**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 |

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**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?** |

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**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 |

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**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:<br>- Financial assets (cash and bank deposits, securities and financial instruments, loans, insurance-linked assets, others)<br>- Ownership interests in legal entities (shares, partnership interests and others)<br>- Immovable property (real estate)<br>- Movable property (high-value goods, precious metals and stones, cultural goods, others)<br>- Intangible assets (intellectual rights, brand rights, others)<br>- Crypto-assets<br>- 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 |

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**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 |

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**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 |

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**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? |

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**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 |

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**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? |

**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 |

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**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 |

**ANNEX I**

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 |

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**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 |

**ANNEX I**

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 |

**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)

| | | |
|---|---|---|
| | 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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**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)

| 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 |

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**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 |

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**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 |

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**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 |

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**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? |