



Questionnaire regarding Anti-Money Laundering and Anti-Terrorist Financing Act (Wet ter voorkoming van witwassen en financieren van terrorisme, hereinafter: 'Wwft') and the Sanctions Act (Sanctiewet 1977, hereinafter: 'Sw') for Investment Firms 2020

## **Introduction**

Welcome, you can log in here for the 'Questionnaire Wwft and Sw for Investment Firms 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](mailto:ondernemersloket@afm.nl) or by telephone on 0800 - 6800 680 (on business days from 10:00 am to 5:00 pm, free of charge).

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 Investment Firms 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 investment firms and the management of these risks. The AFM can thus focus its supervision more closely on risks and trends in the market or developments at individual enterprises.

### Date of completion of the questionnaire

The letter sent to you announcing this questionnaire states the date by which you must complete the questionnaire. You do not have to complete the questionnaire in one go, you can do this in several sessions. Therefore, please 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 two sections. The first section concerns questions on the inherent risks relating to money laundering, terrorist financing and sanctions regulations regarding your clients and products, and the second section concerns 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.

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.

You can 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 telephone on business days between 10:00 and 17:00 hours on 0800 - 6800 680 (free of charge) or by e-mail to [ondernemersloket@afm.nl](mailto: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  
☐ Ms

Name of contact person:

Title of contact person:

Telephone number:

E-mail:

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

E-mail:

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#### **Note:**

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

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## Part I. Inherent risks

### A. Organisation

1.

What is the official status of your enterprise?

- ☐ The enterprise has an independent licence from the AFM
- ☐ The enterprise is a branch<sup>1</sup> of a (foreign) investment firm
- ☐ The enterprise is a tied agent<sup>2</sup> of a (foreign) investment firm

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**Note:**

<sup>1</sup>) If the enterprise is a branch, the AFM has been notified by the foreign supervisor regarding your presence as a branch in the Netherlands. You are thus registered as a branch with the AFM.

<sup>2</sup>) If the enterprise is a tied agent, you do not yourself hold a licence from the AFM, you operate under the full and unconditional responsibility of a particular investment firm. You are thus registered as a tied agent with the AFM.

You can check your registration in the register of licensees at the AFM [here](#).

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2.

*The reference date for this question is 31 March 2020.*

How many branches, tied agents, representative offices and/or subsidiaries do you have outside the Netherlands?

If your enterprise is a branch or a tied agent of a (foreign) investment firm, include the foreign investment firm and the associated branches of this foreign investment firm in your answer to this question.

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

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**Note:**

The European Economic Area (EEA) consists of [30 Member States](#): the 28 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.

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3a.

*The reference date for this question is 31 March 2020.*

Do you (or does the foreign investment firm) have branches, tied agents, representative offices and/or subsidiaries in **high-risk countries**?

- ☐ Yes  
☐ No

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**Note:**

If your **enterprise** is a branch or tied agent of a (foreign) investment firm, state whether the (foreign) investment firm and its associated branches, tied agents, representative offices and/or subsidiaries are located in high-risk countries in your answer to this question.

This includes the situation in which the foreign investment firm is located 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.

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3b.

*The reference date for this question is 31 March 2020.*

You have stated that you (or the foreign investment firm) have/has branches, tied agents, 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, tied agents, representative offices and/or subsidiaries.

	List of high-risk countries

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3c.

*The reference date for this question is 31 March 2020.*

You have stated that you (or the foreign investment firm) have/has branches, tied agents, representative offices and/or subsidiaries in high-risk countries.

State **for each high-risk country** the numbers of these branches, tied agents, representative offices and/or subsidiaries.

High-risk country	Total number of branches, tied agents, representative offices and/or subsidiaries

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**Note:**

This includes the situation in which the foreign investment firm is located in a high-risk country.

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4.

*The reference date for this question is 31 March 2020.*

What investment activities or services do you perform or provide?

*Multiple answers possible*

- ☐ Proprietary trading in financial instruments<sup>1</sup>
- ☐ Receiving and forwarding client orders with regard to financial instruments
- ☐ Executing orders with regard to financial instruments for the account of clients
- ☐ Advice on financial instruments
- ☐ Management of individual capital<sup>2</sup>
- ☐ Underwriting or placement of financial instruments when offered as referred to in the Prospectus Regulation with and/or without firm commitment basis
- ☐ Operating an organised and/or multilateral trading facility (OTF and/or MTF)
- ☐ None of the above

#text

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**Note:**

<sup>1</sup>) This concerns proprietary trading (or trading for own account) as referred to in Section 1(1) Wft.

<sup>2</sup>) This concerns discretionary management of financial instruments belonging to a person or of funds belonging to this person that are available for investment in financial instruments, pursuant to instructions issued by this person (see Section 1(1) Wft). If an investment fund has delegated all or part of its portfolio management to your investment firm, this also qualifies as management of individual capital.

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5a.

Have you worked with business relations located outside the Netherlands in the period from 1 April 2019 to 31 March 2020?

You do **not** have to list the clients/members/participants for whom you perform investment activities or provide investment services when answering this question.

- ☐ Yes  
☐ No

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**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.

Business relations that you have with a cleaning service, for example, do not have to be listed in your answers to this questionnaire.

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5b.

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 April 2019 to 31 March 2020:
  
- The total amount<sup>1</sup> (in €) involved in these cooperations in the period from 1 April 2019 to 31 March 2020:

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**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.

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

You do not have to list the clients/members/participants for whom you perform investment activities or provide investment services when answering this question.

<sup>1</sup>) This is the sum of all transfers between your enterprise and the business relation in question, including compensation-payments.

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6a.

Have you worked with business relations located **in a high-risk country** in the period from 1 April 2019 to 31 March 2020?

- ☐ Yes  
☐ No

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**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.

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

You do not have to list the clients/members/participants for whom you perform investment activities or provide investment services when answering this question.

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.

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6b.

You have stated that you have worked with business relations in high-risk countries in the period from 1 April 2019 to 31 March 2020.

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

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6c.

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 amount<sup>1</sup> involved in the period from 1 April 2019 to 31 March 2020.

