

Questionnaire BO Wwft & Sw

Questionnaire Wwft and Sw Investment Firms 2021¹

Publication date: september 1, 2021

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

¹ Questionnaire regarding Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft) and the Sanctions Act (Sw).

Contact details

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

Salutation

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:

Note:

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

Part I. Inherent risks

A. Organisation

The reference date for these questions is 31 March 2020.

1.

What is the official status of your enterprise¹?

In the case of a branch, the AFM has been notified by the foreign supervisor about your presence as a branch in the Netherlands. In this case, you are registered as a branch with the AFM.

- ☐ The enterprise has an independent licence from the AFM.
- ☐ The enterprise is a branch of a (foreign) investment firm.

Note:

¹) You will find the license register on the AFM website.

2.

This question is pre-filled based on your registration with the AFM.

Which of the following situations applies to your company?

- ☐ My enterprise is active on the reference date 31 March 2021.
- ☐ My enterprise has not (yet) been active or has recently stopped performing activities that require a license and does not have any clients on the reference date 31 March 2021.

Note:

¹) 'Active' means that your enterprise conducts activities for which a licence is required. If your enterprise has ceased all its activities, you need to file a 'verklaring volledige intrekking vergunning' via the AFM portal. A licence cannot be revoked retroactively.

3a.

Are you a subsidiary of one (or more) foreign parent company (s)?

- ☐ Yes
 - ☐ No
-

3b.

In which country is/are the foreign parent enterprise or enterprises established and what is the full name of the parent enterprise or enterprises under the articles of association? In addition, we request that you specify (if applicable) the Legal Entity Identifier (LEI) of the parent enterprise or enterprises.

Full name of the foreign parent enterprise under the articles of association	Country of establishment	LEI ¹
	[dropdown]	

Note:

¹) The LEI is a unique number that identifies entities worldwide. If the LEI number is not known, you must enter '0' here twenty times.

4a.

Does your foreign parent enterprise have branches, tied agents and/or subsidiaries abroad? If your own enterprise is the only branch and/or subsidiary of the foreign parent enterprise, please select 'No'.

- ☐ Yes
☐ No

4b.

In which country are they established/registered and what is their full name (under the articles of association) of the tied agent/branch/subsidiary? In addition, we request that you specify the type of entity and (if applicable) the Legal Entity Identifier (LEI) for each entity.

Full name (under the articles of association) of the tied agent/branch/subsidiary	Type	Country of establishment/registration	LEI ¹
	<input type="checkbox"/> Branch office <input type="checkbox"/> Tied agent <input type="checkbox"/> Subsidiary	[dropdown]	

Note:

¹) The LEI is a unique number that identifies entities worldwide. If the LEI number is not known, you must enter '0' here twenty times.

5a.

Do you have branches, tied agents and/or subsidiaries?

☐ Yes

☐ No

5b.

In which country (this can also be the Netherlands) are they established/registered and what is their full name (under the articles of association)? In addition, we request that you specify the type of entity and (if applicable) the Legal Entity Identifier (LEI) for each entity.

Full name (under the articles of association) of the tied agent/branch/subsidiary	Type	Country of establishment/registration	LEI ¹
	<input type="checkbox"/> Branch office <input type="checkbox"/> Tied agent <input type="checkbox"/> Subsidiary	[dropdown]	

Note:

¹) The LEI is a unique number that identifies entities worldwide. If the LEI number is not known, you must enter '0' here twenty times.

6a.

What investment activities or services do you perform or provide?

Multiple answers possible

- ☐ Proprietary trading in financial instruments¹
- ☐ 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 capital²
- ☐ 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 (this only applies to a branch)

Note:

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

²⁾ 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.

6b.

None of the above (this only applies to a branch)

Explanation field:

text

7a.

Have you worked with business relations located abroad in the period from 1 April 2020 to 31 March 2021?

You should not include the clients/members/participants for whom you perform investment activities and provide investment services when answering this question. The clients/members/participants for whom you perform investment activities and provide investment services are requested in part 'I. Clients'.

- ☐ Yes
☐ No

Note:

An example of a business relationship is a legal office that helps you draft client agreements. This also includes business relationships with affiliated/associated entities, whether those entities are within or outside your group structure, if any. You do not need to include business relationships that you maintain with a cleaning service, for example, when answering this questionnaire.

7b.

