

Wwft & Sw Questionnaire

Investment Firms 2024

Publication date: March 25, 2024

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

This document is a translation from the Dutch Vragenlijst Wwft & Sw Beleggingsondernemingen 2024. The **original non-translated document** is the authoritative version and shall prevail over any translated versions. In case of any discrepancies or inconsistencies between the original and translated versions, the provisions of the **original Dutch language version** shall govern.

For questions about the Wwft and Sw questionnaire, you can consult the explanatory document online (available in Dutch only). If you still have a remaining question after reading it, please contact the AFM by email using businessdesk@afm.nl. You can also contact the AFM by telephone on +31 (0) 20 797 2000. Check our current business hours on our website: <https://www.afm.nl/nl-nl/contact/ondernemersloket>.

Contact Details

Who should the AFM contact for questions relating to your answers to this questionnaire?¹

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?

Note:

¹) If the AFM has questions regarding the answers that you have provided, an AFM employee will contact the contact person that you delegate here.

Part I. Inherent risks

A. Organisation

The reference date for these questions is 31 December 2023.

1.

Which applies to your company?¹

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

Note:

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

2a.

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

- Yes
 - No
-

2b.

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

Full name of the foreign parent companies under the articles of association	Country of establishment	LEI ¹	AML/CFT supervisor

Note:

¹) The LEI is a unique number that identifies entities worldwide.

3.

Does your foreign parent company have branches, tied agents and/or subsidiaries abroad?

If your own company is the only branch and/or subsidiary of the foreign parent company, please select 'No'.

Yes

No

4a.

Does your own company have any branches, tied agents and/or subsidiaries?

Yes

No

4b.

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, (if applicable) the Legal Entity Identifier (LEI) for each entity, the name of its AML/CFT supervisor and a description of its activities.

Full name (under the articles of association) of the tied agent/branch/subsidiary	Type	Country of establishment/registration	LEI ¹	AML/CFT supervisor	Description of the activities
	<input type="checkbox"/> Branch office <input type="checkbox"/> Tied agent <input type="checkbox"/> Subsidiary				

Note:

¹) The LEI is a unique number that identifies entities worldwide.

5a.

What investment activities or services do you perform or provide?

- 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.

5b.

What are the main activities or services provided by the branch?

A. Organisation

The reference date for these questions is 31 December 2023, unless stated otherwise.

In the questions below, "business relationship" refers to those (legal) persons with whom you have a business, professional or commercial relationship related to the professional activities of your company. 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.

6a.

Have you worked with business relations located abroad in the period from 1 January 2023 to 31 December 2023?

You should not include the clients for whom you perform investment activities and provide investment services and members/participants of trading platforms 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

6b.

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 January 2023 to 31 December 2023:

- The total amount¹ (in €) involved in this cooperation in the period from 1 January 2023 to 31 December 2023:

Note:

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

7a.

Have you worked with business relations located **in a high-risk country** in the period from 1 January 2023 to 31 December 2023?¹

- Yes
- No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

7b.

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

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

Note:

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

B. Proprietary trading

The reference date for these questions is 31 December 2023

8.

What is the amount of the total capital (or balance sheet-capital) with which you traded on the mentioned reference date?¹

€

Note:

¹) The AFM requests that you state both equity and debt here.

9a.

Do you have positions in assets in one or more **high-risk countries**?¹

We request that you include both your direct investments and your indirect investments.²

Yes

No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

²) 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.

9b.

You have stated that you hold positions in assets in one or more high-risk countries. Provide for each high-risk country the value of the position.

High-risk country	Value of the position ¹ (€)

Note:

¹) The AFM requests that you base this on the (estimated) market value of the position(s) in the stated high-risk country. 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'.

10.

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

This concerns positions, regardless of the country in which these assets are situated. If you do not have a position in an asset category, please enter '0'.

Asset categories	Value of the position¹ (€)
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 that you to base this on the (estimated) market value of the position in the stated asset category. If this value is not or not easily available, state the most recently known market value.

C. Receiving and forwarding orders

When answering these questions, you must include the clients for whom you receive and forward orders regarding financial instruments, as referred to in Article 1:1 of the Wft. You do not have to state activities on behalf of clients for whom you provide advisory services, the management of the individual capital or perform order execution in your answer to this question. Clients are natural persons, legal persons and other legal entities.