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

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**Note:**

<sup>1)</sup> This is the sum of all transfers between your enterprise and the business relation in question, including compensation-payments.

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7.

Does your enterprise carry out client due diligence for each legal or natural person holding shares or a controlling interest in your investment firm?

- ☐ Yes  
☐ No

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**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. This means that a legal person holding shares or a controlling interest in your investment firm is also a business relation. The depth of the client due diligence must be appropriate to the risks associated with certain clients, services and transactions.

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8.

Is/are there one or more legal or natural persons holding shares or a controlling interest of less than 10% in your investment firm?

- ☐ Yes  
☐ No

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**Note:**

If this situation does not apply, please select 'No'.

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## B. Proprietary trading

### 9. Proprietary traders

*The reference date for this question is 31 March 2020.*

What is the amount of the total capital (or balance sheet-capital) with which you traded on the mentioned reference date?

#€

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**Note:**

The AFM requests you to state both equity and debt here.

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### 10a. Proprietary traders

*The reference date for this question is 31 March 2020.*

Do you have positions in assets in one or more **high-risk countries**? Please state both your direct and your indirect investments here.

- ☐ Yes  
☐ No

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**Note:**

The AFM defines a 'direct investment' as any position held directly by you 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 a collective investment scheme 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.

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### 10b. Proprietary traders

*The reference date for this question is 31 March 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.

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### 10c. Proprietary traders

*The reference date for this question is 31 March 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 inception.

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

### 11. Proprietary traders

*The reference date for this question is 31 March 2020.*

State the value of your positions in the stated asset categories. This concerns positions, regardless of the country in which these assets are situated. If you have no position in an asset category, please enter '0'.

	Value of the position <sup>1</sup> (€)
Virtual currency	
'Investment object' such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

#### 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 recently known market value.

## C. Receiving and forwarding orders

### 12. Receiving and forwarding orders

You have stated that you receive and forward orders from clients in relation to financial instruments. State the requested **information** for these clients only.

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i>	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup> (€)</i>
Natural persons	#		
Legal persons and/or other legal entities			
Total			

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i>	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup> (€)</i>
Professional clients	#		
Non-professional clients			
Total			

#### Note:

You do not have to state activities on behalf of clients for whom you provide advisory services or the management of the individual capital in your answer to this question.

<sup>1)</sup> 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.

<sup>2)</sup> This is the total volume of the orders you have received and forwarded. This amount should exclude orders for the management of individual capital, if you are engaged in this activity.

The AFM defines 'professional clients' according to the definition of 'professional investors' in Section 1(1) Wft. 'Non-professional clients' are defined as all persons not qualifying as 'professional clients'.

### 13. Receiving and forwarding orders

The reference date for this question is 31 March 2020.

Answer the following questions in relation to your clients for whom you receive and forward orders. The AFM requests you to base this on the Wwft risk classification you use for your clients. If your enterprise uses different names for the classifications, please use the classifications stated below. Clients are natural persons, legal persons and other legal entities.

<b><i>Client classification</i></b>	<b><i>Number of clients resident or located in the Netherlands</i></b>	<b><i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i></b>
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

<b><i>Client classification</i></b>	<b><i>Number of clients <u>not</u> resident or located in the Netherlands</i></b>	<b><i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i></b>
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

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**Note:**

<sup>1)</sup> 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.

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

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#### 14a. Receiving and forwarding orders

*The reference date for this question is 31 March 2020.*

Do you have clients for whom you receive and forward orders who are resident or located in a **high-risk country**? Clients are natural persons, legal persons and other legal entities.

- ☐ Yes  
☐ No

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**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.

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#### 14b. Receiving and forwarding orders

*The reference date for this question is 31 March 2020.*

You have stated that you have clients for whom you receive and forward orders who are resident or located in a high-risk country.

Check the boxes in the list below for **all** high-risk countries in which you have clients for whom you receive and forward orders who are resident or located in a high-risk country.

	List of high-risk countries

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#### 14c. Receiving and forwarding orders

You have stated that on the reference date 31 March 2020 you had clients for whom you receive and forward orders who are resident or located in a high-risk country.

State the total number of clients you had **in each high-risk country** on the reference date 31 March 2020, as well as the total value of the investment portfolio for each individual high-risk country for which you receive and transmit orders.

High-risk country	Total number of clients per country	Value of investment portfolio (€) <sup>1</sup>

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**Note:**

<sup>1)</sup> 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.

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### 15. Receiving and forwarding orders

State how many of your clients for whom you receive and forward orders fall into the stated category and the value of the investment portfolio in each category:

	Number of clients	Total value of investment portfolio (€) <sup>5</sup>
Non-profit organisations <sup>1</sup> and public benefit organisations (PBOs <sup>2</sup> )		
Family offices <sup>3</sup>		
High-net worth individuals <sup>4</sup>		

**Note:**

<sup>1</sup> 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"".

<sup>2</sup> 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.

<sup>3</sup> Entities that manage assets on behalf of one or more families.

<sup>4</sup> This refers to natural persons with investable assets of more than €2.5 million.

<sup>5</sup> 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.

### 16a. Receiving and forwarding orders

Do you have clients for whom you receive and forward orders who are engaged in one or more of the following sectors/activities?

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

#### 16b. Receiving and forwarding orders

You have stated that on the reference date 31 March 2020 you had clients for whom you receive and forward orders who are active in one or more of the sectors or activities listed in the previous question.

State the number of clients for whom you received and forwarded orders on the reference date 31 March 2020 who are active in the stated sectors/activities and the total assets under management.

	<i>Number of clients</i>	<i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i>
Churches and other religious institutions		
Charitable institutions or foundations		
Games of chance and gaming online or offline (casinos, amusement arcades, poker, etc.)		
Virtual currency (including mining, exchange, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Object companies managed or directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, Ebay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

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**Note:**

<sup>1)</sup> 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.

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### 17. Receiving and forwarding orders

*The reference date for this question is 31 March 2020.*

State the amount invested in the stated asset categories by the clients for whom you receive and forward orders. This concerns investments, regardless of the country in which these assets are situated. If your clients do not invest in an asset category, please enter '0'.