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

In the case of proprietary trading in financial instruments (trading on own account), we request that you also include the counterparty and corresponding amounts of financial transactions in this question

- The number of business relations located outside the Netherlands with which you have worked in the period from 1 April 2020 to 31 March 2021:
- The total amount¹ (in €) involved in these cooperations in the period from 1 April 2020 to 31 March 2021:

#

#

Note:

¹) This is the amount of all transfers between your company and the relevant business relationship, including fees.

8a.

Have you worked with business relations located **in a high-risk country** in the period from 1 April 2020 to 31 March 2021?

If you click "Yes", you will see the list of high-risk countries in part b of this question.

- ☐ Yes
☐ No

Note:

An example of a business relationship is a legal office that helps you draft client agreements. This also includes business relationships with affiliated/associated entities, whether those entities are within or outside your group structure, if any.

You do not need to include business relationships that you maintain with a cleaning service, for example, when answering this questionnaire.

8b.

State **for each high-risk country** the number of business relations with which you work and the amount¹ involved.

You have stated that you have worked with business relations in high-risk countries in the period from 1 April 2020 to 31 March 2021.

High-risk country	Number of business relations	Amount involved (€) ¹
	#	

Note:

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

9.

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

‘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.

☐ Yes

☐ No

10.

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

Note:

If this situation does not apply, please select ‘No’.

B. Proprietary trading

The reference date for these questions is 31 March 2021.

11.

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

€

Note:

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

12a.

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

We request that you include both your direct investments and your indirect investments. The AFM defines 'direct investment' as any position made directly by you in assets in a high-risk country.

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

If you click "Yes", you will see the list of high-risk countries in part b of this question.

- ☐ Yes
☐ No
-

12b.

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

High-risk country	State for each high-risk country the value of the position on inception

13.

State the value of your positions in the stated asset categories.

This concerns positions, regardless of the country in which these assets are situated.

Asset categories	Value of the position ¹ (€)
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. If you do not have a position in an asset category, please enter '0'.

C. Receiving and forwarding orders

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. The reference date for these questions is 31 March 2021. 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'.

14a.

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

	Number of clients at reference date 31 March 2021	Value of investment portfolio at reference date 31 March 2021¹ (€)	Order volume (1 April 2020 to 31 March 2021)² (€)
Natural persons			
Legal persons and/or other legal entities			
Total			

Note:

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

²⁾ 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.

14b.

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

	Number of clients at reference date 31 March 2021	Value of investment portfolio at reference date 31 March 2021 ¹ (€)	Order volume (1 April 2020 to 31 March 2021) ² (€)
Professional clients			
Non-professional clients			
Total			

Note:

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

²) 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.

15a.

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

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

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

15b.

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

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients not resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

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

16a.

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.

If you click "Yes", you will see the list of high-risk countries in part b of this question.

- ☐ Yes
☐ No

Note:

Clients are natural persons, legal persons and other legal entities.

16b.

State the total number of clients you had in **each high-risk country** on the reference date 31 March 2021, as well as the total value of the investment portfolio for each individual high-risk country for which you receive and forward orders.

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

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

Note:

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

17.

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 (€) ⁴
Non-profit organisations and public benefit organisations (PBOs) ¹		
Family offices ²		
High-net worth individuals ³		

Note:

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

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.

²) Entities that manage assets on behalf of one or more families.

³) This refers to natural persons with investable assets of more than €2.5 million.

⁴) 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.

18.

State the number of clients for whom you received and forwarded orders on the reference date 31 March 2021 who are active in the stated sectors/activities and the total value of the investment portfolio.

	Number of clients	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
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:

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

19.

State the amount invested in the stated asset categories by the clients for whom you receive and forward orders.

Asset categories	Assets invested ¹ (€)
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	

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. 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'.

D. Order execution

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. The reference date for these questions is 31 March 2021. 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'.

20a.

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

	Number of clients at reference date 31 March 2021	Value of investment portfolio at reference date 31 March 2021 ¹ (€)	Order volume (1 April 2020 to 31 March 2021) ² (€)
Natural persons			
Legal persons and/or other legal entities			
Total			

Note:

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

²) 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.

20b.

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

	Number of clients at reference date 31 March 2021	Value of investment portfolio at reference date 31 March 2021 ¹ (€)	Order volume (1 April 2020 to 31 March 2021) ² (€)
Professional clients			
Non-professional clients			
Total			

Note:

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

²) 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.

21a.

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

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

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

21b.

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

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients <u>not</u> resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

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

22a.

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**?

If you click "Yes", you will see the list of high-risk countries in part b of this question.