The reference date for these questions is 31 December 2023.

If you are a branch office, then please fill in this section with the information of clients whom, through your intervention, enter into a contract with your branch and/or (foreign) investment firm.

11.

State the requested information for your clients for whom you receive and forward orders in relation to financial instruments.

	Number of clients	Value of investment portfolio¹ (€)	Order volume (1 January 2023 to 31 December 2023)² (€)
Natural persons			
Legal persons and/or other legal entities and/or legal structures			
Total			

Note:

¹) This is the value of your clients' portfolio 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.

12a.

You have stated that you have clients for whom you receive and forward orders. Provide the requested information for these clients when they are resident or located in the Netherlands.

The AFM requests that you to base this on the Wwft risk classification you use for your clients. If your company uses different names for the classifications, please use the classifications stated below.

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 (€) ¹
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
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.

12b.

You have stated that you have clients for whom you receive and forward orders. Provide the requested information for these clients when they are not resident or located in the Netherlands.

The AFM requests that you to base this on the Wwft risk classification you use for your clients. If your company uses different names for the classifications, please use the classifications stated below.

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 (€) ¹
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
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.

13a.

Do you have clients for whom you receive and forward orders who are resident or located in a **high-risk country**¹?

- Yes
 No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

13b.

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

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.

14.

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

	Number of clients	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) Natural persons with investable assets of more than €2.5 million.

⁴) The value of the investment portfolio of your clients on the stated reference date including the value of cash in the investment account.

15.

State the number of clients for whom you received and/ or forwarded orders who are active in the stated sectors/activities and the total value of the investment portfolio.

If not applicable, please enter '0'.

	Number of clients	Value of investment portfolio ¹ (€)
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, 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.

16.

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

Asset categories	Assets invested¹ (€)
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 that you 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

State only those clients for whom you execute orders for financial instruments for the account of clients. You do not have to state activities on behalf of clients for whom you receive and forward orders, provide advisory services and the management of the individual capital in your answer to this question. Clients are natural persons, legal persons and other legal entities.

The reference date for these questions is 31 December 2023.

If you are a branch office, then please fill in this section with the information of clients whom, through your intervention, enter into a contract with your branch and/or (foreign) investment firm.

17.

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	Value of investment portfolio¹ (€)	Order volume (1 January 2023 to 31 December 2023)² (€)
Natural persons			
Legal persons and/or other legal entities and/or legal structures			
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.

18a.

You have stated that you have clients for whom you execute orders in financial instruments for their account. Provide the requested information for these clients when they are resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your clients. If your company 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 portfolio¹ (€)
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
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.

18b.

You have stated that you have clients for whom you execute orders in financial instruments for their account. Provide the requested information for these clients when they are not resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your clients. If your company 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 ¹ (€)
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
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.

19a.

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**¹

- Yes
 No

Note:

¹⁾ Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

19b.

State the total number of clients you had in each **high-risk country** for whom you execute orders in financial instruments, as well as the total value of the investment portfolio for each individual high-risk country.

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

20.

State the number of your clients, for whom you execute orders in financial instruments, that fall in the stated category. Also state the total value of their 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) Natural persons with investable assets of more than €2.5 million.

⁴) The value of the investment portfolio of your clients on the stated reference date including the value of cash in the investment account.

21.

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 and the total value of the investment portfolio.

If not applicable, please enter '0'.

	Number of clients	Value of investment portfolio ¹ (€)
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, 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.

22.

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

Asset categories	Assets invested¹ (€)
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 that you 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. These questions should not include activities on behalf of clients for whom you receive and forward orders, perform management of individual capital or order execution. Clients are natural persons, legal persons and other legal entities.

The reference date for these questions is 31 December 2023.

If you are a branch office, then please fill in this section with the information of clients to whom advisory services have been provided through the branch office.

23.

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	Value of advisory assets (€)
Natural persons		
Legal persons and/or other legal entities and/or legal structures		
Total		

24a.

You have stated that you have clients for whom you give advice on financial instruments. Provide the requested information for these clients when they are resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your clients. If your company 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 ¹ (€)
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

24b.

