

Explanatory Document

Questionnaire Wwft and Sw

Investment firms 2026

Publication date: June 2nd, 2026

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1. Introduction

Before you begin completing the questionnaire, we ask you to carefully review the information below. This may assist you in submitting your response correctly and on time.

1.1 Purpose of this Questionnaire

The Dutch Authority for the Financial Markets (**AFM**) supervises compliance with the Money Laundering and Terrorist Financing (Prevention) Act (**Wwft**) and the Sanctions Act 1977 (**Sw**) by investment firms in the Netherlands and Dutch branches of foreign investment firms (**Branches**). The AFM applies a riskbased approach in deploying its supervisory capacity. This means, among other things, that the AFM will use the information provided through the 'Questionnaire Wwft and Sw BO 2026' (hereinafter: **the Questionnaire**) to establish risk profiles of investment firms and Branches. The Questionnaire also provides the AFM with a general view of the inherent money laundering, terrorist financing and sanctions evasion risks, as well as the extent to which these risks are mitigated within the sector. Additionally, the AFM uses the information obtained to make decisions regarding its supervisory strategy and the planning of supervisory activities. Institutions will not receive individual feedback.

1.2 Structure of the Questionnaire

The Questionnaire contains consecutively numbered questions. However, it may be the case that you are not required to complete certain questions because they are not applicable to your institution. As a result, some question numbers may be skipped and chapter numbering may not be sequential.

For most questions, only one answer can be selected, although in some cases multiple answers are possible. Where only one answer can be provided, please select the option that is most applicable to, or best reflects, your institution.

At the end of the Questionnaire, you will have the opportunity to submit comments regarding the Questionnaire. You are therefore advised to note any such comments for your own reference while completing it. Your comments may be of a general nature or may relate to a specific question.

1.3 Is completing the Questionnaire mandatory?

Yes, completing both parts of the Questionnaire is mandatory for the investment firms and Branches that have been addressed. Pursuant to Article 5:20 of the General Administrative Law Act (**Awb**), institutions are required to provide the requested information within the prescribed deadline.¹ If an institution does not submit the Questionnaire, or does not submit it on time, the AFM may impose an informal or formal measure, such as a warning or an administrative fine.

¹ Pursuant to Article 5 of the Regulation on the Supervision of the Sanctions Act 1977, a cooperation obligation also applies.

2. Completing the Questionnaire

2.1 Access to the Questionnaire

The announcement letter sent by the AFM to institutions explains how the Questionnaire can be accessed. The Questionnaire is available in the AFM Portal. Via www.afm.nl you can navigate to the AFM Portal through the menu in the upper-right corner (the direct link is <https://portaal.afm.nl>). A user guide for registering and using the portal is also available there.

You log in to the AFM Portal with your e-mail address and password. If you no longer know your password, select 'forgot password'. Please note: after logging in, you must authenticate yourself in the AFM Portal using an authentication code. This provides an additional layer of security for your data. To log in, follow the steps below:

1. Create an account using your e-mail address and log in with your username and password.
2. A QR code will appear on your screen.
3. Scan the QR code using your authenticator app, which must be installed on your phone, tablet or PC. This may be, for example, the Microsoft Authenticator app or Google Authenticator.
4. Enter the sixdigit code generated by your authenticator app.

After you have logged in and successfully completed the authentication process, you will find both parts of the Questionnaire in your portal under "Reporting Obligations" (if necessary, you can further filter by the type "Questionnaire" in the left-hand menu).


2.2 How much time do I have to complete the Questionnaire?

The letter you received announcing the Questionnaire specifies the deadline within which you must complete and submit the Questionnaire. This submission deadline applies to both parts of the Questionnaire. When submitting, please be aware that the submission process may take some time. Wait for the submission process to complete and do not use the 'refresh' button of your internet browser.

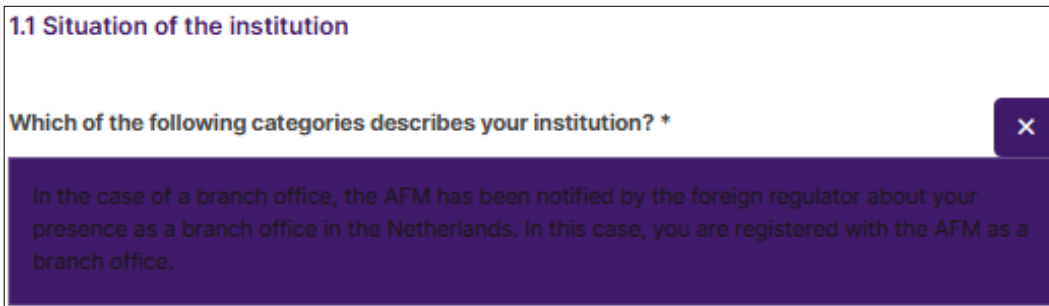
2.3 Do I need to complete the Questionnaire in one session?

You may complete the Questionnaire over multiple sessions; it does not need to be completed at once. Please note that your answers are only saved once you click the 'Save and abort' button (located in the upper-right corner of the form). Saving questions and/or a completed page of the Questionnaire may take some time. After saving, you can easily navigate back to the Questionnaire by clicking the 'Back to the form' button.