- ☐ Yes
☐ No

Note:

Clients are natural persons, legal persons and other legal entities.

22b.

State the total number of clients you had in **each high-risk country** on the reference date 31 March 2021, as well as the total value of the investment portfolio for each individual high-risk country.

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.

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

Note:

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

23.

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 (€) ⁴
Non-profit organisations and public benefit organisations (PBOs) ¹		
Family offices ²		
High-net worth individuals ³		

Note:

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

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.

²) Entities that manage assets on behalf of one or more families.

³) This refers to natural persons with investable assets of more than €2.5 million.

⁴) 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.

24.

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 2021 category and the total value of the investment portfolio.

	Number of clients	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
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:

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

25.

State the amount invested in the stated asset categories by the clients for whom you execute orders in financial instruments.

Asset categories	Assets invested ¹ (€)
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	

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. 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'.

E. Advice on financial instruments

State only those clients for whom you provide exclusively advisory services. The reference date for these questions is 31 March 2021. 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'.

26a.

You have stated that you have clients for whom you give advice on financial instruments. State the requested information for these clients only.

	Number of clients at reference date 31 March 2021	Value of advisory assets at reference date 31 March 2021¹ (€)	Order volume (1 April 2020 to 31 March 2021)² (€)
Natural persons			
Legal persons and/or other legal entities			
Total			

Note:

¹⁾ 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.

²⁾ 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.

26b.

You have stated that you have clients for whom you give advice on financial instruments. State the requested information for these clients only.

	Number of clients at reference date 31 March 2020	Value of advisory assets at reference date 31 March 2020¹ (€)	Order volume (1 April 2020 to 31 March 2020)² (€)
Professional clients			
Non-professional clients			
Total			

Note:

¹⁾ 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.

²⁾ 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.

27a.

You have stated that you have clients for whom you give advice on financial instruments. State the requested information for these clients only.

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients resident or located in the Netherlands	Volume of advisory assets at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

¹⁾ 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.

27b.

You have stated that you have clients for whom you give advice on financial instruments. State the requested information for these clients only.

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients not resident or located in the Netherlands	Volume of advisory assets at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

¹⁾ 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.

28a.

Do you have clients for whom you give advice on financial instruments who are resident or located in a **high-risk country**?

If you click "Yes", you will see the list of high-risk countries in part b of this question.

- ☐ Yes
☐ No

Note:

Clients are natural persons, legal persons and other legal entities.

28b.

State the total number of clients for whom you give advice on financial instrument you had **in each high-risk country** on the reference date 31 March 2021, as well as the volume of the total advisory assets for each individual high-risk country

You have stated that you have clients on the reference date 31 March 2021 for whom you give advice on financial instruments who are resident or located in a high-risk country.

High-risk country	Total number of clients per country	Volume of advisory assets at reference date 31 March 2021 ¹ (€)

Note:

¹) 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.

29.

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 (€) ⁴
Non-profit organisations and public benefit organisations (PBOs) ¹		
Family offices ²		
High-net worth individuals ³		

Note:

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

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.

²) Entities that manage assets on behalf of one or more families.

³) This refers to natural persons with investable assets of more than €2.5 million.

⁴) 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.

30.

State the number of your clients for whom you were giving advice on financial instruments on the reference date 31 March 2021 that are engaged in the stated sectors or activities and the volume of the advisory assets.

	Number of clients	Volume of advisory assets at reference date 31 March 2021 ¹ (€)
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:

¹ 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.

31.

State the amount invested in the stated asset categories by the clients for whom you give advice on financial instruments.

Asset categories	Assets invested ¹ (€)
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	

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. 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'.

F. Management of individual capital

State only those clients for whom you manage the individual capital. The reference date for these questions is 31 March 2021. 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'.

32a.

You have indicated that you manage individual assets. Provide the requested information for these clients only.

	Number of clients at reference date 31 March 2021	Value of investment portfolio at reference date 31 March 2021 ¹ (€)	Order volume (1 April 2020 to 31 March 2021) ² (€)
Natural persons			
Legal persons and/or other legal entities			
Total			

Note:

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

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

32b.

You have indicated that you manage individual assets. Provide the requested information for these clients only.

	Number of clients at reference date 31 March 2021	Value of investment portfolio at reference date 31 March 2021 ¹ (€)	Order volume (1 April 2020 to 31 March 2021) ² (€)
Professional clients			
Non-professional clients			
Total			

Note:

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

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

33a.