You have stated that you have clients for whom you give advice on financial instruments. Provide the requested information for these clients when they are not resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your clients. If your company 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 ¹ (€)
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

25a.

Do you have clients to whom you give advice on financial instruments who are resident or located in a **high-risk country**? ¹

- Yes
- No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

25b.

State the total number of clients you had in each **high-risk country** for whom you give advice on financial instruments, as well as the volume of the total advisory assets for each individual high-risk country.

High-risk country	Total number of clients per country	Volume of advisory assets (€)

26.

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 purpose, 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) Natural persons with investable assets of more than €2.5 million.

27.

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

If not applicable, please enter '0'.

	Number of clients	Volume of advisory assets ¹ (€)
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, Marktplaats)		
Arms dealers		

28.

Do you advise on financial instruments in the asset categories listed below?

Asset categories	Answer
Virtual currency	[Yes/No]
'Investment objects' such as horses, teak, whisky, gold, wine, etc.	[Yes/No]
Art and/or antiques	[Yes/No]
Real estate	[Yes/No]
Microfinance	[Yes/No]
CO2 emission rights	[Yes/No]
Oil, gas, minerals	[Yes/No]

F. Management of individual capital

State only those clients for whom you manage individual capital, as referred to in Article 1:1 of the Wft. You do not have to state activities on behalf of clients for whom you receive and forward orders, perform order execution and give advice on financial instruments in your answer to this question. Clients are natural persons, legal persons and other legal entities.

The reference date for these questions is 31 December 2023.

If you are a branch office, then please fill in this section with the information of clients whose individual capital has been managed through the branch office.

29.

You have stated that you have clients for you manage individual capital. Provide the requested information for these clients only.

	Number of clients	Value of investment portfolio¹ (€)	Order volume (1 January 2023 to 31 December 2023)² (€)
Natural persons			
Legal persons and/or other legal entities and/or legal structures			
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.

30a.

You have stated that you have clients for whom you manage individual capital. Provide the requested information for these clients when they are resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your clients. If your company 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 portfolio¹ (€)
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
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.

30b.

You have stated that you have clients for whom you manage individual capital. Provide the requested information for these clients when they are not resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your clients. If your company 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 ¹ (€)
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
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.

31a.

Do you have clients for whom you manage the individual capital who are resident or located in a **high-risk country**?¹

- Yes
 No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

31b.

State the total number of clients that you had **in each high-risk country**, as well as the total value of the investment portfolio for each individual high-risk country.

High-risk country	Total number of clients per country	Value of investment portfolio 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.

32.

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 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.

33.

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

If not applicable, please enter '0'.

	Number of clients	Value of investment portfolio ¹ (€)
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, 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.

34.

Indicate how much has been invested in the stated asset categories by the clients for whom you manage individual assets.

Asset categories	Assets invested¹ (€)
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 that you base this on the (estimated) market value of the investment in the stated asset category. If this value is not available, state the most recently known market value. 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.

G. Underwriting and placement

For these questions you are only required to state clients for whom you underwrite and/or place financial instruments when offered with or without firm commitment basis as referred to in the Wft and prospectus regulation. Clients are natural persons, legal persons and other legal entities as referred to in the Wft and prospectus regulation.

The reference period for these questions is 1 January 2023 to 31 December 2023.

If you are a branch office, then please fill in this section with the information of clients to whom financial instruments have been underwritten and/or placed through the branch and investors who have accepted such an offer.

35a.

State the requested information for each category.

- 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:

35b.

State the requested information for each category.

	Number of investors
Natural persons	
Legal persons and/or other legal entities and/or legal structures	
Total	

36a.

Provide the requested information for issuing institutions that are located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification that you use for your clients. If your company uses different names for these classifications, please use the equivalent 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.

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

36b.

Provide the requested information for issuing institutions when they are not resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your clients. If your company uses different names for the classifications, please use the equivalent classifications stated below.

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

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

36c.

Provide the requested information for the investors that are resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification that you use for your clients. If your company uses different names for the classifications, please use the equivalent 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.

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

36d.

Provide the requested information for the investors that are not resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification that you use for your clients. If your company uses different names for the classifications, please use the equivalent 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.

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

37a.