2.4 Readability of explanatory notes

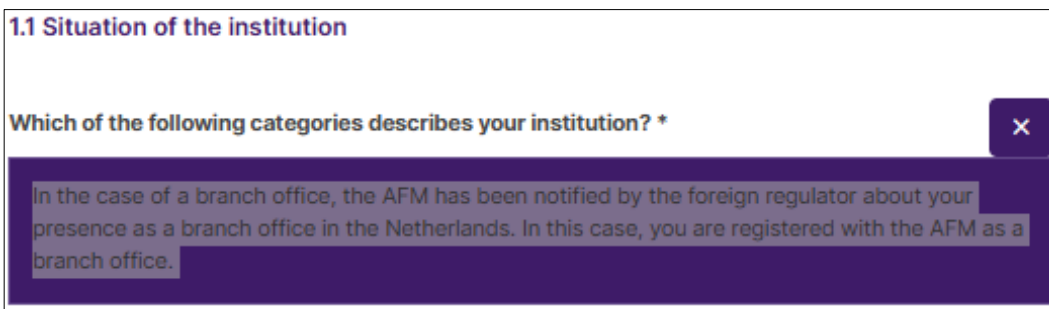
The AFM has formulated the questions as clearly as possible and has provided explanatory notes for several questions. Such explanatory notes are set out directly below a question or can be accessed by clicking on the question mark icon next to the relevant question (where available, ). When clicking on the question mark icon, a technical issue may unfortunately cause the explanatory text to be difficult to read. Selecting the text of the explanation with your cursor will improve its readability. Example:

Poorly readable explanatory note



The screenshot shows a form titled "1.1 Situation of the institution". Below the title is the question "Which of the following categories describes your institution? *". To the right of the question is a question mark icon in a dark blue square. Below the question is a dark blue box containing the explanatory text: "In the case of a branch office, the AFM has been notified by the foreign regulator about your presence as a branch office in the Netherlands. In this case, you are registered with the AFM as a branch office." The text is small and difficult to read.

Readable explanatory note after selection with cursor



The screenshot shows the same form as above, but the explanatory text in the dark blue box is now highlighted in a lighter blue color, indicating it has been selected with a cursor. The text is now much easier to read.

2.5 Is a FAQ available?

The AFM will publish a FAQ on <https://www.afm.nl/vragenlijst-wwft-sw-bo>

If multiple questions are received during the submission period that are similar and/or relate to the same subject. This document will be updated throughout the submission period. A FAQ may not (yet) be available at the moment your institution has a substantive question.

If you require support in completing the Questionnaire correctly, first check whether the AFM has published a FAQ on <https://www.afm.nl/vragenlijst-wwft-sw-bo> and whether your question is already addressed there. If this is not the case and you require further assistance, please contact the AFM at wwft.sw@afm.nl.

2.6 I entered an answer incorrectly. Can I still change it?

While completing the Questionnaire, it is possible to modify information entered earlier. When you correct an answer, this may have consequences for other questions that appear later in the Questionnaire. Unfortunately, this may cause follow-up questions to remain visible even when they should no longer apply, if earlier answers are changed. In such cases, please contact the AFM at wwft.sw@afm.nl or via the Entrepreneurs Desk contact form (<https://www.afm.nl/nl-nl/contact/contactformulier-sector>).

Once the form has been submitted to us, it is no longer possible to make changes. If you have already submitted the Questionnaire but subsequently wish to amend your answers, please contact the AFM at wwft.sw@afm.nl or via the Entrepreneurs Desk contact form (<https://www.afm.nl/nl-nl/contact/contactformulier-sector>).

2.7 Complete and truthful completion

You must complete the Questionnaire fully, accurately and truthfully. The day-to-day policymaker(s) of the institution is/are personally responsible for this. The AFM asks them to provide their own declaration regarding compliance with laws and regulations.²

² Should the AFM subsequently establish violations, it will not use the declarations you have provided when imposing a potential administrative fine. However, it is possible that the AFM may take another measure based on the answers provided.

3. Submitting the questionnaire

3.1 Can I submit the Questionnaire only digitally?

Yes, you can submit the Questionnaire to us only digitally by completing and submitting both parts online in the AFM Portal. Only digital questionnaires submitted online will be accepted. You submit the Questionnaire by clicking 'Submit' on the summary page, which appears automatically once you have completed the Questionnaire.

3.2 Can I also download/print the completed Questionnaire?

We recommend that you retain the completed Questionnaire for your own records. After completing the Questionnaire, you will have the option—per part—to download it (as a PDF). You can do this by clicking 'Download submission'. **PLEASE NOTE: Once you have submitted a part of the Questionnaire, it will no longer be possible to download a PDF of the completed Questionnaire at a later moment.**

3.3 Will I receive a confirmation after submitting the Questionnaire?

Your institution will not receive a confirmation of submission by e-mail. However, you can view the status of the Questionnaire in the AFM Portal under 'Reporting obligations'. If the Questionnaire has been successfully completed and submitted, both parts will be marked 'Completed' (you can filter on this via the left-hand menu).

3.4 Processing of personal data

When submitting the Questionnaire, a limited amount of personal data is transmitted to the AFM. We process the data provided in accordance with the General Data Protection Regulation (GDPR) and observe the required level of care in doing so.³ If we publish any information derived from the Questionnaire, this will only be on a market-wide level. Publications will not be traceable to your institution.

³ The AFM makes its privacy statement available on its website: <https://www.afm.nl/en/over-de-afm/organisatie/privacy>