



***Questionnaire Wwft and Sw
Investment funds 2020***

This version has been translated from Dutch into English. In the event of any discrepancy between the English version and the Dutch version, the Dutch version will prevail.

Introduction

Welcome, you can log in here for the 'Questionnaire Wwft and Sw for AIFM, UCITS and registered (managers of) investment institutions 2020' (the questionnaire).

You have been sent a user name and password by surface mail. To start the questionnaire, enter your user name and password, and click on '**Log In**'.

After logging in, you will first see the notes on completing the questionnaire. Please read these notes carefully before starting to complete the questionnaire.

If you have not received a user name and/or password, or your details are not correct, please contact the Business Desk. The Business Desk is available by e-mail to ondernemersloket@afm.nl

The measures relating to the coronavirus are affecting our activities and our availability. The Business Desk is therefore currently only available via e-mail. An announcement will be posted on our website when this situation changes.

Questionnaire Wwft and Sw for AIFM, UCITS and registered (managers of) investment institutions 2020

This questionnaire concerns the following enterprise: **[Name of enterprise]**

Please read the following information carefully before starting to complete the questionnaire.

What is this questionnaire for?

This questionnaire is a supervisory instrument of the AFM. The information obtained provides the AFM with greater insight into the risks and the development of risks relating to money laundering, the financing of terrorism and sanctions regulations at AIFM, UCITS and registered (managers of) investment institutions and of these risks. The AFM can thus focus its supervision more closely on risks and trends in the market or developments at individual enterprises.

Management companies

If you are a manager of an alternative investment funds, you are sent this questionnaire because as a manager you are responsible for compliance with the Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft)¹ and the Sanctions Act 1977 (Sw) by the alternative investment funds under your management. You should answer the questions in this questionnaire collectively for all the alternative investment funds under your management. This means that you do not have to answer the questions separately for each alternative investment fund that you manage, and you may provide one answer to the questions for all the alternative investment funds under your management. Some questions however require you to provide answers for each alternative investment fund under your management. This is explicitly stated for the questions concerned.

For the record, the AFM stresses that where reference is made to a (manager of) alternative investment funds, this also includes (managers of) UCITS². Please note also that reference in this questionnaire to 'management company' or 'manager' also includes investment funds that do not have a separate management company.

Date of completion of the questionnaire

The letter sent to you announcing this questionnaire states the date by which you must complete and return the questionnaire. You do not have to complete the questionnaire in one go, you can do this in several sessions. Therefore, please therefore keep your login details in a safe place.

Complete the questionnaire truthfully

You must complete this questionnaire fully, accurately and truthfully. The person(s) in charge of day-to-day policy at your enterprise are personally responsible for this.

Structure of the questionnaire

The questionnaire consists of several sections, and includes questions on the inherent risks relating to money laundering, terrorist financing and sanctions regulations regarding your clients and products, and questions on your control measures in relation to the Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft) and the Sanctions Act (Sw). Each section consists of several subsections. A subsection consists of questions relating to the same subject.

¹ Section 1a (6) Wwft.

² For the definition of a UCITS, see Section 1:1 of the Financial Supervision Act (Wft).

You can only give one answer to most of the questions, however multiple answers are possible in some cases. This is stated with the question. **If you can only give one answer, choose the answer that is most appropriate or suitable to your enterprise.**

The questions are numbered in sequence. It may be that you do not need to answer some questions because they do not apply in your case. You may therefore skip certain question numbers.

At the end of the questionnaire, you will be asked to pass on any comments or recommendations regarding the questionnaire. These may be either general, or relate to a specific question. We suggest that you note any comments or recommendations separately while filling in the questionnaire, also noting the relevant question number.

Click [here](#) to open the questionnaire in pdf format. Please note: the download of the questionnaire contains all the questions, some of which may not apply to your organisation. Depending on your answers, during the completion of the questionnaire you will be shown only the questions that are relevant to your organisation.

The AFM will process your personal data provided in accordance with the General Data Protection Regulation (GDPR) with due care and attention.

Navigating in the questionnaire

The completed answers will be automatically saved when you click on 'Next'. Just like clicking 'Next' will take you to the next question, clicking 'Back' will take you back to the previous question. If you wish to go back further than one question, you can use the menu on the left of your screen to do this. If you have changed a previous answer, always click on 'Next' after making your adjustment. Your adjustment may affect the subsequent questions. It is not possible to navigate immediately to the end of the questionnaire, as the questions will depend on the answers that you give. It is not possible to use the scrolling feature in your browser to move up or down in the questionnaire.

Saving the completed questionnaire

Before you submit the questionnaire, you can download a pdf document showing the answers you have given. You may save and/or print this document. The AFM advises you to keep a copy of the completed questionnaire for your own records.

Submitting the questionnaire

To submit the questionnaire electronically, click on the '**Send**' button at the end of the questionnaire. Your questionnaire will then be sent to the AFM automatically. **From this moment you will no longer be able to change your answers. You will also no longer be able to save or print the completed questionnaire.** You will see a confirmation when you have submitted the questionnaire. You can print this confirmation.

Questions?

If after reading this information you still have questions, contact us via the Business Desk. The Business Desk is available by e-mail to ondernemersloket@afm.nl.

The measures relating to the coronavirus are affecting our activities and our availability. The Business Desk is therefore currently only available via e-mail. An announcement will be posted on our website when this situation changes.

**Please note! Changes with respect to your licence must always be notified by you to the Digital Portal.
You cannot notify changes using this questionnaire.**

Click on '**Next**' to start completing the questionnaire.

Contact details

Contact person

Who should the AFM contact for questions relating to your answers to this questionnaire?

- Mr
- Mrs

Contact name:

Title of contact person:

Telephone number:

E-mail¹:

Which e-mail address should the AFM use for correspondence regarding further Wwft and Sw questionnaires?

E-mail:

Note:

¹) If the AFM has questions regarding the answers given, an AFM employee will contact this contact person.

Part I. Organisation

A. Enterprise type

1.

Which of the following categories describes your enterprise? *Multiple answers to this question are possible.*

- A licensed (manager of) alternative investment funds (AIFM) as referred to in Section 2:65(a) Wft
- A registered (manager of) investment institutions as referred to in Section 2:66(a) Wft
- A manager of undertakings for collective investment in transferable securities (UCITS) as referred to in Section 2:69(b) Wft

Note:

Reference to a 'manager of' in this questionnaire also refers to investment funds without a separate management company.

2.

On the reference date 30 June 2020, were you providing services as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft? If so, give details.

Multiple answers to this question are possible.

- Yes, management of individual capital
- Yes, advice on financial instruments in the pursuit of a profession or business
- Yes, custody and administration of participating units in alternative investment funds and UCITS
- Yes, receiving and forwarding client orders with regard to financial instruments in the practice of a profession or the running of a business
- No, our enterprise does not provide services as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft.

Note:

This question concerns the extensions to your licence you may have obtained from the AFM on the basis of Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft. Multiple answers to this question are possible. Check the boxes for all categories that apply to your enterprise.

B. Personnel

3.

How many FTE employees were working for your enterprise on the reference date 30 June 2020? This includes employees in salaried employment, employees not in salaried employment, policymakers, hired in personnel, etc.

Total number of FTE at 30 June 2020	FTE
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Note:

One FTE is one full-time position. Please round the number of FTE to one decimal place. For example, 6.75 FTE becomes 6.8 FTE. Part-time employees should be included in proportion to a full-time position. Two part-time employees who each work for 50% of a full-time position are thus one FTE.

4.

How many FTE at your enterprise had direct client contact on the reference date 30 June 2020?

Total number of FTE with direct client contact on 30 June 2020	FTE
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Note:

With its reference to 'direct client contact', the AFM refers to direct contact (in person, by telephone, by e-mail or by other means) from your enterprise with natural or legal persons that have invested in the investment fund(s). Client contact is direct if there is no intermediary through whom the contact takes place.

Please round the number of FTE to one decimal place. In other words, 6.75 FTE becomes 6.8 FTE.

5.

How many FTE at your enterprise, on the reference date 30 June 2020, need to be acquainted with the provisions of the Wwft and Sw (to the extent relevant) for the performance of their duties?