	Assets invested <sup>1</sup> (€)
Virtual currency	
'Investment objects' such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

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**Note:**

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

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## D. Order execution

### 18. Order execution

You have stated that you execute orders for financial instruments for the account of clients. State the requested information for these clients only.

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i>	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup> (€)</i>
Natural persons	#		
Legal persons and/or other legal entities			
Total			

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i>	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup> (€)</i>
Professional clients	#		
Non-professional clients			
Total			

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**Note:**

You do not have to state activities on behalf of clients for whom you provide advisory services or the management of individual capital in your answer to this question.

<sup>1)</sup> 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.

<sup>2)</sup> This is the amount for which you have actually executed orders. This amount should exclude orders for the management of individual capital, if you are engaged in this activity.

The AFM defines 'professional clients' according to the definition of 'professional investors' in Section 1(1) Wft. 'Non-professional clients' are defined as all persons not qualifying as 'professional clients'.

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## 19. Order execution

The reference date for this question is 31 March 2020.

Answer the following questions regarding your clients for whom you execute orders in financial instruments for the account of these clients. The AFM requests you to base this on the Wwft risk classification you use for your clients. If your enterprise uses different names for the classifications, please use the classifications stated below. Clients are natural persons, legal persons and other legal entities.

Client classification	Number of clients resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2020 <sup>1</sup> (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Client classification	Number of clients <u>not</u> resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2020 <sup>1</sup> (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

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### Note:

<sup>1)</sup> 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.

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

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#### 20a. Order execution

The reference date for this question is 31 March 2020.

Do you have clients for whom you execute orders in financial instruments for their account who are resident or located in a **high-risk country**? Clients are natural persons, legal persons and other legal entities.

- ☐ Yes  
☐ No

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**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.

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#### 20b. Order execution

The reference date for this question is 31 March 2020.

You have stated that you have clients for whom you execute orders in financial instruments for their account who are resident or located in a high-risk country.

Check the boxes in the list below for **all** high-risk countries in which you have clients for whom you execute orders who are resident or located in a high-risk country.

	List of high-risk countries

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#### 20c. Order execution

You have stated that on the reference date 31 March 2020 you had clients for whom you execute orders in financial instruments for their account who are resident or located in a high-risk country.

State the total number of clients you had **in each high-risk country** on the reference date 31 March 2020, as well as the total value of the investment portfolio for each individual high-risk country.

High-risk country	Total number of clients per country	Value of investment portfolio (€) <sup>1</sup>

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**Note:**

<sup>1)</sup> 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.

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## 21. Order execution

State the number of your clients for whom you execute orders in financial instruments that fall in the stated category and the value of the investment portfolio:

	Number of clients	Total value of investment portfolio (€) <sup>5</sup>
Non-profit organisations <sup>1</sup> and public benefit organisations (PBOs <sup>2</sup> )		
Family offices <sup>3</sup>		
High-net worth individuals <sup>4</sup>		

**Note:**

<sup>1</sup> 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"".

<sup>2</sup> 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.

<sup>3</sup> Entities that manage assets on behalf of one or more families.

<sup>4</sup> This refers to natural persons with investable assets of more than €2.5 million.

<sup>5</sup> 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.

## 22a. Order execution

Do you have clients for whom you execute orders in financial instruments for their account who are engaged in one or more of the following sectors or activities?

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

## 22b. Order execution

You have stated that on the reference date 31 March 2020 you had clients for whom you execute orders for their account who are active in one or more of the sectors or activities listed in the previous question.

State the number of your clients for whom you execute orders in financial instruments for their account that were engaged in the stated sectors or activities on the reference date 31 March 2020 and the total value of the investment portfolio.

	Number of clients	Value of investment portfolio at reference date 31 March 2020 <sup>1</sup> (€)
Churches and other religious institutions		
Charitable institutions or foundations		
Games of chance and gaming online or offline (casinos, amusement arcades, poker, etc.)		
Virtual currency (including mining, exchange, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Object companies managed or directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, Ebay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

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**Note:**

<sup>1)</sup> 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.

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### 23. Order execution

*The reference date for this question is 31 March 2020.*

State the amount invested in the stated asset categories by the clients for whom you execute orders in financial instruments. This concerns investments, regardless of the country in which these assets are situated. If your clients do not invest in an asset category, please enter '0'.

	Assets invested <sup>1</sup> (€)
Virtual currency	
'Investment objects' such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

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**Note:**

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

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## E. Advice on financial instruments

### 24. Advice on financial instruments

You have stated that you give advice with respect to financial instruments. State the requested information for these clients only.

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of advisory assets at reference date 31 March 2020<sup>1</sup></i> (€)	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup></i> (€)
Natural persons	#		
Legal persons and/or other legal entities			
Total			

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of advisory assets at reference date 31 March 2020<sup>1</sup></i> (€)	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup></i> (€)
Professional clients	#		
Non-professional clients			
Total			

#### Note:

State only those clients for whom you provide exclusively advisory services.

<sup>1)</sup> This is value of the assets for which advice is given. If you are also engaged in the management of individual capital and give advice on these assets, these assets should be stated under the question on the management of individual capital (see the next question) and not under this question. In this question you should thus state assets for which you give advice only, and therefore do not provide the management of the individual capital.

<sup>2)</sup> This is the amount for which you have actually executed orders. This should exclude orders for the management of individual capital, if you are engaged in this activity.

The AFM defines 'professional clients' according to the definition of 'professional investors' in Section 1(1) Wft. 'Non-professional clients' are defined as all persons not qualifying as 'professional clients'.

## 25. Advice on financial instruments

*The reference date for this question is 31 March 2020.*

Answer the following questions in relation to your clients for whom you give advice on financial instruments. The AFM requests you to base this on the Wwft risk classification you use for your clients. If your enterprise uses different names for the classifications, please use the classifications stated below. Clients are natural persons, legal persons and other legal entities.

