



Print version Questionnaire

MMBES 2025

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Introduction

Welcome. Before you start looking through or completing the questionnaire, please read the information below carefully.

Explanatory notes

This questionnaire is administered by the Dutch Authority for the Financial Markets. This questionnaire for the Market Monitor is intended for financial companies that operated in the Caribbean Netherlands in 2024. The Caribbean Netherlands comprises Bonaire, Sint Eustatius and Saba.

Legal requirement

This questionnaire must be completed by law. The announcement letter states the period in which you can complete the questionnaire. If you have any questions about the **completion period**, you can contact Jeroen.Gevaert@afm.nl.

Reporting changes through the AFM Portal

Changes to your licence can only be reported to us through the AFM Portal: <https://portaal.afm.nl>. You cannot report changes through this questionnaire.

Any questions?

For more information, please go to [our website](#). If you still have questions after reading this information, you can contact Jeroen.Gevaert@afm.nl. Always include your licence number with your questions.

Getting started

The questionnaire can be completed in multiple sessions, so you do not have to do it all at once. The answers you enter on a page will be saved when you click the arrows at the top left (to go to the next page). Answers you enter on a page will not be saved if you do not click the arrows or the save button.

You can use the arrows at the top left to move forwards and backwards through the questionnaire. If you want to go back even further in the questionnaire, you can use the menu on the left side of the screen. **NB: If you jump back, you will have to go through the questionnaire again from this point** (if questions have already been completed, this means you must keep clicking the forward arrows to get to where you left off). This is because any changes you make to an answer may lead to different questions. You cannot use your browser's arrow keys to move backwards or forwards through the questionnaire.

When you have finished completing the questionnaire, you can send it to the AFM by clicking the '**Send**' button on the overview page. You can find this under 'Questionnaire completed, but not yet submitted'.

NB: You will not receive a copy of your answers by e-mail. You can download a copy at the end of the questionnaire (before sending the questionnaire).

Section 1 – Activities of the company

Question 1.1 – Activities

- Table, tick the cells that apply

First, tick the activities that your company carried out in 2024. If your company performed multiple activities, tick all of these activities. If your company did not perform any activities in 2024, you can enter 'My company did not perform any of these activities in 2024' below the table.

For example, if your company was a bank, it probably offered credit, but also provided advice on it. In this case, indicate for both 'offering credit' and 'advising on and/or acting as an intermediary for credit' that your company performed this activity.

NB: If your company was an insurance provider that provided advice on insurance, you must also indicate specifically that your company performed this activity.

NB: Managing existing products (such as insurance or loans) is also deemed to be acting as an intermediary.

Product group	<u>Offering</u>	<u>Advising</u>	<u>Acting as an intermediary</u>	<u>Authorised agent</u>
Life insurance	Yes / No	Yes / No	Yes / No	Yes / No
Non-life insurance	Yes / No	Yes / No	Yes / No	Yes / No
Mortgages	Yes / No	Yes / No	Yes / No	Yes / No
Payment accounts	Yes / No	Yes / No	Yes / No	Yes / No
Savings accounts	Yes / No	Yes / No	Yes / No	Yes / No
Securities	Yes / No	Yes / No	Yes / No	Yes / No

Product group	<u>Offering as credit association</u>	<u>Offering not as credit association</u>	<u>Advising</u>	<u>Acting as an intermediary</u>	<u>Authorised agent</u>
Mortgage loans	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No
Consumer credit	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No

☐ My company did not perform any of these activities in 2024.

Offering = in the course of a profession or business, making, directly or indirectly, a sufficiently specific proposal to a consumer or client to enter into an agreement concerning a financial product as the counterparty, or to enter into, manage or execute such an agreement. See Section 1:1 of the Financial Markets (BES Islands) Act (Wfm BES).

Advising = in the course of a profession or business, recommending one or more specific financial products to a particular consumer or client. See Section 1:1 of the Financial Markets (BES Islands) Act (Wfm BES).

Acting as an intermediary = in the course of a profession or business, performing activities as an intermediary aimed at concluding agreements regarding a financial product between the provider of that product and a consumer or client, as well as assisting with the management or execution of such agreements or transactions. See Section 1:1 of the Financial Markets (BES Islands) Act (Wfm BES).

Authorised agent = Authorized representative of an insurer who, based on their authority, enters into insurance agreements with clients on behalf of that insurer.

Explanatory note on routing for 1.1 - Activities

My company did not perform any of these activities in 2024:

→ Question 1.2 – No activities declaration → End of questionnaire.

