

# Wwft & Sw Questionnaire

## Crypto-asset service providers 2025

Publication date: 21 July, 2025

This document is a translation from the Dutch Vragenlijst Wwft & Sw Aanbieders van cryptoactivadiensten 2025. 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 [wwft.sw@afm.nl](mailto:wwft.sw@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/en/contact/ondernemersloket>.

## Contact details

Who should the AFM contact for questions relating to your answers to this questionnaire?<sup>1</sup>

Salutation:

Name of contact person:

Job title of contact person:

Telephone number:

E-mail:<sup>1</sup>

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### Note:

<sup>1</sup>) If the AFM has questions regarding the answers that you have provided, an AFM employee will contact this contact person.

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

## 1. Organisation

The reference date for these questions is 31 March 2025.

### 1.1.

Which applies to your company?

*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 a MiCAR-license
- ☐ The company is registered as a custodian wallet provider and/or as a provider engaged in exchange services between virtual currencies and fiat currencies
- ☐ The company is an investment firm with a notification for crypto-asset services
- ☐ The company is a manager of one or more undertakings for collective investment in transferable securities with a notification for crypto-asset services
- ☐ The company is a manager of one or more alternative investment funds with a notification for crypto-asset services
- ☐ The company is a branch of a (foreign) crypto-asset service provider, investment firm or manager of one or more undertakings for collective investment in transferable securities and/or alternative investment funds

### 1.2.1.

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

- ☐ Yes
- ☐ No

### 1.2.2.

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

Full name of the foreign parent company under the articles of association	Country of establishment	LEI <sup>1</sup>	AML/CFT-supervisor

Toelichting:

<sup>1</sup>) The LEI is a unique number that identifies entities worldwide.

1.2.3.

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

Full name of the foreign parent company under the articles of association	Country of establishment	LEI <sup>1</sup>	AML/CFT-supervisor

**Note:**

<sup>1</sup>) The LEI is a unique number that identifies entities worldwide.

1.3.1.

Does/do your foreign parent company/companies has/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

1.3.2.

Is at least one of these branches, tied agents and/or subsidiaries established within the EEA? <sup>1</sup>

☐ Yes

☐ No

**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

1.3.3.

In which EEA-countries are these branches, tied agents and/or subsidiaries established?

Country of establishment	Number branches, tied agents and/or subsidiaries

1.3.4.

Does the company whose branch you are have any other branches, tied agents and/or subsidiaries?

*If your own company is the only branch of the company, please select 'No'.*

- ☐ Ja  
☐ Nee

1.3.5.

Is at least one of these branches, tied agents and/or subsidiaries established within the EEA? <sup>1</sup>

- ☐ Yes  
☐ No

**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

1.3.6.

In which EEA-countries are these branches, tied agents and/or subsidiaries established?

Land van vestiging	Aantal bijkantoren, verbonden agenten en/of dochterondernemingen

1.4.1.

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

- ☐ Yes  
☐ No

#### 1.4.2.

In which countries are they established 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	Type	Country of establishment	LEI <sup>1</sup>	AML/CFT supervisor	Description of the activities
	<input type="checkbox"/> Branch <input type="checkbox"/> Tied agent <input type="checkbox"/> Subsidiary				

#### Note:

<sup>1)</sup> The LEI is a unique number that identifies entities worldwide.

#### 1.5.1.

What crypto-asset services, as mentioned in Article 3(1)(16) MiCAR, do you provide? (more answers are possible)

- ☐ Providing custody and administration of crypto-assets on behalf of clients
- ☐ Operation of a trading platform for crypto-assets
- ☐ Exchange of crypto-assets for funds
- ☐ Exchange of crypto-assets for other crypto-assets
- ☐ Execution of orders for crypto-assets on behalf of clients
- ☐ Placing of crypto-assets
- ☐ Reception and transmission of orders for crypto-assets on behalf of clients
- ☐ Providing portfolio management of crypto-assets
- ☐ Providing transfer services for crypto-assets on behalf of clients
- ☐ None of the above

#### 1.5.2.

What are the main services provided by your company?

#### 1.6.1.

In this questionnaire, you will be asked to express the value of crypto assets in euros as of a specific reference date. Please provide a brief explanation of the valuation method used by your company.