Client classification	Number of clients resident or located in the Netherlands	Volume of advisory assets at reference date 31 March 2020 <sup>1</sup> (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Client classification	Number of clients not resident or located in the Netherlands	Volume of advisory assets at reference date 31 March 2020 <sup>1</sup> (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

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### Note:

<sup>1)</sup> This is value of the assets for which advice is given. If you are also engaged in the management of individual capital and give advice on these assets, these assets should be stated under the question on the management of individual capital (see the next question) and not under this question. In this question you should thus state assets for which you give advice only, and therefore do not provide the management of the individual capital.

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

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#### 26a. Advice on financial instruments

*The reference date for this question is 31 March 2020.*

Do you have clients for whom you give advice on financial instruments who are resident or located in a **high-risk country**? Clients are natural persons, legal persons and other legal entities.

- ☐ Yes  
☐ No

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**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.

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#### 26b. Advice on financial instruments

*The reference date for this question is 31 March 2020.*

You have stated that you have clients for whom you give advice on financial instruments who are resident or located in a high-risk country.

Check the boxes in the list below for **all** high-risk countries in which you have clients for whom you give advice on financial instruments who are resident or located in a high-risk country.

	List of high-risk countries

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### 26c. Advice on financial instruments

You have stated that on the reference date 31 March 2020 you had clients for whom you give advice on financial instruments who are resident or located in a high-risk country.

State the total number of clients you had **in each high-risk country** on the reference date 31 March 2020, as well as the volume of the total advisory assets for each individual high-risk country.

High-risk country	Total number of clients per country	Volume of advisory assets at reference date 31 March 2020 <sup>1</sup> (€)

**Note:**

<sup>1</sup> This is value of the assets for which advice is given. If you are also engaged in the management of the individual capital and give advice on these assets, these assets should be stated under the question on the management of individual capital (see the next question) and not under this question. In this question you should thus state assets for which you give advice only, and therefore do not provide the management of the individual capital.

### 27. Advice on financial instruments

State the number of your clients for whom you give advice on financial instruments that fall in the stated category and the volume of the advisory assets:

	Number of clients	Volume of advisory assets (€) <sup>5</sup>
Non-profit organisations <sup>1</sup> and public benefit organisations (PBOs <sup>2</sup> )		
Family offices <sup>3</sup>		
High-net worth individuals <sup>4</sup>		

**Note:**

<sup>1</sup> 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"".

<sup>2</sup> 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.

<sup>3</sup> Entities that manage assets on behalf of one or more families.

<sup>4</sup> This refers to natural persons with investable assets of more than €2.5 million.

<sup>5</sup> This is the value of the assets for which advice is given. If you are also engaged in the management of the individual capital and give advice on these assets, these assets should be stated under the question on portfolio management (see the next question) and not under this question. You should thus state assets for which you give advice only, and therefore do not provide the management of the individual capital.

#### 28a. Advice on financial instruments

Do you have clients for whom you give advice on financial instruments who are engaged in one or more of the following sectors or activities?

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

### 28b. Advice on financial instruments

You have stated that on the reference date 31 March 2020 you had clients for whom you give advice on financial instruments who are active in one or more of the sectors or activities listed in the previous question.

State the number of your clients for whom you were giving advice on financial instruments on the reference date 31 March 2020 that are engaged in the stated sectors or activities and the volume of the advisory assets.

	<i><b>Number of clients</b></i>	<i><b>Volume of advisory assets at reference date 31 March 2020<sup>1</sup> (€)</b></i>
Churches and other religious institutions		
Charitable institutions or foundations		
Games of chance and gaming online or offline (casinos, amusement arcades, poker, etc.)		
Virtual currency (including mining, exchange, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Object companies managed or directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, Ebay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

---

**Note:**

<sup>1</sup> This is the value of the assets for which advice is given. If you are also engaged in portfolio management and give advice on these assets, these assets should be stated under the question on portfolio management (see the next question) and not under this question. You should thus state assets for which you give advice only, and therefore do not manage.

---

## 29. Advice on financial instruments

*The reference date for this question is 31 March 2020.*

State the amount invested in the stated asset categories by the clients for whom you give advice on financial instruments. This concerns investments, regardless of the country in which these assets are situated. If your clients do not invest in an asset category, please enter '0'.

	Assets invested <sup>1</sup> (€)
Virtual currency	
'Investment objects' such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

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**Note:**

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

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## F. Management of individual capital

### 30. Management of individual capital

You have stated that you are engaged in the management of individual capital. State the requested information for these clients only.

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i>	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup> (€)</i>
Natural persons	#		
Legal persons and/or other legal entities			
Total			

	<i>Number of clients at reference date 31 March 2020</i>	<i>Value of investment portfolio at reference date 31 March 2020<sup>1</sup> (€)</i>	<i>Order volume (1 April 2019 to 31 March 2020)<sup>2</sup> (€)</i>
Professional clients	#		
Non-professional clients			
Total			

---

**Note:**

State only those clients for whom you manage the individual capital.

<sup>1)</sup> 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.

<sup>2)</sup> This is the amount for which you have actually executed orders for the purpose of the management of the individual capital.

The AFM defines 'professional clients' according to the definition of 'professional investors' in Section 1(1) Wft. 'Non-professional clients' are defined as all persons not qualifying as 'professional clients'.

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### 31. Management of individual capital

*The reference date for this question is 31 March 2020.*

Answer the following questions in relation to your clients for whom you manage the individual capital. The AFM requests you to base this on the Wwft risk classification you use for your clients. If your enterprise uses different names for the classifications, please use the classifications stated below. Clients are natural persons, legal persons and other legal entities.

Client classification	Number of clients resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2020 <sup>1</sup> (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Client classification	Number of clients not resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2020 <sup>1</sup> (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

---

**Note:**

<sup>1)</sup> 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.

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

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### 32a. Management of individual capital

The reference date for this question is 31 March 2020.

Do you have clients for whom you manage the individual capital who are resident or located in a **high-risk country**? Clients are natural persons, legal persons and other legal entities.

☐ Yes

☐ No

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**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.

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### 32b. Management of individual capital

The reference date for this question is 31 March 2020.

You have stated that you have clients for whom you manage the individual capital who are resident or located in a high-risk country.

Check the boxes in the list below for **all** high-risk countries in which you have clients for whom you manage the individual capital who are resident or located in a high-risk country.