#number

Note:

Please round the number of FTE to one decimal place. In other words, 6.75 FTE becomes 6.8 FTE.

C. Organisation

6.

The reference date for this question is 30 June 2020.

How many branch offices, representative offices and/or subsidiaries do you have?

	Total number of branches, representative offices and/or subsidiaries
in the EEA (excluding the Netherlands)	
outside the EEA	

Note:

The European Economic Area (EEA) consists of **30 Member States**: the 27 EU Member States and three of the four EFTA Member States (Norway, Iceland and Liechtenstein). Switzerland is a member of EFTA, but is not a member of the EEA. Iceland is a member of the EEA, but since February 2020 Iceland has been qualified by the FATF as a country with 'strategic deficiencies', and accordingly Iceland is included as a high-risk country for the purpose of this questionnaire and we therefore request you to include Iceland as BOTH an EEA country AND a high-risk country.

7. A

The reference date for this question is 30 June 2020.

Do you have branch offices, representative offices and/or subsidiaries in high-risk countries?

- Yes
 No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

7. B

This question applies only if the answer to the previous question is 'Yes'.

The reference date for this question is 30 June 2020.

You have stated that you have branches, representative offices and/or subsidiaries in high-risk countries.

In the list below, check the boxes against **all** high-risk countries in which you have branches, representative offices and/or subsidiaries.

	List of high-risk countries

7. C

The reference date for this question is 30 June 2020.

You have stated that you have branches, representative offices and/or subsidiaries in high-risk countries. State **for each high-risk country** the numbers of these branches, representative offices and/or subsidiaries.

High-risk country	Total number of branches, representative offices and/or subsidiaries
High-risk country I	#
High-risk country II	#
Etc.	#

8. A

Have you worked with business relations located outside the Netherlands in the period from 01 July 2019 to 30 June 2020?

This question does not refer to your investors.

- Yes
- No

Note:

A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

8. B

State the following information for your business relations located outside the Netherlands:

- The number of business relations located outside the Netherlands with which you have worked in the period from 1 July 2019 to 30 June 2020:

- The total amount¹ (in €) involved in these cooperation(s) in the period from 1 July 2019 to 30 June 2020:

Note:

A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

This question does not refer to your investors.

¹⁾ This is the sum of all transfers between your enterprise and the business relation in question, including compensation payments and any delegated assets.

9. A

Have you worked with business relations located **in a high-risk country** in the period from 1 July 2019 to 30 June 2020?

This question does not refer to your investors.

- Yes
- No

Note:

A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

9. B

You have stated that you have worked with business relations in high-risk countries in the period from 1 July 2019 to 30 June 2020.

In the list below, check the boxes against **all** high-risk countries in which you have business relations.

	List of high-risk countries

9. c

You have stated that you have business relations in high-risk countries.

State **for each high-risk country** the number of business relations with which you work and the amount¹ involved in the period from 1 July 2019 to 30 June 2020.

High-risk country	Number of business relations	Amount involved¹ (€)
High-risk country I	#	
High-risk country II	#	
Etc.	#	

Note:

1) This is the sum of all transfers between your enterprise and the business relation in question, including compensation payments and (if applicable) any delegated assets.

Part II. Investment Funds

D. Type of Investment Funds

10.

The reference date for this question is 30 June 2020.

The AFM requests you to state how many investment funds your organisation manages. This question concerns the total number of investment funds and investment funds (with or without a separate manager), regardless of whether these are AIFM or UCITS.

How many investment funds does your organisation manage?

Note:

In the case of exclusively an investment fund without a separate management company, enter '1' here.

11.

The reference date for this question is 30 June 2020.

Please complete the table below for each investment fund you manage.

	Name of investment fund ¹	Type ²	Total assets under management (€) ³	Repurchasing frequency ⁴	Number of subfunds ⁵
1.			EUR		
2.			EUR		
3.			EUR		
4.			EUR		
5.			EUR		
6.			EUR		
7.			EUR		
8.			EUR		
9.			EUR		
10.			EUR		

Note:

¹) State the full names of the investment fund(s) here.

²) State whether the investment fund is an alternative investment fund or a UCITS.

³) State the total assets under management in the investment fund here. The AFM defines this as the value of the portfolios of the investment fund that is managed.

⁴) State the repurchase frequency of the investment fund here.

⁵) State the number of subfunds of the investment fund in question. If there are no subfunds, enter '0' here. In the 'Number of subfunds' column, you only have to state how many subfunds fall under the investment fund. You do not need to state the names of the subfunds.

E. Assets invested

12. A

The reference date for this question is 30 June 2020.

Do you have positions in assets in one or more **high-risk countries**? Please state both your direct and your indirect investments here. This concerns all your assets regardless of the category of these assets.

- Yes
 No

Note:

In this question, the AFM defines a 'direct investment' as any investment held directly by your investment fund(s) in assets in a high-risk country.

'Indirect investments' include positions in assets in a high-risk country held through another entity or vehicle. An example of the latter is a position in an investment fund that in turn invests in assets in a high-risk country.

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

12. B

The reference date for this question is 30 June 2020.

You have stated that you hold positions in assets in one or more high-risk countries.

In the list below, check the boxes against **all** high-risk countries in which you have positions in assets.

	List of high-risk countries

12. C

The reference date for this question is 30 June 2020.

You have stated that you hold positions in assets in one or more high-risk countries.

State **for each high-risk country** the value of the position on the stated reference date.

High-risk country	Value ¹ of the position(s) (€)
High-risk country I	#
High-risk country II	#
Etc.	#

Note:

¹) The AFM requests you to base this on the (estimated) market value of the position(s). If this value is not or not easily available, state the most recent market value.

13.

State the value of the direct and indirect investments of your investment fund(s) in the stated asset categories. This concerns positions, regardless of the country in which these assets are situated.

In this question, the AFM defines '*direct investments*' as any investment held directly by your investment fund(s) in one of the stated asset categories. '*Indirect investments*' are any investments held by your investment fund(s) through the intermediation of another entity or vehicle. Such as investments in other investment funds that in turn invest in the stated assets, for example.

If you have no position in an asset category, please enter '0'.

Asset categories	Total value of investment¹ (€)
Virtual currency	EUR
'Investment objects' such as horses, teak, whisky, gold, wine, etc.	EUR
Art and/or antiques	EUR
Real estate	EUR
Microfinance	EUR
CO2 emission rights	EUR
Oil, gas, minerals	EUR

Note:

1) The AFM requests you to base this on the (estimated) market value of the position in the stated asset category. If this value is not or not easily available, state the most recent market value.

With regard to indirect investments, you may state an estimate of the amount of capital involved.

Part III. Investors

F. Delivery channels and receipts

14.

The reference date for this question is 30 June 2020.

How are the units in your investment fund(s) traded?

Please note! This question concerns the total of all your investment fund(s). If the units in some of your investment fund(s) are traded only directly and the units in other investment fund(s) are traded only indirectly, check the box for 'directly and indirectly'.

- Directly
- Indirectly
- Directly and indirectly

Note:

The AFM understands 'direct' trading of units to mean that investors can acquire units in one of your investment fund(s) directly and without the intermediation of investment firms or banks. The units are registered in the name of the investor.

The AFM understands indirect trading to mean that the units are not traded directly.

15.

State the requested information in the table below.

Did you receive cash (notes and coins), payment cards and/or cryptocurrencies from your business relations and investors in the period from 1 July 2019 to 30 June 2020, either directly or indirectly? If not applicable, please enter '0'.

	Number of business relations and investors (direct and indirect)	Amount (€) ¹
Cash received		
Payment cards		
Cryptocurrencies		

Note:

¹ If the amount in question is not denominated in euros, please convert it into euros.

A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

G. Direct investors

16.

You stated that the units in your investment fund(s) are traded directly.

How many direct investors had directly purchased units in the investment fund(s) you manage on the reference date 30 June 2020?

State for each category below the total number of direct investors in all your investment fund(s) and the assets invested by these investors on the reference date 30 June 2020:

Category	Number	Total assets invested ¹ (€)
Natural persons	#	EUR
Legal persons	#	EUR
Total	SUM	SUM

Note:

¹⁾ The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

17.

