

Interpretative Note

On the risk assessment methodologies pursuant to draft RTS under Article 12(7) AMLAR and draft RTS under Article 40(2) AMLD

Key Information for the Purposes of This Data Collection

Reference period. The reference date is 31 December 2025. The reference year is the 2025 calendar year, running from 1 January 2025 to 31 December 2025 inclusive.

Legal basis. Instructions refer, where relevant, to the definitions set out in the Regulation (EU) 2024/1624 AMLR (AMLR) to support consistent reporting. Where AMLR definitions were not yet applicable during the reference year, or where they conflict with the legislation in force for that period, reporting obliged entities should instead apply the definitions and requirements of Directive (UE) 2015/849 (AMLD IV/V) as transposed into their national law for the relevant reference period.

Scope of reporting by activity. Reporting obliged entities must report all datapoints relevant to the activities they perform. Where an obliged entity carries out activities falling under more than one category of obliged entity as defined under the AMLR, it must report datapoints applicable to each relevant activity. For example, a credit institution also acting as a life insurance intermediary must report datapoints applicable to both activities when relevant.

Scope of reporting by establishment. Reporting is required at solo level for each separate establishment, rather than at solo level for each obliged entity as a whole. Concretely:

- Each subsidiary and branch must report solo level data to the national financial supervisor of its country of establishment.
- Obligated entities with cross-border branches must exclude data from those branches when reporting to the national financial supervisor of the country of establishment of the legal entity and must report only data attributable to the head office itself. This rule is intended to avoid double counting in the aggregation of data at national and EU level. The same rule applies for obliged entities with cross border subsidiaries.

Data reporting conventions. A dedicated row in the reporting template specifies, for each datapoint, whether it should be reported as a stock (position as of 31 December 2025) or as a flow (cumulative activity over the period from 1 January 2025 to 31 December 2025). Unless otherwise specified in the template, entering:

- "0" indicates that the reported value for the relevant datapoint is zero. Example: a Credit Institution reports 0 for "Customers with Multiple Prepaid Cards (>3)" if the institution commercializes prepaid cards and 0 customers hold more than three prepaid cards.
- **A blank cell** indicates either:
 - (a) That the relevant datapoint is not applicable to the reporting obliged entity given the nature of its activities or its legal status (cf. AML.01.01 on provided financial services and products). Example: a Credit Institution leaves blank the datapoint "Customers with Multiple Prepaid Cards (>3)" if the institution does not commercialize prepaid cards.
 - (b) The data required for the relevant datapoint exists, but the obliged entity **is unable to report it**. Example: a Credit Institution leaves the cell blank if the institution does commercialize prepaid cards but the number of customers with more than 3 cards is unknown.

⇒ **Reporting entities should only leave a blank cell without a matching comment in case (a). For every blank cell reported under case (b), the obliged entity must add a comment in "AML.01.02 Comments" indicating the relevant table/column/row and including a text beginning with "Unable to report:" followed by the specific reason, e.g., "Unable to report: an ongoing cybersecurity incident in one of the branches makes it impossible to calculate the datapoint XXX for the reporting period."**

Contents

1 Interpretative note on the data points listed in Annex 1 to the Draft RTSs	3
1.1 General instructions	3
1.1.1 Purpose and status of this interpretative note	3
1.1.2 Scope of the note and future updates	4
1.1.3 Introduction to reporting templates, instructions and harmonised reporting	4
1.1.4 Reporting period, currency, currency conversion and Country Convention	5
1.1.5 Excel structure and data quality expectations	6
1.1.6 Objectives and use of the testing & calibration phase	6
1.1.7 Abbreviations	8
SECTION 0: Cover Page	9
AML.01.01 Basic Information	9
AML.01.02 Comments	13
SECTION A: AML/CFT INHERENT RISK DATA POINTS	15
1.2 AML.02.01 Customers Template Instructions	15
1.3 Products and Services template instructions	22
1.3.1 AML.03.01 Payment Accounts	22
1.3.2 AML.03.02 Virtual IBANs	25
1.3.3 AML.03.03 Prepaid Cards	26
1.3.4 AML.03.04 Lending and Factoring	26
1.3.5 AML.03.05 Life Insurance Contracts	30
1.3.6 AML.03.06 Currency Exchange (Involving cash)	31
1.3.7 AML.04.01 Investment Services and Activities	32
Investment Services and Activities – Transmission of orders	32
Investment Services and Activities - Custody Account Keeping	33
Investment Services and Activities - Portfolio management	34
1.3.8 AML.04.02 Money Remittance	36
1.3.9 AML.04.03 Wealth Management	37
1.3.10 AML.04.04 Correspondent Services	38
1.3.11 AML.04.05 Trade Finance	39

1.3.12 AML.04.06 E-Money	40
1.3.13 AML.04.07 TCSP Services	41
1.3.14 AML.04.08 Crypto FIAT Cards	41
1.3.15 AML.04.09 Providing Custody and Administration of Crypto-Assets on Behalf of Clients ⁴²	
1.3.16 AML.04.10 Crypto Services	42
Exchange funds for crypto-assets	42
Exchange crypto-assets for funds	43
Exchange of crypto-assets for other crypto-assets	44
Transfer services for crypto-assets on behalf of clients	44
1.3.17 AML.04.11 Management of UCITS and AIFs	45
Management of UCITS	45
Management of AIFs	46
1.3.18 AML.04.12 Safe custody services	47
1.3.19 AML.04.13 Crowdfunding	48
1.3.20 AML.04.14 Cash transactions	49
1.4 AML.05.01 Geographies	50
1.5 AML.06.01 Distribution Channels	55
Section B – AML/CFT Controls data points	57
1.6 AML.07.01 Governance/Culture and Compliance	57
1.7 AML.07.02 Internal compliance reporting - outsourcing and audit	59
1.8 AML.07.03 Risk Assessment	63
1.9 AML.07.04 Customer Due Diligence and Monitoring	64
1.10 AML.07.05 Transaction Monitoring and Suspicious Activity Reporting	66
1.11 AML.07.06 Targeted Financial Sanctions and Compliance with Fund Transfers Regulation	70
1.12 AML.07.07 Group-wide AML/CFT Framework	71
Annex 1 Reference table data points / labels	74
Annex 2 Definitions	92

1 Interpretative note on the data points listed in Annex 1 to the Draft RTSs

1.1 General instructions

1.1.1 PURPOSE AND STATUS OF THIS INTERPRETATIVE NOTE

This Interpretative Note provides a structured and operational representation of the reporting obligations for the testing and calibration exercise particularly arising from the draft RTS under Article 12(7) of Regulation (EU) 2024/1620 (AMLR) and the draft RTS under Article 40(2) of Directive (EU) 2024/1640 (AMLD VI).

It translates the legal requirements into reporting templates, datapoint descriptions and practical instructions, with a view to supporting correct and consistent implementation by reporting obliged entities and national financial supervisors.

The Note is published by AMLA with the purpose of:

- facilitating the reporting process,
- promoting data standardisation and harmonisation, and
- enhancing data quality and comparability.

The clarifications set out in this Note are technical in nature and are provided solely for facilitating the reporting of the datapoints required under the relevant draft RTS. Reporting obliged entities are expected to adhere to these explanations to ensure consistency of the dataset.

This Note does not create, amend or supersede any legally binding requirement and does not provide legal assurance. In the event of any inconsistency, the applicable Union legal acts (including Regulations and delegated/implementing acts, such as RTS/ITS) shall prevail. Public Q&As issued by the competent EU institutions may also be relevant for interpretative purposes.

This Note refers, where relevant, to the definitions set out in the Regulation (EU) 2024/1624 (AMLR) to support consistent reporting. Where AMLR definitions were not yet applicable during the reference year, or where they conflict with the legislation in force for that period, obliged entities should instead apply the definitions and requirements of Directive (EU) 2015/849 (AMLD IV/V) as transposed into their national law for the relevant reference year.

1.1.2 SCOPE OF THE NOTE AND FUTURE UPDATES

This Interpretative Note supports only the data collection exercise to be conducted from March 2026 until April 2026 for the purpose of calibrating the risk assessment methodologies under Article 12(7) AMLAR and Article 40(2) AMLD VI.

An updated package will be issued for the 2027 reporting cycle and real selection exercise, and the general 2028 reporting cycle incorporating:

- insights gained from the testing and calibration period,
- technical improvements identified during implementation, and
- the final exchange and submission format to AMLA (tentatively CSV OIM XBRL-based).²⁰³⁰

1.1.3 INTRODUCTION TO REPORTING TEMPLATES, INSTRUCTIONS AND HARMONISED REPORTING

The datapoints included in this document are structured using a methodical approach consistent with the reporting practices of other EU authorities such as EBA, ECB, EIOPA, ESMA, SRB and others. Where helpful, the Interpretative Note includes:

- explanations on concepts,
- legal references,
- cross references to the implementation format.

This is in line with the approach followed by the EBA for communicating reporting templates, instructions and IT solutions¹ or the EIOPA and ECB unofficial reporting templates².

For ease of mapping between the **requirements as set in the [draft RTS under Article 12\(7\) AMLAR](#) and the [draft RTS under Article 40\(2\) AMLD VI](#)** and their implementation in the **reporting templates, Annex I** includes a list of template columns together with the corresponding RTS source elements on requested data point to entities.

Datapoints need to be filled in accordance with the sector and the products and services provided by the reporting entity. This means that not all templates will be applicable to every reporting obliged entity. The applicable templates will be based on the information provided by the reporting obliged entity in the template AML.01.01.

¹ As published <https://www.eba.europa.eu/publications-and-media/press-releases/eba-updates-supervisory-reporting-framework>

² As published https://www.ecb.europa.eu/stats/financial_corporations/insurance_corporations/html/data_reporting.es.html

1.1.4 REPORTING PERIOD, CURRENCY, CURRENCY CONVERSION AND COUNTRY CONVENTION

For the testing exercise, the reference date is 31 December 2025. The reference year is the 2025 calendar year, running from 1 January 2025 to 31 December 2025 inclusive.

All monetary amounts must be reported in the **single reporting currency** declared in the **Basic Information template (AML.01.01)**.

Throughout this Interpretative Guidance, there are several datapoints referring to EUR or to thresholds indicated in EUR. In those cases, obliged entities that have chosen a single reporting currency different from EUR should read these datapoints and thresholds as converted to the equivalent value in their single reporting currency.

To avoid formatting inconsistencies, the currency must **not** be added or reformatted in individual cells. The currency indicator from AML.01.01 is the only value AMLA will read.

Where currency conversion is required for reported data or for thresholds of the items, reporting obliged entities should apply the following approach:

1. For data points reported as a stock at the end of the reference year, the applicable exchange rate should be the official exchange rate (e.g. the ECB exchange rate) published on 31 December of the reference year. If no official exchange rate is available on 31 December, reporting obliged entities should use the official rate published on 30 December, or the most recent preceding date for which an official rate is available.
2. For data points reported as of a specific date during the reference year, reporting obliged entities should use the official exchange rate applicable on the date the transaction took place. If no official rate is available on that date, they should use the rate published on the most recent preceding date. By way of exception, where applying this approach would be excessively burdensome and the impact immaterial, reporting obliged entities may use the year-end exchange rate (in accordance with the method described in point 1) for such transactions or events.

When reporting on financial assets, any required valuation should be based on the market value (fair value) as of 31 December.

For the purpose of this data collection, references to “country” should be understood as including jurisdictions (or territories) that do not have the status of a country.

1.1.5 EXCEL STRUCTURE AND DATA QUALITY EXPECTATIONS

The Excel workbook provided for the testing exercise is protected to avoid unintended structural modifications and to preserve processing integrity. **Users must not alter it, and shall use only the data cells available for reporting obliged entities information.**

Altering the workbook structure on worksheet names, cell formats, formulas or validations, or other protected features, may prevent correct data processing by national financial supervisors and/or AMLA and lead to the submission being considered not properly fulfilled.

Blocking validations = “Errors” messages are generated by the validation formulas and are generally not expected to appear when the data is complete and consistent. Blocking validations are intended to highlight omissions or inconsistencies that must be corrected before submission.

If, entering real and accurate data, an unjustified blocking error appears, please consult the AMLA webpage to check whether the issue is already documented for the specific formula. If it is not listed, please contact your national financial supervisor.

Nonblocking validations = “Warnings” messages highlight values that may be unusual or require additional review. Reporting obliged entities should verify whether the flagged value accurately reflects the underlying reality. If it does, the warning can be disregarded. Both reporting entities and supervisors are encouraged to review these warning messages, as they can help identify potential mistakes or inconsistencies in submitted data.

All datapoints must be complete and reflect reality according to the specified requirements. Where a gap exists or where data quality cannot be warranted for a justified reason, the submission must include an explanation of the situation, using the AML.01.02 “Comments” template to reference the template/column/country concerned and provide a clear justification as explained in the template.

Where significant revisions are necessary, resubmissions will be requested. Entities should therefore maintain internal controls and documentation that allow prompt correction and traceable resubmission when requested.

1.1.6 OBJECTIVES AND USE OF THE TESTING & CALIBRATION PHASE

The testing exercise is designed to improve the framework, methodological and technical calibration and improving the reporting package, not to evaluate specific entities. More specifically, this exercise aims at:

- calibrating the non-public aspects of the risk-assessment and selection methodologies under Article 12(7) AMLAR and Article 40(2) AMLD VI;
- mapping data availability and interpretational issues;
- refining reporting guidances and instructions;
- testing reporting capacity and data quality under realistic conditions;
- improving validation rules, metadata and submission formats for the 2027 selection cycle for direct supervision by AMLA, and the 2028 national risk assessments cycle.

During the testing and calibration phase, AMLA encourages reporting obliged entities to provide feedback on:

- the clarity and usability of datapoint instructions,
- potential data quality issues,
- technical aspects of template use or processing,
- elements requiring further clarification, and
- suggestions for improving the final 2027 reporting package.

Feedbacks will be used to refine the reporting framework and support the development of the final RTS implementation tools.

1.1.7 ABBREVIATIONS

CI: credit institutions

CP: credit providers other than credit institutions

LI: life insurance undertaking and life insurance intermediaries

EMI: e-money institutions

PI: payment institutions

BC: bureaux de change

IF: investment firms

AMC: asset management companies, i.e. companies that manage one or more collective investment undertakings (undertaking for collective investment in transferable securities (UCITSs) or Alternative Investment Funds (AIFs)) within the meaning of the UCITS and AIFM directives. Where an AMC manages several UCITSs or AIFs, the assessment should be based on aggregated data covering all such UCITSs and AIFs. Where an UCITS or AIF has not designated a management company, the assessment should be based on data covering only the relevant UCITS or AIF.

CASP: crypto-asset service providers

O: other financial institutions

SECTION 0: Cover Page

AML.01.01 Basic Information

This template captures the basic information of the reporting obliged entity submitting the report.

Please ensure that you provide your LEI (if available) and/or the National Code used with your financial supervisor. The Country of Establishment must be the same as the country of the national financial supervisor to whom you are submitting this report.

The reporting currency is expected to be the currency of your Country of Establishment.

Template Remarks

This template applies to all reporting entities.

It is very important that all content is accurate and fully reflects your type of business, characteristics, licenses, and the products and services you offer, as many templates and validations depend on the information provided here.

The selection of the category does not imply that only the templates for this category need to be submitted. You need to submit all relevant templates related to the actual activities carried out by the entity.

All monetary amounts shall be reported using the single currency reported in C0070. Do not add any currency symbols on cell for monetary amounts of the report, as only the currency indicated on this template is necessary and considered.

This should be the first template to fill out.

Column code	Legal references and instructions
C0010	<p>Legal Entity Identifier (LEI)</p> <p>Indicate the Legal Entity Identifier (LEI) of the reporting obliged entity, assigned in accordance with ISO 17442, where available.</p> <p>Non-legal entities (e.g. branches) should use the LEI of the parent undertaking.</p>
C0020	<p>National Code</p> <p>National or supervisory identifier assigned to the entity by the national financial supervisor where the entity is registered or authorized.</p>

	<p>If no such code exists, leave this field blank.</p> <p>Branches should provide the national code assigned by the host country's competent authority (where the branch is located), if available (otherwise leave this field blank).</p>
C0030	<p><u>Legal Name</u></p> <p>Official legal name of the reporting obliged entity.</p>
C0040	<p><u>English Name</u></p> <p>English name of the entity, if different from the official legal name in C0030. This field is optional and may be used to facilitate identification (e.g. where the official legal name is not in Latin characters or is difficult to interpret).</p>
C0050	<p><u>Type of Entity</u></p> <p>Classification of the entity according to its regulated or supervised activity. Select the category that best reflects its main business model according to one of the options listed below, using the metric considered most relevant for this purpose (e.g., balance sheet size, number of customers, etc.).</p> <p>The selection of the category does not imply that only the templates for this category need to be submitted. You need to submit all relevant templates related to the actual businesses of the entity. The categories to choose from are:</p> <ul style="list-style-type: none"> • Credit institutions • Life insurance undertakings • Life insurance intermediaries • E money institutions • Payment institutions • Bureau de change • Investment firms • Asset management companies • CASP • Other financial institutions
C0060	<p><u>Entity Type – Description for Other FI</u></p>

	In case the reporting entity does not fit into any of the above categories and has chosen “other”, please use this column to provide a description of the relevant regulated/supervised activity.
C0070	<u>Country of Establishment</u> Country where the reporting entity is established. For reporting branches, this is the country where the branch is established (in opposition to the country where head-office is established).
C0080	<u>Currency of reporting</u> Currency used for the reporting of all monetary values across this and all subsequent templates. All values in monetary columns must be converted to this currency if they are denominated in a different currency.

Content Template - Products and Services Offered

Column code	Legal references and instructions
C0090	<u>Payment Accounts</u> Indicate whether the entity offered payment accounts at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.
C0100	<u>Virtual IBANs</u> Indicate whether the entity offered virtual IBANs at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.
C0110	<u>Prepaid Cards</u> Indicate whether the entity offered prepaid cards at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.
C0120	<u>Lending/ Factoring</u> Indicate whether the entity offered lending/ factoring at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.
C0130	<u>Life Insurance Contracts</u> Indicate whether the entity offered life insurance contracts at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.
C0140	<u>Currency Exchange Involving Cash</u>

	Indicate whether the entity offered currency exchange involving cash at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.
C0150	<p><u>Custody of Crypto Assets</u></p> <p>Indicate whether the entity offered custody of crypto assets at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0160	<p><u>Investment Services</u></p> <p>Indicate whether the entity offered investment services at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0170	<p><u>Money Remittance</u></p> <p>Indicate whether the entity offered money remittance at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0180	<p><u>Wealth Management</u></p> <p>Indicate whether the entity offered wealth management at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0190	<p><u>Correspondent Services</u></p> <p>Indicate whether the entity offered correspondent services at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0200	<p><u>Trade Finance</u></p> <p>Indicate whether the entity offered trade finance at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0210	<p><u>E-money</u></p> <p>Indicate whether the entity offered e-money at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0220	<p><u>TCSP Services</u></p> <p>Indicate whether the entity offered TCSP (Trust company service provider) services at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>

C0230	<p><u>Crypto Services (exchange, transfer)</u></p> <p>Indicate whether the entity offered Crypto services (exchange, transfer) at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0240	<p><u>Management of UCITS</u></p> <p>Indicate whether the entity offered management of UCITS at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0250	<p><u>Management of AIFs</u></p> <p>Indicate whether the entity offered management of AIFS at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0260	<p><u>Crypto FIAT Cards</u></p> <p>Indicate whether the entity offered Crypto FIAT cards at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0270	<p><u>Safe Custody Services</u></p> <p>Indicate whether the entity offered safe custody services at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0280	<p><u>Crowdfunding</u></p> <p>Indicate whether the entity offered crowdfunding at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>
C0290	<p><u>Cash Transactions</u></p> <p>Indicate whether the entity offered cash transactions at any point during the reference year. This is a binary flag (Yes/No) to determine the scope of subsequent reporting tables.</p>

AML.01.02 Comments

Template Remarks

This template (cluster of datapoints) is applicable for all sectors

Use this template only to report comments related to the testing exercise or the information submitted. Please note that comments must not change or reinterpret the reported data. They should only serve to clarify methodologies applied, assumptions made, or issues encountered during the preparation of the testing exercise information.

Column code	Legal references and instructions
C0010	<p><u>Template Reference</u></p> <p>Indicate the specific template the comment relates to. If the comment refers to the whole reporting obligation, leave it blank.</p>
C0020	<p><u>Column Reference</u></p> <p>Choose the specific column where the comments relate to. If the comment refers to the whole reporting template, leave it blank.</p>
C0030	<p><u>Country Reference</u></p> <p>If the comment relates to a specific line of the templates AML.05.01 Geographies and AML.06.01 Distribution channels, specific country of the row that the comments relate to. If the comment refers to all the lines, leave it blank.</p>
C0040	<p><u>Comment Content</u></p> <p>Text for the comment to be submitted in relation to the testing calibration exercise. While any official EU language is permitted, please include the comment in English whenever possible.</p>

SECTION A: AML/CFT INHERENT RISK DATA POINTS

1.2 AML.02.01 Customers Template Instructions

Template Remarks

This template is applicable for all sectors (unless otherwise mentioned in the definition of the datapoint).

In the RTS the datapoints from C0020 to C0050 are required per country (see also mapping in Annex 1). These datapoints are moved to the Geography template (AML.05.01). For the purpose of completeness, these datapoints are mentioned in this template as well, but now as totals within an obliged entity.

