total value (EUR) of contracts, agreements and services intermediated
	8	Total value (EUR) of contracts, agreements and services intermediated to/from high-risk third countries
	9	Total value (EUR) of sponsorship intermediated
	10	Value (EUR) of the largest transaction
Geographies	11	Total number of customers that are resident/incorporated/created/governed under the law of a high-risk third country
	12	Total number of beneficial owners of the customers
	13	Total number of beneficial owners of the customers resident in high-risk third countries
Distribution channels	14	Total value (EUR) of payments
	15	Total value (EUR) of payments received by third parties

ANNEX I

Category of obliged entities: **Football agents** Article 3(3) n, Regulation (EU) (2024/1624)

Full set		
Risk Category	Data points	
Ownership structure of the football agency	1	Has the obliged entity changed beneficial ownership?
	2	Total number of beneficial owners which are PEPs
	3	Does the obliged entity have complex ownership structure?
	4	Does the obliged entity have beneficial owners resident in high risk third countries?
	5	Number of branches and subsidiaries in high-risk third countries
	6	Is the parent undertaking located in a high-risk third country?
Customers	7	Total number of customers
	8	Total number of customers that are legal entities or legal arrangements
	9	Total number of customers which are PEPs or whose beneficial owners are PEPs
	10	Number of customers that are legal entities/arrangements that are part of complex structure
Products and Services	11	Total number of contracts, agreements and services intermediated
	12	Total value (EUR) of contracts, agreements and services intermediated
	13	Total value (EUR) of contracts, agreements and services intermediated to/from high-risk third countries
	14	Total value (EUR) of payments for contracts, agreements and services intermediated were received from a country different from the country of establishment of the customer
	15	Total value (EUR) of sponsorship intermediated
	16	Value (EUR) of the highest transaction
Geographies	17	Total number of customers that are non-resident or incorporated/created/governed under the law of a country other than the obliged entity's Member State
	18	Total number of customers that are resident/incorporated/created/governed under the law of a high-risk third country
	19	Total number of beneficial owners of the customers
	20	Total number of non-resident beneficial owners of the customers
	21	Total number of beneficial owners of the customers resident in high-risk third countries
Distribution channels	22	Total value (EUR) of contracts, agreements and services intermediated involving intermediaries
	23	Total value (EUR) of payments
	24	Total value (EUR) of payments received by third parties

ANNEX I

Category of obliged entities: **professional football clubs** in respect of the following transactions: (i) transactions with an investor; (ii) transactions with a sponsor; (iii) transactions with football agents or other intermediaries; (iv) transactions for the purpose of a football player's transfer (Article 3(3) o, Regulation (EU) 2024/1624)

Full set		
Risk Category	**Data points**	
Ownership structure of the obliged entity	1	Does the obliged entity have a complex ownership structure?
	2	Does the obliged entity have politically exposed persons (PEPs) as beneficial owners?
	3	Has the obliged entity changed beneficial ownership?
	4	Does the obliged entity have beneficial owners resident in high risk third countries?
	5	Is the parent undertaking located in a high risk third country?
	6	Is the club part of a multi-club ownership (MCO)?
Customers	7	Total number of customers
	8	Total number of customers that are legal entities or legal arrangements
	9	Total number of customers which are PEPs or whose beneficial owners are PEPs
	10	Number of customers that are legal entities/arrangements that are part of complex structure
	11	Number of customers that are legal entities/arrangements that are part of complex structure
Products and Services	12	Total number of relevant transactions
	13	Total value (EUR) of relevant transactions
	14	Total value (EUR) of transactions with customers with shared economic interest/under common control
	15	Total value (EUR) of transactions with customers from countries other than the country of origin of the club
	16	Total value (EUR) of transactions to/from high-risk third countries
	17	Total value (EUR) of funding from investors
	18	Total value (EUR) of funding from investors originating from third countries
	19	Total number of transfers corresponding to the acquisition of players (also on loan)
	20	Total value (EUR) of transfers corresponding to players acquired (also on loan)
	21	Total number of transfers corresponding to the selling or lending of players
	22	Total value (EUR) of transfers corresponding to the selling or lending of players
	23	Total number of football players transfer-related contracts
	24	Total number of football players transfer-related contracts during the reference year with separate image rights agreements
	25	Total value (EUR) of transfers corresponding to players acquired on loan during the reference year
	26	Total value (EUR) of sponsorship revenue