1.6.2. According to this valuation method, what is the value of one Bitcoin in euros?

#### Note:

<sup>1)</sup> If you use your own valuation method and are unable to calculate the value of one Bitcoin using this method, we kindly request that you enter '0' as your response.

**2. Providing custody and administration of crypto-assets on behalf of clients**

When answering these questions, you should include the clients for whom you provide custody and administration of crypto-assets as referred to in Article 3(1)(17) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides custody and administration of crypto-assets.

**2.1.**

State the requested information for your clients for whom you provide custody and administration of crypto-assets.

	Number of clients	Total value of crypto-assets (€) <sup>1</sup>
Natural persons		
Legal persons and/or other legal entities		
Total		

**Note:**

<sup>1</sup>) This is the total value of crypto-assets of the clients for whom you provide custody and administration of crypto-assets.

### 2.2.1.

Provide the requested information for the clients, for whom you provide custody and administration of crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands	Total value of crypto-assets (€) <sup>1</sup>
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

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**Note:**

<sup>1</sup>) This is the total value of crypto-assets of the clients for whom you provide custody and administration of crypto-assets

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### 2.2.2.

Provide the requested information for the clients, for whom you provide custody and administration of crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <u>not</u> resident or located in the Netherlands	Total value of crypto-assets (€) <sup>1</sup>
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

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**Note:**

<sup>1</sup>) This is the total value of crypto-assets of the clients for whom you provide custody and administration of crypto-assets.

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### 2.3.1.

Do you have clients, for whom you provide custody and administration of crypto-assets, that are resident or located in countries/territories outside the EEA? <sup>1</sup>

- ☐ Yes  
☐ No

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**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

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### 2.3.2.

For each non-EEA country/territory, state the total number of clients you have and the total value of the crypto-assets.

Country/territory <sup>1</sup>	Number of clients per country/territory	Total value of crypto-assets (€) <sup>2</sup>

**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

<sup>2</sup>) This is the total value of crypto-assets of the clients for whom you provide custody and administration of crypto-assets.

### 2.4.

For each of the categories listed below, state the number of clients for whom you provide custody and administration of crypto-assets, and the total value of the crypto-assets.

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

**Note:**

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

<sup>2</sup>) A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup>) This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

<sup>5</sup>) This is the total value of crypto-assets of the clients for whom you provide custody and administration of crypto-assets.

### 2.5.1.

Please indicate how many clients, for whom you provide custody and administration of crypto-assets on the reference date, that are active in the following sectors/activities, whether on professional or commercial basis, and the total value of crypto-assets.

*If not applicable, please enter "0".*

Sector	Number of clients	Total value of crypto-assets (€) <sup>1</sup>
Crypto-asset service providers (including nested services)		
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)		
Charitable institutions or foundations		
Object companies that are managed/directed by trust offices		
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats and Kickstarter)		
Jewellers and merchants in precious stones and precious metals		
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)		
Art dealers and auction houses		
Religious institutions		
Trust offices		
Real estate operation and development (in the Netherlands and/or abroad)		
Weapons/arms trade		

#### Note:

<sup>1</sup>) This is the total value of crypto-assets of the clients for whom you provide custody and administration of crypto-assets.

### 2.5.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide custody and administration of crypto-assets, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

<b>Sector(s)</b>

### 3. Operation of a trading platform for crypto-assets

When answering these questions, you should include the third parties (referred to as clients below) for which you bring together or facilitate the bringing together of multiple third-party purchasing and selling interests in crypto-assets by using one or more multilateral systems that are under your management, as referred to in Article 3(1)(18) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office brings together or facilitates the bringing together of multiple third-party purchasing and selling interests in crypto-assets by using one or more multilateral systems that are under your management.

#### 3.1.

State the requested information for your clients for whom you provide the operation of a trading platform for crypto-assets.

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

#### 3.2.1.

Provide the requested information for the clients, for whom you provide the operation of a trading platform for crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 3.2.2.

Provide the requested information for the clients, for whom you provide the operation of a trading platform for crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <b>not</b> resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 3.3.1.

Do you have clients, for whom you provide the operation of a trading platform for crypto-assets, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

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**Note:**

<sup>1</sup> The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

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### 3.3.2.

For each non-EEA country/territory, state the total number of clients you for whom you provide the operation of a trading platform for crypto-assets.