	List of high-risk countries

---

### 32c. Management of individual capital

You have stated that on the reference date 31 March 2020 you had clients for whom you manage the individual capital who are resident or located in a high-risk country.

State the total number of clients you had **in each high-risk country** on the reference date 31 March 2020, as well as the total value of the investment portfolio for each individual high-risk country.

High-risk country	Total number of clients per country	Value of investment portfolio at reference date 31 March 2020 <sup>1</sup> (€)

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**Note:**

<sup>1)</sup> 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.

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### 33. Management of individual capital

State how many of your clients for whom you manage the individual capital fall into the stated category and the value of the investment portfolio:

	Number of clients	Value of investment portfolio at reference date 31 March 2020 <sup>5</sup> (€)
Non-profit organisations <sup>1</sup> and public benefit organisations (PBOs <sup>2</sup> )		
Family offices <sup>3</sup>		
High-net worth individuals <sup>4</sup>		

**Note:**

<sup>1</sup> 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"".

<sup>2</sup> 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.

<sup>3</sup> Entities that manage assets on behalf of one or more families.

<sup>4</sup> This refers to natural persons with investable assets of more than €2.5 million.

<sup>5</sup> 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.

### 34a. Management of individual capital

Do you have clients for whom you manage the individual capital who are engaged in one or more of the following sectors or activities?

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

### 34b. Management of individual capital

You have stated that on the reference date 31 March 2020 you had clients for whom you manage the individual capital who are active in one or more of the sectors or activities listed in the previous question.

State the number of clients for whom you manage the individual capital on the reference date 31 March 2020 who are active in the stated sectors/activities and the total assets under management.

	Number of clients	Value of investment portfolio at reference date 31 March 2020 <sup>1</sup> (€)
Churches and other religious institutions		
Charitable institutions or foundations		
Games of chance and gaming online or offline (casinos, amusement arcades, poker, etc.)		
Virtual currency (including mining, exchange, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Object companies managed or directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, Ebay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

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**Note:**

<sup>1)</sup> 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.

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### 35. Management of individual capital

*The reference date for this question is 31 March 2020.*

State the amount invested in the stated asset categories by the clients for whom you manage the individual capital. This concerns investments, regardless of the country in which these assets are situated. If your clients do not invest in an asset category, please enter '0'.

	Assets invested <sup>1</sup> (€)
Virtual currency	
'Investment objects' such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

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**Note:**

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

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## G. Underwriting or placement

### 36. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for each category for the period 1 April 2019 to 31 March 2020.

Number of issuing institutions for which  
you have underwritten and/or  
placed financial instruments (with or without firm commitment basis):

#

Total volume (€) of all issues during this period:

(€)

#### Investors to whom financial instruments were offered:

	<i>Number of investors in the period from 1 April 2019 to 31 March 2020</i>
Natural persons	#
Legal persons and/or other legal entities	
Total	

	<i>Number of investors in the period from 1 April 2019 to 31 March 2020</i>
Professional investors	#
Non-professional investors	
Total	

#### Note:

The AFM defines 'professional clients' according to the definition of 'professional investors' in Section 1(1) Wft. 'Non-professional clients' are defined as all persons not qualifying as 'professional clients'.

### 37. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis. The AFM requests you to base this on the Wwft risk classification you use for your issuing institutions and investors. If your enterprise uses different names for the classifications, please use the classifications stated below.

State the requested information for each category for the period 1 April 2019 to 31 March 2020.

#### Issuing institution

Classification of issuing institution	Number of issuing institutions located in the Netherlands
Low risk	
Medium risk	
High/increased risk	
Unacceptable risk	
Not (or not yet) categorised	

Classification of issuing institution	Number of issuing institutions <u>not</u> located in the Netherlands
Low risk	
Medium risk	
High/increased risk	
Unacceptable risk	
Not (or not yet) categorised	

#### Clients to whom financial instruments were offered

Classification of investors to whom financial instruments were offered:	Number of investors resident or located in the Netherlands
Low risk	
Medium risk	
High/increased risk	
Unacceptable risk	
Not (or not yet) categorised	

Classification of investors to whom financial instruments were offered:	Number of investors <u>not</u> resident or located in the Netherlands
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 issuing institutions and investors. It relates to the Wwft risk of your clients.



### 38a. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

Do you have issuing institutions for which you provide this investment service that are located in a **high-risk country**?

- ☐ Yes  
☐ No

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**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.

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### 38b. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

Check the boxes in the list below for **all** high-risk countries in which issuing institutions are located for which you provide this investment service.

	List of high-risk countries

---

### 38c. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

State the total number of issuing institutions you have **in each high-risk country** and the total volume issued in each high-risk country for which you provide this investment service.

High-risk country	Total number of issuing institutions	Total issue volume (€)

---

### 39a. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

Do you have investors for which you provide this investment service that 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.

---

### 39b. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

Check the boxes in the list below for **all** high-risk countries in which you have investors for whom you provide this investment service.

	List of high-risk countries

---

### 39c. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

State the total number of investors you have in **each high-risk country** and the total value of the financial instruments in each high-risk country.

High-risk country	Total number of investors	Total value of financial instruments (€)

---

#### 40. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

State how many of your investors for whom you provide this investment service fall into the stated category.

	Number of investors
Non-profit organisations <sup>1</sup> and public benefit organisations (PBOs <sup>2</sup> )	
Family offices <sup>3</sup>	
High-net worth individuals <sup>4</sup>	

---

**Note:**

<sup>1</sup> 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"".

<sup>2</sup> 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.

<sup>3</sup> Entities that manage assets on behalf of one or more families.

<sup>4</sup> This refers to natural persons with investable assets of more than €2.5 million.

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#### 41a. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

State whether your issuing institutions and/or investors for whom you provide this investment service are engaged in one or more of the following sectors or activities.

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

#### 41b. Underwriting or placement

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

State the requested information for the period 1 April 2019 to 31 March 2020.

State how many of your issuing institutions for which you provide this investment service are engaged in the stated sectors or activities.

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

## H. Operating an MTF/OTF

### 42. Operating an MTF/OTF

*The reference date for this question is 31 March 2020.*

You have stated that you operate an organised and/or multilateral trading facility.