Please answer, using the reference date 30 June 2020, the following questions regarding your direct investors who are **natural persons**:

	Number	Total assets invested ¹ (€)
Natural persons not resident in the Netherlands	#	EUR

Note:

¹⁾ The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

18.A

The reference date for this question is 30 June 2020.

Do you have direct investors who are natural persons residing in a **high-risk country**?

- Yes
 No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

18. B

The reference date for this question is 30 June 2020.

You have stated that you have direct investors who are natural persons residing in a high-risk country.

In the list below, check the boxes against **all** high-risk countries in which you have direct investors who are natural persons.

Multiple answers possible

	List of high-risk countries

18. C

The reference date for this question is 30 June 2020.

You have stated that you had direct investors who are natural persons residing in a high-risk country.

State the total number of direct investors you had **in each high-risk country**, as well as the total assets invested by these direct investors.

High-risk country	Total number of direct investors per country	Total assets invested per country (€) ¹
High-risk country I	#	EUR
High-risk country II	#	EUR
Etc.	#	EUR

Note:

¹) The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

19.

The reference date for this question is 30 June 2020.

Answer the following questions regarding your direct investors that are **legal persons and/or other legal entities**:

	Number	Total assets invested (€) ¹
Legal persons and/or other legal entities not located in the Netherlands	#	EUR

Note:

This question concerns both Dutch and foreign entities, including 'B.V.', 'N.V.', 'LLC', 'Ltd.', 'stichting' (foundation), 'trust', etc.

¹) The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

20. A

The reference date for this question is 30 June 2020.

Do you have direct investors that are legal persons and/or other legal entities and are located in a high-risk country?

- Yes
 No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

20. B

The reference date for this question is 30 June 2020.

You have stated that you have direct investors that are legal persons and/or other legal entities and are located in a high-risk country.

In the list below, check the boxes against **all** high-risk countries in which you have direct investors that are legal persons and/or other legal entities.

20. C

You have stated that on the reference date 30 June 2020 you had direct investors that are legal persons and/or other legal entities located in a high-risk country.

State the total number of legal persons and/or other legal entities you had in each high-risk country on the reference date 30 June 2020, as well as the total assets invested from each high-risk country.

High-risk country	Total number of direct investors that are legal persons and/or other legal entities per country	Total assets invested per country (€) ¹
High-risk country I	#	EUR
High-risk country II	#	EUR
Etc.	#	EUR

¹) The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

21.

The reference date for this question is 30 June 2020.

In the following table, state how many of your direct investors fall into the stated category and the total assets invested per category:

	Number of direct investors	Total assets invested (€) ⁵
Non-profit organisations ¹ and public benefit organisations (PBOs ²)	#	EUR
Family offices ³	#	EUR
High-net worth individuals⁴	#	EUR

Note:

¹ The AFM applies the definition used by the FATF: “A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of ‘good works’”.

² A PBO is an institution with certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax & Customs Administration.

³ Entities that manage assets on behalf of one or more families.

⁴ This refers to natural persons with investable assets of more than €2.5 million on the reference date.

⁵ The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

22. A

The reference date for this question is 30 June 2020.

Do you have direct investors who are engaged in one or more of the following sectors or activities?

	Yes	No
Churches and other religious institutions	<input type="radio"/>	<input type="radio"/>
Charitable institutions or foundations	<input type="radio"/>	<input type="radio"/>
Games of chance and gaming online or offline (casinos, amusement arcades, poker, etc.)	<input type="radio"/>	<input type="radio"/>
Virtual currency (including mining, exchange, etc.)	<input type="radio"/>	<input type="radio"/>
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)	<input type="radio"/>	<input type="radio"/>
Trust offices	<input type="radio"/>	<input type="radio"/>
Object companies managed or directed by trust offices	<input type="radio"/>	<input type="radio"/>
Art dealers, auction houses	<input type="radio"/>	<input type="radio"/>
Real estate operation and development (in the Netherlands and/or abroad)	<input type="radio"/>	<input type="radio"/>
Jewellers and merchants in precious stones and precious metals	<input type="radio"/>	<input type="radio"/>
Digital peer-to-peer marketplaces (such as Uber, eBay, Airbnb, bol.com, Marktplaats)	<input type="radio"/>	<input type="radio"/>
Arms dealers	<input type="radio"/>	<input type="radio"/>

22. B

You have stated that on the reference date 30 June 2020 you had direct investors who are active in one or more of the sectors or activities listed in the previous question.

In the following table, state how many of your direct investors were active in the stated sectors or activities on the reference date 30 June 2020 and the total assets invested.

	Number of direct investors	Total assets invested (€)
Churches and other religious institutions	#	EUR
Charitable institutions or foundations	#	EUR
Games of chance and gaming online or offline (casinos, amusement arcades, poker, etc.)	#	EUR
Virtual currency (including mining, exchange, etc.)	#	EUR
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)	#	EUR
Trust offices	#	EUR
Object companies managed or directed by trust offices	#	EUR
Art dealers, auction houses	#	EUR
Real estate operation and development (in the Netherlands and/or abroad)	#	EUR
Jewellers and merchants in precious stones and precious metals	#	EUR
Digital peer-to-peer marketplaces (such as Uber, eBay, Airbnb, bol.com, Marktplaats)	#	EUR
Arms dealers	#	EUR

Note:

¹⁾ The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

23. A

The reference date for this question is 30 June 2020.

Do you have direct investors for whom the UBOs are **resident in a high-risk country**?

- Yes
 No

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft. Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

23. B

The reference date for this question is 30 June 2020.

You have stated that you have direct investors for whom the UBOs are resident in a high-risk country.

Check the boxes in the list below for **all** high-risk countries in which you have UBOs who are resident in a high-risk country.

23. C

You have stated that on the reference date 30 June 2020 you had direct investors for whom the UBOs are resident or located in a high-risk country.

State for each high-risk country the number of UBOs resident or located in that country on the reference date 30 June 2020.

Summary high-risk country	Number of UBOs per country
High-risk country I	#
High-risk country II	#
Etc.	#

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.

24.

The reference date for this question is 30 June 2020.

Do you have direct investors who are politically exposed persons (PEPs)?

- Yes
- No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

25.

The reference date for this question is 30 June 2020.

How many PEPs do you have in total as direct investors?

#

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

26. A

The reference date for this question is 30 June 2020.

Do you have direct investors who are PEPs and **are resident or located in a high-risk country**?

- Yes
 No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft. Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

26. B

The reference date for this question is 30 June 2020.

You have stated that you have PEPs as direct investors who **are resident or located in a high-risk country**.

In the list below, check the boxes against **all** high-risk countries in which these PEPs reside or are located.

26. C

You have stated that on the reference date 30 June 2020 you had direct investors who are PEPs and are resident or located in a high-risk country.

State **for each high-risk country** how many direct investors you have who are PEPs and the total assets invested.

High-risk country	Number of PEPs	Total assets invested (€) ¹
High-risk country I	#	EUR
High-risk country II	#	EUR
Etc.	#	EUR

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

¹) The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

27.

The reference date for this question is 30 June 2020.

Do you have direct investors for whom the UBO is a PEP?

- Yes
 No

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

28.

The reference date for this question is 30 June 2020.

How many direct investors in total do you have for whom the UBO is a PEP? #

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

29. A

The reference date for this question is 30 June 2020.

Do you have direct investors for whom the UBO is a PEP **who is resident or located in a high-risk country?**

- Yes
 No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

29. B

The reference date for this question is 30 June 2020.

You have stated that you had direct investors for whom the UBO is a PEP.

In the list below, check the boxes against **all** high-risk countries in which these UBOs who are PEPs reside.

29. C

You have stated that on the reference date 30 June 2020 you had direct investors for whom the UBO is a PEP.

State **for each high-risk country** how many direct investors you have for whom the UBOs are PEPs and the total assets invested.

High-risk country	Number of UBOs of your direct investors who are PEPs	Total assets invested (€) ¹
High-risk country I	#	
High-risk country II	#	
Etc.	#	

Note:

Ultimate Beneficial Owner (UBO) or ‘*uiteindelijk belanghebbende*’ as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

¹⁾ The AFM requests you to base this on the (estimated) market value on the stated reference date. If this value is not or not easily available, state the most recent market value.