Column code	Legal references and instructions
C0010	<p><u>Total Customers</u></p> <p>Indicate number of customers as of end of the reference year. See the definition of customer in Annex 2.</p> <p>‘Walk-in customers’ should be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>
C0020	<p><u>Natural Persons</u></p> <p>Total of Natural Persons customers, as of end of the reference year.</p> <p>This datapoint is a subset of datapoint C0010 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>Clients can be treated as natural persons unless they are legally registered as a Legal Entity. This refers to amongst others freelancers/self-employed/sole proprietorships without LE status etc.</p>
C0030	<p><u>Legal Entities</u></p> <p>Total of Legal Entities Customers, as of end of the reference year.</p> <p>For the purpose of this data collection exercise, a Legal Entity customer is an entity that has legal personality, granting it legal rights and obligations, for example the ability to enter into contracts. This therefore also includes (but is not limited to) express trust and similar legal arrangements.</p> <p>This datapoint is a subset of datapoint C0010 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>Legal entities in the same corporate group and connected legal entities (constructed relationships) should be counted separately.</p>

<p>C0040</p>	<p><u>Natural Persons - PEPs, Family Members or Close Associates</u></p> <p>Total of Natural Person customers who are identified as: (i) politically exposed persons (PEPs), (ii) family members of PEPs, or (iii) persons known to be close associates of PEPs, as of end of the reference year.</p> <p>This datapoint is a subset of datapoint C0020 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>See the definition of ‘PEP’, ‘family member’, and ‘person known to be close associate’ in Annex 2.</p>
<p>C0050</p>	<p><u>Legal Entities – PEPs, Family Members or Close Associates as BOs</u></p> <p>Total of Legal Entity (LE) customers whose Beneficial Owners (BOs) include at least one politically exposed person (PEP), a family member of a PEP, or a person known to be a close associate of a PEP, as of end of the reference year.</p> <p>This datapoint is a subset of datapoint C0030 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>See the definition of ‘PEP’, ‘family member’, and ‘person known to be close associate’ in Annex 2.</p> <p>BO means any natural person who ultimately owns or controls a legal entity or an express trust or similar legal arrangement, as defined in Article 2(1), point (28), AMLR.</p> <p>As per recital 125 AMLR, senior managing officials (SMOs) reported instead of the beneficial owners where no natural person is identifiable who ultimately owns or exerts control over an entity (as per Article 22(2) AMLR) are not beneficial owners, and shall not be counted for the purpose of reporting this datapoint.</p>
<p>C0060</p>	<p><u>Active Customers</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as a LI.</p> <p>Covers all customers (NP and LE) who have initiated at least one transaction or instruction during the reference year.</p> <p>Such customers should only be counted once, irrespective of the number of transactions or instructions they have initiated.</p> <p>Non-executed transactions that have been initiated by the customer (mere instructions) should be counted for the purpose of reporting this datapoint.</p> <p>‘Walk-in customers’ should be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>For the definition of transaction, see Annex 2</p>

<p>C0070</p>	<p><u>New Customers</u></p> <p>Natural persons and legal persons who completed the onboarding process with the reporting obliged entity during the reference year, irrespective of the existence of any transactions.</p> <p>Indicative (non-exhaustive) list of cases that should be included in the reported data:</p> <ul style="list-style-type: none"> • Customers onboarded during the reference year with whom the reporting obliged entity also terminated its business relationship during the reference year. • Customers onboarded via agents or distributors • Customers onboarded via third parties. • Customers who had terminated their business relationship before or during the reference year and are re-onboarded as a customer during the reference year. • Customers transferred from other entities in the same group. • Customers acquired via portfolio transfers or mergers onboarded during the reference year. <p>Indicative (non-exhaustive) list of cases that should typically not be included in the reported data:</p> <ul style="list-style-type: none"> • Subscription of new products during the reference year by customers already onboarded before the start of the reference year. • Dormant accounts reactivated during the reference year. • Change in legal form of an existing legal person customer (continuing business relationship). <p>‘Walk-in customers’ should be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>
<p>C0080</p>	<p><u>New Customers - Remote Onboarding</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as a BC and/or IF and/or AMC.</p> <p>The customer enters into a business relationship with the firm in a non-face-to-face manner. Third party onboarding counts as ‘remote onboarding’ where the customer enters into a relationship in a non-face-to-face manner.</p> <p>In case of multiple legal representatives using mixed methods, if the business relationship is not fully entered in a face-to-face manner, it counts as remote.</p> <p>Indicate the number of new customers onboarded remotely during the reference year.</p> <p>This datapoint is a subset of datapoint C0070 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>
<p>C0090</p>	<p><u>New Customers - Third Party Onboarding</u></p>

	<p>This datapoint is not applicable for reporting obliged entities only acting as a BC and/or IF and/or AMC.</p> <p>The customer is introduced by a third party (both subject and not subject to AML/CFT supervision) where the third party conducts in full or in parts the CDD arrangements.</p> <p>Customers introduced by entities within the same group (i.e., customers for whom the obliged entity has outsourced the CDD task to an entity within the same group) must be considered as customers introduced by third parties (both subject and not subject to AML/CFT supervision).</p> <p>Consistently with Article 13 of Regulation (EU) 2024/1624 (AMLR), agents and distributors are in a position comparable to that of the employees of the obliged entity. Therefore, agents and distributors shall not be considered third parties. Indicate the number of new customers onboarded during the reference year by third parties (both subject and not subject to AML/CFT supervision).</p> <p>This datapoint is a subset of datapoint C0070 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>
<p>C0100</p>	<p><u>New Customers - Third Party Onboarding (Non-supervised)</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as a BC and/or IF and/or AMC.</p> <p>This datapoint is a subset of datapoint C0090 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>Indicate the number of customers onboarded during the reference year by third parties not directly subject to AML/CFT supervision.</p>
<p>C0110</p>	<p><u>Legal Entities - Complex Structure</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as a BC.</p> <p>Total of Legal Entity customers that are classified as having or forming part of a complex structure, as of end of the reference year.</p> <p>See the definition of ‘complex structure’ in Annex 2.</p> <p>For CASPs’ customers this data point should also capture legal entities where the ownership or control structure over crypto-assets or wallets is exercised through crypto-assets specific arrangements (e.g., the use of wallet intermediaries, private-key or smart-contract-based control mechanisms mandates or comparable arrangements), particularly where these contribute to the complexity or reduced transparency of the structure.</p> <p>This data point is a subset of data point C0030 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>

<p>C0120</p>	<p>Customers with high-risk activities</p> <p>As of end of the reference year.</p> <p>A ‘high-risk activity’ should include, at least, the activities mentioned under Annex III of AMLR :</p> <p>(1) Customer risk factors:</p> <ul style="list-style-type: none"> (a) the business relationship or occasional transaction is conducted in unusual circumstances; (b) customers that are resident in geographical areas of higher risk as set out in point (3); (c) legal persons or legal arrangements that are personal asset-holding vehicles; (d) corporate entities that have nominee shareholders or shares in bearer form; (e) businesses that are cash-intensive; (f) the ownership structure of the company appears unusual or excessively complex given the nature of the company’s business; (g) customer is a third-country national who applies for residence rights in a Member State in exchange of any kind of investment, including capital transfers, purchase or renting of property, investment in government bonds, (h) investment in corporate entities, donation or endowment of an activity contributing to the public good and contributions to the state budget; (i) customer is a legal entity or arrangement created or set up in a jurisdiction in which it has no real economic activity; (j) substantial economic presence or apparent economic rationale; (k) customer is directly or indirectly owned by one or several entities or arrangements under point (h); <p>(2) Product, service, transaction or delivery channel risk factors:</p> <ul style="list-style-type: none"> (a) private banking; (b) products or transactions that might favour anonymity; (c) payment received from unknown or unassociated third parties; (d) new products and new business practices, including new delivery mechanism, and the use of new or developing technologies for both new and pre-existing products; (e) transactions related to oil, arms, precious metals or stones, tobacco products, cultural artefacts and other items of archaeological, historical, cultural and religious importance, or of rare scientific value, as well as ivory and protected species; <p>(3) Geographical risk factors:</p> <ul style="list-style-type: none"> (a) third countries subject to increased monitoring or otherwise identified by the FATF due to the compliance weaknesses in their AML/CFT systems; (b) third countries identified by credible sources/acknowledged processes, such as mutual evaluations, detailed assessment reports or published follow-up reports, as not having effective AML/CFT systems; (c) third countries identified by credible sources/acknowledged processes as having significant levels of corruption or other criminal activity. <p>Indicate number of customers with at least one high-risk activity during the reference year.</p>
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	<p>Some of the above risk-factors are not found in Annex III of the currently applicable AML Directive (Directive (EU) 2015/849 as subsequently amended) and may therefore be new to obliged entities. Where this is the case, obliged entities are nevertheless invited to provide information on this datapoint on a best effort basis.</p>
C0130	<p><u>Legal entities with at least 1 Beneficial Owner resident in non-EEA countries</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as a BC.</p> <p>Legal person customers with at least one beneficial owner resident in a non-EEA country, as of end of the reference year.</p> <p>In known cases of dual residency (EEA and non-EEA), report the residence of the non-EEA country. In known cases where a BO holds residences in several non-EEA countries, report the usual place of residence as per CDD records or (if registered) the residence in the country with the highest AML/CFT risk (according to the EU list of high-risk third countries and the FATF lists). These instructions apply irrespective of any distinction between temporary or permanent residences.</p> <p>As per Article 2(1)(28) AMLR, ‘beneficial owner’ means “any natural person who ultimately owns or controls a legal entity or an express trust or similar legal arrangement”.</p> <p>As per recital 125 AMLR, senior managing officials (SMOs) reported instead of the beneficial owners where no natural person is identifiable who ultimately owns or exerts control over an entity (as per Article 22(2) AMLR) are <u>not</u> beneficial owners, and shall not be counted for the purpose of reporting this datapoint.</p> <p>This data point is a subset of data point C0030 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>
C0140	<p><u>Customers with cross border Transactions - Non-EEA</u></p> <p>Customers with at least one (individual) transaction over EUR 250 from/to a non-EEA country during the reference year (initiation by either the customer or the counterparty).</p> <p>In the context of this data collection Non-EEA countries refer to the counterparty’s account location (country). For clarity, this includes also non-EEA countries in the SEPA zone.</p> <p>For LI: Gross premiums written/claims received/paid from/to non-EEA countries, if different from the country of residence of the policyholder.</p> <p>For CASPs: Customers with cross-border activity involving non-EEA countries should be identified based on customer-initiated transactions or instructions that, within the scope of the services provided, involve counterparties, wallets, service providers or fiat on- or off-ramps associated with non-EEA jurisdictions, as identified through customer due diligence, onboarding or any other information obtained in the ordinary course of business.</p>

	<p>For the purposes of this data point, such exposure may exist irrespective of whether a fiat transfer occurs and without requiring the conversion of crypto-asset movements into a EUR equivalent. Where fiat transfers are involved, the EUR 250 threshold applies. Where no fiat leg exists, the presence of non-EEA countries directional exposure should be reported irrespective of value. Each customer should be counted once if at least one such transaction or instruction occurred during the reference year.</p> <p>'Walk-in customers' should be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>
C0150	<p><u>'Walk-in customers' with occasional transactions</u></p> <p>This data point is not applicable for reporting obliged entities only acting as a CP and/or LI and/or IF and/or AMC and/or O.</p> <p>Natural or legal person who conducted at least one occasional transaction during the reference year and have not entered into a business relationship with the obliged entity during the reference year.</p> <p>For the purpose of this data collection exercise an occasional transaction means a transaction or a provision of services connected to a transaction that is not carried out as part of a business relationship as defined in Article 2(1)(19) AMLR. For the purpose of this data collection exercise, the applicable thresholds defined in Article 19 AMLR are to be referred to for identifying 'walk-in customers' who conducted at least one occasional transactions.</p>
C0160	<p><u>Occasional Transactions carried out by 'Walk-in customers'</u></p> <p>This data point is not applicable for reporting obliged entities only acting as a CP and/or LI and/or IF and/or AMC and/or O.</p> <p>This information should refer to the number of occasional transactions carried out by walk-in customers during the reference year.</p> <p>For the purpose of this data collection exercise an occasional transaction means a transaction or a provision of services connected to a transaction that is not carried out as part of a business relationship as defined in Article 2(1)(19) AMLR. For the purpose of this data collection exercise, the applicable thresholds defined in Article 19 AMLR are to be referred to for counting occasional transactions.</p>
C0170	<p><u>Customers with requests from FIU</u></p> <p>The FIU is the Finance Intelligence Unit of the respective country where the Obligated Entity operates or, when the Obligated Entity operates through the freedom to provide services, where its registered office is located or, if the obliged entity has no registered office, the Member State in which its head office is located. Reference to these requests can be found in article 69(1)(b) AMLR.</p> <p>This information should refer to the total number of customers with a least one formal or informal self-standing (i.e. not related to an incomplete STR) request from FIUs during the reference year, even if the customer is not a customer/active anymore at the end of the reference year.</p>

	In case its implementation is complex, you can consider 'number of customers subject to requests for information from FIU'.
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1.3 Products and Services template instructions

1.3.1 AML.03.01 PAYMENT ACCOUNTS

Template Remarks

Fill out this template if you offer some of these services and/or products. Normally these products and services are associated with CI, CP, EMI, PI and O.

'Payment account' means an account held in the name of one or more payment service users which is used for the execution of payment transactions, pursuant to Article 4(12) of Directive 2015/2366, and, where relevant for accounts held by consumers, Article 2(3) of Directive 2014/92/EU.

For the purposes of this data collection exercise:

- The qualification of an account as a payment account shall not depend on its commercial designation (e.g. 'savings account' or similar), but on the account's substantive features and permitted functionalities under the applicable national implementing framework. For instance, where an account enables the execution of payment transactions to/from third parties, it should be treated as a payment account. By contrast, where an account's functionality is limited to the accumulation or internal management of liquidity and does not enable the execution of payment transactions to/from third parties, it should not be treated as a payment account.
- All unique payment accounts must be included (multiple accounts per individual, company or group of companies must be included, including virtual IBANs).
- Regarding crypto, where a crypto-asset service offered by a CASP involves payment services, and the execution of those services is carried out by the payment service providers servicing the relevant payment accounts, such payments should be considered within the scope of the data points below.
- An 'incoming transaction' refers to a payment transaction resulting in funds being credited to the customer's payment account held with the obliged entity. In other words, the transaction is incoming from the customers' perspective and increases the balance of their accounts. Equivalently, an 'outgoing transaction' refers to a payment transaction initiated by the customer and debited from the customer's

payment account held with the obliged entity. In other words, the transaction is outgoing from the customers' perspective and reduces the balance of their accounts.

Column code	Legal references and instructions
C0010	<p><u>Payment Accounts</u></p> <p>Total number of payment accounts at the end of the reference year.</p>
C0020	<p><u>Incoming Transactions - Value</u></p> <p>The total value of all incoming payment transactions in the reference year, as defined by Article 4(5) of Directive 2015/2366/EU (PSD2), in funds, credited to payment accounts, as defined by Article 4(12) PSD2, held by customers with the obliged entity.</p> <p>The following shall be excluded:</p> <ul style="list-style-type: none"> - Internal transfers – The crediting of funds to a payment account from another payment account held by the same payment service user within the same obliged entity. <p>For joint payment accounts, ‘same payment service user’ shall be understood as the same set of account holders.</p> <ul style="list-style-type: none"> - Reversals – Transactions that are subsequently reversed, refunded, or otherwise nullified. In the case of partial reversals, only the unreversed net amount is retained. - Intra-group operational transfers – Transactions credited from an account held by an entity that is part of the obliged entity’s consolidation group at global level, as determined in accordance with the applicable accounting framework, provided that the transaction is executed solely for internal operational purposes—such as treasury management, intra-group financing, or internal capital support. This exclusion shall not cover customer-to-customer payments between separate group entities. Furthermore, the exclusion shall not apply to transactions from a group entity where the latter merely intermediates funds originating from a payer outside the group, provided the ultimate payer can be reliably identified from the available payment information. - Incoming e-money payment transactions (to be reported under “E-Money Transactions (Incoming)”) - Incoming payment transactions (Article 4(5) PSD2) where the credited value constitutes electronic money, i.e. electronically (including magnetically) stored monetary value represented by a claim on the issuer, issued on receipt of funds for the purpose of making payment transactions, and accepted by a natural or legal person other than the issuer, within the meaning of Article 2(2) of Directive 2009/110/EC. For clarity, this exclusion applies also in those circumstances where the receiving account/wallet qualifies as a “payment account” under Article 4(12) PSD2.
C0030	<p><u>Incoming Transactions - Number</u></p>

	<p>Number of transactions related to the value mentioned in C0020 above. For the sake of consistency, the exclusions mentioned for data point C0020 should also apply to this data point.</p>
<p>C0040</p>	<p><u>Outgoing Transactions - Value</u></p> <p>The total value of all outgoing payment transactions in the reference year, as defined by Article 4(5) of Directive 2015/2366/EU (PSD2), in funds, debited from payment accounts, as defined by Article 4(12) PSD2, held by customers with the obliged entity. The following shall be excluded from this calculation:</p> <ul style="list-style-type: none"> - Internal transfers – The debiting of funds from a payment account to another payment account held by the same payment service user within the same obliged entity. <p style="padding-left: 40px;">For joint accounts, ‘same payment service user’ shall be understood as the same set of account holders.</p> <ul style="list-style-type: none"> - Reversals – Transactions that are subsequently reversed, refunded, or otherwise nullified. In the case of partial reversals, only the unreversed net amount is retained. - Intra-group operational transfers – Transactions debited from an account held by an entity that is part of the obliged entity’s consolidation group at global level, as determined in accordance with the applicable accounting framework, provided that the transaction is executed solely for internal operational purposes – such as treasury management, intra-group financing, or internal capital support. This exclusion shall not cover customer-to-customer payments between separate group entities. Furthermore, the exclusion shall not apply to transactions from a group entity where the latter merely intermediates funds transferred to a payee outside the group, provided the ultimate payee can be reliably identified from the available payment information. - Outgoing e-money payment transactions (to be reported under “E-Money Transactions (Outgoing)”) - Outgoing payment transactions (Article 4(5) PSD2) where the debited value constitutes electronic money, i.e. electronically (including magnetically) stored monetary value represented by a claim on the issuer, issued on receipt of funds for the purpose of making payment transactions, and accepted by a natural or legal person other than the issuer, within the meaning of Article 2(2) of Directive 2009/110/EC. For clarity, this exclusion applies also in those circumstances where the account/wallet from which the funds are debited qualifies as a “payment account” under Article 4(12) PSD2.
<p>C0050</p>	<p><u>Outgoing Transactions - Number</u></p> <p>Number of transactions related to the value mentioned in C0040 above. For the sake of consistency, the exclusion mentioned for data point C0040 should also apply to this data point.</p>

1.3.2 AML.03.02 VIRTUAL IBANS

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, EMI and PI.

The definition of vIBAN is based on the definition used in Article 2(26) AMLR: identifier causing payments to be redirected to a payment account identified by an IBAN different from that identifier. This should include both individual and pooled vIBAN accounts.

Column code	Legal references and instructions
C0010	<p><u>Master Accounts with Linked Virtual IBANs</u></p> <p>Indicate the total number of master accounts with linked virtual IBANs (vIBANs) as of as of end of the reference year. This includes both individual and pooled vIBAN accounts.</p>
C0020	<p><u>Transactions on vIBANs (Incoming) - Number</u></p> <p>Indicate Transactions on vIBANs (Incoming) - Number during the reference year.</p>
C0030	<p><u>Transactions on vIBANs (Incoming) - Value</u></p> <p>Indicate Transactions on vIBANs (Incoming) - Value during the reference year.</p>
C0040	<p><u>Transactions on vIBANs (Outgoing) - Number</u></p> <p>Indicate Transactions on vIBANs (Outgoing) - Number during the reference year.</p>
C0050	<p><u>Transactions on vIBANs (Outgoing) - Value</u></p> <p>Indicate Transactions on vIBANs (Outgoing) - Value during the reference year.</p>
C0060	<p><u>Re-issued Virtual IBANs</u></p> <p>Indicate the total number of re-issued Virtual IBANs during the reference year.</p> <p>Re-issued IBANs can be regarded as virtual IBANs for which the end user is not a customer of the obliged entity during the reference year.</p>

1.3.3 AML.03.03 PREPAID CARDS

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, EMI, PI and CASP.

‘Prepaid card’ means a non-nominal card that stores or provides access to monetary value or funds which can be used for payment transactions, for acquiring goods or services or for the redemption of currency where such card is not linked to a bank account, in accordance with Article 2(1)(f) of Regulation (EU) 2018/1672.

Column code	Legal references and instructions
C0010	<p><u>Prepaid Cards Issued - Number</u></p> <p>Indicate the total number of Prepaid Cards Issued – Total number during the reference year.</p>
C0020	<p><u>Prepaid Cards Issued - Value</u></p> <p>Indicate the total value of the Prepaid Cards Issued - Value during the reference year.</p>
C0030	<p><u>Prepaid Cards - Outstanding Value</u></p> <p>Balance remaining as of end of the reference year on pre-paid cards issued during the reference year.</p>
C0040	<p><u>Customers Using Prepaid Cards</u></p> <p>Indicate the total number of customers using pre-paid cards during the reference year. Using customers also include customers that bought or were issued a prepaid card during the reference year, but didn’t use it during the reference year.</p>
C0050	<p><u>Customers with Multiple Prepaid Cards (>3)</u></p> <p>Indicate the total number of customers using (more than 3) pre-paid cards during the reference year. Using customers also include customers that bought or were issued a prepaid card during the reference year, but didn’t use it during the reference year.</p>

1.3.4 AML.03.04 LENDING AND FACTORING

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI and CP.