At least 1 activity ticked:

→ Section 2 – Persons in the company → Section 3 – Operations → Section 4 – Complaints & Incidents → See table below for next step (multiple possibilities):

Product group	<u>Offering</u>	<u>Advising</u>	<u>Acting as an intermediary</u>	<u>Authorised agent</u>
Life insurance	Section 5 – Questions for insurance providers	Section 6 – Questions for insurance advisers and intermediaries	Section 6 – Questions for insurance advisers and intermediaries	
Non-life insurance	Section 5 – Questions for insurance providers	Section 6 – Questions for insurance advisers and intermediaries	Section 6 – Questions for insurance advisers and intermediaries	
Mortgages				
Payment accounts				
Savings accounts				
Securities				

Product group	<u>Offering</u> as credit association	<u>Offering</u> not as credit association	<u>Advising</u>	<u>Acting as an intermediary</u>	<u>Authorised agent</u>
Mortgage loans	Section 8 – Questions for credit providers (operating as credit associations)	Section 7 – Questions for credit providers (not operating as credit associations)	Section 9 – Questions for credit advisers and intermediaries	Section 9 – Questions for credit advisers and intermediaries	
Consumer credit	Section 8 – Questions for credit providers (operating as credit associations)	Section 7 – Questions for credit providers (not operating as credit associations)	Section 9 – Questions for credit advisers and intermediaries	Section 9 – Questions for credit advisers and intermediaries	

Question 1.2 – No activities declaration

- *Only ask question if company has answered question 1.1 by stating 'My company did not perform any of these activities in 2024'.*
- *Open question, allow longer answer.*
- *The questionnaire ends after this question, since no activities are performed*

You stated that your institution performed no activities in 2024. What is the reason for this and what are your future plans for the licence?

NB: Under Section 2:14 of the Financial Markets (BES Islands) Act (Wfm BES), the AFM may amend or wholly or partly withdraw a licence it has granted if the licensee ceases to practise its profession or business for more than twelve months.

Section 2 – Persons in the company

Question 2.1 – Contact person

- Text box

Who should the AFM contact, for example with questions concerning your answers in this questionnaire?

- ☐ Mr
- ☐ Ms
- ☐ Mx
- ☐ None

Name of contact person:

Job title of contact person:

Telephone number:

E-mail:

If the AFM has any questions concerning the answers given in this questionnaire, an AFM employee will contact this person.

Question 2.2 – Policy makers

- Open question
- At least 1 answer given

Who was/were your company's policy maker(s) (or co-policy maker(s)) in the Caribbean Netherlands on 31-12-2024?

Policy maker = See Section 3:7 of the Financial Markets (BES Islands) Act (Wfm BES) for further details of the definition of a policy maker. A policy maker is a person who determines or co-determines the policy of your financial company. Members of a body charged with supervising the policy and general affairs of your financial company are also deemed to be policy makers.

- Open question
- Optional, may be left blank if not applicable.

If your company is part of a group, please also enter the group's policy makers.

Question 2.3 – Profit on activities

- Do not allow values other than numbers.

State the pre-tax profit generated by the company in the Caribbean Netherlands from activities subject to a licensing obligation (in \$) for the 2023 and 2024 financial years.

2023

2024

Profit generated by the company in the Caribbean Netherlands from activities subject to a licensing obligation = The profit of the business units related to the activities for which the company is licenced by the AFM or DNB. For example, this could be the profit that a bank generates by granting loans and acting as an insurance intermediary.

Question 2.4 – Workforce

- 2 Tables
- All cells should be filled with numbers only.
- Autofill the last column of both tables. Column 4 = Column 1 + column 2 – column 3
- Autofill first column of 2nd table. Column 1 of table 2 = column 4 of table 1.

State how many employees (measured in FTE) were employed in your company to provide your services in the Caribbean Netherlands. Also state how many employees joined and left your company in 2023 and 2024.

Enter something in every row. If one or more posts do not exist in your company, you can enter 0.

NB: Only include employees who were involved in the company's financial activities in the Caribbean Netherlands. Cleaners or canteen staff do not therefore have to be included.

NB: Employees who held multiple posts and worked full-time should be entered as 1 FTE. Example: An employee who worked 50% for the Legal Affairs department and also performed 50% compliance work should be included as 1 FTE.

2023	Director/policy maker/office manager	Credit adviser	Insurance adviser	Administrative assistant	Asset management assistant	Risk/compliance/legal affairs	Other
<u>FTE</u> at the beginning of the period							
<u>FTE</u> newly employed							
<u>FTE</u> out of service							

FTE = One FTE (Full Time Equivalent) is a full-time post (averaging around 38 hours). Do not include externally hired staff in your answer to this question.

2024	Director/policy maker/office manager	Credit adviser	Insurance adviser	Administrative assistant	Asset management assistant	Risk/compliance/legal affairs	Other
FTE at the beginning of the period							
FTE newly employed							
FTE out of service							

Question 2.5 – Professional competence

- *One answer possible*
- *Possibility of explanatory notes for 'Other, namely...'*

What were the professional competence arrangements in your company in the Caribbean Netherlands in 2024?