You have indicated that you manage individual assets. Provide the requested information for these clients only.

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

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

33b.

You have indicated that you manage individual assets. Provide the requested information for these clients only.

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.

In case you do not have any clients in the mentioned classification, please answer with '0' for that classification.

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

Client classification	Number of clients not resident or located in the Netherlands	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) categorised		

Note:

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

34a.

Do you have clients for whom you manage the individual capital who are resident or located in a **high-risk country**?

If you click "Yes", you will see the list of high-risk countries in part b of this question.

- ☐ Yes
☐ No

Note:

Clients are natural persons, legal persons and other legal entities.

34b.

State the total number of clients you had in **each high-risk country** on the reference date 31 March 2021, as well as the total value of the investment portfolio for each individual high-risk country.

You have stated that on the reference date 31 March 2021 you had clients for whom you manage the individual capital who are resident or located in a high-risk country.

High-risk country	Total number of clients per country	Value of investment portfolio at reference date 31 March 2021 ¹ (€)

Note:

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

35.

Indicate how many of your clients for whom you manage individual assets fall into category and the value of the investment portfolio:

	Number of clients	Value of investment portfolio at reference date 31 March 2021 ⁴ (€)
Non-profit organisations and public benefit organisations (PBOs) ¹		
Family offices ²		
High-net worth individuals ³		

Note:

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

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.

²) Entities that manage assets on behalf of one or more families.

³) This refers to natural persons with investable assets of more than €2.5 million.

⁴) 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.

36.

State how many of your clients for whom you manage assets are active in the sectors / activities mentioned on the reference date of 31 March 2021 and the total value of the investment portfolio.

	Number of clients	Value of investment portfolio at reference date 31 March 2021 ¹ (€)
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:

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

37.

Indicate how much has been invested in the stated asset categories by the clients for whom you manage individual assets. This concerns investments independent of the country in which these assets are located. If your clients do not invest in an asset category, please enter 0.

Asset categories	Assets invested ¹ (€)
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	

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.

G. Underwriting or placement

State the requested information for the period 1 April 2020 to 31 March 2021. 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'.

38a.

State the requested information for each category for the period 1 April 2020 to 31 March 2021.

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:

(€)

38b.

State the requested information for each category for the period 1 April 2020 to 31 March 2021.

	Number of investors to whom financial instruments were offered in the period from 1 April 2020 to 31 March 2021
Natural persons	
Legal persons and/or other legal entities	
Total	

38c.

State the requested information for each category for the period 1 April 2020 to 31 March 2021.

	Number of investors to whom financial instruments were offered in the period from 1 April 2020 to 31 March 2021
Professional investors	
Non-professional investors	
Total	

39a.

State the requested information for each category for the period 1 April 2020 to 31 March 2021.

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. If your enterprise uses different names for the classifications, please use the classifications stated below.

In case you do not have any issuing institutions in the mentioned classification, please answer with '0' for that classification. This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft risk of your clients.

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	

39b.

State the requested information for each category for the period 1 April 2020 to 31 March 2021.

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. If your enterprise uses different names for the classifications, please use the classifications stated below.

In case you do not have any issuing institutions in the mentioned classification, please answer with '0' for that classification. This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft risk of your clients.

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	

39c.

State the requested information for each category for the period 1 April 2020 to 31 March 2021.

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 investors. If your enterprise uses different names for the classifications, please use the classifications stated below.

In case you do not have any investors in the mentioned classification, please answer with '0' for that classification. This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft risk of your clients.

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	

39d.

State the requested information for each category for the period 1 April 2020 to 31 March 2021.

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 investors. If your enterprise uses different names for the classifications, please use the classifications stated below.

In case you do not have any investors in the mentioned classification, please answer with '0' for that classification. This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft risk of your clients.

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	

40a.

State the requested information for the period 1 April 2020 to 31 March 2021. You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis.

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

- ☐ Yes
☐ No

40b.

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.

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

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

41a.

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

- ☐ Yes
☐ No

41b.

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.

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

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

42.

You have stated that you underwrite and/or place financial instruments when offered with or without firm commitment basis. State how many of your investors for whom you provide this investment service fall into the stated category.

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

Note:

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

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.

²) Entities that manage assets on behalf of one or more families.

³) This refers to natural persons with investable assets of more than €2.5 million.

43.

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

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

	Number of issuing institutions and/or investors
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

The reference date for these questions is 31 March 2021. You have stated that you operate an organised and/or multilateral trading facility. The AFM defines 'members or participants' as the natural persons, legal persons and other legal entities for whom you perform this investment activity.