30.

State the following information for your direct investors who have placed funds with/via your enterprise in the period from 1 July 2019 to 30 June 2020:

Number of direct investors with funds originating from a Dutch bank account	#
Number of direct investors with funds originating from a bank account in the EEA (other than the Netherlands)	#
Number of direct investors with funds originating from a bank account outside the EEA (other than high-risk countries)	#

Note:

The European Economic Area (EEA) consists of **30 Member States**: the 27 EU Member States and three of the four EFTA Member States (Norway, Iceland and Liechtenstein). Switzerland is a member of EFTA, but is not a member of the EEA. Iceland is a member of the EEA, but since February 2020 Iceland has been qualified by the FATF as a country with ‘strategic deficiencies’, and accordingly Iceland is included as a high-risk country for the purpose of this questionnaire and we therefore request you to include Iceland as BOTH an EEA country AND a high-risk country.

31.

State the following information for your direct investors who have placed funds with/via your enterprise in the period from 1 July 2019 to 30 June 2020:

	Number of transactions	Total amount (€)
Transactions originating from a Dutch bank account		
Transactions originating from a bank account in the EEA (other than the Netherlands)		
Transactions originating from a bank account outside the EEA (other than high-risk countries)		

Note:

The European Economic Area (EEA) consists of **30 Member States**: the 27 EU Member States and three of the four EFTA Member States (Norway, Iceland and Liechtenstein). Switzerland is a member of EFTA, but is not a member of the EEA. Iceland is a member of the EEA, but since February 2020 Iceland has been qualified by the FATF as a country with ‘strategic deficiencies’, and accordingly Iceland is included as a high-risk country for the purpose of this questionnaire and we therefore request you to include Iceland as BOTH an EEA country AND a high-risk country.

32. A

Did any of your direct investors place funds originating from a bank account in a high-risk country with/via your enterprise in the period from 1 July 2019 to 30 June 2020?

- Yes
- No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

32. B

You have stated that you have received funds from direct investors originating from a bank account in a high-risk country.

In the list below, check the boxes against **all** high-risk countries from which you have received funds from your investors.

32. C

You have stated that you have received funds from direct investors originating from a bank account in a high-risk country.

State the number of direct investors, the number of transactions and the total amount of these transactions (in €) for each high-risk country.

High-risk country	Number of direct investors	Number of transactions	Total amount (€)
High-risk country I			#
High-risk country II			#
Etc.			#

33.

Have you accepted non-monetary participation in one or more of the investment fund(s) you manage in the period 1 July 2019 to 30 June 2020?

- Yes
- No

34.

State the following information for your largest direct investors¹ (based on the total assets invested in all the investment fund(s) you manage) in the period 1 July 2019 to 30 June 2020:

- Type of direct investor (natural person or legal person)
- Total assets invested
- Number of years as a direct investor with your enterprise
- Country of residence or country of establishment

Investor	Type of direct investor (natural person or legal person)	Total assets invested (€)	Number of years as a direct investor with your enterprise	Country of residence or country of establishment ¹
1.		EUR		
2.		EUR		
3.		EUR		
4.		EUR		
5.		EUR		
6.		EUR		
7.		EUR		
8.		EUR		
9.		EUR		
10.		EUR		

Note:

Please write the names of the countries **in full in Dutch**, therefore “Verenigde Arabische Emiraten” and not “VAE”.

¹) The number of direct investors, with a maximum of 10, shown in the table depends on your answer to question 16.

35.

For your direct investors, state the requested figures for the period 1 July 2019 to 30 June 2020.

	Number
Total number of direct investors accepted in the stated period (physical and non-physical present)	
Acceptance of direct investors resident or located in the Netherlands (not physically present)	
Acceptance of direct investors <u>not</u> resident or located in the Netherlands (not physically present)	

36.

State how many new direct investors you accepted in the period from 1 July 2019 to 31 March 2020 who were introduced by an intermediary:

	Number of direct investors
Via an intermediary located in the Netherlands	#
Via an intermediary located in the EEA (outside the Netherlands)	#
Via an intermediary located outside the EEA (excluding high-risk countries)	#

Note:

If a client is introduced by an intermediary but the final contract is concluded between your organisation and the client, this is a direct investor who is introduced by an intermediary.

37. A

Have you accepted direct investors in the period from 1 July 2019 to 30 June 2020 who were introduced by an intermediary **located in a high-risk country**?

- Yes
 No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

37. B

The reference date for this question is 30 June 2020.

You have stated that you accepted direct investors in the period from 1 July 2019 to 30 June 2020 who were introduced by an intermediary located in a high-risk country.

In the list below, check the boxes against **all** high-risk countries in which this intermediary or these intermediaries reside.

37. C

You have stated that you accepted direct investors in the period from 1 July 2019 to 30 June 2020 who were introduced by an intermediary located in a high-risk country.

For each high-risk country, state how many direct investors you have accepted through an intermediary in the high-risk country in question and the number of intermediaries located in the high-risk country in question.

High-risk country	Number of intermediaries	Number of direct investors accepted through an intermediary in this high-risk country
High-risk country I		#
High-risk country II		#
Etc.		#

H. Indirect investors

38.

You have stated that the units in your investment fund(s) are traded indirectly.

How many indirect investors had indirectly purchased units in investment fund(s) you manage on the reference date 30 June 2020?

#

Note:

The AFM understands 'indirect' trading of units to mean that investors acquire units in one or more of your investment fund(s) with the intermediation of for example investment firms or banks.

39.

You have stated that the units in your investment fund(s) are traded indirectly.

State the numbers of each type of external enterprise through which the units in your investment fund(s) are traded:

Type	Number
Investment firms (other than trading platforms)	#
Trading platforms (e.g. an MTF)	#
Regulated markets (RM)	#
Banks	#
Other, give details	#

Open field for details under 'Other':

40. A

The reference date for this question is 30 June 2020.

You stated in the previous question that your units are traded indirectly and that you use external enterprises for this purpose. Is/are one or more of these enterprises **located in a high-risk country**?

- Yes
 No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

40. B

The reference date for this question is 30 June 2020.

In the list below, check the boxes against **all** high-risk countries in which these external enterprises are located.

40. C

For each high-risk country, state how many indirect investors hold your participating units through the external enterprise in the high-risk country in question.

High-risk country	Number of external enterprises	Total number of indirect investors
High-risk country I		#
High-risk country II		#
Etc.		#

41.

You have stated that the participating units in your investment fund(s) are traded indirectly.

Do you know the place of residence and/or country of establishment of your indirect investors?

- Yes, 100% of all my indirect investors
- Yes, 50 - 99% of my indirect investors
- Yes, 0 - 49% of my indirect investors
- No, none of my indirect investors

42.

You have stated that you know the place of residence and/or country of establishment of all or some of your indirect investors.

Please answer, using the reference date 30 June 2020, the following questions regarding your indirect investors:

	Number	Total assets invested (€)
Indirect investors not resident or located in the Netherlands	#	EUR

43. A

The reference date for this question is 30 June 2020.

Do you have indirect investors who are resident or located in a high-risk country?

- Yes
- No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

43. B

The reference date for this question is 30 June 2020.

You have stated that you have indirect investors who are resident or located in a high-risk country.

In the list below, check the boxes against **all** high-risk countries in which these indirect investors reside.

43. C

You have stated that on the reference date 30 June 2020 you had indirect investors who are resident or located in a high-risk country.

State the total number of indirect investors you had **in each high-risk country** on the reference date 30 June 2020, as well as the total assets invested per individual high-risk country.

High-risk country	Total number of indirect investors per country	Total assets invested per country (€)
High-risk country I	#	EUR
High-risk country II	#	EUR
Etc.	#	EUR

44.

The reference date for this question is 30 June 2020.

Do you have indirect investors who are politically exposed persons (PEPs)?

- Yes
- No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

45.

The reference date for this question is 30 June 2020.

How many PEPs do you have in total as indirect investors?

#

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

46. A

The reference date for this question is 30 June 2020.

Do you have indirect investors who are PEPs **and are resident or located in a high-risk country?**

- Yes
- No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

46. B

The reference date for this question is 30 June 2020.