An outstanding loan refers to the portion of a loan that remains unpaid by the borrower at a given point in time. For revolving credit facilities or lines of credit, the outstanding principal

should only refer to the drawn amount. Overdrafts, guarantees and undrawn committed lines are thus not included.

Factoring, Leasing, written off loans (with repayment activity), non performing loans should be included.

Credit agreements which are secured either by a mortgage or by another comparable security commonly used in a Member State on immovable property or secured by a right related to immovable property are excluded (except for datapoints C0030 and C0040 in this template).

Credit cards with a credit facility and similar products (e.g. credit invoice facilities) are excluded from this template.

Intra group loans should be excluded.

Reporting must align with the entity that legally books the loan (regardless of customer relationship management).

Column code	Legal references and instructions
C0010	<p><u>Outstanding Loans - Number</u></p> <p>Indicate the status of the total number of outstanding loans as of end of the reference year.</p> <p>Only count every loan once (even if there are more clients to one loan)</p>
C0020	<p><u>Outstanding Loans - Value</u></p> <p>Indicate the status of the total value of outstanding loans as of end of the reference year.</p>
C0030	<p><u>Outstanding Real Estate Loans - Number</u></p> <p>Total number of outstanding loans/Credit agreements (partly or fully) secured either by a mortgage or by another comparable security commonly used in a Member State on residential real estate collateral or secured by a right related to that immovable property, as of end of the reference year.</p> <p>In accordance with the meaning of residential real estate set out in the CRR, 'residential property' means a residence which is occupied or intended to be occupied by the owner of the residence, including the right to inhabit an apartment in housing cooperatives (Article 4(1)(75) of Regulation (EU) 575/2013 (CRR)</p> <p>Exclude operating leases and pure leasing agreements not classified as loans, and Commercial real estate loans.</p>
C0040	<p><u>Real Estate Loans with Third-party Payments - Number</u></p>

	<p>This information should refer to the total number of outstanding real estate loans with third party payments as of the end of the reference year with third party payments at any point during the year.</p> <p>Payments and/or interest payments on mortgage loans to be made by third parties/persons not mentioned in the mortgage deed, other than a notary, from a joint account with only one borrower, the national mortgage guarantee (NHG), municipalities or an insurance company as of end of the reference year.</p> <p>This includes on-off payments by third parties and/or payments by close family members (if not legally part of the loan agreement).</p>
C0050	<p><u>Loans Granted - Value</u></p> <p>Indicate Loans Granted (New disbursements) - Value of the nominal principal disbursed during the reference year.</p> <ul style="list-style-type: none"> ○ Only drawn amounts (outstanding balances) should be reported for credit lines/revolving facilities. ○ Undrawn limits (e.g., approved but unused overdrafts) must be excluded.
C0060	<p><u>Asset-backed Loans with Cash Collateral</u></p> <p>Collateral which at least partially consists of cash or an account on which cash is deposited as per the definition of cash under Article 2(1)(a) of Regulation (EU) 2018/1672: ‘Cash’ means: (i) currency; (ii) bearer-negotiable instruments; (iii) commodities used as highly liquid stores of value; (iv) prepaid cards.</p> <p>Indicate the total number of outstanding asset-backed loans with cash collateral as of the end of the reference year.</p>
C0070	<p><u>Loan Repayments - Number</u></p> <p>The total number of loans that were fully repaid and closed within the reference year, regardless of their original disbursement date during the reference year.</p>
C0080	<p><u>Premature Loan Repayments - Number</u></p> <p>The total number of loans that were fully repaid and closed during the reference year, prematurely compared to their originally planned redemption date.</p> <p>This datapoint is a subset of datapoint C0070 above.</p>
C0090	<p><u>Loan Repayments from Non-EEA Countries</u></p> <p>Indicate the total number of loans that meet both of the following conditions:</p> <p style="padding-left: 40px;">(a) the loan was fully repaid during the reference year and</p>

	<p>(b) for the purpose of the reimbursement have benefitted – also partially – of transactions (e.g., instalments or lump-sum payment) originating from non-EEA countries.</p> <p>For determining the origin of the payment (EEA vs non-EEA), use the country of the payment account.</p> <p>This datapoint is a subset of datapoint C0070 above.</p>
C0100	<p><u>Unspecified Consumer Loans - Number</u></p> <p>Total number of consumer credits and similar credit lines that are granted to customers during the reference year without specifying a purpose for the credit (without a defined purpose at origination). The customers are free to decide how (and when) they want to use the funds borrowed from the lender.</p> <p>Loans initially linked to a purpose but later used flexibly and loans related to mortgages, auto loans, point-of-sale financing, corporate loans, acquired loan portfolios etc. should be excluded.</p>
C0110	<p><u>Factoring Contracts Granted - Number</u></p> <p>For the purpose of this data collection, factoring should be understood as a credit activity consisting of the financing of commercial transactions through the purchase of trade receivables, with or without recourse during the reference year. This includes payables finance and invoice discounting.</p> <p>Securitisation, leasing, forfaiting, stock financing (unless explicitly part of factoring operations) and intermediated/brokered factoring are excluded.</p> <p>Indicate the total number of factoring contracts granted during the reference year (e.g., count each legally distinct contract, regardless of client). Master agreements with multiple assignments should be counted once. Count only the contracts, even if one contract covers multiple legal entities.</p>
C0120	<p><u>Factoring Contracts Granted - Value</u></p> <p>Indicate Factoring Contracts Granted - Value during the reference year.</p> <p>The value includes the nominal receivables (or payables in case of reverse factoring).</p>
C0130	<p><u>Factoring Contracts to Non-EEA Obligators - Value</u></p> <p>Indicate Factoring Contracts to Non-EEA Obligators - Value during the reference year.</p>

1.3.5 AML.03.05 LIFE INSURANCE CONTRACTS

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with LI.

Life insurance activities and operations are defined by Article 2(3) of Directive 2009/138/EC.

Column code	Legal references and instructions
C0010	<p><u>Gross Written Premiums - Value</u></p> <p>In accordance with Article 35 of Directive 91/674/EEC, gross premiums written shall comprise all amounts due during the reference year in respect of insurance contracts regardless of the fact that such amounts may relate in whole or in part to a later financial year.</p> <p>It includes both direct and reinsurance business of obliged entities.</p> <p>Credit institutions and other distributors acting solely as sellers of life insurance products are not required to report this datapoint, unless expressly provided otherwise in the reporting instructions. This approach is also applicable to tied insurance intermediaries which: (i) collect premiums on behalf of the undertaking and transfer them to the insurance undertaking without delay and (ii) operate within the undertaking's AML/CFT framework (e.g., by implementing the undertaking's AML/CFT policies, procedures and controls).</p> <p>Non-tied intermediaries and tied insurance intermediaries with their own AML/CFT policies and procedures should report the portion of gross premiums written by the life insurance undertaking in the reporting year that the relevant life insurance intermediary has distributed.</p> <p>Indicate the total amount of incoming gross written premiums during the reference year.</p>
C0020	<p><u>Surrender Value of Insurance Contracts</u></p> <p>The total amount of surrender value as mentioned in Article 185 (3)(f) of Directive 2009/138/EC, paid. The surrender value should reflect the amount, defined contractually, paid to the policyholder during the reference year in case of early termination of the contract (i.e. before it becomes payable by maturity or occurrence of the insured event, such as death), net of charges and policy loans. It includes surrender values guaranteed and not guaranteed.</p> <p>Indicate the total of amount of surrender value of the insurance contracts paid during the reference year.</p>
C0030	<p><u>Premiums Paid to Broker (%)</u></p>

	Indicate the percentage of all gross written premium collected (on behalf of insurer) directly by brokers from policy holders during the reference year, as a share of total Gross Written Premiums. Exclude commissions/fees paid by the insurer to brokers.
C0040	<p><u>Non-low Risk Insurance Contracts - Number</u></p> <p>Indicate the total number of life insurance contracts or products outstanding as of end of the reference year that do not meet any of the following conditions (these are not cumulative): (i) they cannot be redeemed, (ii) contracts merely covering death or certain disabilities or attacks on the physical integrity of the person (which often require medical evidence), which do not include an element of savings or investment, (iii) the annual premium is not above EUR 1 000 or the unique premium is not above EUR 2 500, (iv) contracts whose premiums remain below or equal to applicable tax-deductible ceiling.</p> <p>In case of bundled products: when several elements of the bundle do not meet the above criteria, they shall be reported separately.</p>

1.3.6 AML.03.06 CURRENCY EXCHANGE (INVOLVING CASH)

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, EMI, PI and BC.

Currency exchange transactions are transactions where funds are converted from one currency into another and at least one side of the transaction is in physical cash (cash-to-cash, cash-to-account or account-to-cash). Both standalone cash currency exchanges (e.g. walk-in business) and transactions where a cash currency-exchange component is embedded in a broader operation (e.g. money remittance), provided that this component is explicitly recorded as a currency exchange transaction, should be considered.

For the purpose of this data collection, with regard to currency exchange transactions, obliged entities should consider the domestic currency as the base currency and the foreign currency as the quoted currency. The domestic currency is the legal tender in the jurisdiction where the transaction occurs.

Consistently with the approach above:

- “buy” should refer to transactions in which the base currency is received, and the quoted currency is used (sold) to pay for the exchange;
- “sell” should refer to transactions in which the base currency is sold, and the quoted currency is received.

For foreign exchange transactions not involving the single reporting currency (in any part of the transaction), the transaction amounts still need to be converted in the single reporting currency for the purpose of the volume-based data points in this section. The conversion into

the single reporting currency should follow the general approach applied across this data collection, i.e., by using the year-end exchange rate. In case this approach results as being overly burdensome for obliged entities - because they immediately convert these transactions into the single reporting currency, for example for internal reporting purposes or foreign exchange transactions involving currencies other than the single reporting currency by using the spot conversion factor applicable on the date of the transaction - these obliged entities may use that same spot conversion rate also for the purpose of this data collection.

Column code	Legal references and instructions
C0010	<u>Currency Exchange - Sell (Number)</u> Indicate the number of Currency Exchange transactions carried out - Sell - during the reference year.
C0020	<u>Currency Exchange - Buy (Number)</u> Indicate the number of Currency Exchange transactions carried out - Buy - during the reference year.
C0030	<u>Currency Exchange - Sell > EUR 1 000 (Number)</u> Indicate the number of currency exchange transactions carried out - sell - where the transaction is above EUR 1 000 during the reference year.
C0040	<u>Currency Exchange - Buy > EUR 1000 (Number)</u> Indicate the number of currency exchange transactions carried out - Buy - during the reference year, where the transaction is above EUR 1 000.
C0050	<u>Currency Exchange - Sell (Value)</u> Indicate the value of currency exchange transactions carried out - Sell - during the reference year.
C0060	<u>Currency Exchange - Buy (Value)</u> Indicate the value of currency exchange transactions carried out - Buy - during the reference year.
C0070	<u>Currency Exchange - Cash-to-Cash (Value)</u> Indicate the value of cash-to-cash currency exchange transactions carried out during the reference year.

1.3.7 AML.04.01 INVESTMENT SERVICES AND ACTIVITIES

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, IF and AMC.

For the purpose of this section on Investment Services and Activities, consistently with Recital 103 of Directive 2014/65/EU (MiFID), eligible counterparties - as referred to in Article 30 of MiFID - should be considered to be acting as clients.

For clarity, Obligated Entities (in particular Asset Management Companies) should not include the management of UCITS and/or AIFs in any of the datapoints of this section (namely AML.04.01) on Investment Services and Activities, as a dedicated sheet (namely AML04.11) exists for reporting information regarding the management of UCITS and/or AIFs. This guidance should apply in particular to datapoints from C0080 to C0110 of this sheet (i.e., AML04.01) which specifically refer to portfolio management.

INVESTMENT SERVICES AND ACTIVITIES – TRANSMISSION OF ORDERS

For reporting purposes:

As per Annex I, Section A on investment services and activities, point (1) of Directive 2014/65/EU (MiFID), reception and transmission of orders (RTO) means the “reception and transmission of orders in relation to one or more financial instruments”. This should be interpreted as covering any activity where a firm receives a client instruction to transact in a financial instrument and forwards that instruction to a third party for execution.

This covers all financial instruments (e.g. funds, securities), whether held in direct custody or by a third party custodian.

This excludes: discretionary portfolio management trades, investment advice without order transmission, pure client introductions, technical order routing without client relationship, and activities where the firm neither receives nor transmits client transaction instructions.

Column code	Legal references and instructions
C0010	<p>Retail Clients (MiFID)</p> <p>Indicate the total number of retail clients as of the end of the reference year.</p> <p>As per Article 4(1)(11) of Directive 2014/65/EU (MiFID), ‘retail client’ means a client who is not a professional client.</p> <p>In the case of joint accounts, each account holder shall be reported as a separate client.</p>
C0020	<p>Professional Clients (MiFID)</p>

	Indicate the total number of professional clients as defined in Article 4(1)(10) of Directive 2014/65/EU (MIFID), and further specified in Annex II of the same Directive, as of the end of the reference year.
C0030	<p>Non-EEA AML/CFT Regulated Customers</p> <p>Amongst the total number of customers (retail and professional clients) receiving the service of transmission of order, indicate the total number of AML/CFT regulated customers (retail and professional clients) outside the EEA.</p> <p>For the purpose of identifying AML/CFT regulated customers outside the EEA, reporting entities can use as a guidance the description of obliged entities as contained in Article 3 AMLR.</p>

INVESTMENT SERVICES AND ACTIVITIES - CUSTODY ACCOUNT KEEPING

Assets under custody refers to the assets for which the investment firm provides safekeeping and administration services (cf. Directive 2014/65/EU – Annex I, Section B on ancillary services, point (1)).

Column code	Legal references and instructions
C0040	<p>Retail Clients (MiFID)</p> <p>This datapoint is not applicable for reporting obliged entities only acting as a AMC.</p> <p>Indicate the total number of retail clients as defined in Article 4(1)(11) of Directive 2014/65/EU (MiFID), as of the end of the reference year.</p>
C0050	<p>Professional Clients (MiFID)</p> <p>This datapoint is not applicable for reporting obliged entities only acting as a AMC.</p> <p>Indicate the number of professional clients as defined in Article 4(1)(10) of Directive 2014/65/EU (MiFID), and further specified in Annex II of the same Directive, as of the end of the reference year.</p>
C0060	<p>Indirect Custody Assets (%)</p> <p>This datapoint is not applicable for reporting obliged entities only acting as a AMC.</p> <p>Indicate the percentage of assets under custody for which the obliged entity does not have a direct business relationship with the final investor, as of the end of the reference year.</p> <p>Final Investor: Refers to the end client or individual who ultimately owns and benefits from the investments, as opposed to intermediaries or entities managing or holding the assets on behalf of others.</p>
C0070	Non-EEA AML/CFT Regulated Customers

	<p>This datapoint is not applicable for reporting obliged entities only acting as a AMC.</p> <p>Amongst the total number of customers (retail and professional clients) receiving the service of custody account keeping, indicate the number of AML/CFT regulated customers outside the EEA, as of the end of the reference year.</p> <p>For the purpose of identifying AML/CFT regulated customers outside the EEA, reporting entities can use as a guidance the description of obliged entities as contained in Article 3 AMLR.</p>
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INVESTMENT SERVICES AND ACTIVITIES - PORTFOLIO MANAGEMENT

Portfolio management is the activity referred to in Annex I, Section A on investment services and activities, point (4) of Directive 2014/65/EU (MiFID). Based on Article 4(1)(8) of Directive 2014/65/EU (MiFID), ‘portfolio management’ means managing portfolios in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more financial instruments. For the purpose of data points from C0080 to C0110 of this section on portfolio management, Obligated Entities should exclude ‘investment advice’, as defined in Article 4(1)(4) MiFID as “the provision of personal recommendations to a client, either upon its request or at the initiative of the investment firm, in respect of one or more transactions relating to financial instruments.

Consistently with the above, when computing the monetary value of Assets Under Management (AUM), Obligated Entities should use the following approach, also with regard to the elements to be included:

- For Investment Firms: the definition of AUM is contained in Article 4(1)(27) of Regulation (EU) 2019/2033 (IFR), which refers to the value of assets that an investment firm manages for its clients under discretionary portfolio management and under non-discretionary arrangements constituting investment advice of an ongoing nature. Importantly, for the purpose of this data point, non-discretionary arrangements constituting investment advice of an ongoing nature are excluded from the definition of AUM.
- For Asset Management Companies, this data point becomes relevant only when they are subject to Regulation (EU) 2019/2033 (IFR) because they perform MiFID II investment services (e.g., discretionary portfolio management for individual clients) under a MiFID authorisation. In relation to the above MiFID II investment services, Asset Management Companies should report AUM based on the guidance provided above for Investment Firms (i.e., following the definition of AUM contained in Article 4(1)(27) IFR, but excluding non-discretionary arrangements constituting investment advice of an ongoing nature).
- For Credit Institutions: the reference should be to the assets managed based on the portfolio management definition set out in Article 4(1)(8) of Directive 2014/65/EU

(MiFID). For consistency with the above treatment of AUM for Investment Firms and Asset Management Companies, the provision of ongoing advice, as set out in Article 4(1)(4) of Directive 2014/65/EU (MiFID), should be excluded for the purpose of this data point.

Column code	Legal references and instructions
C0080	<p>Retail Clients (MiFID)</p> <p>Indicate the number of retail clients, as defined in Article 4(1)(11) of Directive 2014/65/EU (MiFID), as of the end of the reference year.</p>
C0090	<p>Professional Clients (MiFID)</p> <p>Indicate the number of professional clients as defined in Article 4(1)(10) of Directive 2014/65/EU (MiFID), and further specified in Annex II of the same Directive, as of the end of the reference year.</p>
C0100	<p>Total assets under management</p> <p>Indicate the total value of AUM (computed consistently with the guidance provided above), as the monetary stock of the end of the reference year.</p>
C0110	<p>Customers with Assets >= EUR 5M</p> <p>For the purpose of this datapoint, Obligated Entities should only consider the assets they manage for each customer under the respective management mandate. In order to ascertain whether the EUR 5 000 000 threshold is exceeded for a given customer, Obligated Entities should compute the customer total assets by following the same approach used for datapoint C0100 above.</p> <p>In the case of joint accounts/joint management mandates (i.e., those involving more than one customer) the EUR 5 000 000 threshold should apply to the total account value and should not be split between the account holders or the parties to the joint management mandate. In case the EUR 5 000 000 threshold is exceeded by a joint account/joint management mandate, for the purpose of this datapoint Obligated Entities should report each account holder as separately exceeding the threshold.</p> <p>Indicate the number of customers holding total assets with a value of at least EUR 5 000 000, as of the end of the reference year.</p>

1.3.8 AML.04.02 MONEY REMITTANCE

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, EMI and PI.

Money Remittance as referred to in Article 4(22) of EU Directive (PSD) 2015/2366. All services provided by the reporting obliged entity that fall under that definition (e.g., bill payments) should be reported as money remittance.

Column code	Legal references and instructions
C0010	<p><u>Money Remittance (Incoming) – Number</u></p> <p>Indicate the total number of Money Remittance payments (Incoming) processed and executed during the reference year.</p>
C0020	<p><u>Money Remittance (Outgoing) – Number</u></p> <p>Indicate the total number of Money Remittance payments (Outgoing) processed and executed during the reference year.</p>
C0030	<p><u>Money Remittance (Incoming) - Value</u></p> <p>Transaction value should be intended as prior to the application of fees.</p> <p>Indicate the total value of Money Remittance payments (Incoming) processed and executed during the reference year.</p>
C0040	<p><u>Money Remittance (Outgoing) - Value</u></p> <p>Transaction value should be intended as prior to the application of fees.</p> <p>Indicate the total value of Money Remittance payments (Outgoing) processed and executed during the reference year.</p>
C0050	<p><u>Money Remittance (Incoming) > EUR 1 000 - Number</u></p> <p>Indicate the total number of money remittance transactions (Incoming) above EUR 1 000 processed and executed during the reference year.</p> <p>Transaction value should be intended as prior to the application of fees.</p> <p>Only individual incoming money remittance transactions with a transaction amount over EUR 1 000 should be counted. Aggregated or cumulative totals are not included.</p>
C0060	<p><u>Money Remittance (Outgoing) > EUR 1 000 - Number</u></p> <p>Indicate the total number of money remittance transactions (Outgoing) above EUR 1 000 processed and executed during the reference year.</p> <p>Transaction value should be intended prior to the application of fees.</p> <p>Only individual outgoing money remittance transactions with a transaction amount over EUR 1 000 should be counted. Aggregated or cumulative totals are not included.</p>

1.3.9 AML.04.03 WEALTH MANAGEMENT

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, LI, IF and CASP.

Wealth management encompasses all ‘banking and other financial services to high-net worth individuals and their families or businesses’, according to the ML/TF Risk Factor Guidelines (RFLGs), Guideline 12, EBA/GL/2021/02.

The value of the total assets shall comprise all financial, investable or real estate assets, or a combination thereof, excluding that customer’s private residence, in accordance with Article 34(5) AMLR.

Discretionary management services should be accounted for.

For LI: This data point is requested for life insurance services provided to high-net-worth customers (NP).