44.

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.

	Number of members/participants at reference date 31 March 2021
Natural persons	
Legal persons and/or other legal entities	
Total	

45a.

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

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. This risk classification does not refer to the risk appetite of your members/participants. It relates to the Wwft risk of your members/participants.

In case you do not have any members/participants in the mentioned classification, please answer with '0' for that classification.

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	

45b.

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

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. This risk classification does not refer to the risk appetite of your members/participants. It relates to the Wwft risk of your members/participants.

In case you do not have any members/participants in the mentioned classification, please answer with '0' for that classification.

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	

46a. Operating an MTF/OTF

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

- ☐ Yes
☐ No

46b.

State the total number of members/participants that you had on the reference date 31 March 2021 for whom you perform this investment activity **for each high-risk country**.

High-risk country	Total number of members/participants

47. Operating an MTF/OTF

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

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

Note:

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

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.

²) Entities that manage assets on behalf of one or more families.

³) This refers to natural persons with investable assets of more than €2.5 million.

I. Clients

The reference date for these questions is 31 March 2021.

In the case of a branch, 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.

48.

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.

	Number of clients at reference date 31 March 2021
Natural persons	
Legal persons and/or other legal entities	
Total	

49a.

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

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.

Business relations also entails entities with whom you cooperate, regardless whether these entities are within or outside your group structure.

Do you have clients and/or business relations who expect or require an unusual degree of confidentiality or discretion?

- ☐ Yes
☐ No

49b.

How many clients and/or business relations do you have who expect or require an unusual degree of confidentiality or discretion?

#

50a.

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

- ☐ Yes
☐ No

Note:

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

50b.

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

High-risk country	Number of UBOs

51.

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

- ☐ Yes
☐ No

Note:

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

52.

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

#

53a.

Do you have PEPs as clients/members/participants **who are resident in a high-risk country?**

- ☐ Yes
☐ No

53b.

State how many PEPs you had as clients/members/participants on the reference date **in each high-risk country.**

High-risk country	Number of PEPs

54.

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

- ☐ Yes
☐ No

55.

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

Number:

#

56a.

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

- ☐ Yes
☐ No

56b.

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

J. Products, services and transactions

In the case of a branch, 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.

57.

State the following information for your clients who have placed funds with/via your enterprise in the period from 1 April 2020 to 31 March 2021:

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) ¹	#
Number of clients with funds originating from a bank account outside the EEA (other than <u>high-risk countries</u>)	#

Note:

1) The European Economic Area (EEA) has **30 member states**: the 27 EU member states and three of the four EFTA member states (Norway, Iceland and Liechtenstein). Switzerland is a member of the EFTA but is not part of the EEA. Cyprus and Malta are part of the EEA and are also high-risk countries for the purpose of this questionnaire. We therefore request that you include Cyprus and Malta as EEA countries AND as high-risk countries. The following question provides an overview of the countries designated as high-risk countries.

58.

State the following information for your clients who have placed funds with/via your enterprise in the period from 1 April 2020 to 31 March 2021:

	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) ¹	#	€
Transactions originating from a bank account outside the EEA (other than <u>high-risk countries</u>)	#	€

Note:

1) The European Economic Area (EEA) has **30 member states**: the 27 EU member states and three of the four EFTA member states (Norway, Iceland and Liechtenstein). Switzerland is a member of the EFTA but is not part of the EEA. Cyprus and Malta are part of the EEA and are also high-risk countries for the purpose of this questionnaire. We therefore request that you include Cyprus and Malta as EEA countries AND as high-risk countries. The following question provides an overview of the countries designated as high-risk countries.

59a.

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 2020 to 31 March 2021?

- ☐ Yes
- ☐ No

59b.

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 (€)

60.

Did you receive cash, payment cards and/or cryptocurrencies from clients and/or business relations in the period from 1 April 2020 to 31 March 2021?

A business relationship here refers to the persons or legal entities with whom you have a business, professional or commercial relationship that is related to the professional activities of your institution (being the main activities covered by your license). An example of a business relationship is, for example, a legal (advisory) office that helps you draft your client agreements. This also includes business relationships with affiliated/affiliated entities. Another example of a business relationship is, for example, an asset manager or a charitable organization with which you work. You do not need to include business relationships that you maintain with a cleaning service, for example, when answering this questionnaire. Business relationships also include the entities you work with, regardless of whether these entities are within or outside your group structure, if any.