You have stated that you have PEPs as indirect investors **who are resident or located in a high-risk country.**

In the list below, check the boxes against **all** high-risk countries in which these PEPs reside or are located.

46. C

You have stated that on the reference date 30 June 2020 you had indirect investors who are PEPs and are resident or located in a high-risk country.

State **for each high-risk country** how many indirect investors you have who are PEPs and the total assets invested with you by each indirect investor. This refers to the country of residence of the PEP.

High-risk country	Number of PEPs	Total assets invested (€)
High-risk country I	#	EUR
High-risk country II	#	EUR
Etc.	#	EUR

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

47.

The reference date for this question is 30 June 2020.

Do you have indirect investors for whom the UBO is a PEP?

- Yes
- No

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

48.

The reference date for this question is 30 June 2020.

How many indirect investors in total do you have for whom the UBO is a PEP?

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

49. A

The reference date for this question is 30 June 2020.

Do you have indirect investors for whom the UBO is a PEP **who is resident in a high-risk country?**

- Yes
- No

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

49. B

The reference date for this question is 30 June 2020.

You have stated that on the reference date 30 June 2020 you had indirect investors for whom the UBO is a PEP who is resident in a high-risk country.

In the list below, check the boxes against **all** high-risk countries in which these UBOs who are PEPs reside.

49. C

You have stated that on the reference date 30 June 2020 you had indirect investors for whom the UBO is a PEP.

State the number of UBOs of your indirect investors who are PEPs **for each high-risk country**. This refers to the country of residence of the PEP.

High-risk country	Number of UBOs of your indirect investors who are PEPs
High-risk country I	#
High-risk country II	#
Etc.	#

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

Part IV. 4 Investment services

I. Asset management

50.

These questions concern the services selected in question 2 as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft.

You have stated that you provide asset management services.

How many individual asset management clients did you have on the reference date 30 June 2020?

51.

The reference date for this question is 30 June 2020.

What is the total value of the investment portfolio¹ of your asset management clients?

Note:

¹ This is the value of the investment portfolio of your clients on the stated reference date including the value of cash in the investment account.

52. A

The reference date for this question is 30 June 2020.

Do you have asset management clients who **are resident or located in a high-risk country**?

- Yes
 No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

52. B

The reference date for this question is 30 June 2020.

In the list below, check the boxes against **all** high-risk countries in which these asset management clients reside or are located.

Multiple answers possible

52. C

State the total number of asset management clients you had in **each high-risk country** on the reference date 30 June 2019, as well as the total assets invested per high-risk country.

High-risk country	Total number of asset management clients	Total assets invested per country (€)
High-risk country I	#	EUR
High-risk country II	#	EUR
Etc.	#	EUR

53.

Do you invest the assets you manage for your asset management clients solely in your own investment fund(s)?

- Yes
- No

54.

State the requested figures for the period 1 July 2019 to 30 June 2020.

State the requested figures for your asset management clients¹ in the period 1 July 2019 to 30 June 2020.

	Number
Total number of asset management clients accepted in the stated period (physically and non-physically present)	
Acceptance of asset management clients resident or located in the Netherlands (not physically present)	
Acceptance of asset management clients <u>not</u> resident or located in the Netherlands (not physically present)	

Note:

¹) An investment service involving your management of investors' capital.

55.

The reference date for this question is 30 June 2020.

Do you have asset management clients who are politically exposed persons (PEPs)?

- Yes
- No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

56.

The reference date for this question is 30 June 2020.

How many of your asset management clients are PEPs?

#

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

57. A

The reference date for this question is 30 June 2020.

Do you have asset management clients who are PEPs **and are resident in a high-risk country?**

- Yes
- No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

57. B

The reference date for this question is 30 June 2020.

You have stated that you have PEPs as asset management clients **who are resident in a high-risk country.**

In the list below, check the boxes against **all** high-risk countries in which these PEPs reside or are located.

57. C

You have stated that on the reference date 30 June 2020 you had asset management clients who are PEPs and are resident in a high-risk country.

State **for each high-risk country** how many asset management clients you have who are PEPs and the total assets invested for each of these clients. This refers to the country of residence of the PEP.

High-risk country	Number of PEPs	Total assets under management (€)
High-risk country I	#	EUR
High-risk country II	#	EUR
Etc.	#	EUR

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

58.

The reference date for this question is 30 June 2020.

Do you have asset management clients for whom the UBO is a PEP?

- Yes
 No

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft. PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

59.

The reference date for this question is 30 June 2020.

How many asset management clients in total do you have for whom the UBO is a PEP?

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft. PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

60. A

The reference date for this question is 30 June 2020.

Do you have asset management clients for whom the UBO is a PEP **who is resident in a high-risk country**?

- Yes
 No

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft. PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft. Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

60. B

The reference date for this question is 30 June 2020.

You have stated that on the reference date 30 June 2020 you had asset management clients for whom the UBO is a PEP.

In the list below, check the boxes against **all** high-risk countries in which these UBOs who are PEPs reside.

60. c

You have stated that on the reference date 30 June 2020 you had asset management clients for whom the UBO is a PEP.

State the number of UBOs of your asset management clients who are PEPs **for each high-risk country**. This refers to the country of residence of the PEP.

High-risk country	Number of UBOs of your asset management clients who are PEPs
High-risk country I	#
High-risk country II	#
Etc.	#

Note:

Ultimate Beneficial Owner (UBO) or *'uiteindelijk belanghebbende'* as defined in Section 1(1) Wwft. PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

J. Advice and/or receipt and forwarding of orders

61.

These questions concern the services selected in question 2 as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft.

You have stated that you give advice with respect to financial instruments and/or that you receive and forward client orders relating to financial instruments.

State the number of clients you have for each type of service with reference date 30 June 2020.

	Number of clients
Execution only	#
Advice	#

Note:

Type of investment service:

- **Execution-only:** An investment service whereby investors are themselves able to trade in financial instruments. Receiving, forwarding and/or executing client orders for investments in financial instruments.
- **Advice:** An investment service whereby you give advice with regard to investments in financial instruments to investors, either at their request or on your own initiative.

62.

State the requested figures for the period 1 July 2019 to 30 June 2020.

State the requested figures for your clients for whom you gave advice on financial instruments and/or received and forwarded orders in the period from 1 July 2019 to 30 June 2020.

	Total number of clients accepted in the stated period (physically or non-physically present)	Acceptance of clients resident or located in the Netherlands (not physically present)	Acceptance of clients not resident or located in the Netherlands (not physically present)
Execution only			
Advice			

Note:

Type of investment service:

- **Execution-only:** An investment service whereby investors are themselves able to trade in financial instruments. Receiving, forwarding and/or executing client orders for investments in financial instruments.
- **Advice:** An investment service whereby you give advice with regard to investments in financial instruments to investors, either at their request or on your own initiative.

63. A

The reference date for this question is 30 June 2020.

Do you have Execution-only or Advice clients who **are resident or located in a high-risk country**?

Yes

No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

63. B

The reference date for this question is 30 June 2020.

In the list below, check the boxes against **all** high-risk countries in which these Execution-only or Advice clients reside or are located.

Multiple answers possible

63. C

State the total number of Execution-only or Advice clients **for each high-risk country** on the reference date 30 June 2020.

High-risk country	Total number of clients
High-risk country I	#
High-risk country II	#
Etc.	#

64.

The reference date for this question is 30 June 2020.

Do you have Execution-only or Advice clients who are PEPs?

Yes

No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

65.

The reference date for this question is 30 June 2020.

How many Execution-only or Advice clients do you have who are PEPs?

#

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

66. A

The reference date for this question is 30 June 2020.

Do you have Execution-only or Advice clients who are PEPs **and are resident or located in a high-risk country?**

- Yes
- No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

66. B

The reference date for this question is 30 June 2020.

You have stated that you have PEPs using Execution-only or Advice services **who are resident or located in a high-risk country.**

In the list below, check the boxes against **all** high-risk countries in which these PEPs reside or are located.

66. C

State the number of PEPs you have using Execution-only or Advice services **for each high-risk country.**

High-risk country	Number of PEPs
High-risk country I	#
High-risk country II	#
Etc.	#

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

67.