Multiple answers are possible:

- ☐ All customer-facing employees have a relevant qualification
- ☐ There is a de facto manager with a recognised qualification who checks advice provided by employees without qualifications
- ☐ There are no professional competence arrangements at present
- ☐ Other, namely...

Section 3 – Business operations

Question 3.1 – Administrative Organisation & Internal Control

- Date field (Year)

In what year was the description of the Administrative Organisation and the Internal Control System (AO/IC) for your services in the Caribbean Netherlands last updated?

AO/IC = 'The entire complex of organisational measures that relate directly or indirectly to the proper functioning of the administration. Administration here means: The systematic collection, recording, processing and supplying of information for the purpose of managing and operating internal affairs and for the purpose of the associated accountability.' AO/IC is also referred to as business processes. These include:

- *The procedure concerning employees' professional competence (checking qualifications and determining which qualifications or experience are required in order to perform certain activities);*
- *Determining integrity-sensitive functions and assessing integrity and properness (for example by means of the Properness and Integrity Assurance form);*
- *An incident procedure (drawing attention to the obligation to report incidents and violations of the properness requirement and the registration of incidents);*
- *A description of the safeguarding of the advice files retention obligation (what a file contains, who should collect it, who supervises it);*
- *A description of the company's control structure.*

Question 3.2 – Product information

- Single choice

In what year was your product information last updated?

- ☐ 2024
- ☐ 2023
- ☐ 2022
- ☐ Before
2022

Product information = All relevant information provided by the company that enables the consumer to properly assess the products offered. A proper assessment of the financial product also requires information on the features of the financial product in question and, where relevant, on the provider of the product.

Section 4 – Complaints & Incidents

Question 4.1 – Number of complaints

- Do not allow values other than whole numbers, 0 is permitted.

How many complaints from consumers or clients did your company enter in its complaints register in the Caribbean Netherlands in 2023 and 2024?

NB: See Sections 3:12 and 5:9 of the Financial Markets (BES Islands) Act (Wfm BES) for the complaint handling obligations. Customers can lodge complaints by letter, by e-mail, through the website, by telephone or verbally in your office. You should record all these complaints in your complaint register

2023

2024

Complaint = A statement of dissatisfaction sent by a natural person or legal entity to a company regarding its performance in offering, advising on or acting as an intermediary in a financial product or security.

Question 4.2 – Subjects of complaints

- Do not allow values other than whole numbers, 0 is permitted.
- Except in the case of Other, namely..., where text can be entered.
- Bottom row automatically totals numeric rows above.
- As a check, the number in the total must be the same as in 4.1.

How many complaints did your company receive in the Caribbean Netherlands in 2023 and 2024, broken down by subject?

Subjects	2023	2024
Savings		
Payments		
ATM		
Credit cards		
Consumer credit		
Mortgage loans		
Insurance		
Other services		
Other, namely		
Total		

Question 4.3 – Number of incidents

- Do not allow values other than whole numbers, 0 is permitted.

How many incidents occurred in your company in the Caribbean Netherlands in 2023 and 2024?

2023	<input type="text"/>
2024	<input type="text"/>

Incidents = An example of an incident as defined by the AFM is where an adviser or intermediary signs a quotation or a false health declaration on behalf of the customer. These also include practices or events that jeopardise the integrity of your business, such as fraud or theft.

Question 4.4 – Nature of the incidents

- Only ask if answer to 3.2a or 3.2b = >0

What was the nature of the incidents referred to in the previous question?

2023	<input type="text"/>
2024	<input type="text"/>

Section 5 – Questions for insurance providers

- Only display if the answer to Question 1.1 – Activities was that insurance was offered in 2024.

You stated that your company offered insurance in 2024.

Question 5.1 – Number of newly arranged and existing products

- Do not allow values other than whole numbers, 0 is permitted.
- Autofill the bottom row of each table (= Existing + newly arranged + acquired – terminated – transferred)

For 2023 and 2024, please complete the overview of movements below for all insurances arranged in and from the Caribbean Netherlands. Please distinguish between personal and business insurance policies.

You must enter something in each box. If your company has not arranged/does not arrange one or more types of insurance, you can enter 0.

	Personal			Business		
Number of insurance policies 2023	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Existing as at 1-1						
+ Newly arranged						
+ Acquired						
- Terminated						
- Transferred						
Existing as at 31-12						

	Personal			Business		
Number of insurance policies 2024	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Existing as at 1-1						
+ Newly arranged						
+ Acquired						
- Terminated						
- Transferred						
Existing as at 31-12						

Business insurance policies = policies issued to clients in the business market, such as SMEs and self-employed persons. This does not include insurance policies issued to professional market participants. Professional market participants are: collective investment companies, credit institutions, pension funds, asset managers, insurers or other parties designated in an order in council.