If not applicable, please enter '0'.

	Number of clients and / or business relations	Amount (€) ¹
Cash receipts (banknotes and coins)		
Payment cards		
Cryptocurrencies		

Note:

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

61.

Have you been involved in opening a current or investment account on behalf of your clients in a **high-risk country**?

- ☐ Yes
☐ No

K. Delivery and distribution channels

In the case of a branch, 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.

62a.

State the requested numbers for each activity in the period 1 April 2020 to 31 March 2021.

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

	Total number of clients accepted in the stated period (physical and <u>non</u>-physical)	Acceptance of clients resident or located in the Netherlands (<u>not</u> physically present)	Acceptance of clients <u>not</u> resident or located in the Netherlands (<u>not</u> physically present)
Receiving and forwarding of orders			

62b.

State the requested numbers for each activity in the period 1 April 2020 to 31 March 2021.

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

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

62c.

State the requested numbers for each activity in the period 1 April 2020 to 31 March 2021.

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

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

62d.

State the requested numbers for each activity in the period 1 April 2020 to 31 March 2021.

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

	Total number of clients accepted in the stated period (physical and <u>non-physical</u>)	Acceptance of clients resident or located in the Netherlands (<u>not</u> physically present)	Acceptance of clients <u>not</u> resident or located in the Netherlands (<u>not</u> physically present)
Management of individual capital			

62e.

State the requested numbers for each activity in the period 1 April 2020 to 31 March 2021.

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

	Total number of clients accepted in the stated period (physical and <u>non-physical</u>)	Acceptance of clients resident or located in the Netherlands (<u>not</u> physically present)	Acceptance of clients <u>not</u> resident or located in the Netherlands (<u>not</u> physically present)
Underwriting or placement of financial instruments			

62f.

State the requested numbers for each activity in the period 1 April 2020 to 31 March 2021.

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

	Total number of clients accepted in the stated period (physical and <u>non-physical</u>)	Acceptance of clients resident or located in the Netherlands (<u>not</u> physically present)	Acceptance of clients <u>not</u> resident or located in the Netherlands (<u>not</u> physically present)
Operation of an OTF or MTF			

63.

State how many new clients you accepted in the period from 1 April 2020 to 31 March 2021 who were introduced by an intermediary.

If a client is introduced by an intermediary and the agreement is between your enterprise and the client then this counts as a client who is introduced by an intermediary.

	Number of clients
Via an intermediary in the Netherlands	
Via an intermediary located in the EEA (outside the Netherlands) ¹	
Via an intermediary located outside the EEA	

Note:

1) The European Economic Area (EEA) has **30 member states**: the 27 EU member states and three of the four EFTA member states (Norway, Iceland and Liechtenstein). Switzerland is a member of the EFTA but is not part of the EEA. Cyprus and Malta are part of the EEA and are also high-risk countries for the purpose of this questionnaire. We therefore request that you include Cyprus and Malta as EEA countries AND as high-risk countries. The following question provides an overview of the countries designated as high-risk countries.

64a.

Have you accepted clients in the period from 1 April 2020 to 31 March 2021 who were introduced by an intermediary located in a high-risk country?

- ☐ Yes
☐ No

64b.

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

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.

65.

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

- ☐ Yes
- ☐ No

66.

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

- ☐ Yes
- ☐ No

67.

When were these results updated?

- ☐ 2021
- ☐ 2020
- ☐ 2019
- ☐ Before 2019
- ☐ Never

68.

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.

Is your risk assessment based on gross or inherent risks?

- ☐ Yes
- ☐ No

69.

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

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

70a.

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

70b.

Enter below what is meant by 'other':

71.

How do you assess your enterprise with respect to the following risk categories?

Please base your answers on the gross risks. In the case of a branch, 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.

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

M. Policies, controls and procedures

72.

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

- ☐ Yes
☐ No

73a.

Do you have a specific policy on the Wwft and/or sanctions regulations, 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"/>

73b.

When was this policy last updated and approved?

	2021	2020	2019	Before 2019
Wwft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

73c.

When was this policy last updated and approved?

	2021	2020	2019	Before 2019
Sanction regulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

73d.

When was this policy last updated and approved?

	2021	2020	2019	Before 2019
General integrity policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

74.

Does this policy include the following?

In the case of a branch, 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
Client acceptance	<input type="checkbox"/>	<input type="checkbox"/>
Risk classification of the client	<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"/>

75a.