The reference date for this question is 30 June 2020.

Do you have clients using Execution-only or Advice services for which the UBO is a PEP?

- Yes
- No

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

68.

The reference date for this question is 30 June 2020.

How many clients using Execution-only or Advice services for which the UBO is a PEP do you have in total?

#

Note:

Ultimate Beneficial Owner (UBO) or 'uiteindelijk belanghebbende' as defined in Section 1(1) Wwft.
PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

69. A

The reference date for this question is 30 June 2020.

Do you have clients using Execution-only or Advice services for which the UBO is a PEP **and is resident in a high-risk country?**

- Yes
- No

Note:

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.
Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

69. B

The reference date for this question is 30 June 2020.

You have stated that on the reference date 30 June 2020 you had clients using Execution-only or Advice services for which the UBO is a PEP and is resident in a high-risk country.

In the list below, check the boxes against **all** high-risk countries in which these UBOs who are PEPs reside.

69. C

You have stated that on the reference date 30 June 2020 you had clients using Execution-only or Advice services for which the UBO is a PEP.

State the number of UBOs of your clients you have using Execution-only or Advice services who are PEPs for each high-risk country. This refers to the country of residence of the PEP.

High-risk country	Number of UBOs of clients using Execution-only or Advice services who are PEPs
High-risk country I	#
High-risk country II	#
Etc.	#

Note:

Ultimate Beneficial Owner (UBO) or *'uiteindelijk belanghebbende'* as defined in Section 1(1) Wwft.

PEP stands for politically exposed person or politically prominent person as defined in Section 1(1) Wwft.

K. Delivery channels for investment services

70.

In your answer to question 2, you stated that you have obtained one or more extensions to the scope of your licence. This question concerns these licence extensions, and therefore relates only to clients for whom you perform one or more services as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft.

State how many new clients you accepted in the period from 1 July 2019 to 30 June 2020 who were introduced by an intermediary:

	Number of clients
Via an intermediary located in the Netherlands	#
Via an intermediary located in the EEA (outside the Netherlands)	#
Via an intermediary located outside the EEA	#

Note:

If a client is introduced by an intermediary but the final contract is concluded between your organisation and the client, this is a client who is introduced by an intermediary.

The European Economic Area (EEA) consists of **30 Member States**: the 27 EU Member States and three of the four EFTA Member States (Norway, Iceland and Liechtenstein). Switzerland is a member of EFTA, but is not a member of the EEA. Iceland is a member of the EEA, but since February 2020 Iceland has been qualified by the FATF as a country with 'strategic deficiencies', and accordingly Iceland is included as a high-risk country for the purpose of this questionnaire and we therefore request you to include Iceland as BOTH an EEA country AND a high-risk country.

71. A

In your answer to question 2, you stated that you have obtained one or more extensions to the scope of your licence. This question concerns these licence extensions, and therefore relates only to clients for whom you perform one or more services as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft.

Have you accepted clients in the period from 1 July 2019 to 30 June 2020 who were introduced by an intermediary **located in a high-risk country**?

- Yes
 No

Note:

Click on 'high-risk countries' to view a list of high-risk countries. The list of high-risk countries will be shown in a separate window.

71. B

The reference date for this question is 30 June 2020.

In your answer to question 2, you stated that you have obtained one or more extensions to the scope of your licence. This question concerns these licence extensions, and therefore relates only to clients for whom you perform one or more services as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft.

You have stated that you accepted clients in the period from 1 July 2019 to 30 June 2020 who were introduced by an intermediary located in a high-risk country.

In the list below, check the boxes against **all** high-risk countries in which this intermediary or these intermediaries reside.

71. c

In your answer to question 2, you stated that you have obtained one or more extensions to the scope of your licence. This question concerns these licence extensions, and therefore relates only to clients for whom you perform one or more services as referred to in Section 2:67(a)(2) Wft or Section 2:69(c)(2) Wft.

You have stated that you accepted clients in the period from 1 July 2019 to 30 June 2020 who were introduced by an intermediary located in a high-risk country.

State **for each high-risk country** how many clients you have accepted through an intermediary in the high-risk country in question.

High-risk country	Number of clients accepted through an intermediary from the high-risk country in question
High-risk country I	#
High-risk country II	#
Etc.	#

Part V. Control measures

L. Risks of money laundering and the financing of terrorism and risk assessment

72.

Have you taken measures to identify and assess your risks in relation to money laundering and financing of terrorism?

- Yes
- No

Note:

In its risk assessment, the investment fund(s) must in any case take into account risk factors including those relating to its clients, products, services, transactions and delivery channel and with countries or geographical areas. The risk assessments must be documented and kept up-to-date. Furthermore, investment fund(s) must have internal conduct codes, procedures and measures in place based on this risk assessment that enable them to meet the requirements of the Wwft.

73.

Have you recorded the results of this analysis and assessment of the risks of money laundering and the financing of terrorism?

- Yes
- No

Note:

In its risk assessment, the investment fund(s) must in any case take into account risk factors including those relating to its clients, products, services, transactions and delivery channel and with countries or geographical areas. The risk assessments must be documented and kept up-to-date. Furthermore, investment fund(s) must have internal conduct codes, procedures and measures in place based on this risk assessment that enable them to meet the requirements of the Wwft.

74.

When were these results updated?

- 2020
- 2019
- 2018
- Before 2018
- Not or not yet

75.

Is your risk assessment based on gross (inherent) risks?

- Yes
- No

Note:

A gross or inherent risk is a risk that is inherently (in other words, regardless of available control measures) associated with the clients, activities and products of the institution or the environment in which an institution operates. This concerns threats and vulnerabilities that exist for your enterprise before account is taken of the internal control measures in place.

76.

Does your risk assessment describe the net or residual risks that exist after consideration of your control measures with regard to the gross (inherent) risks?

- Yes
 No

Note:

Net or residual risk is the risk that remains when taking account of the effects of the control measures in place.

77.

Which of the integrity risks listed below have you included and assessed in your most recent risk assessment?

- Money laundering
 Financing of terrorism
 Corruption (bribery)
 Market manipulation
 Circumvention of sanctions regulation
 Evasion and avoidance of tax regulation
 Internal fraud by employees of your institution
 External fraud by clients or relations
 Conflicts of interest
 Other
 None of the above

78.

How do you assess your enterprise with respect to the following risk categories? Please base your answers on the gross risks.

	Very low risk	Low risk	Neutral risk	High risk	Very high risk
Type of client					
Type of service and products					
Risks relating to countries					
Risks relating to delivery channels					

M. Policy, procedures and measures

79.

Have you incorporated the findings of your risk assessment in your policy, procedures and/or measures?

- Yes
- No

80.

Have you a specific policy in relation to the Wwft and/or sanctions regulation, and do you have a general integrity policy?

Wwft	Yes / no
Sanctions regulation	Yes / no
General integrity policy	Yes / no

81.

Does this policy include the following:

Client acceptance	Yes / no
Client risk profile	Yes / no
Client review	Yes / no
Termination of the client relation	Yes / no
Transaction monitoring	Yes / no
Reporting of unusual transactions	Yes / no
Screening of relations, transactions and investments in relation to sanctions regulation	Yes / no

82.

When was this policy last updated and approved?

	2020	2019	2018	Before 2018
Wwft				
Sanctions regulation				
General integrity policy				

N. Customer due diligence

83.

The reference date for this question is 30 June 2020.

Provide the following information on your clients. This question relates only to your investors who are **natural persons**.

The AFM requests you to answer this question based on the Wwft risk classification you use for your investors. If your enterprise uses different names for the classifications from those stated below, please use the classifications stated below in your answer.

Classification of investors	Number of natural persons in the Netherlands	Total assets invested (€)
Low risk	#	
Medium risk	#	
High/increased risk	#	
Unacceptable risk	#	
Not (or not yet) categorised	#	

Classification of investors	Number of natural persons <u>not</u> resident in the Netherlands	Total assets invested (€)
Low risk	#	
Medium risk	#	
High/increased risk	#	
Unacceptable risk	#	
Not (or not yet) categorised	#	

Note:

This risk classification does not refer to the risk appetite of your investors. It relates to the Wwft risk of your investors.