- In cases where the policyholder is a legal entity and the insured person is a natural person (for instance, in the case of group contracts), insured persons are to be considered customers even if they are not the policyholder.
- For contracts which have two policyholders, both should be considered. The amount should not be divided.
- AUM For LI: Surrender value for life insurance undertakings. The surrender value should reflect the amount, defined contractually, paid to the policyholder in case of early termination of the contract (i.e., before it becomes payable by maturity or occurrence of the insured event, such as death), net of charges and policy loans. It includes surrender values guaranteed and not guaranteed.

Column code	Legal references and instructions
C0010	<p>Customers with AUM >= EUR 5M and total assets >= EUR 50M</p> <p>Indicate number of unique customers as of end of the reference year.</p> <p>The reference should be to the number of customers (NP) with total assets under management <u>by the reporting obliged entity</u> over a value of at least EUR 5 000 000 AND with total assets estimated or declared by the customer over a value of at least EUR 50 000 000.</p>
C0020	<p>Private Banking Customers (EBA)</p> <p>Indicate the total number of customers (NP) that fall under the definition of private banking (EBA Risk Factor Guidelines), as of end of the reference year.</p>

	For the purpose of this exercise, the threshold of total assets under management (by the obliged entity) with a value of at least EUR 500 000 is used.
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1.3.10 AML.04.04 CORRESPONDENT SERVICES

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, PI and CASP.

Reporting obliged entities should refer to correspondent relationship definition provided for in Article 2(1)(22) AMLR, which entails the provision of banking services by one credit institution as the correspondent to another credit institution as the respondent, including providing a current or other liability account and related services, such as cash management, international transfers of funds as defined in Article 4, point (25), of Directive (EU) 2015/2366, cheque clearing, payable-through accounts and foreign exchange services.

This refers also to the relationships between and among credit institutions and financial institutions including where similar services are provided by a correspondent institution to a respondent institution, and relationships established for securities transactions or transfers of funds as defined in Article 4, point (25), of Directive (EU) 2015/2366, transactions in crypto-assets or transfers of crypto-assets;

These services include those processed through correspondent relationships within the group.

Payable through accounts are correspondent accounts established by a respondent institution with a correspondent institution that are used directly by third parties to transact business on their own behalf.

Nested account are accounts where a financial institution (the nested financial institution) gains indirect access to conduct transactions and obtain access to other financial services by transacting through another financial institution's (the respondent institution) correspondent account.

Column code	Legal references and instructions
C0010	<p><u>Respondent Client Transactions (Incoming) - Value</u></p> <p>Indicate the total value of transactions executed on behalf of the respondent client (Incoming) during the reference year.</p>
C0020	<p><u>Respondent Client Transactions (Outgoing) - Value</u></p> <p>Indicate the total value of transactions executed on behalf of the respondent client (Outgoing) during the reference year.</p>

C0030	<p><u>Payable Through Accounts (Incoming) - Value</u></p> <p>Indicate the total value of transactions gone through payable through accounts (Incoming) during the reference year.</p>
C0040	<p><u>Payable Through Accounts (Outgoing) - Value</u></p> <p>Indicate the total value of transactions gone through payable through accounts (Outgoing) during the reference year.</p>
C0050	<p><u>Nested Accounts (Incoming) - Value</u></p> <p>Indicate the total value of transactions received via nested arrangements. (Incoming).</p> <p>For the purpose of this testing exercise, only the value from nested transactions flowing through a respondent account should be reported.</p>
C0060	<p><u>Nested Accounts (Outgoing) - Value</u></p> <p>Indicate the total value of transactions sent via nested arrangements (Outgoing)</p> <p>For the purpose of this testing exercise, only the value from nested transactions flowing through a respondent account should be reported.</p>

1.3.11 AML.04.05 TRADE FINANCE

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI and CP.

Reporting obliged entities should refer to the definition of trade finance provided for in Article 4(1)(80) of Regulation (UE) No 575/2013 (CRR).

Trade Finance Transaction: A completed trade finance operation that results in an actual transfer of funds.

Incoming trade finance transactions involve the import of goods or services, where the importer pays the exporter for the goods or services received.

Outgoing trade finance transactions, involve the export of goods or services, where the exporter receives payment from the importer.

Column code	Legal references and instructions
C0010	<p><u>Trade Finance Customers</u></p> <p>Indicate the total number of unique trade finance customers as of end of the reference year.</p>

C0020	<u>Trade Finance Transactions (Incoming) - Number</u> Indicate the total number of incoming trade finance transactions during the reference year.
C0030	<u>Trade Finance Transactions (Outgoing) - Number</u> Indicate the total number of outgoing trade finance transactions during the reference year.
C0040	<u>Trade Finance Transactions (Incoming) - Value</u> Indicate Trade Finance Transactions (Incoming) - Value during the reference year.
C0050	<u>Trade Finance Transactions (Outgoing) - Value</u> Indicate Trade Finance Transactions (Outgoing) - Value during the reference year.

1.3.12 AML.04.06 E-MONEY

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI and EMI.

For the purpose of this data collection, E-Money (Electronic money) should be understood as electronically, including magnetically, stored monetary value as represented by a claim on the issuer which is issued on receipt of funds for the purpose of making payment transactions as defined in Article 4(5) of Directive (EU) 2015/2366, and which is accepted by a natural or legal person other than the electronic money issuer (Article 2(3) of Directive 2009/110/EC)

Column code	Legal references and instructions
C0010	<u>E-money Transactions (Incoming) - Number</u> Indicate E-money Transactions (Incoming) - Number during the reference year.
C0020	<u>E-money Transactions (Outgoing) - Number</u> Indicate E-money Transactions (Outgoing) - Number during the reference year.
C0030	<u>E-money Transactions (Incoming) - Value</u> Indicate E-money Transactions (Incoming) - Value during the reference year.
C0040	<u>E-money Transactions (Outgoing) - Value</u> Indicate E-money Transactions (Outgoing) - Value during the reference year.

C0050	<p>E-money Transactions (Non-identified Customers) - Value</p> <p>Indicate the value of e-money payment transactions by non-identified customers during the reference year.</p> <p>Reporting obliged entities should refer to the exemption in Article 19(7) of EU 2024/1624 (AMLR), where obliged entities are exempted from applying, in full or in part, the customer due diligence measures referred to in Article 20(1), points (a), (b) and (c), with respect to electronic money on the basis of the proven low risk posed by the nature of the product during the reference year.</p>
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1.3.13 AML.04.07 TCSP SERVICES

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI and IF.

Reporting obliged entities should report the total number of Legal Entity customers in respect of which they act as Trust and company service providers (TCSPs). Providing these services involve a wide range of services and activities, including, among others: acting as a director or secretary of a company or similar position, providing a registered office or business address for a company, acting as trustees of an express trust, etc. All activities must be interpreted in line with Article 2(1)(11) AMLR.

Column code	Legal references and instructions
C0010	<p>TCSP Customers (Legal Entities)</p> <p>This refers to services provided by the obliged entity during the reference year.</p> <p>Indicate the total number of legal entity customers that during the reference year have used TCSP services provided by the obliged entity.</p>

1.3.14 AML.04.08 CRYPTO FIAT CARDS

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, EMI and PI.

According to Article 3(1)(15) of Regulation (EU) 2023/1114: ‘crypto-asset service provider’ means a legal person or other undertaking whose occupation or business is the provision of one or more crypto-asset services to clients on a professional basis, and that is allowed to provide crypto-asset services in accordance with Article 59. This definition is relevant for non-EEA CASP, as long as they actively offer services to EU clients or advertises/solicits in the EU.

Column code	Legal references and instructions
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	Non-EEA Crypto Companies (BIN-sponsored)
C0010	Indicate the number of non-EEA crypto companies for which the obliged entity acts as a BIN-sponsor, as of the end of the reference year. BIN sponsorship is a financial arrangement in which the financial institution (the “sponsor”) lets another business access its payment environment using the sponsor’s Bank Identification Number (BIN).

1.3.15 AML.04.09 PROVIDING CUSTODY AND ADMINISTRATION OF CRYPTO-ASSETS ON BEHALF OF CLIENTS

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, EMI, PI and CASP.

The provision by an obliged entity of services in line with Article 3(1)(16)(a) Regulation (EU) 2023/1114.

Column code	Legal references and instructions
	Customers holding Crypto-assets - Number
C0010	Indicate the total number of customers holding crypto-assets as of end of the reference year.
	Crypto Assets in Custody - Value
C0020	Indicate the total value of crypto-assets held on customers’ custody wallets as of end of the reference year.

1.3.16 AML.04.10 CRYPTO SERVICES

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, EMI, PI, IF and CASP.

EXCHANGE FUNDS FOR CRYPTO-ASSETS

The provision by an obliged entity of services in line with Article 3(1)(16)(c) of Regulation (EU) 2023/1114, insofar as they involve the directional exchange of funds for crypto-assets.

‘Self-hosted address’ should be intended as defined in Article 3(20) of Regulation (EU) 2023/1113.

Column code	Legal references and instructions
C0010	Funds-to-Crypto - Value

	Indicate the exchanges of Funds-to-Crypto – total value of funds exchanged for or used to purchase crypto-assets during the reference year.
C0020	<u>Funds-to-Crypto – Number</u> Indicate the exchanges of Funds-to-Crypto - Number of transactions during the reference year.
C0030	<u>Funds to Crypto - Customers</u> Indicate the exchanges of Funds-to-Crypto - Number of Customers using this service during the reference year.
C0040	<u>Funds-to-Crypto (to Self-hosted) – Number</u> Transactions should be counted where a CASP exchanges funds for crypto-assets, and those crypto-assets are subsequently transferred to a self-hosted wallet, irrespective of whether the transfer takes place immediately or following a holding period on the platform. Indicate the total number of transactions funds-to-crypto to self-hosted address during the reference year.

EXCHANGE CRYPTO-ASSETS FOR FUNDS

The provision by an obliged entity of services in line with Article 3(1)(16)(c) of Regulation (EU) 2023/1114, insofar as they involve the directional exchange of crypto-assets for funds.

‘Self-hosted address’ should be intended as defined in Article 3(20) of Regulation (EU) 2023/1113.

Column code	Legal references and instructions
C0050	<u>Crypto-to-Funds - Value</u> Indicate the exchanges of Crypto-to-Funds – total value of transactions (crypto-asstes exchanged for funds) during the reference year.
C0060	<u>Crypto-to-Funds - Number</u> Indicate the exchanges of Crypto-to-Funds - Number of transactions during the reference year.
C0070	<u>Crypto-to-Funds - Customers</u> Indicate the exchanges of Crypto-to-Funds - Number of Customers using this service during the reference year.
C0080	<u>Crypto-to-Funds (from Self-hosted) - Number</u>

	<p>Transactions should be counted where crypto assets originating from a self-hosted wallet are exchanged for funds by the CASP, regardless of whether the exchange occurs immediately or after a holding period during the reference year.</p> <p>Indicate the total number of transactions crypto-to-funds from self-hosted address during the reference year.</p>
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EXCHANGE OF CRYPTO-ASSETS FOR OTHER CRYPTO-ASSETS

The provision by an obliged entity of services in line with Article 3(1)(16)(d) of Regulation (EU) 2023/1114.

‘Self-hosted address’ should be intended as defined in Article 3(20) of Regulation (EU) 2023/1113.

Column code	Legal references and instructions
C0090	<p><u>Crypto-to-Crypto - Value</u></p> <p>Indicate Crypto-to-Crypto - Value during the reference year.</p>
C0100	<p><u>Crypto-to-Crypto - Customers</u></p> <p>Indicate the exchanges of Crypto-to-Crypto - Number of Customers using this service during the reference year.</p>
C0110	<p><u>Crypto-to-Crypto - Number</u></p> <p>Indicate the exchanges of Crypto-to-Crypto - Number of transactions during the reference year.</p>
C0120	<p><u>Crypto-to-Crypto (to Self-hosted) - Number</u></p> <p>Indicate the exchanges of Crypto-to-Crypto (to Self-hosted) – Number of transactions during the reference year.</p>
C0130	<p><u>Crypto-to-Crypto (from Self-hosted) - Number</u></p> <p>Indicate the exchanges of Crypto-to-Crypto (from Self-hosted) – Number of transactions during the reference year.</p>

TRANSFER SERVICES FOR CRYPTO-ASSETS ON BEHALF OF CLIENTS

The provision by an obliged entity of services in line with Article 3(1)(16)(j) of Regulation (EU) 2023/1114.

‘Self-hosted address’ should be intended as defined in Article 3(20), of Regulation (EU) 2023/1113.

Column code	Legal references and instructions
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C0140	<p><u>Transfers - Value</u></p> <p>Indicate the total value of crypto-asset transfers executed on behalf of customers during the reference year.</p> <p>For the purpose of this datapoint, use the value of the crypto asset on the date of the transfers.</p>
C0150	<p><u>Transfers - Customers</u></p> <p>Indicate Transfers - Customers using these services during the reference year.</p>
C0160	<p><u>Transfers - Number</u></p> <p>Indicate Transfers – Number of transfers during the reference year.</p>
C0170	<p><u>Transfers (to Self-hosted) – Number</u></p> <p>Indicate Transfers (to Self-hosted) – Number of transfers during the reference year.</p>
C0180	<p><u>Transfers (from Self-hosted) - Number</u></p> <p>Indicate Transfers (from Self-hosted) – Number of transfers during the reference year.</p>

1.3.17 AML.04.11 MANAGEMENT OF UCITS AND AIFS

Template Remarks

Fill out this template if you offer the services of management of UCITS and/or AIFs; normally these services are associated with AMC. For clarity, Obligated Entities that only market and or distribute UCITS and/or AIFs are not required to provide the data on this section.

For the purposes of this data collection, self-managed UCITS and internally managed AIFs should be treated in the same manner as UCITS AMCs or AIFMs. This reflects the fact that, in such cases, the regulatory obligations normally applicable to an external assets management company or AIFM, apply directly to the self-managed UCITS or to the internally managed AIF, which therefore performs, in practice, the functions of an AMC/AIFM.

Where a reporting AMC and/or AIFM delegates portfolio management or other management functions to a third party, the delegating AMC and/or AIFM should report in this section the UCITS and/or AIFs that are the subject of the delegation of portfolio management or other management functions.

In parallel, and in order to avoid double counting, where a reporting AMC and/or AIFM is delegated portfolio management or other management functions in relation to certain UCITS and/or AIFs, it should not report in this section the UCITS and/or AIFs that are the subject of such delegation.

MANAGEMENT OF UCITS

An undertaking for collective investment in transferable securities (UCITS) is a collective investment vehicle that raises capital from the public and invests it, with due regard to specific restrictions on investments and diversification requirements. The characteristics of a UCITS have been set down in the UCITS Directive (2009/65/EC).

Column code	Legal references and instructions
C0010	<p>Management of UCITS - Retail Investors</p> <p>The person investing in the UCITS (generally by purchasing the shares issued by such UCITS), where this person is retail client as defined in MiFID.</p> <p>Indicate the number of investors who are retail investors, as of the end of the reference year.</p>
C0020	<p>Management of UCITS - Professional Investors</p> <p>The person investing in the UCIT (generally by purchasing the shares issued by such UCIT), where this person is a professional client as defined in MiFID. Where the obliged entity is an asset management company which does not have access to this information (as is often the case in practice), this field is not mandatory.</p> <p>Indicate the number of investors who are professional investors, as of the end of the reference year.</p>
C0030	<p>Management of UCITS - Total AUM</p> <p>The concept of Total Asset under Management of UCITSs should refer to the sum as of end of the reference year Total Assets of all UCITS funds managed by the Management Company. As a guidance, Obligated Entities should refer to the concept of "Total Assets" as presented in Schedule B of Annex I of the UCITS Directive (2009/65/EC), and precisely under point 1) on "Statement of assets and liabilities:", fourth bullet point.</p> <p>Indicate the total assets under management of UCITS as of end of the reference year.</p>

MANAGEMENT OF AIFS

Based on Article 4(1)(a) of Directive 2011/61/EU Alternative Investment Funds (AIFs') mean collective investment undertakings, including investment compartments thereof, which: (i) raise capital from a number of investors, with a view to investing it in accordance with a defined investment policy for the benefit of those investors; and (ii) do not require authorisation pursuant to Article 5 of Directive 2009/65/EC

Column code	Legal references and instructions
C0040	<p>Management of AIFs - Retail Investors</p> <p>The person investing in the AIF (generally by purchasing the shares issued by such AIF), where this person is retail client as defined in MiFID. Where the obliged entity is an asset</p>

	<p>management company which does not have access to this information (as is often the case in practice), this field is not mandatory.</p> <p>Indicate the number of investors who are retail investors, as of the end of the reference year.</p>
C0050	<p><u>Management of AIFs - Professional Investors</u></p> <p>The person investing in the AIF (generally by purchasing the shares issued by such AIF), where this person is a professional client as defined in MiFID. Where the obliged entity is an asset management company which does not have access to this information (as is often the case in practice), this field is not mandatory.</p> <p>Indicate the number of investors who are professional investors, as of the end of the reference year.</p>
C0060	<p><u>Open-ended Funds - Number</u></p> <p>An open-ended fund is a collective investment vehicle in which investors can subscribe and redeem on-demand. For the purpose of this datapoint, funds where investors have a redemption right at their initiative (even if periodic/limited) should be considered as open-ended funds.</p> <p>Indicate the number of open-ended funds as of end of the reference year.</p>
C0070	<p><u>Closed-ended Funds - Number</u></p> <p>Collective investment vehicle in which investors cannot subscribe and redeem on-demand. For clarity, funds where investors have no redemption right until liquidation/termination should be considered as closed-ended funds.</p> <p>Indicate the number of closed-ended funds as of end of the reference year.</p>
C0080	<p><u>Management of AIFs - Total AUM</u></p> <p>For this datapoint, Obligated Entities should provide a metric calculated consistently with Article 2 of Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012.</p> <p>Indicate the total assets under management of AIFM as of end of the reference year.</p>
C0090	<p><u>Management of AIFs - Total AUM in unlisted assets</u></p> <p>Unlisted assets are financial instruments that are not traded on a regulated market, multilateral trading facility (MTF), or organised trading facility (OTF).</p> <p>This datapoint is subset of datapoint C0080 above.</p> <p>Indicate the total assets under management in unlisted assets as of end of the reference year.</p>

1.3.18 AML.04.12 SAFE CUSTODY SERVICES

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI.

Safe deposit boxes refer to secure, individually assigned physical storage containers located within a regulated credit institution or financial entity's premises, rented or otherwise made available to customers, typically under a contractual agreement.

Column code	Legal references and instructions
C0010	<p>Customers Using Safe Deposit Boxes</p> <p>Indicate the total number of customers using safe deposit boxes as of as of end of the reference year.</p>

1.3.19 AML.04.13 CROWDFUNDING

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, CP, EMI, PI, IF and CASP.

Refers to ‘crowdfunding services’ within the meaning of Article 2(1)(a) of Regulation (EU) 2020/1503.

This activity must be carried out directly by the Reporting obliged entity under an authorization granted pursuant to Article 12 of Regulation (EU) 2020/1503. Therefore, only activities for which the Obligated Entity is authorized as a crowdfunding service provider should be included.

Transactions where an investor instructs, for example, a credit institution to execute a payment towards a crowdfunding platform for a specific project do not qualify as crowdfunding services; they are considered payment services only and should not be reported under the data points referred to crowdfunding.

Column code	Legal references and instructions
C0010	<p>Funding Projects - Value</p> <p>Refers to ‘crowdfunding project’ within the meaning of Article 2(1)(l) of Regulation (EU) 2020/1503: the business activity or activities for which a project owner seeks funding through the crowdfunding offer.</p> <p>Indicate the total Value of funds collected during the reference year as part of ‘crowdfunding project’.</p>
C0020	<p>Projects Funded - Number</p> <p>Total number of crowdfunding projects for which funding was successfully completed during the reference year. Refer to ‘crowdfunding project’ within the meaning of Article 2(1)(l) of Regulation (EU) 2020/1503.</p> <p>Indicate the total number of successfully funded projects during the reference year.</p>
C0030	<p>Donors from High-risk Countries</p> <p>For the concept of donor we refer to the concept of investors, as described in Article 2(1)(i) of Regulation (EU) 2020/1503: any natural or legal person who, through a</p>

	<p>crowdfunding platform, grants loans or acquires transferable securities or admitted instruments for crowdfunding purposes.</p> <p>Indicate the total number of donors from high-risk third countries (according to the EU list of high-risk third countries and the FTAF lists) during the reference year. For the purpose of this data collection, the country should be referred to the country of the payment account of the donor.</p>
C0040	<p>Projects with High-risk Country Owners</p> <p>Project owner is defined in Article 2(1)(h) of Regulation (EU) 2020/1503.</p> <p>Indicate the total number of projects where the owner is from a high-risk third country (according to the EU list of high-risk third countries and the FTAF lists) during the reference year.</p>

1.3.20 AML.04.14 CASH TRANSACTIONS

Template Remarks

Fill out this template if you offer some of these services and/or products, normally these products and services are associated with CI, CP, LI, EMI, PI and CASP.

Cash transactions include all movements of physical cash into or out of payment deposit accounts held by natural or legal persons, regardless of the method of deposit or withdrawal. This includes, but is not limited to, over-the-counter cash deposits and withdrawals, ATM transactions, cash-in-transit operations (such as cash courier vans), night safe deposits, bulk cash movements and cash received or deposited by exchanging crypto-assets.

Cash transactions refers to transaction based on cash, as defined in Article 2(1)(43) AMLR.