Do you have issuing institutions for whom you underwrite and/or place financial instruments when offered with or without firm commitment basis that are located in a **high-risk country**?¹

- Yes
 No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

37b.

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

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

38a.

Do you have investors located in a **high-risk country**?¹

- Yes
 No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

38b.

State the total number of investors that you had **in each high-risk country**. Also state the total value of the financial instruments in each high-risk country.

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

39.

State how many of your investors fall into the following categories.

	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) Natural persons with investable assets of more than €2.5 million.

40.

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.

If not applicable, please enter '0'.

	Number of issuing institutions	Number of investors
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, Marktplaats)		
Arms dealers		

H. Operating MTF/OTF

For these questions, you should only state those members/participants for whom you operate an organised and/or multilateral trading facility (MTF/OTF).

The reference date for these questions is 31 December 2023.

If you are a branch office, then please fill in this section with the information of clients whom, through your intervention, enter into a contract with your branch and/or (foreign) investment firm.

41.

Provide the requested information for each category of your members/participants.

	Number of members/participants
Natural persons	
Legal persons and/or other legal entities and/or legal structures	
Total	

42a.

Provide the requested information for the members/participants that are resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your members/participants. If your company 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 resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

42b.

Provide the requested information for the members/participants that are not resident or located in the Netherlands.

The AFM requests that you base this on the Wwft risk classification you use for your members/participants. If your company uses different names for the classifications, please use the classifications stated below.

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 not resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

43a.

Do you have members/participants for whom you perform this investment activity that are located in a **high-risk country**? ¹

- Yes
 No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

43b.

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

High-risk country	Total number of members/participants

44.

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) Natural persons with investable assets of more than €2.5 million.

I. Clients

For the questions below, you must include under 'clients' all clients for whom you perform or provide one or more investment activities and/or services. 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.

Give the total number of unique clients for each question. Unique means that if you perform or provide multiple investment activities and/or services for one client, you should include this client once.

The reference date for these questions is 31 December 2023.

If you are a branch office, then please fill in this section with the information of clients to whom an investment service is provided through the branch or who are affiliated with an organized and/or multilateral trading facility (OTF/MTF) operated through the branch.

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

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

45.

State the total number of unique clients for each category below.

	Number of clients
Natural persons	
Legal persons and/or other legal entities and/or legal structures	
Total	

46a.

Do you have clients for whom the UBOs are resident in a **high-risk country**¹?

- Yes
 No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

46b.

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

High-risk country	Number of UBOs

47.

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

- Yes
 No

48.

How many PEPs do you have in total as clients?

49a.

Do you have PEPs as clients who are resident in a **high-risk country**¹?

- Yes
 No

Note:

¹) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

49b.

State how many PEPs you have as clients **in each high-risk country**. This is the PEP's country of residence.

High-risk country	Number of PEPs

50.

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

- Yes
 No

51.

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

52a.

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

Yes

No

Note:

1) Upon selecting "Yes", you will see the list of high-risk countries in part b of this question.

52b.

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

High-risk country	Number of UBOs of your clients who are PEPs

J. Products, services and transactions

For the questions below, you must include under 'clients' all clients for whom you perform or provide one or more investment activities and/or services. 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.

Give the total number of unique clients for each question. Unique means that if you perform or provide multiple investment activities and/or services for one client, you should include this client once.

If you are a branch office, then please fill in this section with the information of clients to whom an investment service is provided through the branch or who are affiliated with an organized and/or multilateral trading facility (OTF/MTF) operated through the branch.

53a.

State the following information for your clients who have placed funds with/via your company in the period from 1 January 2023 to 31 December 2023.

	Number of clients	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, Cyprus and Malta) ¹			
Transactions originating from a bank account outside the EEA (other than high-risk countries) ²			
Transactions originating from bank accounts in high-risk countries ²			

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 request that you include Cyprus and Malta as high-risk countries only.

²) If you enter a value greater than zero, you will see the list of high-risk countries in part b of this question.

53b.

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 (€)

54.

Did you receive cash, payment cards and/or virtual currencies from clients and/or business relations in the period from 1 January 2023 to 31 December 2023?

If not applicable, please enter '0'.

	Number of clients	Amount (€) ¹
Cash receipts (banknotes and coins)		
Payment cards		
Virtual currencies		

Note:

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

K. Delivery and distribution channels

For the questions below, you must include under 'clients' all clients for whom you perform or provide one or more investment activities and/or services.