84.

The reference date for this question is 30 June 2020.

Provide the following information on your clients. This question relates only to your investors who are **legal persons and/or other legal entities**.

The AFM requests you to answer this question based on the Wwft risk classification you use for your investors. If your enterprise uses different names for the classifications from those stated below, please use the classifications stated below in your answer.

Classification of investors	Number of legal persons and/or other legal entities located in the Netherlands	Total assets invested (€)
Low risk	#	
Medium risk	#	
High/increased risk	#	
Unacceptable risk	#	

Not (or not yet) categorised	#	
------------------------------	---	--

Classification of investors	Number of legal persons and/or other legal entities <u>not</u> located in the Netherlands	Total assets invested (€)
Low risk	#	
Medium risk	#	
High/increased risk	#	
Unacceptable risk	#	
Not (or not yet) categorised	#	

Note:

This risk classification does not refer to the risk appetite of your investors. It relates to the Wwft risk of your investors.

85.

The reference date for this question is 30 June 2020.

Provide the following information on your clients. This question concerns only your other business relations¹ and not your investors.

The AFM requests you to answer this question based on the Wwft risk classification you use for your 'other business relations'. If your enterprise uses different names for the classifications from those stated below, please use the classifications stated below in your answer.

Classification of business relations	Number of business relations
Low risk	#
Medium risk	#
High/increased risk	#
Unacceptable risk	#
Not (or not yet) categorised	#

Note:

A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

86.

How many potential clients have you refused for reasons relating to the Wwft in the period from 1 July 2019 to 30 June 2020?

Number:

#

Note:

'Clients' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

87.

With how many clients have you terminated the business relation for reasons relating to the Wwft in the period from 1 July 2019 to 30 June 2020?

Number:

#

Note:

'Clients' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

88.

Do you delegate your client due diligence to a third party?

- In 100% of cases
- In 50 - 99% of cases
- In >0 - 49% of cases
- In 0% of cases

Note:

This refers to Section 10 Wwft, on the basis of which part of the client due diligence may be delegated. Note that this does not include the ongoing monitoring of business relations and transactions (see Section 10(1) Wwft and Section 3(2)(d) Wwft).

'Client' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

89.

In the case of delegation to a third party, do you monitor that the client due diligence by this third party is conducted in accordance with the Wwft?

- At least once a year
- Once every three years
- Less than once every three years
- No

Note:

'Client' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

90.

Do you have a contractual arrangement with this third party to whom you delegate the client due diligence?

- Yes
- No

91.

Does this contractual arrangement establish the obligations with respect to compliance with the Wwft and Sw?

- Yes
- No

92.

Does your enterprise allow clients to add an authorised person to their account? If this is not applicable, please select 'No' in your answer to this question.

- Yes
- No

Note:

'Clients' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

93.

Is the client due diligence also performed for this additional authorised person or persons?

- In 100% of cases
- In 50 - 99% of cases
- In >0 - 49% of cases
- In 0% of cases

Note:

'Clients' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. A business relation here is a legal or natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

94.

Do you carry out a risk assessment of your clients in the context of the client due diligence as defined in the Wwft? Please distinguish here between investors and other business relations.

	In 100% of cases	In 50-99% of cases	In > 0-49% of cases	In 0% of cases
Investors	0	0	0	0
Number of business relations	0	0	0	0

Note:

'Client' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1) Wwft. The depth of the client due diligence must be appropriate to the risks associated with certain clients, services and transactions.

Reference to 'other business relations' here concerns legal or natural persons with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

95.

Is the client due diligence based on the Wwft applied at the inception of a business relationship, or the effecting of a one-off transaction? Please distinguish here between investors and other business relations.

	Always in advance	Sometimes in advance, sometimes afterwards	Always afterwards	No client due diligence is performed
Investors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Number of business relations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Note:

'Client' here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. The depth of the client due diligence must be appropriate to the risks associated with certain clients, services and transactions.

Reference to 'other business relations' here concerns legal or natural persons with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

A transaction is an action or combination of actions by or on behalf of a client that your institution has become aware of in the performance of its service to the client in question. This also includes intended transactions.

96.

As part of your ongoing client monitoring, do you investigate the source of the funds to be used for the business relationship or transaction when necessary?

Please distinguish here between investors and other business relations.

	In 100% of cases	In 50-99% of cases	In > 0-49% of cases	In 0% of cases
Investors	O	O	O	O
Number of business relations	O	O	O	O

Note:

‘Client’ here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. The depth of the client due diligence must be appropriate to the risks associated with certain clients, services and transactions.

Reference to ‘other business relations’ here concerns legal or natural persons with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included. An asset manager or a charitable organisation with which you work is another example of a business relation.

Business relations that you have with a cleaning service, for example, do not have to be listed.

A transaction is an action or combination of actions by or on behalf of a client that your institution has become aware of in the performance of its service to the client in question. This also includes intended transactions.

97.

You have stated that the units in your investment fund(s) are traded indirectly and that you use external enterprises for this purpose.

Do you perform client due diligence on these external enterprises?

- Yes, 100% of these external enterprises
- Yes, 50-99% of these external enterprises
- Yes, > 0-49% of these external enterprises
- No, none of these external enterprises

98.

Is there a regular review of the risk profile of all your clients?

	Event driven	Regular
Clients with low risk	Yes/No	Yes/No
Clients with medium risk	Yes/No	Yes/No
Clients with high or increased risk	Yes/No	Yes/No
Clients with unacceptable risk	Yes/No	Yes/No

Note:

‘Client’ here refers to any natural or legal person or other legal entity with whom a business relation exists or for whom a transaction is executed as defined in Section 1(1)(b) Wwft. A business relation here is a legal or

natural person with whom you have a business, professional or commercial relation that is connected to the professional activities of your enterprise (the main activities for which you hold a licence). For example, a legal or consultancy firm which assists you in drafting your client agreements is a business relation. Business relations with affiliated/associated entities are also included.

Business relations that you have with a cleaning service, for example, do not have to be listed.

O. Transaction monitoring

99.

Is your transaction monitoring system automated or manual?

- Exclusively automated
- Exclusively manual
- Combination of automated and manual
- No such system

Note:

'Automated' here means that the monitoring is carried out without human intervention. Updating an Excel sheet, for example, does not qualify as automated in this context.

A transaction is an action or a combination of actions. This also includes intended transactions and transactions with business relations.

100.

What is the timing of the transaction monitoring?

	Prior to execution in most cases	Within a week of execution in most cases	A week after execution in most cases
Transactions initiated by your enterprise	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transactions by or on behalf of a client	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note:

A transaction is an action or a combination of actions. This also includes intended transactions and transactions with business relations.

101.

Is an expected transaction profile generated for the client on the inception of the service provision?

Multiple answers possible

- Yes, in all cases
- Yes, for clients with high or increased risk
- Yes, for clients with medium risk
- No

102.

Does your transaction monitoring involve an assessment of whether a client's transaction pattern corresponds to the transaction profile previously formulated for that client?

- Yes
- No

103.

Is it possible that funds are received for the benefit of a client that originate from an account that is not in that client's name?

- Yes
- No

Note:

This does not include joint accounts.

104.

Is it possible that funds are paid to an account that is not in the client's name?

- Yes
- No

Note:

This does not include joint accounts.

105.

You have stated that it is possible that funds are received from or paid to an account that is not in the client's name.

Does your enterprise perform audit procedures in such situations?

- In 100% of cases
- In 50 - 99% of cases
- In >0 - 49% of cases
- In 0% of cases

106.

Does your enterprise follow up on alerts generated by your transaction monitoring system?

- Yes
- No

107.

How many alerts were generated in the period from 1 July 2019 to 30 June 2020?

#

108.

Was there a backlog in your assessment of these alerts on the reference date 30 June 2020?

- Yes, a backlog of up to one month. Number of alerts yet to be assessed:
- Yes, a backlog of more than one month. Number of alerts yet to be assessed:
- No, no backlog

#
#

109.

How many transactions did your enterprise refuse in the period from 1 July 2019 to 30 June 2020 due to suspicion of involvement in money laundering and/or financing of terrorism?