Provide the requested information for each category. For the purpose of this question, the AFM defines 'members or participants' as the natural persons, legal persons and other legal entities for whom you perform this investment activity.

	<b><i>Number of members/participants at reference date 31 March 2020</i></b>
Natural persons	#
Legal persons and/or other legal entities	
Total	

#### 43. Operating an MTF/OTF

*The reference date for this question is 31 March 2020.*

You have stated that you operate an organised and/or multilateral trading facility. The AFM requests you to base this on the Wwft risk classification you use for your members or participants. If your enterprise uses different names for the classifications, please use the classifications stated below.

Provide the requested information for each category. For the purpose of this question, the AFM defines 'members or participants' as the natural persons, legal persons and other legal entities for whom you perform this investment activity.

Classification of members/participants	Number of members/participants located in the Netherlands
Low risk	
Medium risk	
High/increased risk	
Unacceptable risk	
Not (or not yet) categorised	

Classification of members/participants	Number of members/participants <u>not</u> located in the Netherlands
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 members/participants. It relates to the Wwft risk of your members/participants.

---

#### 44a. Operating an MTF/OTF

*The reference date for this question is 31 March 2020.*

You have stated that you operate an organised and/or multilateral trading facility.

Do you have members/participants for whom you perform this investment activity that are located in a **high-risk country**?

For the purpose of this question, the AFM defines 'members or participants' as the natural persons, legal persons and other legal entities for whom you perform this investment activity.

- ☐ 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.

---

#### 44b. Operating an MTF/OTF

*The reference date for this question is 31 March 2020.*

You have stated that you operate an organised and/or multilateral trading facility.

Check the boxes in the list below for **all** high-risk countries in which you have members/participants for whom you perform this investment activity who are resident or located in a high-risk country.

For the purpose of this question, the AFM defines 'members or participants' as the natural persons, legal persons and other legal entities for whom you perform this investment activity.

	List of high-risk countries

---



#### 44c. Operating an MTF/OTF

You have stated that on the reference date 31 March 2020 you had members/participants for whom you operate an organised and/or multilateral trading facility.

State the total number of members/participants that you had on the reference date 31 March 2020 for whom you perform this investment activity **for each high-risk country**.

For the purpose of this question, the AFM defines 'members or participants' as the natural persons, legal persons and other legal entities for whom you perform this investment activity.

High-risk country	Total number of members/participants per country

#### 45. Operating an MTF/OTF

You have stated that on the reference date 31 March 2020 you had members/participants for whom you operate an organised and/or multilateral trading facility.

State the number of members/participants for whom you perform this investment activity that fall into the stated category:

For the purpose of this question, the AFM defines 'members or participants' as the natural persons, legal persons and other legal entities for whom you perform this investment activity.

	Number of members/participants
Non-profit organisations <sup>1</sup> and public benefit organisations (PBOs <sup>2</sup> )	
Family offices <sup>3</sup>	
High-net worth individuals <sup>4</sup>	

#### Note:

<sup>1</sup> 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"".

<sup>2</sup> 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.

<sup>3</sup> Entities that manage assets on behalf of one or more families.

<sup>4</sup> This refers to natural persons with investable assets of more than €2.5 million.

## I. Clients

46.

The reference date for this question is 31 March 2020.

State the total number of unique clients for each category below. 'Unique' here means that clients for whom you perform multiple investment activities and/or services should be counted once.

	<b>Number of clients at reference date 31 March 2020</b>
Natural persons	#
Legal persons and/or other legal entities	
Total	

---

**Note:**

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

If you underwrite and/or place financial instruments when offered with or without firm commitment basis, 'clients' in this question means the issuing institutions and the investors.

---

47.

Do you have clients<sup>1</sup> and/or business relations<sup>2</sup> who expect or require an unusual degree of confidentiality or discretion?

In the case of a branch or tied agent, please also include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

- ☐ Yes, number:  
☐ No

Number

---

**Note:**

1. 'Clients' here refers to the clients for whom you perform investment activities and provide investment services.

2. 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.

---

48a.

The reference date for this question is 31 March 2020.

Do you have clients for whom the UBOs are resident in a [high-risk country](#)?

This includes all the clients for whom you perform the investment activities and/or provide the investment services you have specified.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

- ☐ 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.

---

48b.

You have stated that you have clients 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 or located in a high-risk country.

	List of high-risk countries

---

**Note:**

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

---

48c.

You have stated that on the reference date 31 March 2020 you had clients/members/participants for whom the UBOs are resident in a high-risk country.

State the number of UBOs residing **in each high-risk country**

High-risk country	Number of UBOs per country

**Note:**

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

49.

*The reference date for this question is 31 March 2020.*

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

This includes all the clients for whom you perform the investment activities and/or provide the investment services you have specified.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

- ☐ Yes  
☐ No

**Note:**

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

50.

How many PEPs do you have in total as clients/members/participants?

Number:

**Note:**

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

51a.

*The reference date for this question is 1 March 2020.*

Do you have PEPs as clients/members/participants **who 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.

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.

51b.

You have stated that you have PEPs as clients/members/participants 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.

	List of high-risk countries

**Note:**

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

51c.

You have stated that on the reference date 31 March 2020 you had clients/members/participants who are PEPs.

State how many PEPs you had as clients/members/participants on the reference date 31 March 2020 **in each high-risk country**. This refers to the country of residence of the PEP.

High-risk country	Number of PEPs

**Note:**

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

52.

*The reference date for this question is 31 March 2020.*

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

This includes all the clients for whom you perform the investment activities and/or provide the investment services you have specified.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

- ☐ 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.

---

53.

How many clients/members/participants in total do you have for whom the UBO is a PEP?

Number:

---

**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.

---

54a.

The reference date for this question is 31 March 2020.

Do you have clients/members/participants for whom the UBO is a PEP **who is resident 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.

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.

---

54b.

You have stated that on the reference date 31 March 2020 you had clients/members/participants for whom the UBOs are PEPs.

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

	List of high-risk countries

---

**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.

---

54c.