ANNEX I

Category of obliged entities: **professional football clubs** in respect of the following transactions: (i) transactions with an investor; (ii) transactions with a sponsor; (iii) transactions with football agents or other intermediaries; (iv) transactions for the purpose of a football player's transfer (Article 3(3) o, Regulation (EU) 2024/1624)

	27	Total value (EUR) of sponsorship revenue during the reference year received from sponsors with less than 2 years of operating history
	28	Total amount (EUR) of football players transfer-related ancillary costs
	29	Total value (EUR) of players' salaries during the reference year
	30	Value (EUR) of the highest transaction
Geographies	31	Total number of customers that are non-resident or incorporated/created/governed under the law of a country other than the obliged entity's Member State
	32	Total number of customers that are resident/incorporated/created/governed under the law of a high-risk third country
	33	Total number of beneficial owners
	34	Total number of non-resident beneficial owners of the obliged entity's customers
	35	Total number of beneficial owners resident in high-risk third countries
	36	Is the parent undertaking located in a high risk third country?
Distribution channels	37	Total value (EUR) of payments made to agents and other intermediaries
	38	Total value (EUR) of payments made to agents and other intermediaries in high-risk third countries
	39	Total value (EUR) of transfer-related payments received from third parties

ANNEX II
Quality of AML/CFT controls

Full set		
Risk Category	Data points	
Governance, Culture & Compliance function	1	Does the obliged entity have written internal policies and procedures covering the entirety of the AML/CFT framework?
	2	How often does the obliged entity review and/or update its written AML/CFT procedures?
	3	Date of the last update of the obliged entity's written AML/CFT procedures
	4	Total number of staff (in FTEs)
	5	Total number of staff (in FTEs) assigned with AML/CFT responsibilities
	6	At which frequency is the obliged entity's staff assigned with AML/CFT responsibilities subject to AML/CTF training?
	7	At which frequency is the senior management of the obliged entity subject to AML/CTF training?
	8	Total number of staff (in FTEs) subject to AML/CFT training
	9	Total number of staff (in FTEs) subject to AML/CFT training that have successfully completed the training
Internal Controls & Outsourcing	10	Have the AML/CFT controls been assessed by an internal/external audit?
	11	How often are the obliged entity's AML/CFT controls assessed by an internal/external audit?
	12	Are there any findings of internal/external audits pending remediation?
	13	Does the obliged entity outsource any of the AML/CFT obligations?
	14	Is there a written agreement with the party to whom the AML/CFT obligations are outsourced outlining the roles and responsibilities in place?
Risk assessment	15	Does the obliged entity perform business-wide risk assessments? (if applicable)
	16	Date when the obliged entity's business-wide risk assessment was last reviewed or updated
	17	Based on the latest business-wide risk assessment performed, what is the risk exposure of the obliged entity?
	18	Does the obliged entity have policies and procedures on Customer Risk Assessment (CRA)?
Customer due diligence	19	Total number of customers
	20	Number of customers per ML/TF risk category
	21	Number of customers that are legal entities or legal arrangements whose beneficial owners have not been identified and/or whose identity has not been verified
	22	Number of customers for which the obliged entity performed enhanced due diligence (EDD) measures
Ongoing monitoring/transaction monitoring	23	Does the obliged entity perform ongoing monitoring and/or transaction monitoring?
	24	Is the obliged entity's ongoing monitoring and/or transaction monitoring manual, partially automated or automated?
	25	Is the obliged entity's ongoing monitoring and/or transaction monitoring performed periodically or based on trigger events?
	26	Number of customers for whom a review and update were due
	27	Number of customers for whom customer information was reviewed and updated

ANNEX II

Quality of AML/CFT controls

	28	Total number of STRs/SARs submitted to the FIU
	29	Total number of terminated/not initiated business relationships/occasional transactions due to ML/TF concerns
	30	Does the obliged entity have policies, procedures and controls in place to ensure compliance with TFS?
	31	If controls are in place to ensure compliance with TFS, are these performed manually, partially automated or automated?