You have stated that you have branches, tied agents and/or subsidiaries.

Have you drawn up a group policy for compliance with anti-money laundering regulations?

- ☐ Yes
☐ No

75b.

If so, how do you ensure effective application of the group policy by your branches, tied agents and/or subsidiaries?

75c.

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

Has the (foreign) investment firm drawn up a group policy for compliance with anti-money laundering regulations?

- ☐ Yes
- ☐ No



75d.

If so, how do you ensure effective application of the group policy by your own institution?



N. Client due diligence

'Clients' here means all clients for whom you perform the activities stated in question 6. 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**.

76.

You have indicated that your enterprise is a branch of a (foreign) investment firm.

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

- ☐ 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.

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.

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

- ☐ Yes
- ☐ No

79a.

Do you carry out a risk assessment of your investors and/or business relations in the context of the client due diligence as defined in the 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. The depth of the client due diligence must be geared 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, 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.

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

79b.

Do you carry out a risk assessment of your investors and/or business relations in the context of the client due diligence as defined in the 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. The depth of the client due diligence must be geared 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, 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.

	In 100% of cases	In 50-99% of cases	In >0-49% of cases	In 0% of cases
Business relations	O	O	O	O

Client refers to any natural or legal person or other legal entity with whom a business relationship is entered into or for whom a transaction is carried out within the meaning of Article 1, first paragraph, under b, of the Wwft. "Other business relationships" here means the (legal) persons with whom you have a business, professional or commercial relationship related to the professional activities of your company (being the main activities covered by your license). An example of a business relationship is, for example, a legal (advisory) office that helps you draft your client agreements. This also includes business relationships with affiliated/affiliated entities.

You do not need to include business relationships that you maintain with a cleaning service, for example, when answering this questionnaire.

80a.

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?

In the case of operating an MTF/OTF, also include the members/participants in your answer to this question. In the case of a branch, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

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

80b.

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?

In the case of operating an MTF/OTF, also include the members/participants in your answer to this question. In the case of a branch, please include under 'clients' those clients who have entered into an agreement with your enterprise and/or a (foreign) investment firm through your intermediation.

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

Client refers to any natural person or legal person or other legal entity with whom a business relationship is entered into or for whom a transaction is carried out within the meaning of Article 1, first paragraph, under b, Wwft. By "other business relationships" here refers to the persons or legal entities with whom you have a business, professional or commercial relationship related to the professional activities of your company (being the main activities covered by your license). An example of a business relationship is, for example, a legal (advice) office that helps you draft your client agreements. Business relationships with affiliated / affiliated entities are also included.

You do not need to include business relationships that you maintain with a cleaning service when answering this questionnaire.

A transaction is an action or combination of actions by or on behalf of a client of which the institution has taken cognizance for the benefit of its services to that client. This also includes proposed transactions.

In the case of a branch office, we request that you also include clients in this question who, through your intermediation, enter into a contract with your company and / or (foreign) investment firm. In the case of operating an MTF / OTF, we request that you also include the members / participants in this question.

81a.

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
Investors	O	O	O	O

81b.

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
Business relations	O	O	O	O

82.

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

In case you do not have any clients in the mentioned classification, please select 'Not applicable'.

	Event driven	Regular
Clients with low risk	Yes/No/Not applicable	Yes/No/Not applicable
Clients with medium risk	Yes/No/Not applicable	Yes/No/Not applicable
Clients with high or increased risk	Yes/No/Not applicable	Yes/No/Not applicable
Clients with unacceptable risk	Yes/No/Not applicable	Yes/No/Not applicable

83.

In which cases does your enterprise take additional control measures?

Multiple answers possible

- ☐ Clients that are Politically exposed persons (PEPs)
- ☐ Clients in high risk countries
- ☐ Clients with high/increased risk
- ☐ Clients which are not physically present at the moment of inception
- ☐ No additional control measures

84.

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).

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

85.

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?

- ☐ More than once every 2 years
- ☐ Once every 2 years
- ☐ Less than once every 2 years
- ☐ No

86.

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

- ☐ Yes
- ☐ No

87.

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

- ☐ Yes
- ☐ No

Client refers to any natural person or legal person or other legal entity with whom a business relationship is entered into or for whom a transaction is carried out within the meaning of Article 1, first paragraph, under b, Wwft. By "other business relationships" here refers to the persons or legal entities with whom you have a business, professional or commercial relationship related to the professional activities of your company (being the main activities covered by your license). An example of a business relationship is, for example, a legal (advice) office that helps you draft your client agreements. Business relationships with affiliated / affiliated entities are also included.