You have stated that on the reference date 31 March 2020 you had clients/members/participants for whom the UBOs are PEPs.

State the number of UBOs of your clients/members/participants 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 clients who are PEPs

---

**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. Products, services and transactions

### 55.

State the following information for your clients who have placed funds with/via your enterprise in the period from 1 April 2019 to 31 March 2020:

Number of clients with funds originating from a Dutch bank account	#
Number of clients with funds originating from a bank account in the EEA (other than the Netherlands)	#
Number of clients with funds originating from a bank account outside the EEA (other than <b>high-risk countries</b> )	#

---

**Note:**

The European Economic Area (EEA) consists of [30 Member States](#): the 28 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.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

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.

---

56.

State the following information for your clients who have placed funds with/via your enterprise in the period from 1 April 2019 to 31 March 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 <b>high-risk countries</b> )		

**Note:**

The European Economic Area (EEA) consists of **30 Member States**: the 28 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.

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.

57a.

Did any of your clients place funds originating from a bank account in a **high-risk country** with/via your enterprise in the period from 1 April 2019 to 31 March 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.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

57b.

You have stated that funds originating from a bank account in a high-risk country were placed by your clients with/via your enterprise.

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

57c.

You have stated that funds originating from a bank account in a high-risk country were placed by your clients with/via your enterprise.

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

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

58a.

Did you receive cash, payment cards and/or cryptocurrencies from clients and/or business relations in the period from 1 April 2019 to 31 March 2020?

- ☐ Yes, from clients and from business relations
- ☐ Yes, only from clients
- ☐ Yes, only from business relations
- ☐ No

**Note:**

Please note the following regarding the term 'clients' in this question: In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

**58b.**

You have stated that you received cash, payment cards and/or cryptocurrencies in the period from 1 April 2019 to 31 March 2020.

State the number of clients/business relations and the amount of **cash received** below.

If not applicable, please enter '0'.

	Number	Amount (€) <sup>1</sup>
Clients	#	
Business relations	#	

State the number of clients/business relations and the amount of **payment cards** below. If not applicable, please enter '0'.

	Number	Amount (€) <sup>1</sup>
Clients	#	
Business relations	#	

State the number of clients/business relations and the amount of **cryptocurrencies** below. If not applicable, please enter '0'.

	Number	Amount (€) <sup>1</sup>
Clients	#	
Business relations	#	

**Note:**

<sup>1</sup>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. Business relations that you have with a cleaning service, for example, do not have to be listed.

**59.**

Does your enterprise provide activities/services relating to tax advice?

- ☐ Yes  
☐ No

**Note:**

Activities/services such as advice on financial instruments should be omitted for the purpose of this question.

60.

You have stated that your enterprise is not engaged in tax advice.

Do you refer clients to an enterprise that is engaged in tax advice?

☐ Yes

☐ No

---

**Note:**

Activities such as advice on financial instruments should be omitted for the purpose of this question.

---

61.

Have you been involved in opening a current or investment account on behalf of your clients 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.

---

## K. Delivery and distribution channels

62.

State the requested numbers for each activity in the period 1 April 2019 to 31 March 2020:

	Total number of clients accepted in the stated period (physical and <u>non</u> -physical)	Acceptance of clients resident or located in the Netherlands ( <b>not</b> physically present)	Acceptance of clients <u>not</u> resident or located in the Netherlands ( <b>not</b> physically present)
Receiving and forwarding of orders			
Order execution			
Advice			
Management of individual capital			
Underwriting or placement of financial instruments			
Operation of an OTF or MTF			

---

### Note:

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

If you perform several activities for the same client, include this client in each of these activities.

---

63.

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

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

**Note:**

The European Economic Area (EEA) consists of 30 Member States: the 28 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.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

64a.

Have you accepted clients in the period from 1 April 2019 to 31 March 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.

64b.

You have stated that you accepted clients in the period from 1 April 2019 to 31 March 2020 who were accepted through 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.

	List of high-risk countries

64c.

You have stated that you accepted clients in the period from 1 April 2019 to 31 March 2020 who were accepted through 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



## Part 2. Control measures

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

65.

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

---

66.

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 firm must in any case take into account risk factors including those relating to their clients, products, services, transaction and delivery channel and with countries or geographical areas. The risk assessment must be documented and kept up-to-date. Furthermore, investment firms must have internal procedures and measures in place based on this risk assessment that enable them to meet the requirements of the Wwft.

---

67.

When were these results updated?

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

68.

Is your risk assessment based on gross or 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 enterprise or the environment in which an enterprise operates. This concerns threats and vulnerabilities that exist for your enterprise before account is taken of the internal control measures in place.

---

69.

Does your risk assessment describe the net or residual risks remaining after consideration of your control measures with regard to the gross or 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.

---

70.

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 enterprise  
☐ External fraud by clients or relations  
☐ Conflicts of interest  
☐ Other   
☐ None of the above

71.

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					

---

**Note:**

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

---

## M. Mandatory procedures and measures

72.

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

- ☐ Yes  
☐ No

73.

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

	Yes	No
Wwft	<input type="checkbox"/>	<input type="checkbox"/>
Sanctions regulation	<input type="checkbox"/>	<input type="checkbox"/>
General integrity policy	<input type="checkbox"/>	<input type="checkbox"/>

74.

Does this policy include the following?

	Yes	No
Client acceptance	<input type="checkbox"/>	<input type="checkbox"/>
Client risk profile	<input type="checkbox"/>	<input type="checkbox"/>
Client review	<input type="checkbox"/>	<input type="checkbox"/>
Termination of the client relation	<input type="checkbox"/>	<input type="checkbox"/>
Transaction monitoring	<input type="checkbox"/>	<input type="checkbox"/>
Reporting of unusual transactions	<input type="checkbox"/>	<input type="checkbox"/>
Screening of relations, transactions and investments in relation to sanctions regulation	<input type="checkbox"/>	<input type="checkbox"/>

### Note:

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, 'clients' in this question means the members/participants.

75.

When was this policy last updated and approved?

	2020	2019	2018	Before 2018
Wwft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sanctions regulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General integrity policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

---

## N. Client due diligence

### 76.

You have stated that your enterprise is a branch or a tied agent of a (foreign) investment firm.