Column code	Legal references and instructions
C0010	<p>Cash Transactions (Withdrawals) - Number</p> <p>Indicate Cash Transactions (Withdrawals) - Number during the reference year.</p>
C0020	<p>Cash Transactions (Deposits) - Number</p> <p>Indicate Cash Transactions (Deposits) - Number during the reference year.</p>
C0030	<p>Cash Transactions (Withdrawals) - Value</p> <p>Indicate Cash Transactions (Withdrawals) - Value during the reference year.</p>
C0040	<p>Cash Transactions (Deposits) - Value</p> <p>Indicate Cash Transactions (Deposits) - Value during the reference year.</p>

C0050	Customers with Cash Transactions > EUR 20 000 Indicate the number of customers with Cash Transactions (Withdrawals + Deposits) above EUR 20 000 during the reference year.
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1.4 AML.05.01 Geographies

Template Remarks

This template (cluster of datapoints) is applicable for all sectors (unless it is mentioned in the datapoint otherwise).

For the purpose of this exercise, “per country” in the data points relevant for transactions mean country of the account of the counterparty - payer for incoming transactions and of the payee for outgoing transactions.

C0010	<p><u>Country</u></p> <p>Select the country from the dropdown menu.</p>
C0020	<p><u>Natural Persons</u></p> <p>This datapoint is applicable for all sectors.</p> <p>Per country data should be based on the customers’ country of residence. Indicate the number of customers which are Natural Persons (NP) per country, as of end of the reference year.</p> <p>In case of multiple residencies, take the usual place of residence as per CDD records.</p> <p>This datapoint is a subset of datapoint C0010 in AML.02.01. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>Clients can be treated as natural persons unless they are legally registered as a Legal Entity. This refers to amongst others freelancers/self-employed/sole proprietorships without LE status etc.</p> <p>Indicate the number of customers which are Natural Persons (NP) per country, as of end of the reference year.</p>
C0030	<p><u>Legal Entities</u></p> <p>This datapoint is applicable for all sectors.</p> <p>For the purposes of this data collection exercise, Legal entities include legal persons as well as express trust and similar legal arrangements.</p> <p>Legal entities in the same corporate group and connected legal entities (constructed relationships) should be counted separately. Legal entities with branches shall be reported only once, according to the country of registration of the head office.</p> <p>Per country data should be based on the customers’ country of registration – where the address of the registered or official office is located</p>

	<p>This datapoint is a subset of datapoint C0010 in AML.02.01. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>Indicate the number of customers which are Legal Entities (LE) per country, as of end of the reference year.</p>
<p>C0040</p>	<p><u>Natural Persons – PEPs, Family Members or Close Associates</u></p> <p>This datapoint is applicable for all sectors.</p> <p>Indicate the number of Natural Person (NP) customers who are identified as: (i) politically exposed persons (PEPs), (ii) family members of PEPs, or (iii) persons known to be close associates of PEPs, per country, as of end of the reference year.</p> <p>For the purposes of this data point, the country dimension refers to the PEP’s country of nationality (i.e. for family members and close associates, the country of nationality of the related PEP).</p> <p>This datapoint is a subset of datapoint C0020 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p> <p>See the definition of ‘PEP’, ‘family member’, and ‘person known to be close associate’ in Annex 2.</p>
<p>C0050</p>	<p><u>Legal Entities – PEPs, Family Members or Close Associates as BOs</u></p> <p>This datapoint is applicable for all sectors.</p> <p>Indicate the number of Legal Entity (LE) customers whose Beneficial Owners (BOs) include at least one politically exposed person (PEP), a family member of a PEP, or a person known to be a close associate of a PEP, per country, as of end of the reference year.</p> <p>For the purposes of this data point, the country dimension refers to the PEP’s country of nationality (i.e. for family members and close associates, the country of nationality of the related PEP).</p> <p>When a single legal entity has multiple BOs that are PEPs, family members of PEPs or persons known to be close associates of PEPs either from the same country or from different countries, report only once per country.</p> <p>See the definition of ‘PEP’, ‘family member’, and ‘person known to be close associate’ in Annex 2.</p> <p>BO means any natural person who ultimately owns or controls a legal entity or an express trust or similar legal arrangement, as defined in Article 2(1)(28), AMLR.</p> <p>This datapoint is a subset of datapoint C0030 above. ‘Walk-in customers’ should therefore be excluded (see C0150) from this datapoint for the purpose of this testing exercise.</p>

	<p>As per recital 125 AMLR, senior managing officials (SMOs) reported instead of the beneficial owners where no natural person is identifiable who ultimately owns or exerts control over an entity (as per Article 22(2) AMLR) are <u>not</u> beneficial owners, and shall not be counted for the purpose of reporting this datapoint.</p>
C0060	<p><u>Transactions (Incoming) – Number</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as an IF and/or AMC.</p> <p>The country to be referred to is the country from which the transaction originated (e.g. in the case of a payment transaction, the country of the payer’s bank account).</p> <p>For clarity, reporting obliged entities should refer to the concept of “incoming” transactions provided for in Annex 2.</p> <p>Indicate the number of incoming transactions during the reference year, by country.</p>
C0070	<p><u>Transactions (Incoming) - Value</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as an IF and/or AMC.</p> <p>The country to be referred to is the country from which the transaction originated (e.g. in the case of a payment transaction, the country of the payer’s bank account).</p> <p>For clarity, reporting obliged entities should refer to the concept of “incoming” transactions provided for in Annex 2.</p> <p>Indicate the total value of incoming transactions in the reference year, by country.</p>
C0080	<p><u>Transactions (Outgoing) - Number</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as an IF and/or AMC.</p> <p>The country to be referred to is the country to which the transaction was directed (e.g. in the case of payment transactions, the country of the payee’s bank account).</p> <p>For clarity, reporting obliged entities should refer to the concept of “outgoing” transactions provided for in Annex 2.</p> <p>Indicate the number of outgoing transactions during the reference year, by country.</p>
C0090	<p><u>Transactions (Outgoing) - Value</u></p> <p>This datapoint is not applicable for reporting obliged entities only acting as an IF and/or AMC.</p>

	<p>The country to be referred to is the country to which the transaction was directed (e.g. in the case of payment transactions, the country of the payee’s bank account).</p> <p>For clarity, reporting obliged entities should refer to the concept of “outgoing” transactions provided for in Annex 2.</p> <p>Indicate the total value of outgoing transactions during the reference year, by country.</p>
C0100	<p><u>CIU Investment Flows - Value</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as an AMC.</p> <p>The reference here is to the aggregated value of gross investment inflows on the asset side of Collective Investment Undertakings – i.e., both UCITS and AIF - during the reference year. Gross investment inflows correspond to the aggregated value of investor subscriptions received during the reference year, without netting against any redemptions.</p> <p>The amount should be reported broken down by the country from which the investment inflows are received.</p> <p>Indicate the total value of investment flows of the obliged entity's Collective Investment Undertakings – i.e., both UCITS and AIF - by country.</p>
C0110	<p><u>Investors</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as an IF and/or AMC.</p> <p>For clarity, the concept of investor in this datapoint should coincide with the concept of customer, as detailed in Annex 2. As a consequence, the reported data must be consistent with datapoints C0020 and C0030 above. In substance, for reporting obliged entities acting as an IF and/or AMC the datapoints C0020 and C0030 above should be a subset of this datapoint.</p> <p>Per country data should be based on the investors’ country of residence. In case of multiple residencies, take the usual place of residence as per CDD records.</p> <p>Where the obliged entity is an AMC which does not have access to this information (as is often the case in practice), this field is not mandatory.</p> <p>Indicate the number of investors by country, as of end of the reference year.</p>
C0120	<p><u>Assets under Management - Value</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as an AMC</p> <p>The value of assets under management (AUM) should be understood as the total AUM of UCITS and AIFs managed by the AMC as of end of the reference year, broken down by country.</p>

	<p>In computing this datapoint, obliged entities should ensure consistency with datapoints C0030 and C0080 in sheet AML.04.11 on management of UCITS and AIFs.</p> <p>To accurately reflect the concept of a country breakdown, AMCs should take into account both the country in which a UCITS or AIF is authorised or established and the country or countries in which the units or shares of the UCITS or AIF are marketed.</p> <p>Indicate the total value of assets under management by country as of end of the reference year.</p>
C0130	<p><u>Respondent Institutions</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, PI and/or CASP.</p> <p>Obliged reporting entities should refer to correspondent relationship definition provided for in Article 2(1)(22) AMLR (see for further clarification: AML04.04).</p> <p>A reporting entity acting as correspondent should report cases where the respondent institution is part of the same group as the correspondent. Indicate the number of institutions established in non-EEA countries to whom you provide correspondent services (by country), as of end of the reference year.</p>
C0140	<p><u>Respondent Client Funds (Incoming) - Value</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, PI and CASP.</p> <p>Consistently with Article 2(1)(22) of the AMLR, this data point requires obliged entities acting as correspondent service providers to report the total value of incoming funds processed on behalf of respondent institutions and their underlying customers, aggregated by the country of establishment of each respondent, for the reference year.</p> <p>For the purpose of this data point, incoming funds shall mean all financial inflows received by the correspondent — including, but not limited to, those transmitted through payment, settlement, transfer or equivalent mechanisms — that are credited to the account or other equivalent arrangement held by the respondent with the correspondent, or otherwise processed for the respondent within the scope of the correspondent relationship.</p> <p>A reporting entity acting as correspondent should report incoming funds also in those cases where the respondent institution is part of the same group as the correspondent.</p> <p>Indicate the total value of incoming funds moved on behalf of the respondent's clients by country of respondent's establishment during the reference year.</p>
C0150	<p><u>Respondent Client Funds (Outgoing) - Value</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, PI and CASP.</p>

	<p>Consistently with Article 2(1)(22) of the AMLR, this data point requires obliged entities acting as correspondent service providers to report the total value of outgoing funds processed on behalf of respondent institutions and their underlying customers, aggregated by the country of establishment of each respondent, for the reference year.</p> <p>For the purpose of this data point, outgoing funds shall mean all financial outflows executed by the correspondent — including, but not limited to, those transmitted through payment, settlement, transfer or equivalent mechanisms — that are debited from the account or other equivalent arrangement held by the respondent with the correspondent, or otherwise executed for the respondent within the scope of the correspondent relationship.</p> <p>A reporting entity acting as correspondent should report outgoing funds also in those cases where the respondent institution is part of the same group as the correspondent.</p> <p>Indicate the total value of outgoing funds moved on behalf of the respondent's clients by country of respondent's establishment during the reference year.</p>
<p>C0160</p>	<p>Number of branches by country</p> <p>This datapoint is applicable for all sectors.</p> <p>In general, branches are establishments of an institution which is not a separate legal entity and which performs directly all or some activities of that credit or financial institution. This concept applies both to branches in a Member State other than that of establishment of the reporting obliged entity, as well as to branches established in third countries (in the latter case, based on the national law of the home Member State and the regulatory framework of the host third country), as of end of the reference year.</p> <p>For the purpose of this reporting, only branches that are themselves obliged entities inside or outside the EU should be reported.</p> <p>For CI's, IF's, AMC's, and PI's a reference to the respective regulations or directives are reported below:</p> <p>1) For Credit Institutions, from the CRD (Directive 2013/36/EU):</p> <p>"A branch of a credit institution means any establishment of a credit institution which is not a separate legal entity and which performs directly all or some of the activities of that credit institution".</p> <p>2) For IFs, from MiFID II Article 4(1)(30):</p> <p>"An investment firm's branch means a place of business other than the head office which is part of an investment firm, has no legal personality, and which carries out some or all of the activities of that investment firm."</p> <p>3) For AMC, Directive 2009/65/EC, Article 2(1)(g): 'branch' means a place of business which is a part of the management company, which has no legal personality and which provides the services for which the management company has been authorised";</p>

	<p>4) For PIs, Directive 2015/2366/EU (PSD2), Article 4(1)(39):</p> <p>“branch’ means a place of business other than the head office which is a part of a payment institution, which has no legal personality and which carries out directly some or all of the transactions inherent in the business of a payment institution; all of the places of business set up in the same Member State by a payment institution with a head office in another Member State shall be regarded as a single branch”;</p>
C0170	<p><u>Number of subsidiaries by country</u></p> <p>This datapoint is applicable for all sectors.</p> <p>For the purpose of this reporting, a subsidiary is an undertaking that is an obliged entity, inside or outside the EU, controlled by the reporting obliged entity and that is not a branch. Subsidiaries of such subsidiaries shall also be reported. As of end of the reference year.</p>

1.5 AML.06.01 Distribution Channels

Template Remarks

This template (cluster of datapoints) is applicable for all sectors (unless it is mentioned in the datapoint otherwise).

C0010	<p><u>Country</u></p> <p>Select the country from the dropdown menu.</p>
C0020	<p><u>Number of agents by country</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a EMI, PI and IF.</p> <p>As of the end of the reference year.</p> <p>For PI: An agent within the meaning of Article 4(38) of Directive (EU) 2015/2366 (a natural or legal person who acts on behalf of a payment institution in providing payment services).</p> <p>For IF: Agents should be understood as ‘tied agents’.</p>
C0030	<p><u>Number of distributors by country</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a EMI.</p> <p>As of the end of the reference year. Only to be reported by EMIs</p> <p>Refers to Article 3(4) of the Directive 2009/110/EC (E-money Directive).</p>

<p>C0040</p>	<p><u>Gross Written Premiums through Brokers - Value</u></p> <p>This datapoint is only applicable for reporting obliged entities only acting as a LI.</p> <p>Broker: an intermediary who sells, solicits, or negotiates insurance on behalf of a client for compensation.</p> <p>Indicate the total value of gross written premiums through insurance contracts issued through brokers during the reference year, broken down by country the brokers are established.</p>
<p>C0050</p>	<p><u>White Labelling Partners by country</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, EMI, PI, CASP and O.</p> <p>White labelling partner that collaborates with a licensed reporting obliged entity to offer financial services under its own brand, without having a banking licence itself. While it presented the service to customers, the actual service is legally and operationally provided by the bank. The partner acts as an intermediary between the bank and the customers but not performing any regulated banking activities on its own. Intra-group companies should also be captured.</p> <p>Indicate the number of white labelling partners at the end of the reference year by country of establishment.</p>

Section B – AML/CFT Controls data points

1.6 AML.07.01 Governance/Culture and Compliance

For the purpose of this reporting, staff means all employees who work for the reporting obliged entity. Independent contractors, staff from another company within the same group, consultants and external service providers should not be accounted for.

When a member of staff is only partially dedicated to the tasks to be reported, the reporting obliged entity should, to the extent reasonably feasible, report only the proportion of that staff member's time that is allocated to the tasks in question.

Template Remarks

This template (cluster of datapoints) is applicable for all sectors.

Column code	Legal references and instructions
C0010	<p>Last AML/CFT Compliance Check</p> <p>Indicate the date at which the procedures covering at least a significant part of the AML/CFT framework (including initial and ongoing CDD, transaction and business relationship monitoring, STR, and targeted financial sanction screening) were checked by the compliance function (second line) as being in compliance with existing laws and regulations applicable at that date.</p> <p>If you have more than one date, please use the most recent one.</p>
C0020	<p>Dedicated AML/CFT Staff (FTE)</p> <p>Indicate the number of dedicated AML/CFT compliance staff (in FTE) in the compliance function as of the end of the reference year. The number of FTEs could be reported with decimals places.</p> <p>Staff mainly focused on AML/CFT compliance-related tasks. This should include at least:</p> <ul style="list-style-type: none"> - the compliance officer appointed in accordance with Article 11 AMLR and all the staff assisting the compliance officer in the tasks defined in Article 11 AMLR. - staff responsible for carrying out the analysis mentioned in Article 69(2) AMLR and staff responsible for reporting suspicious transactions in accordance with Article 69 AMLR. - staff responsible for establishing and reviewing the internal policies and procedures mentioned in Article 9 AMLR.

	<ul style="list-style-type: none"> - all other staff specialising in AML/CFT compliance, including those who spend the majority of their time on tasks listed Article 20 AMLR.
C0030	<p>AML Training - Compliance Staff (%)</p> <p>Indicate the percentage of AML/CFT compliance personnel (headcount) who have completed internal or external AML/CFT training during the reference year.</p> <p>AML/CFT training: Structured education or instruction provided to employees to ensure they understand their legal obligations, institutional policies, and practical procedures for preventing and detecting money laundering and terrorist financing. Reference can be made to the training programmes as described in Article 12 AMLR.</p> <p>AML/CFT Compliance personnel: Staff mainly focused on AML/CFT compliance-related tasks. This should include at least:</p> <ul style="list-style-type: none"> - the compliance officer appointed in accordance with Article 11 AMLR and all the staff assisting the compliance officer in the tasks defined in Article 11 AMLR. - staff responsible for carrying out the analysis mentioned in Article 69(2) AMLR and staff responsible for reporting suspicious transactions in accordance with Article 69 AMLR. - staff responsible for establishing and reviewing the internal policies and procedures mentioned in Article 9 AMLR. - all other staff specialising in AML/CFT compliance, including those who spend the majority of their time on tasks listed Article 20 AMLR.
C0040	<p>AML Training - Non-AML/CFT Compliance Personnel</p> <p>Indicate the percentage of non-AML/CFT compliance personnel who have received AML/CFT training during the reference year.</p> <p>AML/CFT training: Structured education or instruction provided to employees to ensure they understand their legal obligations, institutional policies, and practical procedures for preventing and detecting money laundering and terrorist financing. Reference can be made to the training programmes as described in Article 12 AMLR.</p> <p>Non-AML/CFT specialist staff (e.g. customer facing staff): Other relevant staff, with no dedicated AML/CFT functions, who are involved in the performing of AML/CFT duties or perform functions that are relevant from an AML/CFT perspective. This includes, but is not limited to, all staff who are not AML Specialists but who have knowledge of customer and/or transaction information and who should be able to contribute to the detection of facts relevant to Article 69 AMLR (such as front-office staff), internal auditors and senior management.</p>
C0050	<p>AML Training - Agents and Distributors (%)</p> <p>Indicate the percentage of Agents and Distributors who have received AML/CFT training during the reference year.</p>

	<p>AML/CFT training: Structured education or instruction provided to employees to ensure they understand their legal obligations, institutional policies, and practical procedures for preventing and detecting money laundering and terrorist financing. Reference can be made to the training programmes as described in Article 12 AMLR.</p> <p>Agents are intermediaries that are under the full responsibility of a credit or financial institution.</p> <p>Distributors are legal or natural persons that can distribute and redeem electronic money pursuant to Article 3(4) of the E-Money Directive (Directive 2009/110/EC).</p>
C0060	<p>AML Training - Members of the management body (%)</p> <p>Indicate the percentage of the Management Body (both in its management function and its supervisory function) who have received AML/CFT training during the reference year.</p> <p>AML/CFT training: Structured education or instruction provided to employees to ensure they understand their legal obligations, institutional policies, and practical procedures for preventing and detecting money laundering and terrorist financing. Reference can be made to the training programmes as described in Article 12 AMLR.</p> <p>For the purpose of this exercise, we refer here to the management body as defined in Article 2(1)(37) AMLR: ‘management body’ means an obliged entity’s body or bodies, which are appointed in accordance with national law, which are empowered to set the obliged entity’s strategy, objectives and overall direction, and which oversee and monitor management decision-making, and include the persons who effectively direct the business of the obliged entity; where no such body exists, the person who effectively directs the business of the obliged entity.</p>

1.7 AML.07.02 Internal compliance reporting - outsourcing and audit

Template Remarks

This template (cluster of datapoints) is applicable for all sectors.

Outsourcing: Reference can be made to Article 18 AMLR. Cases of services outsourced within the same group (intragroup outsourcing and shared services centers) must be accounted for. Processes or arrangements that contribute to the performance of a requirement under AMLR, but where the performance of the requirement itself is not carried out by a service provider, such as the use or acquisition of third-party software or the access to databases or screening services by the obliged entity, are not considered to be outsourcing (cf. Recital 47 AMLR).