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.

Give the total number of unique clients for each question. Unique means that if you perform or provide multiple investment activities and/or services for one client, you should include this client once.

If you are a branch office, then please fill in this section with the information of clients to whom an investment service is provided through the branch or who are affiliated with an organized and/or multilateral trading facility (OTF/MTF) operated through the branch.

55.

State the requested numbers for each activity in the period 1 January 2023 to 31 December 2023.

	Number
Total number of clients accepted in the stated period, both physically and non-physically present	
Total number of clients resident or located in the Netherlands that were not physically present during acceptance	
Total number of clients <u>not</u> resident or located in the Netherlands that were not physically present during acceptance	

56a.

State how many new clients you accepted in the period from 1 January 2023 to 31 December 2023 who were introduced by an intermediary.

	Number of clients ¹
Via an intermediary located in the Netherlands	
Via an intermediary located in the EEA (outside the Netherlands, Cyprus and Malta) ²	
Via an intermediary located outside the EEA (high-risk countries excluded) ³	
Via an intermediary located in a high-risk country ³	

Note:

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

2) 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 request that you include Cyprus and Malta as high-risk countries only.

3) If you enter a number of clients, you will see the list of high-risk countries in part b of this question.

56b.

State per high-risk country the number of clients accepted that were introduced by an intermediary located in that specific country.

High-risk country	Number of clients

Part 2 Control measures

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

Risk assessment refers to the identification and assessment of firm-specific risks regarding money laundering and the financing of terrorism, as referred to in paragraph 1 of Section 2b of the Wwft. It is therefore not about assessing the risk profile of individual clients. 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.

The reference date for these questions is 31 December 2023.

57.

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

- Yes
 - No
-

58.

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

- Yes
 - No
-

59.

When were these results updated?

- 2023
 - 2022
 - 2021
 - Before 2021
 - Never
-

60.

Is your risk assessment based on gross/inherent risks?¹

- Yes
- No

Note:

¹) 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 company or the environment in which a company operates. This concerns threats and vulnerabilities that exist for your company before account is taken of the internal control measures in place.

61.

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

- Yes
- No

Note:

¹) Net or residual risk is the risk that remains when taking account of the effects of the control measures in place.

62.

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)
- Circumvention of sanctions regulation
- Evasion and avoidance of tax regulation
- Proliferation funding¹
- None of the above

Note:

¹) The proliferation of nuclear, chemical, and biological weapons (so-called "weapons of mass destruction") and their financing.

63.

How do you assess your company with respect to the following risk categories?¹

	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					

Note:

¹) 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 company and/or a (foreign) investment firm through your intermediation.

M. Policies, controls and procedures

64.

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

- Yes
- No

65.

Do you have specific policies on the Wwft and/or sanctions regulation

	Answer
Wwft	Yes/No
Sanctions regulation	Yes/No

66.

When were these policies updated and approved?

	2023	2022	2021	Before 2021
Wwft				

	2023	2022	2021	Before 2021
Sanctions regulation				

67.

Do these policies cover the following subjects?

	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"/>
Evidence and document retention (record keeping).	<input type="checkbox"/>	<input type="checkbox"/>
Vetting, training and qualifications	<input type="checkbox"/>	<input type="checkbox"/>

68a.

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

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

Yes

No

68b.

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

68c.

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

You have stated that your company is a branch or subsidiary of a (foreign) investment firm.

Yes

No

68d.

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

N. Client due diligence

For the questions below, you must include under 'clients' all clients for whom you perform or provide one or more investment activities and/or services. 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.

You have indicated that your company is a branch or subsidiary of a (foreign) investment firm.

69.

Which answer applies to your branch or subsidiary of a (foreign) investment firm regarding client due diligence?

- Our company applies client due diligence measures for all clients and business relations.
- Our company applies client due diligence measures for some clients and business relations, and the (foreign) investment firm applies client due diligence measures for some clients and business relations.
- The (foreign) investment firm applies client due diligence measures for these clients and business relations.
- Our company does not apply client due diligence measures for these clients and business relations, and the (foreign) investment firm does not apply these measures either.

70.