Question 5.2 – Commission

Arrangement commission

- Do not allow values other than numbers, max. 2 decimal places, 0 is permitted.

In the table below, state the lowest and highest percentages of (arrangement and ongoing) commission for each type of insurance that your company paid out gross to intermediaries in the Caribbean Netherlands in 2023 and 2024.

NB: Your answer to this question should include commissions paid on both personal and business insurance policies.

	Personal			Business		
Commission 2023	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Highest % arrangement						
Lowest % arrangement						
Highest % ongoing						
Lowest % ongoing						

	Personal			Business		
Commission 2024	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Highest % arrangement						
Lowest % arrangement						
Highest % ongoing						
Lowest % ongoing						

Question 5.3 – Controlled business operations

- Single choice (per year)

In 2023 and/or 2024, were checks made of whether your company only enters into agreements in the Caribbean Netherlands with intermediaries registered in the AFM register?

NB: The AFM register can be found on [the AFM website](#) and states which licences the company holds.

2023

- ☐ Yes
- ☐ No
- ☐ Not applicable, company does not do business with intermediaries

2024

- ☐ Yes
- ☐ No
- ☐ Not applicable, company does not do business with intermediaries

- *Do not ask this question if both answers to the previous question were 'not applicable'.*
- *Option of entering multiple intermediaries*
- *Licence number is optional*

State which intermediaries your company worked with in 2023 and 2024. Also enter the intermediary's licence number (if known).

Intermediary

Licence number

Intermediary

Licence number

Intermediary

Licence number

Etc.

Section 6 – Questions for insurance advisers and intermediaries

- Only display if the answer to Question 1.1 – Activities was that the company acted as an insurance adviser or intermediary in 2024.

You stated that your company provided insurance advice or acted as an insurance intermediary in 2024.

Question 6.1 – Part of a group that also includes an insurance company

- Single choice

Does your company act as an insurance intermediary and does the group also include an insurance company?

- ☐ Yes, we act as an intermediary and our group includes an insurance company
- ☐ No, we do act as an intermediary, but our group does not include an insurance company
- ☐ No, we do not act as an intermediary and only provide advice

Question 6.2 – Insurance policies

- Do not allow values other than whole numbers, 0 is permitted.

For 2023 and 2024, please complete the overview of movements below for all insurances for which you provided advice or acted as an intermediary, in and from the Caribbean Netherlands. Please distinguish between personal and business insurance policies.

You must enter something in each box. If your company has not arranged/does not arrange one or more types of insurance, you can enter 0.

	Personal			Business		
Number of insurance policies 2023	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Existing as at 1-1						
+ Newly arranged						
+ Acquired						
- Terminated						
- Transferred						
Existing as at 31-12						

	Personal			Business		
Number of insurance policies 2024	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Existing as at 1-1						
+ Newly arranged						

+ Acquired						
- Terminated						
- Transferred						
Existing as at 31-12						

Question 6.3 – Commission

Arrangement commission

- Do not allow values other than numbers, max. 2 decimal places, 0 is permitted.

In the table below, state the lowest and highest percentages of (arrangement and ongoing) commission for each type of insurance that your company received gross when arranging the insurance in the Caribbean Netherlands in 2023 and 2024.

NB: Your answer to this question should include commissions paid on both personal and business insurance policies.

	Personal			Business		
Commission 2023	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Highest % arrangement						
Lowest % arrangement						
Highest % ongoing						
Lowest % ongoing						

	Personal			Business		
Commission 2024	Non-life	Life	Miscellaneous	Non-life	Life	Miscellaneous
Highest % arrangement						
Lowest % arrangement						
Highest % ongoing						
Lowest % ongoing						

Question 6.4 – Partnerships

- Multiple choice, multiple answers possible

State which providers your company acted as an intermediary for in 2024.

Multiple answers possible

- American Bankers Life Assurance Company of Florida

2. ASKA Leven N.V.
3. ASKA Schade N.V.
4. Ennia Caribe Leven N.V.
5. Ennia Caribe Schade N.V.
6. Fatum Life N.V.
7. Fatum General Insurance N.V.
8. Gulf Insurance Ltd
9. International Insurance Company N.V.
10. Island Heritage Company N.V.
11. Massy United Insurance Ltd
12. Nagico Life Insurance N.V.
13. MCB Risk Insurance N.V.
14. National General Insurance Corporation N.V. (NAGICO)
15. Onderlinge Waarborgmaatschappij voor Instellingen in de Gezondheidszorg MediRisk B.A.
16. Onderlingehulp Antillen Verzekeringen II N.V.
17. OOM Global Care N.V.
18. OOM Schadeverzekering N.V.
19. Pan American Accident and Health Insurance Company N.V.
20. Pan American Life Insurance Company of Curaçao and Sint Maarten N.V.
21. Treston Insurance Company (Curaçao) N.V.
22. Other provider(s), namely...