#

Note:

A transaction is an action or combination of actions by or on behalf of a client that your enterprise has become aware of in the performance of its service to the client in question.

P. Reporting of unusual transactions

110.

Are you registered as a reporting entity with the Financial Intelligence Unit - Nederland (FIU-NL)?

- Yes
 No

Note:

An enterprise must have conduct codes, controls and procedures in place that enable it to recognise unusual transactions and to report these unusual transactions to FIU-Nederland. The reporting procedure is explained on the website of FIU-Nederland under 'Reporting' and 'Reporting Groups'.

Under Section 16 Wwft, an effected or intended transaction that is unusual must be reported to FIU-Nederland without delay once the unusual nature of the transaction is identified.

Note that if you register with FIU-Nederland or make a report, make sure that you do this on the basis of your own registration as a manager of an investment fund(s).

111.

How many unusual transactions did you report to FIU-NL in the period from 1 July 2019 to 30 June 2020?

#

Note:

An enterprise must have policies, controls and procedures in place that enable it to recognise unusual transactions and to report these unusual transactions to FIU-Nederland. The reporting procedure is explained on the website of FIU-Nederland under 'Reporting' and 'Reporting Procedure'.

Under Section 16 Wwft, an effected or intended transaction that is unusual must be reported to FIU-Nederland without delay once the unusual nature of the transaction is identified.

Note that if you register with FIU-Nederland or make a report, make sure that you do this on the basis of your own registration as the manager of an investment fund(s).

Q. Sanctions monitoring

112.

Do you use the services of an enterprise that supports you in monitoring the sanctions lists?

- Yes
- No

113.

Which of the following sanctions lists (one or more) do you use in the monitoring of your client base?

Multiple answers possible

- National sanctions list terrorism
- EU sanction lists
- UN sanction lists
- Other, namely:
- None

Note:

Reference to 'you' in this question also includes the enterprise that supports you in the monitoring of sanctions lists.

114.

Do you check whether a prospective or existing client relation is on one or more sanctions lists **before** providing your services?

- Always
- Regularly
- Occasionally
- No

Note:

When referring to a 'prospective or existing client relation', the AFM refers to not only the client but also the UBO, the representative and/or any other relevant natural and/or legal persons involved in the commercial relation. The AFM applies the definition in the Regulation on Supervision pursuant to the Sanctions Act 1977 ("a client is anyone who is involved in a financial service or a financial transaction").

115.

Do you check whether a client is on a sanctions list **during** the provision of your services?

- Weekly, or more frequently
- Monthly
- Quarterly

- Less than quarterly
- No

Note:

When referring to a ‘relation’, the AFM refers to not only the client but also the UBO, the representative and/or any other relevant natural and/or legal persons involved in the commercial relation. The AFM applies the definition in the Regulation on Supervision pursuant to the Sanctions Act 1977 (“a client is anyone who is involved in a financial service or a financial transaction”).

116.

How often do you check that the sanctions lists you use for your client base are still current?

- Weekly, or more frequently
- Monthly
- Quarterly
- Less than quarterly
- No

117.

When funds are received or paid out, do you check whether the relation concerned (for instance, the beneficiary or originator of the payment) is included in one or more sanctions lists?

	In 100% of cases	In 50 - 99% of cases	In >0 - 49% of cases	In 0% of cases
For receipts				
For payments				

118.

When investing funds, entering into a business relationship or effecting transactions, do you check whether the party concerned is on one or more sanctions lists?

- In 100% of cases
- In 50 - 99% of cases
- In >0 - 49% of cases
- In 0% of cases

119.

How many relations (including clients, UBOs, beneficiaries of payments) have had their funds frozen by you on the basis of sanctions regulations in the period from 1 July 2019 to 30 June 2020?

#

120.

How many relations whose funds have been frozen have you reported to the AFM in the period from 1 July 2019 to 30 June 2020?

R. Training

121.

Does your enterprise provide a facility allowing the employees of your enterprise to receive training with regard to the Wwft and sanctions regulation? This concerns training that is offered both internally and externally.

If you have no employees, please select 'not applicable'.

Wwft	Yes / no / not applicable
Sanctions regulation	Yes / no / not applicable

122.

Provide the following information on your employees:

	How many employees have taken this training in the past 24 months?	How many employees still have to take this training?
Training for Wwft		
Training for sanctions regulation		

Note:

It is possible that you have stated in your answer to the previous question that you do not offer a training facility but you still have to answer this question. You may have *new* employees who have taken such training prior to entering employment with you.

123.

Have one or more day-to-day policymakers taken one or more training courses with regard to the Wwft and/or sanctions regulation in the past 24 months?

- Yes, training for Wwft
- Yes, training for sanctions regulation
- No

S. Compliance & Audit

124.

How many FTE do you have in the internal compliance department that are involved with activities relating to the Wwft and the Sanctions Act?

Note:

One FTE is one full-time position. Please round the number of FTE to one decimal place. For example, 6.75 FTE becomes 6.8 FTE. Part-time employees should be included in proportion to a full-time position. Two part-time employees who each work for 50% of a full-time position are thus one FTE. Policymakers who determine the policy of the enterprise via a holding company, for example, and are therefore not employees should not be included.

125.

Do you use an external compliance function that is involved with activities relating to the Wwft and the Sanctions Act?

- Yes
 No

126.

How many FTE do you have in the external compliance department that are involved with activities relating to the Wwft and the Sanctions Act?

Note:

One FTE is one full-time position. Please round the number of FTE to one decimal place. In other words, 6.75 FTE becomes 6.8 FTE. Part-time employees should be included in proportion to a full-time position. Two part-time employees who each work for 50% of a full-time position are thus one FTE. Policymakers who determine the policy of the enterprise via a holding company, for example, and are therefore not employees should not be included.

127.

State for each item below whether compliance monitoring has taken place during the last 24 months, and the resultant assessment

	Adequate	Adequate, with findings	Inadequate	Not taken place
Client acceptance/due diligence				
Transaction monitoring				
Sanctions screening				
Reassessment of client risk (client review)				

128.

When was the last Wwft audit performed?

- 2020
- 2019
- 2018
- Before 2018
- Never

129.

When was the last sanctions regulation audit performed?

- 2020
- 2019
- 2018
- Before 2018
- Never

T. Governance

130.

Is the prevention of money laundering and the financing of terrorism an agenda item for meetings of the board of directors and senior management?

- Yes, a permanent or frequent agenda item
- Yes, ad hoc on the basis of incidents or current developments
- No, or only rarely

Concluding remarks

131.

You have reached the end of the questionnaire.

Do you have any comments or recommendations you would like to make in relation to the questionnaire? These may be either general, or in relation to a specific question.

Question number/general	Comments/recommendations
Number/general	#text
Number/general	#text

Declaration

It is important that your response to this request for information is correct and complete. We accordingly request you to declare that the questionnaire has been completed truthfully and in accordance with reality.

Initials:	<input type="radio"/> Mr <input type="radio"/> Ms
Prefix:	#
Surname:	#
Date of birth (dd/mm/yyyy):	#

By checking this box, the above policymaker declares that this questionnaire has been completed truthfully.

Check

If you click on the 'Next' button, you will be shown an overview of the answers you have given. Please check your questions and answers carefully before submitting your questionnaire.

Checking your answers

An overview of the answers you have given is shown below. You can download and check your answers in pdf format by clicking on the blue link '*Download as pdf*' below. If you wish to make changes, click on the 'Next' button.

You can make a copy of the answers you have entered by saving or printing the pdf document. It is no longer possible to make a copy of your answers once you have submitted the questionnaire. The AFM advises you to keep a copy of the completed questionnaire for your own records.

If you click on Next, you will be shown the last instructions for submission.

Download as PDF

Submitting the questionnaire

Click on 'Send' to submit your answers to the AFM. You can no longer change your answers once you have done so.

Confirmation of receipt

You will be sent a confirmation that your answers have been digitally submitted to the AFM immediately after clicking 'Send'. You can print this confirmation as evidence that your answers have been submitted.

Please note:

It is no longer possible to make a pdf copy of your answers once you have submitted the questionnaire. If you still wish to download this, you may do so by clicking on the download button below.

[Download a pdf with your answers here](#)

- I have read the submission instructions and the information above.