Does your enterprise perform its client due diligence on the basis of the Wwft?

‘Clients’ here means all clients for whom you perform the activities stated in question 4. This means that you must include all clients that have entered into an agreement with your enterprise and/or the (foreign) investment firm **through your intermediation**.

- ☐ Yes, our enterprise applies client due diligence measures for all clients and business relations.
- ☐ Our enterprise applies client due diligence measures for some clients and business relations, and the (foreign) enterprise applies client due diligence measures for some clients and business relations.
- ☐ No, the (foreign) investment firm applies client due diligence measures for these clients and business relations.
- ☐ No, our enterprise does not apply client due diligence measures for these clients and business relations, and the (foreign) investment firm does not apply these measures either.

---

#### **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. 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.

---

### 77.

You have stated that the (foreign) investment firm applies client due diligence measures for all clients or some clients.

Are you familiar with the (foreign) investment firm’s client due diligence measures?

- ☐ Yes
  - ☐ No
-

78.

You have stated that your enterprise is a branch or a tied agent of a (foreign) investment firm. You have also stated that your enterprise applies client due diligence measures for some or all of the clients for whom you perform activities.

Applying client due diligence measures, do you use policies, controls and procedures of the (foreign) investment firm?

- ☐ Yes
  - ☐ No
- 

79.

Do you carry out a risk assessment of your client and/or business relations in the context of the client due diligence as defined in the Wwft?

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

---

**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. 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.

In the case of a branch or tied agent, please include under ‘clients’ those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

80.

Is the client due diligence based on the Wwft applied at the inception of a business relation, or the effecting of a one-off transaction?

- ☐ Always in advance
- ☐ Sometimes in advance, sometimes afterwards
- ☐ Always afterwards
- ☐ No client due diligence is performed

---

**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. 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.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---



81.

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

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

---

**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.

See also Sections 3 to 9 of the Wwft.

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. This also includes intended transactions.

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

82.

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.

In the case of a branch or tied agent, please include under ‘clients’ those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

83.

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 the client due diligence may be delegated. Note that this does not include the ongoing monitoring (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.

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

In the case of a branch or tied agent, please include under ‘clients’ those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

84.

In the case of delegation to a third party, do you monitor that the client due diligence by this 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.

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

In the case of a branch or tied agent, please include under ‘clients’ those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

85.

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

- ☐ Yes
  - ☐ No
- 

86.

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

- ☐ Yes
  - ☐ No
-

87.

How many potential clients have you refused for reasons relating to the Wwft in the past 12 months?

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.

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

In the case of a branch or tied agent, please include under ‘clients’ those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

88.

With how many clients have you terminated the business relation for reasons relating to the Wwft in the past 12 months?

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.

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

In the case of a branch or tied agent, please include under ‘clients’ those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

89.

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.

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

In the case of a branch or tied agent, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---

90.

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.

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

In the case of a branch or tied agent, please include under ‘clients’ those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

For the operation of an MTF/OTF, also include the members/participants in your answer to this question.

---



## O. Transaction monitoring

91.

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.

---

92.

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:**

This also includes intended transactions and transactions with business relations.

---

93.

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

*Multiple answers possible*

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

94.

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
- 

95.

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

- ☐ Yes
  - ☐ No
- 

**Note:**

This does not include joint accounts.

---

96.

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.

---

97.

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
-

98.

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

- ☐ Yes  
☐ No
- 

99.

How many alerts were generated in the period from 1 April 2019 to 31 March 2020?

#

---

100.

Was there a backlog in your assessment of these alerts on the reference date 31 March 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

#

#

---

101.

How many transactions did your enterprise refuse in the past calendar year due to suspicion of involvement in money laundering and/or financing of terrorism?

Number: #

---

**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

102.

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

- ☐ Yes  
☐ No
- 

103.

How many unusual transactions did you report to FIU-NL in the period from 1 April 2019 to 31 March 2020?

Number:

#

---

### **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 an investment firm.

---

## Q. Sanctions monitoring

104.

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

- ☐ Yes
- ☐ No

105.

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.

---

106.

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

- ☐ Always
- ☐ Regularly
- ☐ Occasionally
- ☐ No

---

**Note:**

When referring to a 'prospective or existing 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 relation is anyone who is involved in a financial service or a financial transaction").

---

107.

Do you check whether a relation is on one or more sanctions lists **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").

---

108.

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

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

109.

On receipt or payment of funds, do you check whether the relation concerned (for instance, the beneficiary or originator of the payment) is included on 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				



110.

When investing funds, entering into a business relation 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
- 

111.

How many relations (including clients, UBOs, beneficiaries of payments) have had their funds frozen by you on the basis of sanctions regulations in the past 12 months?

#

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112.

How many relations whose funds have been frozen have you reported to the AFM in the past 12 months?

#

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## R. Training

113.

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

114.

You have stated that your enterprise provides training with regard to the Wwft and/or sanctions regulation.

	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		

115.

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

*Multiple answers possible*

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

## S. Compliance & Audit

116.

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.

---

117.

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

- ☐ Yes  
☐ No
- 

118.

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.

---

119.

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 due diligence				
Transaction monitoring				
Sanctions screening				
Delegation				
Reassessment of client risk (client review)				

120.

When was the last Wwft audit performed?

- ☐ 2020
- ☐ 2019
- ☐ 2018
- ☐ Before 2018
- ☐ Never

121.

When was the last sanctions regulation audit performed?

- ☐ 2020
- ☐ 2019
- ☐ 2018
- ☐ Before 2018
- ☐ Never

## T. Governance

122.

Is the mitigation of integrity risks – and the prevention of money laundering and the financing of terrorism in particular – 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

123.

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 relate to a specific question.

Question number	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 as a policymaker to declare that the questionnaire has been completed truthfully and in accordance with reality (integrity of information).

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

☐ By checking this box, the above policymaker declares that the Wwft and Sw Investment Firms Questionnaire 2020 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.

**Please note: You can no longer change your answers once you have submitted the questionnaire digitally to the AFM.**

**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 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.