Question 6.5 – Authorised agents

- *Single choice*

Was your company authorised by a provider to issue insurance policies as an independent agent in 2023 and/or 2024?

- ☐ Yes
☐ No

- *Only ask if previous question = Yes*
- *Open question*

For which provider(s) did your company act as an authorised agent in 2023 and/or 2024?

Question 6.6 – Controlled business operations

Professional liability insurance

- *Single choice*

Did your company have professional liability insurance for its office in the Caribbean Netherlands in 2023 and 2024?

NB: see [Section 3:24 of the Financial Markets \(BES Islands\) Act \(Wfm BES\)](#) and [Section 4:46 of the Financial Markets \(BES Islands\) Decree \(Bfm BES\)](#)

- ☐ Yes
☐ No

- *Only ask if previous question = Yes*
- *Do not allow values other than numbers, max. 2 decimal places.*

What was the amount of your company's professional liability insurance in whole dollars for the office in the Caribbean Netherlands in 2023 and 2024?

2023

2024

Question 6.7 – Money laundering and/or terrorist financing

- *Only for companies that state in answer to 1.1 Activities that they act as a life insurance intermediary*

Policy on the combating of money laundering and/or terrorist financing

- *Single choice per year*

In 2023 and 2024, did you have a specific policy relating to the Money Laundering and Terrorist Financing (Prevention) (BES Islands) Act (Wwft BES)?

- 2023 ☐ Yes ☐ No
2024 ☐ Yes ☐ No

- *Only ask if at least 1 answer to the previous question = Yes*
- *Multiple choice*

Which of the following subjects are covered by this policy?

Multiple answers possible

- ☐ Client acceptance
☐ Client risk classification
☐ Client review
☐ Termination of client relationship
☐ Transaction monitoring

- ☐ Unusual transaction reporting

Unusual transactions

- *Table*
- *Only whole numbers*

Please complete the table below (if not applicable, enter '0'). State the number of unusual transactions you reported to the FIU-NL in 2023 and 2024. Please also state the number of transactions declined by your company in 2023 and 2024 due to possible involvement in money laundering and/or terrorist financing.

	2023	2024
Number of unusual transactions reported to FIU-NL:		
Number of transactions declined due to suspected involvement in money laundering and/or terrorist financing:		

Sanctions lists

Did your company have a specific policy addressing compliance with sanctions regulations in 2023 and 2024?

- *Single choice per year*

2023 ☐ Yes ☐ No
 2024 ☐ Yes ☐ No

- *Only ask if previous question for any year = Yes*
- *Single choice*

When was this policy last amended and approved?

- ☐ 2024
☐ 2023
☐ 2022
☐ Before 2022

- *Single choice*

Do you check whether a prospective or existing business relation appears in a sanctions list before providing your services?

- ☐ Yes
☐ No

Relation = The AFM takes 'relation' to mean not only the client, but also the UBO, the representative and/or other relevant natural persons and/or legal entities involved in the business relationship. It thus uses the definition of relation in the Regulation on Supervision pursuant to the Sanctions Act 1977 ('relation is any party involved in a financial service or a financial transaction').

- Only ask if previous question = Yes
- Multiple choice

How often do you check your business relations against the sanctions lists you use?

Multiple answers possible

- ☐ When entering into the relationship
- ☐ During the provision of the services
- ☐ When the insurance is paid out
- ☐ When there is a change in the sanctions lists used
- ☐ Other, namely...
- ☐ None of the above

Relation = The AFM takes 'relation' to mean not only the client, but also the UBO, the representative and/or other relevant natural persons and/or legal entities involved in the business relationship. It thus uses the definition of relation in the Regulation on Supervision pursuant to the Sanctions Act 1977 ('relation is any party involved in a financial service or a financial transaction').

- Table

Please complete the table below (if not applicable, enter '0').

Please state the number of potential matches detected by your institution between relations of your institution and persons and/or entities included in the sanctions lists published by the European and/or Dutch authorities ('potential hits'). Also state the number of actual matches ('true hits') in the past two calendar years. Finally, the AFM would like to know how many true hits against a sanctions list were reported to DNB.

	2023	2024
Number of potential hits against EU and/or NL sanctions lists		
Number of true hits against EU and/or NL sanctions lists		
Number of true hits reported to DNB		
	2023	2024
How many business relations (including customers, UBOs and beneficiaries of payments) have had their funds frozen by you on the basis of sanctions regulations in the last two years?		

Training

- Do not allow values other than whole numbers.

How many employees, to the extent relevant to the performance of their duties, have received training in the past two years enabling them to identify unusual transactions?

2023

2024

- Single choice

Has the director responsible for compliance with the Money Laundering and Terrorist Financing (Prevention) (BES Islands) Act (Wwft BES) received training in the past two years enabling him or her to identify unusual transactions?