Column code	Legal references and instructions
C0010	<p><u>Frequency of AML reporting to the management body</u></p> <p>Frequency of reporting by the AML compliance officer/manager to the management body. If there are several reporting frequencies, please select the most frequent reporting interval.</p> <p>Reporting activities as referred to in Article 11(6) AMLR. Reporting activities should be written and/or documented information exchanges.</p> <p>The management body as defined in Article 2(1)(37) AMLR,</p> <p>The compliance manager and officer as referred to in Article 11(1) and (2) AMLR.</p>
C0020	<p><u>Outsourcing - CDD</u></p> <p>Indicate whether Customer Due Diligence (CDD) measures, as specified in Article 20 AMLR, are outsourced (in total or in part), or are not outsourced, by the reporting obliged entity during the reference year.</p>
C0030	<p><u>Outsourcing - Training</u></p> <p>Indicate whether AML/CFT training tasks are outsourced by the legal entity (in total or in part) or are not outsourced during the reference year. Reference can be made to the training programmes as described in Article 12 AMLR.</p>
C0040	<p><u>Outsourcing - Transaction Monitoring</u></p> <p>Indicate whether Transaction Monitoring tasks are outsourced by the legal entity (in total or in part), or are not outsourced during the reference year.</p> <p>TFS and other types screenings that are not used for the purpose of detection of unusual or suspicious transactions should not be considered as transaction monitoring.</p>
C0050	<p><u>Outsourcing - Suspicious Transaction or Activity Reports</u></p> <p>Indicate whether preparatory tasks to Suspicious Transaction or Activity Reports are outsourced by the legal entity (in total or in part), or are not outsourced during the reference year.</p>
C0060	<p><u>Outsourcing - Sanctions Screening Tasks</u></p> <p>Indicate whether the screening of customers and counterparties for the implementation of targeted financial sanctions are outsourced by the legal entity (in total or in part), or are not outsourced during the reference year.</p>
C0070	<p><u>Outsourcing - PEP status</u></p>

	Indicate whether the process of determination of the Politically Exposed Person (PEP) status (PEP screening) is outsourced by the reporting obliged entity (in total or in part), or are not outsourced during the reference year.
C0080	<p>Outsourcing - Compliance Monitoring Checks</p> <p>Indicate whether compliance monitoring checks are outsourced by the reporting obliged entity (in total or in part), or are not outsourced, during the reference year.</p> <p>Compliance Monitoring Checks: Refers to the internal controls and internal audit function assessments that a firm should put in place to monitor and manage compliance with its internal policies and procedures (AMLR, Article 9(2)(a)(vii) and Article 9(2)(b)).</p>
C0090	<p>Outsourcing - Third Country (Non-group)</p> <p>Indicate whether AML/CFT tasks reported under C0020 to C0080 are ultimately outsourced to an external service provider that is not part of the reporting obliged entity's group and located in a country outside the EEA during the reference year.</p>
C0100	<p>Outsourcing - Third Country (Intra-group)</p> <p>Indicate whether AML/CFT tasks reported under C0020 to C0080 are outsourced to an external service provider that is part of the reporting obliged entity's group and located in a country outside the EEA during the reference year.</p>
C0110	<p>Last Audit - BWRA</p> <p>Date of the latest internal audit report assessing the Business Wide Risk Assessment as referred to in Article 10 AMLR – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>As BWRA is usually approved by the parent undertaking for the whole group, obliged reporting entities that are different from the parent undertaking are expected to report the same information as the parent undertaking.</p> <p>Indicate the audit report signing date if available or end of the audit period (report its start in case of an ongoing audit).</p>
C0120	<p>Last Audit - Customers ML/TF Risk Profile</p> <p>Date of the latest internal audit report assessing the policies and procedures for the determination of ML/TF risk profile of customers in a business relationship – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>Indicate the audit report signing date if available or end of the audit period (report its start in case of an ongoing audit).</p>
C0130	<p>Last Audit – Assessment AML/CFT Training measures</p> <p>Date of the latest internal audit report assessing the AML/CFT-related awareness-raising and staff training measures – including tests carried out by an</p>

	<p>external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>Indicate the audit report signing date if available or end of the audit period (report its start in case of an ongoing audit).</p>
C0140	<p><u>Last Audit - Identification and Verification Procedures</u></p> <p>Date of the latest internal audit report assessing the identification and identity verification procedures – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>Indicate the audit report signing date if available or at the end of the audit period (report its start in case of an ongoing audit).</p>
C0150	<p><u>Last Audit - Policies and Procedures for Monitoring and Analysing Business Relationships</u></p> <p>Date of the latest internal audit report assessing at least part of the policies and procedures for monitoring and analysing business relationships (including transaction monitoring) – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>Indicate the audit report signing date if available or end of the audit period (report its start in case of an ongoing audit).</p>
C0160	<p><u>Last Audit - Suspicious Transaction or Activity Reporting Procedures</u></p> <p>Date of the latest internal audit report assessing the policies and procedures for suspicious transaction or activity reporting – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>Indicate the audit report signing date if available or at the end of the audit period (report its start in case of an ongoing audit).</p>
C0170	<p><u>Last Audit - Record-keeping Policies and Procedures</u></p> <p>Date of the latest internal audit report assessing the record-keeping policies and procedures – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>Indicate the audit report signing date if available or end of the audit period (report its start in case of an ongoing audit).</p>
C0180	<p><u>Last Audit - Resources dedicated to AML/CFT</u></p> <p>Date of the latest internal audit report assessing the human and material resources dedicated to AML/CFT – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p>

	Indicate the audit report signing date if available or at the end of the audit period (report its start in case of an ongoing audit).
C0190	<p><u>Last Audit - Organisation of the AML/CFT System, Governance and Reporting Arrangements</u></p> <p>Date of the latest internal audit report assessing the organisation of the AML/CFT system, governance and reporting to management bodies – including tests carried out by an external expert as referred to in Article 9(2)(b) AMLR in the absence of an independent audit function.</p> <p>Indicate the audit report signing date if available or end of the audit period (report its start in case of an ongoing audit).</p>

1.8 AML.07.03 Risk Assessment

Template Remarks

This template (cluster of datapoints) is applicable for all sectors.

Business Wide Risk Assessment (BWRA) as referred to in Article 10 AMLR at the end of the reference period.

Customer Risk Assessment (CRA): Number of customers per ML/TF risk category are divided in **four risk categories** this exercise (low risk, medium-low risk, medium-high risk, high-risk)

In case an entity uses three risk categories

Low risk -> Low risk

Medium risk -> Medium-low risk

High risk -> High risk

In case an entity uses five risk categories

Low risk -> Low risk

Medium-low risk -> Low risk

Medium-high risk -> Medium-low risk

High risk -> Medium-high risk

Ultra/very high risk -> High risk

Column code	Legal references and instructions
C0010	<p><u>Last approval date of the BWRA</u></p> <p>For this exercise, reference should be made to approval by the management body in its management function, in line with Article 10(2) AMLR.</p> <p>As BWRA is usually approved by the parent undertaking for the whole group, obliged reporting entities that are different from the parent undertaking are expected to report the same information as the parent undertaking.</p>

	<p>Conceptually speaking, the understanding of datapoints C0010 and C0020 is easier when you follow this logic: first, check whether the management body in its management function has approved the BWRA, as per datapoint C0020; second, if the answer to C0020 is “Yes”, indicate in C0010 the exact date of the approval.</p> <p>Indicate the exact date of the last approval of the BWRA by the management body in its management function, even if it predates the reference year (2025).</p>
C0020	<p>Senior Management Approval (BWRA)</p> <p>For this exercise, reference should be made to approval by the management body in its management function, in line with Article 10(2) AMLR. For the purpose of this datapoint, senior management approval should be understood as the approval by the management body in its management function.</p> <p>Conceptually speaking, the understanding of datapoints C0010 and C0020 is easier when you follow this logic: first, check whether the management body in its management function has approved the BWRA, as per datapoint C0020; second, if the answer to C0020 is “Yes”, indicate in C0010 the exact date of the approval.</p> <p>As BWRA is usually approved by the parent undertaking for the whole group, obliged reporting entities that are different from the parent undertaking are expected to report the same information as the parent undertaking. Indicate whether the reporting entity has in place BWRA approved by the management body in its management function.</p>
C0030	<p>Date of the last update of the CRA</p> <p>The update refers to the CRA methodology and not to the update of each customer risk score. Minor adjustments do not count as updates. In case of outsourcing to third parties, report the date of the third party's last CRA update.</p>
C0040	<p>Customers - Low Risk</p> <p>Number of customers classified as low risk according to the CRA methodology, as of the end of the reference year.</p>
C0050	<p>Customers - Medium-low Risk</p> <p>Indicate the number of customers classified as medium-low risk according to the CRA methodology, as of the end of the reference year.</p>
C0060	<p>Customers - Medium-high Risk</p> <p>Indicate the number of customers classified as medium- high risk according to the CRA methodology, as of the end of the reference year.</p>
C0070	<p>Customers - High Risk</p> <p>Indicate the number of customers classified as high risk according to the CRA methodology, as of the end of the reference year.</p>

1.9 AML.07.04 Customer Due Diligence and Monitoring

Template Remarks

This template (cluster of datapoints) is applicable for all sectors.

Please refer to the definition of a customer and transaction provided in the annex.

Column code	Legal references and instructions
C0010	<p><u>Customers – LE/Trusts with BO Not Identified</u></p> <p>Indicate the number of customers that are legal entities, legal arrangements or trusts whose beneficial owners have not been identified, as of the end of the reference year.</p> <p>As per Article 2(1)(28) AMLR, ‘beneficial owner’ means “any natural person who ultimately owns or controls a legal entity or an express trust or similar legal arrangement”.</p> <p>As per recital 125 AMLR, senior managing officials (SMOs) reported instead of the beneficial owners where no natural person is identifiable who ultimately owns or exerts control over an entity (as per Article 22(2) AMLR) are <u>not</u> beneficial owners, and shall not be counted for the purpose of reporting this datapoint.</p> <p>Beneficial owners identified through consultation of public registers or other reliable national systems that contain the necessary information shall be counted as being identified for the purpose of reporting this datapoint.</p> <p>In case a legal arrangement or trust has several BOs not all of which have been identified, it shall be reported as “BO not identified” for the purpose of this datapoint.</p>
C0020	<p><u>Customers – LE/Trusts With BO Identified Not Verified</u></p> <p>Indicate the number of customers that are legal entities, legal arrangements or trusts whose beneficial owners have been identified but the identity of whom has not been verified, as of the end of the reference year.</p> <p>As per Article 2(1)(28) AMLR, ‘beneficial owner’ means “any natural person who ultimately owns or controls a legal entity or an express trust or similar legal arrangement”.</p> <p>For the purposes of this data point, “verified” means that the reporting obliged entity has taken reasonable measures to verify the identity of the beneficial owner, using reliable documents, data or information, in accordance with Article 20(1)(b) and Article 22 AMLR. This includes consultation of the central register(s) as an additional verification step, in accordance with Article 22(7) AMLR.</p> <p>Accordingly, this data point should include customers where the beneficial owner(s) have been identified, but the reporting obliged entity has not yet completed the verification of the beneficial owner’s identity in line with the above requirements, as of the end of the reference year.</p>

	For the purposes of this data point, senior managing officials (SMOs) reported in place of the beneficial owners in circumstances where no natural person is identifiable as ultimately owning or exercising control over an entity (in accordance with Article 22(2) AMLR) shall not be treated as beneficial owners and shall not be counted under this datapoint. This is consistent with Recital 125 AMLR.
C0030	<p><u>Customers – Missing ID/Verification Documentation</u></p> <p>Indicate the number of customers (both natural and legal persons) for which no identity document (or equivalent document or non-face-to-face measure) is recorded as of the end of the reference year.</p> <p><u>This includes:</u></p> <ul style="list-style-type: none"> - <u>Out-of-date identity documents (or equivalent document or non-face-to-face measure)</u> - <u>Identity documents (or equivalent) for which the recorded copy has been found to be unreadable or otherwise corrupted</u>
C0040	<p><u>Customers – CDD Not Compliant with Article 20 AMLR</u></p> <p>Indicate the number of customers (both natural and legal persons) whose CDD data and information is not yet in line with the requirements of Article 20 AMLR as listed in Section B of Annex I, as of the end of the reference year.</p> <p>Be aware that this data points shall not be used for the purpose of the first selection process referred to in Article 13(4) of AMLAR (the selection data collection in 2027).</p>
C0050	<p><u>Customers – Without ML/TF Risk Profile</u></p> <p>Indicate the number of customers (both natural and legal persons) without ML/TF risk profile (excluding customers with whom the reporting obliged entity does not have a business relationship), as of the end of the reference year.</p>
C0060	<p><u>Customers – Information Reviews Due</u></p> <p>Indicate the number of customers (both natural persons and legal entities) for whom a review of customer information was due, in accordance with the reporting obliged entity's AML/CFT policies and procedures regarding ongoing monitoring obligations, during the reference year.</p> <p>For the purposes of this exercise, and in accordance with Article 26(2)-(3) AMLR, this data point should capture both periodic (risk-based) reviews and event-driven reviews/updates triggered by relevant changes or newly acquired relevant information.</p>
C0070	<p><u>Customers – Information Updates Completed</u></p> <p>Indicate the number of customers (both natural persons and legal entities) for whom a review of customer information was due during the reference year (as per data point C0060 above), in accordance with the reporting obliged entity's AML/CFT policies and procedures regarding ongoing monitoring obligations, and whose information was effectively reviewed and, where relevant, updated during the reference year.</p>

For the purposes of this exercise, and in accordance with Article 26(2)-(3) AMLR, this data point should capture both periodic (risk-based) reviews and event-driven reviews/updates triggered by relevant changes or newly acquired relevant information.

1.10 AML.07.05 Transaction Monitoring and Suspicious Activity Reporting

Template Remarks

This template (cluster of datapoints) is applicable for all sectors (unless it is mentioned in the datapoint otherwise).

A transaction monitoring system is a system used by the obliged entity to ensure compliance with its obligation to conduct ongoing monitoring of transactions and other relevant activities, including situations where obliged entities do not process transactions or have limited transaction visibility performed by the customer throughout the course of a business relationship in accordance with Article 26 AMLR.

Column code	Legal references and instructions
C0010	<p><u>The Obligated Entity Has a Transaction/ Monitoring System in Place</u></p> <p>Indicate whether the reporting obliged entity conducts ongoing monitoring business relationships, including transactions undertaken by the customer throughout the course of a business relationship, as required by Article 26 AMLR. This can be automated or manual, and outsourced.</p>
C0020	<p><u>Transaction / Activity Monitoring System Type</u></p> <p>Indicate whether the transaction/activity monitoring system is:</p> <p>a) Not automated; a system where alerts are generated manually in order to identify transactions/activities carried out by customers that could potentially be suspicious from an AML/CFT perspective.</p> <p>b) At least partially automated: a system that, as a minimum, automatically generates alerts in order to identify transactions/activities carried out by customers that could potentially be suspicious from an AML/CFT perspective.</p>
C0030	<p><u>If manual system: Average Alert Analysis Time (Days)</u></p> <p>Indicate the average number of calendar days between the moment in which the transaction occurred and completion of the analysis.</p> <p>For obliged reporting entities using event-driven monitoring analysis, the reported timeframe should reflect the time from when the activity became available to the entity for review to the completion of the analysis.</p>

C0040	<p><u>Automated Monitoring System - Alerts on Inconsistencies with Expected Number of Transactions</u></p> <p>If the transaction monitoring system is at least partly automated, indicate whether the system can generate alerts in case of inconsistencies between the expected activity of the customer (as per the purpose and intended nature of the business relationship and any other relevant information feeding the customer profile, such as CDD) and the Number of Transactions related to the customer within the monitoring period applied in the entity's monitoring framework.</p>
C0050	<p><u>Automated Monitoring System - Alerts on Inconsistencies with Expected Value of Aggregated Transactions</u></p> <p>If the transaction monitoring system is at least partly automated, indicate whether the system can generate alerts in case of inconsistencies between the expected activity of the customer (as per the purpose and intended nature of the business relationship and any other relevant information feeding the customer profile, such as CDD) and the Value of Aggregated Transactions related to the customer within the monitoring period applied in the entity's monitoring framework.</p>
C0060	<p><u>Automated Monitoring System – Alerts on Inconsistencies with Expected Value of Single Transactions</u></p> <p>If the transaction monitoring system is at least partly automated, indicate whether the system can generate alerts in case of inconsistencies between the expected activity of the customer (as per the purpose and intended nature of the business relationship and any other relevant information feeding the customer profile, such as CDD) and the Value of Single Transactions related to the customer.</p>
C0070	<p><u>Automated Monitoring System – Alerts on Inconsistencies with Expected Counterparties</u></p> <p>If the transaction monitoring system is at least partly automated, indicate whether the system can generate alerts in case of inconsistencies between the expected activity of the customer (as per the purpose and intended nature of the business relationship and any other relevant information feeding the customer profile, such as CDD) and the Value of Aggregated Transactions within the monitoring period applied in the entity's monitoring framework.</p> <p>For the purposes of this datapoint, “counterparties” refers to the other party or parties to a transaction related to the customer as captured in the entity's monitoring framework.</p>
C0080	<p><u>Automated Monitoring System - Alerts on Geographical Inconsistencies</u></p> <p>If the transaction monitoring system is at least partly automated, indicate whether the system can generate alerts in case of inconsistencies between the expected activity of the customer (as per the purpose and intended nature of the business relationship and any other relevant information feeding the customer profile, such as CDD) and the</p>

	<p>countries associated with transactions related to that customer. This includes deviations from the expected geographic exposure derived from the customer profile. For the purposes of this datapoint, “countries” refers to the geographic indicators captured in the entity’s monitoring framework, such as the origin or destination of funds or the location of a counterparty’s account.</p>
C0090	<p><u>If automated system: Alerts Pending</u></p> <p>Indicate the number of alerts generated by the automated transaction monitoring system that remain open or pending analysis as of as of end of the reference year. An alert is considered 'not analysed' if a final decision (close or escalate to STR) has not yet been taken.</p>
C0100	<p><u>If automated system: Average Alert Analysis Time (Days)</u></p> <p>Indicate the average time to analyse an alert during the reference year (number of days between that the alert was generated and the moment that the alert was closed)</p>
C0110	<p><u>If automated system: total number of alerts</u></p> <p>Indicate the number of alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) AMLR. This should include alerts generated during the reference year even if the related STRs (if applicable) were reported during the year following the reference year.</p> <p>This excludes alerts of systems exclusively meant to detect transaction subject to targeted financial sanctions or politically exposed persons.</p>
C0120	<p><u>If automated system: total number of STRs submitted to the FIU</u></p> <p>The data to be provided here is the number of STRs initially reported during the reference year and resulting from alerts generated by the automated transaction monitoring systems in accordance with Article 26(1) AMLR.</p> <p>This should include STRs initially reported during the reference year even if the related alerts from the automated system were generated during the year before the reference year.</p>
C0130	<p><u>DLT/Blockchain Analysis Tool</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, EMI, PI, IF and CASP.</p> <p>Indicate whether the entity has implemented a tool that enables it to analyse information available on distributed ledgers and generate alerts where unusual patterns or risk factors are identified, in relation to the transactions carried out by the customer.</p>
C0140	<p><u>Average STR Processing Time (Days)</u></p>

	<p>Indicate the average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the reference year.</p> <p>Date of identification is the date on which a transaction reported as suspicious was first identified as inconsistent with the entity’s knowledge of the customer (pursuant to Article 26(1) AMLR), before conducting the assessment of such transactions pursuant to Article 69(2) AMLR.</p>
<p>C0150</p>	<p>STRs Submitted (Total)</p> <p>Indicate the total number of STRs and SARs submitted to the FIU during the reference year (including manual).</p> <p>The reporting of suspicions transactions should be carried out according to Article 69(1)(a) AMLR.</p>

1.11 AML.07.06 Targeted Financial Sanctions and Compliance with Fund Transfers Regulation

Template Remarks

This template (cluster of datapoints) is applicable for all sectors (unless it is mentioned in the datapoint otherwise).

Column code	Legal references and instructions
C0010	<p><u>TFS Implementation Time (Hours)</u></p> <p>This datapoint is applicable for all sectors.</p> <p>Indicate the maximum number of hours experienced over the reference period between the publication of the TFS in the Official Journal of the EU (which can be set on 23.59 of the day of publication) and the effective implementation of these changes in the institution's screening tools. Vendor-dependent and external parties delays must be included in the number of hours reported.</p> <p>The reported timeframe should reflect when updated targeted financial sanctions are effectively applied in practice by the obliged reporting entity.</p>
C0020	<p><u>Outbound Transfers with Information Requests (RFI)</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, CP, EMI, PI, CASP and O.</p> <p>Indicate the number of outbound transfers for which requests were received from a counterparty (through all possible communication channels) in the transfer chain for information that is missing, incomplete or provided using inadmissible characters during the reference year.</p> <p>Outbound transfer: For the purpose of this datapoint, an outbound transfer is any transfer that is not internal to the reporting entity.</p>
C0030	<p><u>Total Outbound Transfers</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, CP, EMI, PI, CASP and O.</p> <p>Indicate the total number of outbound transfers during the reference year.</p> <p>Outbound transfer: For the purpose of this datapoint, an outbound transfer is any transfer that is not internal to the reporting entity.</p>
C0040	<p><u>Rejected/Returned Outbound Transfers (%)</u></p> <p>This datapoint is only applicable for reporting obliged entities acting as a CI, CP, EMI, PI, CASP and O.</p>

	<p>Indicate only transfers that are rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters, during the reference year.</p> <p>Counterparty: Any legal entity or individual that takes the opposite side of the financial transaction or contract.</p> <p>Outbound transfer: For the purpose of this datapoint, an outbound transfer is any transfer that is not internal to the reporting entity.</p>
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1.12 AML.07.07 Group-wide AML/CFT Framework

Template Remarks

This template (cluster of datapoints) is applicable for all sectors (unless it is mentioned in the datapoint otherwise).

In the context of this template, group entities are the entities that are part of the group as defined in Article 2(1)(41) and (42) AMLR, including non-EU obliged entities. Entities of the group that are not obliged entities under AMLR should be excluded from the scope.

The questions below should only be answered by parent undertakings within the meaning of Article 2(1)(42) AMLR. See Annex II of this guidance for full definitions.

Special remarks:

All “Group Reporting” datapoints below cover the provision by group entities or local AML functions of aggregated information (e.g. KPIs) or identity/transaction-level information to the group compliance function for the purposes of allowing the parent undertaking to fulfil its obligation under Article 16 AMLR to “ensure that the requirements on internal procedures, risk assessment and staff referred to in [Chapter 1, Section 1 AMLR] apply in all branches and subsidiaries of the group in the Member States and, for groups whose head office is located in the Union, in third countries”.