You do not need to include business relationships that you maintain with a cleaning service when answering this questionnaire.

In the case of a branch office, we request that you also include clients in this question who, through your intermediation, enter into a contract with your company and / or (foreign) investment firm. In the case of operating an MTF / OTF, we request that you also include the members / participants in this question.

88.

How many potential clients have you refused for reasons relating to the Wwft in the period 1 April 2020 to 31 March 2021?

Number:

#

89.

With how many clients have you terminated the business relation for reasons relating to the Wwft in the period 1 April 2020 to 31 March 2021?

Number:

#

90.

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

91.

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
-

O. Transaction monitoring

92.

'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.

Is your transaction monitoring system automated or manual?

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

93a.

What is the timing of the transaction monitoring?

When does the transaction check take place? This also includes intended transactions and transactions with business relations.

	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"/>

93b.

What is the timing of the transaction monitoring?

When does the transaction check take place? This also includes intended transactions and transactions with business relations.

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

94.

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
-

95.

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
-

96.

This does not include joint accounts.

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

- ☐ Yes
 - ☐ No
-

97.

This does not include joint accounts.

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

- ☐ Yes
 - ☐ No
-

98.

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

99.

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

- ☐ Yes
- ☐ No

100.

How many alerts were generated in the period from 1 April 2020 to 31 March 2021?

101a.

Was there a backlog in your assessment of these alerts on the reference date 31 March 2021?

- ☐ Yes, a backlog of up to two weeks
- ☐ Yes, a backlog of more than two weeks
- ☐ No, no backlog

101b.

Number of alerts yet to be assessed

102.

How many transactions did your enterprise refuse in the period 1 April 2020 to 31 March 2021 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

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.

103.

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

☐ Yes

☐ No

104.

How many unusual transactions did you report to FIU-NL in the period from 1 April 2020 to 31 March 2021?

Q. Sanctions monitoring

105.

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

- ☐ Yes
- ☐ No

106a.

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:

In this question 'you' can also be read as the company that supports you in checking the sanctions lists.

106b.

Other, namely:

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 prospective or existing relation is on one or more sanctions lists **before** providing your services?

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

108.

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
-

109.

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
-

110.

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				

111.

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

112.

How many relations (including clients, UBOs, beneficiaries of payments) have had their funds frozen by you on the basis of sanctions regulations in the period 1 April 2020 to 31 March 2021?

113.

How many relations whose funds have been frozen have you reported to the AFM in the period 1 April 2020 to 31 March 2021?

R. Training

114a.

Do you employ personnel?

- ☐ Yes
☐ No

114b.

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.

	Yes	No
Wwft		
Sanctions regulation		

115a.

How many employees have taken Wwft-training in the past 24 months?

How many employees still have to take a Wwft-training?

115b.

How many employees have taken sanctions regulation training in the past 24 months?

How many employees still have to take a sanction regulation training?

116.

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

117.

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 enterprise, for example, and are therefore not employees should not be included.

118.

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

- ☐ Yes
☐ No
-

119.

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 enterprise, for example, and are therefore not employees should not be included.

120.

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 onboarding/Client due diligence				
Transaction monitoring				
Sanctions screening				
Reassessment of client risk (client review)				

121.

When was the last Wwft audit performed?

- ☐ 2021
- ☐ 2020
- ☐ 2019
- ☐ Before 2019
- ☐ Never

122.

When was the last sanctions regulation audit performed?

- ☐ 2021
- ☐ 2020
- ☐ 2019
- ☐ Before 2019
- ☐ Never

T. Governance

123.

Does your enterprise have two or more policymakers?

- ☐ Yes
- ☐ No

124.

Has your enterprise designated one of its policymakers as responsible for compliance with the Wwft?

- ☐ Ja
- ☐ Nee

125.

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

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

Concluding remarks

You have reached the end of the questionnaire.

Do you have any comments 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

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.

Salutation:

Initials:

Prefix:

Surname:

Policymaker declares truthfully

☐ By checking this box, the above policymaker declares that the Wwft and Sw Investment Firms Questionnaire 2021 has been completed truthfully.



Autoriteit Financiële markten

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Mission

The AFM is committed to promoting fair and transparent financial markets.

As an independent market conduct supervisor, we contribute to a sustainable financial system and prosperity in the Netherlands.