2023

☐ Yes

☐ No

2024

☐ Yes

☐ No

- Only ask if previous question for any year = Yes
- Text input

Enter the name of the training here. In the case of external training, enter the name of the organisation that provided the training.

Amount of the premium

- Table
- Do not allow values other than numbers.

In the table below, enter the number of existing life insurance policies in your portfolio with an annual premium of USD 1,000 or more. Distinguish between term life insurance, life insurance with capital accumulation and mixed life insurance.

	31-12-2023	31-12-2024
Term life insurance policies		
Life insurance policies with capital accumulation		
Mixed life insurance policies		

Life insurance = In this question, life insurance means an insurance contract paying out monetary benefits in connection with the life or death of a person, except accident insurance contracts. This includes life insurance with capital accumulation, term life insurance and mixed life insurance (combination of endowment insurance and term life insurance).

- Table
- Do not allow values other than numbers.

In the table below, enter the number of existing life insurance policies in your portfolio that had a single premium of USD 2,500 or more when issued. Distinguish between term life insurance, life insurance with capital accumulation and mixed life insurance.

	31-12-2023	31-12-2024
Term life insurance policies		
Life insurance policies with capital accumulation		
Mixed life insurance policies		

Life insurance = In this question, life insurance means an insurance contract paying out monetary benefits in connection with the life or death of a person, except accident insurance contracts. This includes life insurance with capital accumulation, term life insurance and mixed life insurance (combination of endowment insurance and term life insurance).

Customer due diligence

- Table
- Do not allow values other than numbers.

How many of the following categories of customer due diligence did you conduct in 2023 and 2024?

Categories of customer due diligence	2023	2024
Normal customer due diligence under Section 2:2 Wwft BES		
Simplified customer due diligence under Section 2:8 Wwft BES		
Enhanced customer due diligence under Section 2:10 Wwft BES		
No customer due diligence (exception to customer due diligence) under Section 2:7 Wwft BES		

Clients outside the Caribbean Netherlands

- Table

Please state the number of life insurance customers for which you act as an intermediary for each country outside the Caribbean Netherlands.

Country	Number of customers

Clients' risk profile

- Table
- Do not allow values other than numbers

How many customers does your company have with each Wwft BES risk profile?

NB: This is the number of customers at the end of 2024, broken down by risk profile. For the risk profile, select the profile that most closely matches your own classification. This is the profile based on the various money laundering and/or terrorist financing risks arising from the transaction.

	Bonaire	Sint Eustatius	Saba	Outside the Caribbean Netherlands
Number of low-risk customers				
Number of medium-/normal-risk customers				
Number of high-risk customers				
Number of unacceptable-risk customers				

Payment facilities

- *Table*

Please complete the tables below. Do you accept:

Cash	Yes / No
Anonymous payment cards (e.g. debit cards)	Yes / No
Cryptocurrencies	Yes / No
Bank transfers through banks outside the Netherlands, the Caribbean Netherlands or the Netherlands Antilles	Yes / No

- *Only for categories where the answer to the previous question was yes*
- *Do not allow values other than numbers*

If so, how often has this occurred in the past two years?

	2023	2024
Cash		
Anonymous payment cards (e.g. debit cards)		
Cryptocurrencies		
Bank transfers through banks outside the Netherlands, the Caribbean Netherlands or the Netherlands Antilles		

New customers

- Do not allow values other than numbers.

How many new customers did your institution acquire in 2023 and 2024 who took out a life insurance policy and paid for it in full with a single payment (a 'one-time purchase price lumpsum payment')?

NB: This is the number of new customers in 2023 and 2024 who made such a one-time payment for a life policy, as well as the total volume. Please provide a breakdown by island: Bonaire (BON), Sint Eustatius (EUX) and Saba (SAB).

	Bonaire		Sint Eustatius		Saba		Outside the Caribbean Netherlands	
	2023	2024	2023	2024	2023	2024	2023	2024
Number of new customers paying a 'one-time purchase price lumpsum'								

Customers who cancelled

- Do not allow values other than numbers.

How many customers of your institution cancelled a life insurance policy in 2023 and 2024, with a sum of money becoming available for this customer or another beneficiary?

NB: Please provide this for the calendar years 2023 and 2024 with a breakdown by island: Bonaire (BON), Sint Eustatius (EUX) and Saba (SAB).

	Bonaire		Sint Eustatius		Saba		Outside the Caribbean Netherlands	
	2023	2024	2023	2024	2023	2024	2023	2024
Number of customers who cancelled and received a sum of money.								

Section 7 – Questions for credit providers (not operating as credit associations)

- Only display if the answer to Question 1.1 – Activities was that the company offers loans, not as a credit association

You stated that your company offered loans in 2024 (not as a credit association).