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

- Yes
- No

71.

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

- Yes
 - No
-

N. Client due diligence

For the questions below, you must include under 'clients' all clients for whom you perform or provide one or more investment activities and/or services. 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.

In the questions below, "business relationship" refers to those (legal) persons with whom you have a business, professional or commercial relationship related to the professional activities of your institution. 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.

If you are a branch office, then please fill in this section with the information of clients to whom an investment service is provided through the branch or who are affiliated with an organized and/or multilateral trading facility (OTF/MTF) operated through the branch.

72.

Do you carry out a risk assessment in the context of the client due diligence as defined in the Wwft?

Only if you have no clients and/or other business associates, please select 'NA'.

	In 0% of cases	In 1-25% of cases	In 26-50% of cases	In 51-75% of cases	In 76-99% of cases	In 100% of cases	NA
Clients							
Other business relations							

73a.

Is client due diligence under the Wwft performed when entering into a business relationship?

	Answer
Clients	Yes/No
Other business relations	Yes/No

73b.

Is client due diligence under the Wwft performed when conducting a one-off transaction?

	Answer
Clients	Yes/No
Other business relations	Yes/No

74.

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?

If you have no clients and/or other business relations for which you need to determine the source of the funds, please select 'not applicable'. Institutions are required under Section 3(2)(d) of the Wwft to conduct an investigation into the source of the funds 'if necessary'. Especially in high-risk situations, it is reasonable to conduct an investigation into the source of the funds.

	Answer
Clients	Yes/No/NA
Other business relations	Yes/No/NA

75.

For which clients is the risk profile event-driven and/or periodically reviewed??

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/NA	Yes/No/NA
Clients with neutral risk	Yes/No/NA	Yes/No/NA
Clients with high or increased risk	Yes/No/NA	Yes/No/NA
Clients with unacceptable risk	Yes/No/NA	Yes/No/NA

76.

In which cases does your company take additional control measures?

- 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

77a.

Do you outsource (a part of) your client due diligence under the Wwft and/or sanctions regulations to a third party/parties?¹

- Yes
- No

Note:

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

77b.

What part of the client due diligence do you (partially) outsource to (a) third party/parties?

- Identification of clients and/or other business relationships
- Verification of the identity of clients and/or other business relationships
- PEP check
- Adverse media check
- Sanctions check

77c.

To which third party/parties do you (partly) outsource the client due diligence under the Wwft and/or sanctions regulations?

78.

When outsourcing to (a) third party/parties, does your firm monitor that the client due diligence by this third party is performed in accordance with the Wwft and/or sanctions regulations?

- More than once every 2 years
- Once every 2 years
- Less than once every 2 years
- No, never

79.

Do you have a contractual arrangement with this/these third party/parties?

- Yes
- No

80.

Does this outsourcing arrangement stipulate the obligations with respect to compliance with the Wwft and/or sanctions regulations?

- Yes
- No

N. Client due diligence

For the questions below, you must include under 'clients' all clients for whom you perform or provide one or more investment activities and/or services. 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.

Give the total number of unique clients for each question. Unique means that if you perform or provide multiple investment activities and/or services for one client, you should include this client once.

In the questions below, "business relationship" refers to those (legal) persons with whom you have a business, professional or commercial relationship related to the professional activities of your institution. 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.

If you are a branch office, then please fill in this section with the information of clients to whom an investment service is provided through the branch or who are affiliated with an organized and/or multilateral trading facility (OTF/MTF) operated through the branch.

81.

How many potential clients have you refused for reasons relating to the Wwft in the period 1 January 2023 to 31 December 2023?

82.

How many clients did you terminate the relationship with for Wwft-related reasons in the period from January 1, 2023 to December 31, 2023

83.

Does your company 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

84.

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

Yes

No

O. Transaction monitoring

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.

85.

Is your transaction monitoring system automated or manual?¹

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

Note:

¹) '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.

86.

In most cases, how often does transaction monitoring take place?

	Daily	Weekly	Monthly	Less often than monthly
Transactions initiated by your company				
Transactions by or on behalf of a client				

87.

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

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

88.

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

89.

Does your firm allow that funds are received by your firm for clients that originate from an account that is not in the client's name?¹

- Yes
- No

Note:

¹) This does not include joint accounts.