Column code	Legal references and instructions
C0010	<p>Group Reporting - Group Entities Reporting on CDD</p> <p>Indicate the percentage of group entities that provided reports to the Group AML compliance on CDD during the reference year.</p> <p><u>Examples of information included in such reports (strictly indicative):</u></p> <ul style="list-style-type: none"> - Customers onboarded/off-boarded (in a given period) - Risk distribution (% LR, MR, HR) - Number/% of: PEPs, sanctions true matches, customers with complex corporate structures - Number/% of active customers with complete CDD

	<ul style="list-style-type: none"> - Number/% of CDD/EDD deficiencies (missing ID, missing UBO information, expired documents, missing source of funds/wealth, PEP annual review completed/due/overdue, etc.) - CDD data quality deficiencies - Periodic KYC review: completed/due/overdue (total/%), overdue HR customers - Trigger events: event-driven KYC reviews completed/due, average time to complete KYC after review - Etc.
C0020	<p>Group Reporting - Group Entities Reporting on Ongoing Monitoring</p> <p>Indicate the percentage of group entities that provided reports to the Group AML compliance on ongoing monitoring during the reference year.</p> <p><u>Examples of information included in such reports (strictly indicative):</u></p> <ul style="list-style-type: none"> - Total transactions monitoring alerts generated (breakdown by scenarios) - % of alerts linked to HR customers - Number/% of alerts closed - Backlog of open alerts - Average time to close/escalate alerts - % of alerts escalated to level 2 - % of alerts resulting in STRs (breakdown by scenario) - Number/% of false positives (breakdown by scenario) - % of transactions involving high-risk third countries - Etc.
C0030	<p>Group Reporting - Group Entities Reporting on STRs</p> <p>Indicate the percentage of group entities that provided reports to the Group AML compliance on Suspicious Transaction Indicates (STRs) during the reference year.</p> <p><u>Examples of information included in such reports (strictly indicative):</u></p> <ul style="list-style-type: none"> - Number of STRs filed (breakdown by product, business line) - Number/% of STRs per origin (automated transactions monitoring, manual referrals, audit findings, FIU/law enforcement referrals) - Average time from alert generation to STR filing - Number/% of late STR filings (period) - STR quality indicators: <ul style="list-style-type: none"> o Number/% STRs rejected internally before filing o Number/% returned by FIU for additional information o FIU feedback received (positive/negative) o Follow-up requests from FIU (number) o STRs linked to confirmed investigations (if known) - STRs risk breakdown (% linked to HR customers, PEPs, HR jurisdictions, complex corporate structures etc.) - STRs breakdown by underlying offense - Customers reported by several group entities.
C0040	<p>Group Reporting - Group Entities Reporting on Identity and Transaction-level Information on High-risk Customers</p>

	<p>Indicate the percentage of group entities that provided reports to the Group AML compliance on identity and transaction-level information on high-risk customers during the reference year.</p> <p>This datapoint should reflect the sharing of information related to specific individual customers or specific transactions from one group entity or local AML functions to the group compliance function (e.g. for the purpose of further group-wide investigations).</p>
C0050	<p><u>Group Reporting - Group Entities Reporting on Deficiencies</u></p> <p>Indicate the percentage of group entities that provided reports to the Group AML compliance on deficiencies during the reference year.</p>
C0060	<p><u>Group Reporting - Jurisdictions subject to Compliance Reviews</u></p> <p>Indicate the percentage of jurisdictions in which the group is established which were subject to reviews performed by the group AML/CFT compliance function during the three-year period comprising the reference year and the two preceding calendar years.</p> <p>For calculation:</p> <ul style="list-style-type: none"> ▪ Denominator: "100% = total number of jurisdictions where the group has obliged entities." ▪ Numerator: "Number of jurisdictions where at least one compliance review was conducted in the last 3 years." <p>In case a compliance review covered multiple jurisdictions, these jurisdictions should be considered in assessing the percentage.</p> <p>Compliance reviews: assessment of compliance of local AML-CFT frameworks with existing laws and regulations covering at least a significant part of the AML/CFT framework, including access to customer and transaction level data. This refers to initial and ongoing CDD, ongoing monitoring, STR, and targeted financial sanction screening. These compliance reviews are conducted by the compliance function.</p> <p>Applies only to groups that have been existing before the start of the three-year period comprising the reference year and the two preceding calendar years.</p>
C0070	<p><u>Group Entities with Deficiencies (within EU/EEA)</u></p> <p>Indicate the number of group entities in the EU/EEA for which deficiencies were identified by competent AML/CFT supervisors during the reference year. This includes (but is not restricted to) AML/CFT control deficiencies mentioned in written compliance briefings, written warnings, and administrative sanctions such as an order subject to penalty or an administrative fine.</p>
C0080	<p><u>Group Entities with Deficiencies (outside EU/EEA)</u></p> <p>Indicate the number of group entities outside the EU/EEA for which deficiencies were identified by competent AML/CFT supervisors during the reference year.</p> <p>This includes (but is not restricted to) AML/CFT control deficiencies mentioned in written compliance briefings, written warnings, and administrative sanctions such as an order subject to penalty or an administrative fine.</p>

Annex 1 Reference table data points / labels

Risk Category	Sub-Category	Data points	Labels in the template	column	template
Customers	Customers	Total number of customers	Total Customers	C0010	AML.02.01
		Number of customers which are Natural Persons (NP) per country	Natural Persons	C0020	AML.02.01
			Natural Persons	C0020	AML.05.01
		Number of customers which are Legal Entities (LE) per country	Legal Entities	C0030	AML.02.01
			Legal Entities	C0030	AML.05.01
		Number of customers NP who are PEPs per country	Natural Persons - PEPs	C0040	AML.02.01
			Natural Persons - PEPs	C0040	AML.05.01
		Number of customers LE whose UBO are PEPs per country	Legal Entities - PEP Bos	C0050	AML.02.01
			Legal Entities - PEP Bos	C0050	AML.05.01
		Number of customers with at least one transaction in the previous year	Active Customers	C0060	AML.02.01
		Number of new customers in the previous year	New Customers	C0070	AML.02.01
		Number of legal entities with complex corporate structure	Legal Entities - Complex Structure	C0110	AML.02.01
		Number of customers with high risk activities	Customers with high-risk activities	C0120	AML.02.01
		Number of legal entities with at least 1 UBOs located in non-EEA countries (residence)	Legal entities with at least 1 Beneficial Owner resident in non-EEA countries	C0130	AML.02.01

		Number of customers with cross border transactions involving non-EEA countries	Customers with cross border Transactions - Non-EEA	C0140	AML.02.01
		Number of walk-in customers	Walk-in Customers	C0150	AML.02.01
		Number of occasional transactions carried by walk in customers	Occasional Transactions carried out by walk in customers	C0160	AML.02.01
		Number of customers with requests from FIU	Customers with requests from FIU	C0170	AML.02.01
Products	Payment Accounts	Number of payment accounts	Payment Accounts	C0010	AML.03.01
		Total Value (EUR) of incoming transactions in the previous year	Incoming Transactions - Value	C0020	AML.03.01
		Number of incoming transactions in the previous year	Incoming Transactions - Number	C0030	AML.03.01
		Total Value (EUR) of outgoing transactions in the previous year	Outgoing Transactions - Value	C0040	AML.03.01
		Number of outgoing transactions in the previous year	Outgoing Transactions - Number	C0050	AML.03.01
	Virtual IBANs	Total Number of master accounts with linked vIBANs	Master Accounts with Linked Virtual IBANs	C0010	AML.03.02
		Number of transactions on Virtual IBANs (incoming) in the previous year	Transactions on vIBANs (Incoming) - Number	C0020	AML.03.02
		Total Value (EUR) of transactions on Virtual IBANs (incoming) in the previous year	Transactions on vIBANs (Incoming) - Value	C0030	AML.03.02
		Number of transactions on Virtual IBANs (outgoing) in the previous year	Transactions on vIBANs (Outgoing) - Number	C0040	AML.03.02
		Total Value (EUR) of transactions on Virtual IBANs (outgoing) in the previous year	Transactions on vIBANs (Outgoing) - Value	C0050	AML.03.02
		Total Number of re-issued IBANs	Re-issued Virtual IBANs	C0060	AML.03.02

		Total Number of re-issued IBANs where the end-user is not a customer of the obliged entity	Re-issued Virtual IBANs	C0060	AML.03.02
	Prepaid Cards	Total Number of Prepaid Cards issued during the previous year	Prepaid Cards Issued - Number	C0010	AML.03.03
		Total Value (EUR) of the issued prepaid cards during the previous year (turnover)	Prepaid Cards Issued - Value	C0020	AML.03.03
		Total Value (EUR) outstanding on prepaid cards issued during the previous year (turnover)	Prepaid Cards - Outstanding Value	C0030	AML.03.03
		Total number of customers using prepaid cards	Customers Using Prepaid Cards	C0040	AML.03.03
		Total number of customers using prepaid cards with more than 3 prepaid cards	Customers with Multiple Prepaid Cards (>3)	C0050	AML.03.03
	Lending	Total Number of outstanding loans	Outstanding Loans - Number	C0010	AML.03.04
		Total Value (EUR) of outstanding loans	Outstanding Loans - Value	C0020	AML.03.04
		Total Number of outstanding real estate loans	Outstanding Real Estate Loans - Number	C0030	AML.03.04
		Total Number of outstanding real estate loans with third party payments in the past calendar year	Real Estate Loans with Third-party Payments - Number	C0040	AML.03.04
		Total Value (EUR) of loans granted during the previous year	Loans Granted - Value	C0050	AML.03.04
		Total Number of outstanding asset backed loans with cash collateral	Asset-backed Loans with Cash Collateral	C0060	AML.03.04
		Total Number of loan repayments during the previous year	Loan Repayments - Number	C0070	AML.03.04
Total Number of prematurely repaid loans during the previous year		Premature Loan Repayments - Number	C0080	AML.03.04	

		Total Number of loan repayments from non-EEA countries during the previous year	Loan Repayments from Non-EEA Countries	C0090	AML.03.04
		Total Number of consumer loans granted during the previous year that are not associated to the acquisition of any product/service	Unspecified Consumer Loans - Number	C0100	AML.03.04
	Factoring	Total Number of factoring contracts granted in the previous year	Factoring Contracts Granted - Number	C0110	AML.03.04
		Total Value (EUR) of factoring contracts granted during the previous year	Factoring Contracts Granted - Value	C0120	AML.03.04
		Total Value (EUR) of factoring contracts granted to obligors established in non-EEA countries during the previous year	Factoring Contracts to Non-EEA Obligors - Value	C0130	AML.03.04
	Life insurance contracts	total amount (EUR) of gross written premiums in the previous year (incoming)	Gross Written Premiums - Value	C0010	AML.03.05
		total of amount (EUR) of surrender value of the insurance contracts at the end of the previous year	Surrender Value of Insurance Contracts	C0020	AML.03.05
		% of all gross written premium (amount in EUR) paid directly to the life insurance broker in the previous year	Premiums Paid to Broker (%)	C0030	AML.03.05
		Number of insurance contracts that are not used for low risk contracts	Non-low Risk Insurance Contracts - Number	C0040	AML.03.05
	Currency Exchange (involving cash)	Number of currency exchange transactions carried out during the previous year (sell)	Currency Exchange - Sell (Number)	C0010	AML.03.06
		Number of currency exchange transactions carried out during the previous year (buy)	Currency Exchange - Buy (Number)	C0020	AML.03.06

		Number of currency exchange transactions carried out during the previous year, where the transaction is above 1000 euros (sell)	Currency Exchange - Sell > EUR 1000 (Number)	C0030	AML.03.06	
		Number of currency exchange transactions carried out during the previous year, where the transaction is above 1000 euros (buy)	Currency Exchange - Buy > EUR 1000 (Number)	C0040	AML.03.06	
		Total Value (EUR) of currency exchange transactions carried out during the previous year (sell)	Currency Exchange - Sell (Value)	C0050	AML.03.06	
		Total Value (EUR) of currency exchange transactions carried out during the previous year (buy)	Currency Exchange - Buy (Value)	C0060	AML.03.06	
		Value (EUR) of currency exchange transactions cash-to-cash carried out during the previous year	Currency Exchange - Cash-to-Cash (Value)	C0070	AML.03.06	
	Custody of crypto assets	Number of customers owning crypto-assets	Customers holding Crypto-assets - Number	C0010	AML.04.09	
		Total value (EUR) of crypto assets held on customer custody wallets in the previous year	Crypto Assets in Custody - Value	C0020	AML.04.09	
	Services	Invest. Services and Activities - reception and transmission of orders	number of retail clients	Retail Clients (MiFID)	C0010	AML.04.01
			number of professional clients	Professional Clients (MiFID)	C0020	AML.04.01
			Number of AML/CFT regulated customers outside the EEA	Non-EEA AML/CFT Regulated Customers	C0030	AML.04.01
Invest. Services and Activities - custody		number of retail clients	Retail Clients (MiFID)	C0040	AML.04.01	
		number of professional clients	Professional Clients (MiFID)	C0050	AML.04.01	

	account keeping	% of assets under custody for which the obliged entity does not have a direct business relationship with the final investor	Indirect Custody Assets (%)	C0060	AML.04.01
		Number of AML/CFT regulated customers outside the EEA	Non-EEA AML/CFT Regulated Customers	C0070	AML.04.01
	Invest. Services and Activities - Portfolio management	number of retail clients	Retail Clients (MiFID)	C0080	AML.04.01
		number of professional clients	Professional Clients (MiFID)	C0090	AML.04.01
		total assets under management	Total assets under management	C0100	AML.04.01
		Number of customers for which customer holding total assets with a value of at least EUR 5 000 000	Customers with Assets >= EUR 5M	C0110	AML.04.01
	Money Remittance	Total Number of money remittance payments in the previous year (incoming)	Money Remittance (Incoming) - Number	C0010	AML.04.02
		Total Number of money remittance payments in the previous year (outgoing)	Money Remittance (Outgoing) - Number	C0020	AML.04.02
		Total Value (EUR) of remittance payments in the previous year (incoming)	Money Remittance (Incoming) - Value	C0030	AML.04.02
		Total Value (EUR) of remittance payments in the previous year (outgoing)	Money Remittance (Outgoing) - Value	C0040	AML.04.02
		Total Number of money remittance transactions above 1000 euro in the previous year (incoming)	Money Remittance (Incoming) > EUR 1000 - Number	C0050	AML.04.02
		Total Number of money remittance transactions above 1000 euro in the previous year (outgoing)	Money Remittance (Outgoing) > EUR 1000 - Number	C0060	AML.04.02
	Wealth Management	Total Number of customers (NP) with total assets under management over a value of at least EUR	Customers with AUM >= EUR 5M and total assets >= EUR 50M	C0010	AML.04.03

		5,000,000 AND with total assets over a value of at least EUR 50,000,000				
		Total Number of customers (NP) that fall under the definition of private banking (EBA Risk Factor Guidelines)	Private Banking Customers (EBA)	C0020	AML.04.03	
	Correspondent services	Total Value (EUR) of transactions executed on behalf of the respondent client in the previous year (incoming)	Respondent Client Transactions (Incoming) - Value	C0010	AML.04.04	
		Total Value (EUR) of transactions executed on behalf of the respondent client in the previous year (outgoing)	Respondent Client Transactions (Outgoing) - Value	C0020	AML.04.04	
		Total Value (EUR) of transactions going through payable through accounts in the previous year (incoming)	Payable Through Accounts (Incoming) - Value	C0030	AML.04.04	
		Total Value (EUR) of transactions going through payable through accounts in the previous year (outgoing)	Payable Through Accounts (Outgoing) - Value	C0040	AML.04.04	
		Total Value (EUR) of transactions going through nested accounts in the previous year (incoming)	Nested Accounts (Incoming) - Value	C0050	AML.04.04	
		Total Value (EUR) of transactions going through nested accounts in the previous year (outgoing)	Nested Accounts (Outgoing) - Value	C0060	AML.04.04	
		Trade finance	Total Number of trade finance customers	Trade Finance Customers	C0010	AML.04.05
			Total Number of trade finance transactions in the previous year (incoming)	Trade Finance Transactions (Incoming) - Number	C0020	AML.04.05
	Total Number of trade finance transactions in the previous year (outgoing)		Trade Finance Transactions (Outgoing) - Number	C0030	AML.04.05	

		Total Value (EUR) of trade finance transactions in the previous year (incoming)	Trade Finance Transactions (Incoming) - Value	C0040	AML.04.05
		Total Value (EUR) of trade finance transactions in the previous year (outgoing)	Trade Finance Transactions (Outgoing) - Value	C0050	AML.04.05
	E-Money	Number of e-money payment transactions in the previous year (incoming)	E-money Transactions (Incoming) - Number	C0010	AML.04.06
		Number of e-money payment transactions in the previous year (outgoing)	E-money Transactions (Outgoing) - Number	C0020	AML.04.06
		Total Value (EUR) of e-money payment transactions in the previous year (incoming)	E-money Transactions (Incoming) - Value	C0030	AML.04.06
		Total Value (EUR) of e-money payment transactions in the previous year (outgoing)	E-money Transactions (Outgoing) - Value	C0040	AML.04.06
		Value (EUR) of e-money payment transactions by non-identified customers in the previous year	E-money Transactions (Non-identified Customers) - Value	C0050	AML.04.06
	TCSP services	Total Number of legal entity customers using TCSP services in the previous year	TCSP Customers (Legal Entities)	C0010	AML.04.07
	Crypto cash cards	Number of non-EEA crypto companies for which the obliged entity acts as a BIN-sponsor	Non-EEA Crypto Companies (BIN-sponsored)	C0010	AML.04.10
	Exchange crypto for funds	Total amount (EUR) crypto-funds in the previous year	Crypto-to-Funds - Value	C0050	AML.04.10
		Total number of transactions crypto-funds in the previous year	Crypto-to-Funds - Number	C0060	AML.04.10
		number of customers using this type of service in the previous year	Crypto-to-Funds - Customers	C0070	AML.04.10
		Total number of transactions crypto-funds from unhosted wallets in the previous year	Crypto-to-Funds (from Self-hosted) - Number	C0080	AML.04.10

	Exchange funds for crypto	Total amount (EUR) funds-crypto in the previous year	Funds-to-Crypto - Value	C0010	AML.04.10
		Total number of transactions funds-crypto in the previous year	Funds-to-Crypto - Number	C0020	AML.04.10
		number of customers using this type of service in the previous year	Funds to Crypto - Customers	C0030	AML.04.10
		Total number of transactions funds-crypto to unhosted wallets in the previous year	Funds-to-Crypto (to Self-hosted) - Number	C0040	AML.04.10
	Exchange crypto for crypto	Total amount (EUR) crypto-crypto in the previous year	Crypto-to-Crypto - Value	C0090	AML.04.10
		Number of customers using this type of service in the previous year	Crypto-to-Crypto - Customers	C0100	AML.04.10
		Total number of transactions crypto-crypto in the previous year	Crypto-to-Crypto - Number	C0110	AML.04.10
		Total number of transactions crypto-crypto to unhosted wallets in the previous year	Crypto-to-Crypto (to Self-hosted) - Number	C0120	AML.04.10
		Total number of transactions crypto-crypto from unhosted wallets in the previous year	Crypto-to-Crypto (from Self-hosted) - Number	C0130	AML.04.10
	Transfer crypto-assets	Total amount (EUR) that customers transferred in the previous year	Transfers - Value	C0140	AML.04.10
		Number of customers using this type of service in the previous year	Transfers - Customers	C0150	AML.04.10
		Total number of transfers of crypto-assets in the previous year	Transfers - Number	C0160	AML.04.10
		Total number of transactions to unhosted wallets in the previous year	Transfers (to Self-hosted) - Number	C0170	AML.04.10
		Total number of transactions from	Transfers (from Self-hosted) - Number	C0180	AML.04.10

		unhosted wallets in the previous year			
Management of UCITS		Number of retail investor customers	Management of UCITS - Retail Investors	C0010	AML.04.11
		Number of professional investor customers	Management of UCITS - Professional Investors	C0020	AML.04.11
		Total assets under management of UCITSs	<u>Management of UCITS - Total AUM</u>	C0010	AML.04.11
Management of AIFs		Number of retail investor customers	Management of AIFs - Retail Investors	C0020	AML.04.11
		Number of professional investor customers	Management of AIFs - Professional Investors	C0030	AML.04.11
		Number of open-ended funds	Open-ended Funds - Number	C0040	AML.04.11
		Number of closed-ended funds	Closed-ended Funds - Number	C0050	AML.04.11
		Total assets under management	Management of AIFs - Total AUM	C0060	AML.04.11
		Total assets under management in unlisted assets	Management of AIFs - Total AUM in unlisted assets	C0070	AML.04.11
Safe Custody Services		Total Number of customers using safe deposit boxes	Customers Using Safe Deposit Boxes	C0010	AML.04.12
Crowdfunding		Total Value (EUR) of funding projects in the previous year	Funding Projects - Value	C0010	AML.04.13
		Total Number of projects being funded in the previous year	Projects Funded - Number	C0020	AML.04.13
		Total Number of donors from high-risk countries	Donors from High-risk Countries	C0030	AML.04.13
		Total Number of projects where the owner is from a high-risk country	Projects with High-risk Country Owners	C0040	AML.04.13
Cash Transactions		Number of cash transactions in the previous year (withdrawals)	Cash Transactions (Withdrawals) - Number	C0010	AML.04.14