Question 7.1 – Products

Credit offering

- Table 1 and table 2
- Row as at 31-12 autofill: row 1 + row 2 – row 3 – row 4
- Table 2: row 'as at 1-1' autofill = row as at 31-12 table 1

How many mortgage loans or consumer loans did your company provide for personal customers in the Caribbean Netherlands on 31-12-2024 and what was the total volume of the outstanding mortgage and consumer credit portfolio (in \$) on 31-12-2024?

2023	Numbers of consumer loans	Numbers of mortgages
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

2024	Numbers of consumer loans	Numbers of mortgages
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

2023	Volume of consumer loans in \$	Volume of mortgages in \$
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

2024	Volume of consumer loans in \$	Volume of mortgages in \$
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

Payment arrears

- Table 1 and table 2
- Row as at 31-12 autofill: row 1 + row 2 + row 3 – row 4 – row 5
- Table 2: row 'as at 1-1' autofill = row as at 31-12 table 1

Please complete the table below. State the movements in consumer credit and mortgage arrears, in numbers and volume, in dollars in the years 2023 and 2024.

2023	Numbers of consumer loans	Numbers of mortgages
As at 1-1		
+ newly in arrears		
+ acquired		
- fully written off		
- resolved by customer		
- restructured		
As at 31-12		

2024	Numbers of consumer loans	Numbers of mortgages
As at 1-1		
+ newly in arrears		
+ acquired		
- fully written off		
- resolved by customer		
- restructured		
As at 31-12		

2023	Volume of consumer loans in \$	Volume of mortgages in \$
As at 1-1		
+ newly in arrears		
+ acquired		
- fully written off		
- resolved by customer		
- restructured		
As at 31-12		

2024	Volume of consumer loans in \$	Volume of mortgages in \$
As at 1-1		
+ newly in arrears		
+ acquired		
- fully written off		
- resolved by customer		
- restructured		
As at 31-12		

Collateral

- Do not allow values other than numbers, to 2 decimal places.

What percentage of total consumer credit applications from personal customers in the Caribbean Netherlands in 2023 and 2024 were approved with collateral in the form of insurance (such as a term life insurance policy)?

2023

2024

Annuity mortgage

- Table
- Do not allow any empty cells.
- Autofill 'Total' row. Total of rows 1,2,3 and 4.

Please complete the table below. State the form of new mortgages issued in 2023 and 2024. Enter 0 if that specific form was not issued in the respective year.

	Numbers	
Mortgages issued	2023	2024
Annuity mortgage		
Linear mortgage		
Interest-only mortgage		
Other		
Total		

	Volume in dollars	
Mortgages issued	2023	2024
Annuity mortgage		
Linear mortgage		
Interest-only mortgage		
Other		
Total		

Credit model

- *Single choice*

Did your company use the latest version of the AFM model to calculate the maximum credit to be granted in the Caribbean Netherlands in 2023 and 2024? (The table usually changes once a year)

NB: The current AFM model for calculating the maximum credit to be granted can be found on the [AFM website](#).

2023 ☐ Yes ☐ No
2024 ☐ Yes ☐ No

- *Do not allow values other than numbers, to 2 decimal places.*

What was the lowest and highest loan interest rate (APR) that your company charged on a loan granted in the Caribbean Netherlands in 2023 and 2024?

	2023	2024
Highest APR%		
Lowest APR%		

APR = annual percentage rate, including all the costs of the loan.

Question 7.2 – Personnel and partnerships

- *Licence number is optional*
- *Option of entering multiple intermediaries*

Which intermediaries did your company work with in 2024? Also enter the intermediary's licence number (if known).

Intermediary

Licence number

Intermediary

Licence number

Intermediary

Licence number

Etc.

Section 8 – Questions for credit providers acting as credit associations

- Only display if the answer to Question 1.1 – Activities was that loans are offered by the company acting as a credit association

You stated that your company offered mortgage loans and/or consumer loans in 2024 as a credit association.

Question 8.1 – Customers

- Table
- Do not allow values other than whole numbers

Please complete the table below. Please enter the movements in the number of your association's members in the Caribbean Netherlands in 2023 and 2024.

	2023
As at 1-1	
+ New members	
- Terminations	
- Cancellations	
As at 31-12	

	2024
As at 1-1	
+ New members	
- Terminations	
- Cancellations	
As at 31-12	

Question 8.2 – Controlled business operations

- Single choice

Did your company take out risk insurance for your members in 2024?

☐ Yes

- ☐ No, but members had the option to take out insurance individually
- ☐ No, we do not take out insurance for our members.

- Only for categories where the answer to the previous question was yes
- Single choice

Did this risk insurance cover all your members in 2024?

- ☐ Yes
- ☐ No

Question 8.3 – Commission

- Single choice

Did your company receive remuneration from the insurance company/companies in the form of profit-sharing or commission for arranging insurance in 2024?