90.

Does your firm allow that funds by your firm are paid to an account that is not in the client's name?

- Yes
- No

Note:

¹) This does not include joint accounts.

91.

Does your company perform audit procedures in such situations?

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.

- Yes
 - No
-

92.

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

- Yes
 - No
-

93.

How many alerts were generated in the period from 1 January 2023 to 31 December 2023?

94a.

Was there a backlog in your assessment of these alerts on the reference date 31 December 2023?

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

94b.

Number of alerts yet to be assessed:

95.

How many transactions did your company refuse in the period 1 January 2023 to 31 March 2023 due to suspicion of involvement in money laundering and/or financing of terrorism?

P. Reporting of unusual transactions

A company 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 article 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.

96.

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

Yes

No

97.

How many unusual transactions did you report to FIU-NL in the period from 1 January 2023 to 31 December 2023?

Q. Sanctions screening

By "relationship" the AFM means not only the client, but also the UBO, the representative and/or other relevant natural and/or legal persons involved in the business relationship. The AFM hereby uses the definition of relationship from the Regulation on the Supervision of the Sanctions Act 1977 ("A relationship is anyone who is involved in a financial service or a financial transaction").

98a.

Which of the following sanctions lists (one or more) do you use in the screening of your business relations?¹

- Dutch terrorism sanctions list
- EU sanctions lists
- UN sanctions lists
- Other
- None

Note:

¹) In this question 'you' also refers to any company that supports you in checking whether your business relations appear in the sanctions lists.

98b.

Please indicate what is meant by 'other':

99.

Do you check if a prospective or existing business relation appears in one or more sanctions lists **before** providing your services?

- Always
 - Regularly
 - Occasionally
 - Never
-

100.

Do you conduct a daily check of sanctions lists?¹

- Yes
 - No
-

Note:

¹) With this question you can think of a daily screening of all relations using an automated system.

101.

Do you check if a prospective or existing business relation appears in one or more sanctions lists **during** providing your services?

- In case of changes to the sanctions lists
 - In case of changes on the side of the relationship
 - At the end of the relationship
 - No
-

102.

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

- Yes
 - No
-

103.

How many business relations (including clients, UBOs, and beneficiaries of payments) have had their funds frozen by you on the basis of sanctions regulations in the period from 1 January 2023 to 31 December 2023?

104.

How many business relations whose funds were frozen did you report to the AFM in this period?

R. Training

105a.

Do you employ personnel?

- Yes
- No

105b.

Does your company provide internal or external training(s) or course(s) for your company's employees on Wwft and sanctions regulations?

	Answer
Wwft	Yes/No
Sanctions regulations	Yes/No

106.

For your workforce, provide the following information.

	How many employees have followed training in the past 24 months?¹	How many employees still have to follow training?
Wwft training		
Sanctions regulation training		

107.

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

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

S. Compliance and audit

108.

How many FTE do you have in the internal compliance department that are involved with activities relating to the Wwft and sanctions regulations?¹

Note:

¹) 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 company via a holding company, for example, are not employees and should therefore not be included.

109.

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

- Yes
 No
-

110.

How many FTE do you have in the external compliance department that are involved with activities relating to the Wwft and sanctions regulations?¹

Note:

¹) 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 company via a holding company, for example, are not employees and should therefore not be included.

111.

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)				

112.

When was the last Wwft audit performed?

- 2023
- 2022
- 2021
- Before 2021
- Never

113.

When was the last sanctions regulations audit performed?

- 2023
 - 2022
 - 2021
 - Before 2021
 - Never
-

T. Governance

114.

Does your company have two or more policymakers?

- Yes
 - No
-

115.

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

- Yes
 - No
-

116.

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?¹

Question number	Comments
Number/general	

Note:

¹) These may be either general, or relate to a specific question.

Declaration

It is important that your response to this request for information is correct and complete. We accordingly request that you as policymaker declare that the questionnaire has been completed truthfully and to the best of your knowledge.

Salutation:

Initials:

Prefix:

Surname:

- By checking this box, the undersigned, as the policymaker, **declares** that they have **answered and completed** the Wwft and Sw Investment Firms Questionnaire 2024 **truthfully and to the best of their knowledge.**



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