		Number of cash transactions in the previous year (deposits)	Cash Transactions (Deposits) - Number	C0020	AML.04.14
		Total Value (EUR) of cash transactions in the previous year (withdrawals)	Cash Transactions (Withdrawals) - Value	C0030	AML.04.14
		Total Value (EUR) of cash transactions in the previous year (deposits)	Cash Transactions (Deposits) - Value	C0040	AML.04.14
		Total Number of natural persons totalling cash transactions over 20 000 EUR during the previous year	Customers with Cash Transactions > EUR 20 000	C0050	AML.04.14
Geographies	Geographies	Number of incoming transactions in the previous year by country	Transactions (Incoming) - Number	C0050	AML.05.01
		Total value (EUR) of incoming transactions in the previous year by country	Transactions (Incoming) - Value	C0060	AML.05.01
		Number of outgoing transactions in the previous year by country	Transactions (Outgoing) - Number	C0070	AML.05.01
		Total value (EUR) of outgoing transactions in the previous year by country	Transactions (Outgoing) - Value	C0080	AML.05.01
		Total value (EUR) of entity's investment undertakings (CIUs) by country	CIU Investment Flows - Value	C0090	AML.05.01
		Number of investors by country (for AMCs)	Investors	C0100	AML.05.01
		Total value (EUR) of assets under management by country (for AMCs)	Assets under Management - Value	C0110	AML.05.01
		Number of institutions established in foreign countries to whom you provide correspondent services (by country)	Respondent Institutions	C0120	AML.05.01
		Total value of incoming funds moved on behalf of the respondent's clients by country of respondent's establishment	Respondent Client Funds (Incoming) - Value	C0130	AML.05.01

		Total value of outgoing funds moved on behalf of the respondent's clients by country of respondent's establishment	Respondent Client Funds (Outgoing) - Value	C0140	AML.05.01
		Number of branches by country	Number of branches by country	C0150	AML.05.01
		Number of subsidiaries by country	Number of subsidiaries by country	C0160	AML.05.01
		Country where the entities undertaking is located (parent company)	Country of Establishment	C0060	AML.01.01
Distribution channels	Distribution channels	Number of new customers onboarded remotely in the previous year	New Customers - Remote Onboarding	C0080	AML.02.01
		Number of new customers onboarded in the previous year by third parties	New Customers - Third Party Onboarding	C0090	AML.02.01
		Number of customers onboarded in the previous year by third parties not directly subject to AML/CFT supervision	New Customers - Third Party Onboarding (Non-supervised)	C0100	AML.02.01
		Number of agents by country	Number of agents by country	C0020	AML.06.01
		Number of distributors by country	Number of distributors by country	C0030	AML.06.01
		Total value of gross written premiums through insurance contracts issued through brokers, broken down by country the brokers are established	Gross Written Premiums through Brokers - Value	C0040	AML.06.01
		Number of white labelling partners by country of establishment	White Labelling Partners	C0050	AML.06.01

Category	Data Points	Labels in template	Column	Template
1 - Governance, Culture & Compliance function (Role and responsibilities of the management body, AML/CFT risk culture, AML/CFT Compliance Function and Resources, AML/CFT training)	Date at which the procedures covering the entirety of the AML/CFT framework (including initial and ongoing CDD, transaction and business relationship monitoring, STR, and financial sanction screening) were checked as being in compliance with existing laws and regulations applicable at that date	Last AML/CFT Compliance Check	C0010	AML.07.01
	Number of dedicated AML/CFT compliance staff (in FTE)	Dedicated AML/CFT Staff (FTE)	C0020	AML.07.01
	% of personnel per category who have received AML training during the last calendar year: a) AML/CFT compliance staff b) non-AML/CFT compliance staff (e.g. customer facing staff) c) agents and distributors d) Board members / non-executive directors	AML Training - Compliance Staff (%)	C0030	AML.07.01
		AML Training - Non-AML/CFT Compliance Personnel	C0040	AML.07.01
		AML Training - Agents and Distributors (%)	C0050	AML.07.01
		AML Training - Members of the management body (%)	C0060	AML.07.01
2 - Internal Controls & Outsourcing (Internal controls and reporting)	Frequency of reporting by the AML compliance officer to the management body (never, monthly, quarterly, half-yearly, yearly)	Frequency of AML reporting to the management body	C0010	AML.07.02
	Tasks outsourced by the obliged entity (in total or in part) to service providers:	Outsourcing CDD	C0020	AML.07.02

<p>systems, Outsourcing and reliance on third parties, Internal audit function / external expert, Record keeping)</p>	<p>CDD Training Transaction Monitoring Suspicious Transaction Reports Sanctions Screening PEP detection Compliance Monitoring Checks</p>	<p>Outsourcing - Training</p>	<p>C0030</p>	<p>AML.07.02</p>
		<p>Outsourcing - Transaction Monitoring</p>	<p>C0040</p>	<p>AML.07.02</p>
		<p>Outsourcing - Suspicious Transaction Reports</p>	<p>C0050</p>	<p>AML.07.02</p>
		<p>Outsourcing - Sanctions Screening Tasks</p>	<p>C0060</p>	<p>AML.07.02</p>
		<p>Outsourcing - PEP Identification</p>	<p>C0070</p>	<p>AML.07.02</p>
		<p>Outsourcing - Compliance Monitoring Checks</p>	<p>C0080</p>	<p>AML.07.02</p>
	<p>AML/CFT tasks outsourced to an external service provider located in third country that is not part of the group</p>	<p>Outsourcing - Third Country (Non- group)</p>	<p>C0090</p>	<p>AML.07.02</p>
	<p>Existence of AML/CFT tasks outsourced to an external service provider located in third country that is part of the group</p>	<p>Outsourcing - Third Country (Intra- group)</p>	<p>C0100</p>	<p>AML.07.02</p>
	<p>Dates when the AML/CFT obligations/ controls were last assessed by an internal/external audit:</p>	<p>Last Audit - BWRA</p>	<p>C0110</p>	<p>AML.07.02</p>
	<p>a. BWRA</p>	<p>Last Audit - Customers ML/TF Risk Profile</p>	<p>C0120</p>	<p>AML.07.02</p>
	<p>b. determination of ML/TF risk profile of customers in a business relationship</p>	<p>Last Audit - assessment AML/CFT Training measures</p>	<p>C0130</p>	<p>AML.07.02</p>
	<p>c. AML/CFT-related awareness-raising and staff training measures</p>	<p>Last Audit - Identification and Verification Procedures</p>	<p>C0140</p>	<p>AML.07.02</p>
	<p>d. Identification and identity verification procedures</p>	<p>Last Audit - Policies and Procedures for Monitoring and Analysing Business Relationships</p>	<p>C0150</p>	<p>AML.07.02</p>
	<p>e. Policies and procedures for monitoring and analysing business relationships, including transaction monitoring</p>	<p>Last Audit - Suspicious Transaction</p>	<p>C0160</p>	<p>AML.07.02</p>
	<p>f. Policies and procedures for suspicious transaction reporting</p>			
	<p>g. Record keeping policies and procedures</p>			
<p>h. Resources dedicated to AML/CFT</p>				
<p>i. Organisation of the AML/CFT system,</p>				

	governance and reporting to management bodies.	Reporting Procedures		
		Last Audit - Record-keeping Policies and Procedures	C0170	AML.07.02
		Last Audit - Resources dedicated to AML/CFT	C0180	AML.07.02
		Last Audit - Organisation of the AML/CFT System, Governance and Reporting Arrangements	C0190	AML.07.02
3 - Risk assessment (Business Wide Risk Assessment (BWRA) and Customer ML/TF risk assessment and classification (CRA))	Last approval date of the BWRA	Last approval date of the BWRA	C0010	AML.07.03
	Senior management approved the last version of the BWRA	Senior Management Approval (BWRA)	C0020	AML.07.03
	Date of the last update of the CRA	Date of the last update of the CRA	C0030	AML.07.03
	Number of customers per ML/TF risk category (low risk, medium-low risk, medium-high risk, high-risk)	Customers - Low Risk	C0040	AML.07.03
		Customers - Medium-low Risk	C0050	AML.07.03
		Customers - Medium-high Risk	C0060	AML.07.03
		Customers - High Risk	C0070	AML.07.03
	4 - Customer due diligence & monitoring (Customer Due Diligence and Ongoing monitoring of business relationships)	Number of customers that are legal entities /trusts whose beneficial owners have not been identified	Customers – LE/Trusts with BO Not Identified	C0010
Number of customers that are legal entities /trusts whose beneficial ownership has been identified, but the identity of whom has not been verified		Customers – LE/Trusts With BO Identified Not Verified	C0020	AML.07.03
Number of customers without identification and verification documentation/ information		Customers – Missing ID/Verification Documentation	C0030	AML.07.03
Number of customers whose CDD data and information is not yet in line with the requirements of Article 20 AMLR		Customers – CDD Not Compliant with Article 20 AMLR	C0040	AML.07.03

	Number of customers without ML/TF risk profile (excluding customers with whom the obliged entity does not have a business relationship)	Customers – Without ML/TF Risk Profile	C0050	AML.07.03
	Number of customers for whom updates of customer information were due in the last calendar year, in accordance with the obliged entity's policies and procedures	Customers – Information Updates Due	C0060	AML.07.03
	Number of customers for whom customer information was reviewed and updated in the last calendar year	Customers – Information Updates Completed	C0070	AML.07.03
5 - Transaction monitoring and Suspicious Activity Reporting	The obliged entity has a transaction monitoring system in place	The Obligated Entity Has a Transaction/Activity Monitoring System in place	C0010	AML.07.05
	The transaction monitoring system is: a) Not automated; or b) At least partly automated	Transaction / Activity Monitoring System Type	C0020	AML.07.05
	If manual system: Average time in days to analyse the transaction since the moment it occurred	If manual system: Average Alert Analysis Time (Days)	C0030	AML.07.05
	If automated system: The system can generate alerts in case of inconsistencies between CDD information relating to the customer and the following elements: a) Number of transactions b) Value of aggregated transactions c) value of single transactions d) counterparties e) countries	Automated Monitoring System - Alerts on Number of Transactions	C0040	AML.07.05
		Automated Monitoring System - Alerts on Value of Aggregated Transactions	C0050	AML.07.05
		Automated Monitoring System - Alerts on Value of Single Transactions	C0060	AML.07.05
		Automated Monitoring System - Alerts on Counterparties	C0070	AML.07.05
		Automated Monitoring System - Alerts on Countries	C0080	AML.07.05

	If automated system: Number of alerts not analysed at the end of the calendar year	If automated system: Alerts Pending	C0090	AML.07.05
	If automated system: Average time to analyse an alert in the last calendar year (number of days between that the alert was generated and the moment that the alert was closed)	If automated system: Average Alert Analysis Time (Days)	C0100	AML.07.05
	If automated system: Ratio between number of alerts and number of STRs	If automated system: total number of alerts	C0110	AML.07.05
		If automated system: total number of STRs submitted to the FIU	C0120	AML.07.05
	The entity has implemented a tool that enables it to analyse the information available on distributed ledgers and generate alerts where unusual patterns or risk factors are identified, in relation to the transactions carried out by the customer	DLT/Blockchain Analysis Tool	C0130	AML.07.05
	Average number of days between the date of identification of potential suspicious transactions (prior to the analysis of the transaction) and the date when the transaction is reported to the FIU (after the analysis of the transaction) during the last calendar year	Average STR Processing Time (Days)	C0140	AML.07.05
	Total number of STRs submitted to the FIU during the last calendar year	STRs Submitted (Total)	C0150	AML.07.05
	6 - Targeted Financial Sanctions and Compliance with Fund Transfers Regulation	Maximum number of hours between the publication of the TFS by the authorities and the implementation of these changes in the institution's screening tools	TFS Implementation Time (Hours)	C0010
Number of outbound transfers for which requests were received from a counterparty in the transfer chain for information that is missing, incomplete or provided using inadmissible characters in the last calendar year		Outbound Transfers with Information Requests (RFI)	C0020	AML.07.06
Total number of outbound transfers in the last calendar year		Total Outbound Transfers	C0030	AML.07.06

	<p>% of outbound transfers rejected or returned by the counterparty in the transfer chain due to information that is missing, incomplete or provided using inadmissible characters in the last calendar year</p>	<p>Rejected/Returned Outbound Transfers (%)</p>	<p>C0040</p>	<p>AML.07.06</p>
<p>7 - Group-wide AML/CFT Framework (AML/CFT governance structures, Group-wide ML/TF risk assessment, Group policies and procedures, including sharing of information, Group-wide AML/CFT function)</p>	<p>% of group entities that provided reports to the Group AML compliance on the following areas in the last calendar year (should only be answered by the parent company):</p> <ul style="list-style-type: none"> a) CDD b) ongoing monitoring c) STRs d) identity and transaction level information on high-risk customers e) deficiencies 	<p>Group Reporting - Group Entities Reporting on CDD</p>	<p>C0010</p>	<p>AML.07.07</p>
		<p>Group Reporting - Group Entities Reporting on Ongoing Monitoring</p>	<p>C0020</p>	<p>AML.07.07</p>
		<p>Group Reporting - Group Entities Reporting on STRs</p>	<p>C0030</p>	<p>AML.07.07</p>
		<p>Group Reporting - Group Entities Reporting on Identity and Transaction-level Information on High-risk Customers</p>	<p>C0040</p>	<p>AML.07.07</p>
		<p>Group Reporting - Group Entities Reporting on Deficiencies</p>	<p>C0050</p>	<p>AML.07.07</p>
	<p>% of jurisdictions in which the group is established covered by reviews (including access to customer and transaction level data) performed by the group AML/CFT compliance function in the last three calendar years. (applies only to groups that have been existing for more than 3 years and should only be filled in by the parent company)</p>	<p>Group Reporting - Jurisdictions subject to Compliance Reviews</p>	<p>C0060</p>	<p>AML.07.07</p>
	<p>Number of group entities for which deficiencies were identified by competent AML/CFT supervisors in the last calendar year (should only be filled in by the parent company)</p> <ul style="list-style-type: none"> - EU/EEA entities - Non-EU/EEA 	<p>Group Entities with Deficiencies (within EU/EEA)</p>	<p>C0070</p>	<p>AML.07.07</p>
<p>Group Entities with Deficiencies (outside EU/EEA)</p>		<p>C0080</p>	<p>AML.07.07</p>	

Annex 2 Definitions

The data points related to this guidance shall be provided understanding:

‘Business relationship’ means a business, professional or commercial relationship connected with the professional activities of an obliged entity, which is set up between an obliged entity and a customer, including in the absence of a written contract and which is expected to have, at the time when the contact is established, or which subsequently acquires, an element of repetition or duration. (Article 2(19) AMLR).

‘Complex structure’: for the purposes of this data collection exercise a customer shall be treated as having or forming part of a complex structure where there are three or more layers between the customer and the beneficial owner and in addition, more than one of the following conditions is met:

- (a) there is a legal arrangement or a similar legal entity such as a foundation in any of the layers;
- (b) the customer and any legal entities present at any of these layers are registered in jurisdictions outside the EU;
- (c) there are nominee shareholders or nominee directors involved in the structure; or
- (d) the structure obfuscates or diminishes transparency of ownership with no legitimate economic rationale or justification.

For the purposes of point (a), and in accordance with Article 2(1)(32) AMLR, ‘legal arrangement’ means an express trust or an arrangement which has a similar structure or function to an express trust, including fiducie and certain types of Treuhand and fideicomiso.

For the purposes of point (c), ‘nominee shareholder’ and ‘nominee director’ should be understood as persons acting as shareholder or director on behalf of, and under instructions from, another natural person or legal entity, under a nominee arrangement, whether formal or informal. A ‘formal nominee arrangement’ should be intended as a contract or an equivalent arrangement, between a nominator and a nominee, as defined under Article 53(4)(c) AMLR.

‘Customer’ means a natural or legal person who maintains a business relationship with a financial institution pursuant to AMLR. It also includes the persons referred to in Article 19(6) of that Regulation.

For LI: ‘Customer’ should refer to the policyholder (natural or legal person).

For AMC: Customer should refer to the person mentioned in the shares/units register of the Collective Investments Undertaking (CIU) for which the Asset Management Company is designated AIFM or UCITS Management Company. If a customer has multiple positions (lines in the shares/units of the CIU), please count it only once per CIU.

As a general rule, and unless specified otherwise:

- all customers should be included (active and non-active, including those holding dormant accounts)
- customers that, within one obliged entity, have more than one product or service should be counted only once (no double counting of customers per obliged entity)
- for joint accounts, each holder is regarded as a single customer.

‘Customer initiated transaction’ means any operation or activity initiated by a customer and involving the transfer or movement of funds, crypto-assets, securities, or other assets or value. A transaction is considered *customer-initiated* if it is triggered by a customer’s action or mandate (‘instruction’), including instructions that lead to automated or recurring execution (e.g., standing orders, direct debits, pre-authorized securities orders).

Indicative (non-exhaustive) list of operations that should typically be considered as transactions, provided they are initiated by the customer:

- Physical cash transactions (deposits/withdrawals)
 - Debit/credit card transactions
 - Transfer of value through account-to-account transfers, whether internal or external
 - Transactions involving monetary instruments (traveller’s cheques, money orders)
 - Transfer of assets under custody
 - Direct debit collections
 - Standing orders
 - Loan repayments
 - Purchase, sale, subscription, redemption, or exchange of financial instruments
 - Top up, transfer, or spending of anonymous or prepaid cards
 - Insurance premium payments (including one off and recurring contributions to life insurance and similar financial insurance products)
 - Insurance withdrawals, partial surrenders, or policy redemptions initiated by the customer
 - Operations registered on the blockchain, or executed in layer 2 environments as well as within a CASP’s internal ledgers.
- Indicative (non-exhaustive) list of operations that should typically not be considered as transactions:
 - Internal transfers between a customer’s own accounts within the same entity

- Operations not initiated by the customer (e.g. fees, commissions, interest accruals, tax adjustments, AMC initiated capital calls or distributions)
- System generated movements (e.g., auto sweeps, margin calls not triggered by customer instruction)
- Transactions not involving value transfer, or non-executed (e.g., rejected, reversed, or failed transactions).

For CASPs: As per Article 3(10) Regulation (EU) 2023/1113 ‘transfer of crypto-assets’ means any transaction with the aim of moving crypto-assets from one distributed ledger address, crypto-asset account or other device allowing the storage of crypto-assets to another, carried out by at least one crypto-asset service provider acting on behalf of either an originator or a beneficiary, irrespective of whether the originator and the beneficiary are the same person and irrespective of whether the crypto-asset service provider of the originator and that of the beneficiary are one and the same.

‘Family member’ (of a PEP) means, in accordance with Article 2(1)(35) AMLR:

- (a) a spouse, or a person in a registered partnership or civil union or in a similar arrangement;
- (b) a child and a spouse of, or a person in a registered partnership or civil union or in a similar arrangement with, that child;
- (c) a parent;
- (d) for the functions referred to Article 2(1)(34)(a)(i) AMLR and equivalent functions at Union level or in a third country, a sibling.

‘Group’ (cf. Article 2(1)(41) AMLR) means a group of undertakings which consists of a parent undertaking, its subsidiaries, as well as undertakings linked to each other by a relationship within the meaning of Article 22 of Directive 2013/34/EU

A **‘Legal entity’** customer is an entity that has legal personality, granting it legal rights and obligations, for example the ability to enter into contracts. These also includes companies.

Legal entities in the same corporate group and connected legal entities (constructed relationships) should be counted separately.

‘Parent undertaking’ (cf. Article 2(1)(42) AMLR) means:

- a. for groups whose head office is located in the Union, an obliged entity that is a parent undertaking as defined in Article 2, point (9), of Directive 2013/34/EU that is not itself a subsidiary of another undertaking in the Union, provided that at least one subsidiary undertaking is an obliged entity;

- b. for groups whose head office is located outside of the Union, where at least two subsidiary undertakings are obliged entities established in the Union, an undertaking within that group established in the Union that:
- (i) is an obliged entity;
 - (ii) is an undertaking that is not a subsidiary of another undertaking that is an obliged entity established in the Union;
 - (iii) has a sufficient prominence within the group and a sufficient understanding of the operations of the group that are subject to the requirements of this Regulation; and
 - (iv) is given the responsibility of implementing group-wide requirements under Chapter II, Section 2 of this Regulation;

A **'PEP'** (politically exposed person) means a natural person who is or has been entrusted with a prominent public function, as defined in Article 2(1)(34) AMLR. The prominent public functions referred to in that provision include:

(a) in a Member State:

- (i) heads of State, heads of government, ministers and deputy or assistant ministers;
- (ii) members of parliament or of similar legislative bodies;
- (iii) members of the governing bodies of political parties that hold seats in national executive or legislative bodies, or in regional or local executive or legislative bodies representing constituencies of at least 50 000 inhabitants;
- (iv) members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, except in exceptional circumstances;
- (v) members of courts of auditors or of the boards of central banks;
- (vi) ambassadors, *chargés d'affaires* and high-ranking officers in the armed forces;
- (vii) members of the administrative, management or supervisory bodies of enterprises controlled under any of the relationships listed in Article 22 of Directive 2013/34/EU either by the state, or, where those enterprises qualify as medium sized or large undertakings or medium sized or large groups, as defined in Article 3(3), (4), (6) and (7) of that Directive, by regional or local authorities;
- (viii) heads of regional and local authorities, including groupings of municipalities and metropolitan regions, with at least 50 000 inhabitants;
- (ix) other prominent public functions provided for by Member States;

(b) in an international organisation:

- (i) the highest ranking officials, their deputies and members of the board or equivalent functions of an international organisation;

(ii) representatives to a Member State or to the Union;

(c) at Union level:

functions at the level of Union institutions and bodies that are equivalent to those listed in points (a) (i), (ii), (iv), (v) and (vi);

(d) in a third country: functions that are equivalent to those listed in point (a).

‘Person known to be a close associate’ (of a PEP) means, in accordance with Article 2(1)(36) AMLR:

(a) a natural person who is known to have joint beneficial ownership of legal entities or legal arrangements, or any other close business relations, with a PEP;

(b) a natural person who has sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the de facto benefit of a PEP.