- ☐ Yes, profit-sharing
- ☐ Yes, commission
- ☐ No

Question 8.4 – Products

Credit offering

- Do not allow values other than numbers

How many consumer loans did your company provide for your members in the Caribbean Netherlands in 2024 and what was the total size (in numbers and \$) of the outstanding consumer credit portfolio on 31 December 2024?

	Consumer loans
Total provided in 2024	
Size of portfolio in numbers on 31-12-2024	
Size of portfolio in \$ on 31-12-2024	\$

Payment arrears

What was the total size of payment arrears (in numbers and \$) on your company's outstanding consumer credit portfolio in the Caribbean Netherlands on 31-12-2024?

Payment arrears = customers with payment arrears of more than 3 months.

- Do not allow values other than numbers

	Consumer loans
--	----------------

Size of payment arrears in numbers on 31-12-2024	
Size of payment arrears in \$ on 31-12-2024	\$

- Do not allow values other than numbers
- Table

How many personal savings accounts did your company open in the Caribbean Netherlands in 2024 and what was the total amount of savings (in \$) that your company attracted in 2024?

	In numbers	
	2023	2024
As at 1-1		
As at 31-12		

	In volume \$	
	2023	2024
As at 1-1		
As at 31-12		

Credit model

- Single choice

Did your company use the latest version of the AFM model to calculate the maximum credit to be granted in the Caribbean Netherlands in 2023 and 2024? (The table usually changes once a year)

NB: The current AFM model for calculating the maximum credit to be granted can be found on the [AFM website](#).

2023 ☐ Yes ☐ No
2024 ☐ Yes ☐ No

- Do not allow values other than numbers, to 2 decimal places.

What was the lowest and highest loan interest rate (APR) that your company charged on a loan granted in the Caribbean Netherlands in 2023 and 2024?

	Consumer credit		Mortgage	
	2023	2024	2023	2024
Highest APR%				
Lowest APR%				

Section 9 – Questions for credit advisers and intermediaries

- Only display if the answer to Question 1.1 – Activities was that the company provides advice or acts as an intermediary in loans

You stated that you provide advice or act as an intermediary in loans.

Question 9.1 – Personnel and partnerships

- Open question

For which credit provider(s) did your company act as an intermediary in 2023 and 2024 in the Caribbean Netherlands?

Question 9.2 – Controlled business operations

- Single choice

Did your company have professional liability insurance for its office in the Caribbean Netherlands in 2023 and 2024?

NB: see [Section 3:24 of the Financial Markets \(BES Islands\) Act \(Wfm BES\)](#).

2023 ☐ Yes ☐ No
2024 ☐ Yes ☐ No

Question 9.3 – Commission

- Table

How much did your company receive in one-off, ongoing and total gross commission income for mortgage and consumer loans in the Caribbean Netherlands in 2023 and 2024 (in \$)?

	Mortgage loans		Consumer loans	
	2023	2024	2023	2024
One-off commission income				
Ongoing commission income				
Total gross commission income				

Question 9.4 – Products

Credit offering

- Table
- Autofill 'as at 31-12' = row 1 + row 2 – row 3 – row 4
- Autofill 'as at 1-1' table 2 = 'as at 31-12' table 1

Please complete the table below. State how many mortgage or consumer loans (in numbers and volume in \$) your company arranged for personal clients in 2023 and 2024 as an intermediary in the Caribbean Netherlands.

2023	Numbers of consumer loans	Numbers of mortgages
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

2024	Numbers of consumer loans	Numbers of mortgages
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

2023	Volume of consumer loans in \$	Volume of consumer loans in \$
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

2024	Volume of consumer loans in \$	Volume of consumer loans in \$
As at 1-1		
+ new		
- fully repaid		
- fully written off		
As at 31-12		

- *Multiple choice*

What type of insurance(s) were consumers able to take out with their loan in the Caribbean Netherlands in 2023 and 2024?

Multiple answers possible

- ☐ Disability insurance
- ☐ Accident insurance
- ☐ Unemployment insurance
- ☐ Term life insurance
- ☐ Non-life insurance
- ☐ Other, namely...
- ☐ Not applicable

- *Do not allow values other than numbers, to 2 decimal places.*

What percentage of consumers who took out a mortgage or consumer loan in 2023 and 2024 also took out insurance from you or through you at the same time as the loan?

2023

2024

- *Single choice*

Did your company use the latest version of the AFM model to calculate the maximum credit to be granted in the Caribbean Netherlands in 2023 and 2024? (The table usually changes once a year)

NB: The current AFM model for calculating the maximum credit to be granted can be found on the [AFM website](#).

- | | | |
|------|------------------------------|-----------------------------|
| 2023 | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2024 | <input type="checkbox"/> Yes | <input type="checkbox"/> No |