Country/territory <sup>1</sup>	Number of clients per country/territory

**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

### 3.4.

For each of the categories listed below, state the number of clients for whom you provide the operation of a trading platform for crypto-assets.

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

**Note:**

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

<sup>2</sup>) A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup>) This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

### 3.5.1.

Please indicate how many clients, for whom you provide the operation of a trading platform for crypto-assets, are active in the following sectors on a professional or commercial basis.

*If not applicable, please enter "0".*

Sector	Number of clients
Crypto-asset service providers (including nested services)	
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)	
Charitable institutions or foundations	
Object companies that are managed/directed by trust offices	
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats, and Kickstarter)	
Jewellers and merchants in precious stones and precious metals	
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)	
Art dealers and auction houses	
Religious institutions	
Trust offices	
Real estate operation and development (in the Netherlands and/or abroad)	
Weapons/arms trade	

### 3.5.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide the operation of a trading platform for crypto-assets, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

Sector(s)

#### 4. Exchange of crypto-assets for funds

When answering these questions, you should include the clients for whom you provide the exchange of crypto-assets for funds, as referred to in Article 3(1)(19) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides the exchange of crypto-assets for funds.

The term 'business relations' refers to the (legal) persons and/or legal entities with whom your company has a business, professional or commercial relationship that is related to the professional activities of your company. An example of a business relation could be a broker, trust company service provider, or a legal consulting firm. This also includes business relationships with affiliates/associated entities with whom your company has a business relationship. In this questionnaire, you do not need to include business relations that are not connected to your professional activities, such as with a cleaning service company.

##### 4.1.1.

Do you maintain business relationships for the purpose of acquiring the proprietary capital used to exchange crypto-assets for funds?

- ☐ Yes  
☐ No

##### 4.1.2.

Please provide the names of the business relations that are used to acquire the proprietary capital used to exchange crypto-assets for funds.

##### 4.2

Can clients purchase or sell crypto-assets through your company?

- ☐ Clients can purchase crypto-assets with funds through my company  
☐ Clients can sell crypto-assets for funds through my company

##### 4.3.

Provide the requested information for your clients for whom you provide the exchange of crypto-assets for funds.

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

#### 4.4.1.

Provide the requested information for the clients, for whom you provide the exchange of crypto-assets for funds, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

#### 4.4.2.

Provide the requested information for the clients, for whom you provide the exchange of crypto-assets for funds, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <u>not</u> resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

#### 4.5.1.

Do you have clients, for whom you provide the exchange of crypto-assets for funds, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

#### Note:

<sup>1</sup> The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

#### 4.5.2.

For each non-EEA country/territory, state the total number of clients for whom you provide the exchange of crypto-assets for funds.

Country/territory <sup>1</sup>	Number of clients per country/territory

#### Note:

<sup>1</sup> The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

#### 4.6.

For each of the categories listed below, state the number of clients for whom you provide the exchange of crypto-assets for funds.

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

#### Note:

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

<sup>2</sup> A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup> This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

#### 4.7.1.

Please indicate how many clients, for whom you provide the exchange of crypto-assets for funds, are active in the following sectors.

*If not applicable, please enter "0".*

Sector	Number of clients
Crypto-asset service providers (including nested services)	
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)	
Charitable institutions or foundations	
Object companies that are managed/directed by trust offices	
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats, and Kickstarter)	
Jewellers and dealers in precious stones and precious metals	
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)	
Art dealers and auction houses	
Religious institutions	
Trust offices	
Real estate and operation and development (in the Netherlands and/or abroad)	
Weapons/arms trade	

#### 4.7.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide the exchange of crypto-assets for funds, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

Sector(s)

4.8.1.

Do you manage one or more crypto-asset automated teller machines, that can be used to purchase crypto-assets with funds and/or or sell crypto-assets for funds, using proprietary capital?

- ☐ Yes  
☐ No

4.8.2.

In which Dutch postal codes are these crypto-asset automated teller machines located? Please also specify the type of location (i.e. supermarket, restaurants, stations, etc.).

Type of location	Postal code

4.8.3.

Against which crypto-assets can funds be purchased or sold through the usage of these crypto-asset automated teller machines?

Crypto-assets

4.8.4.

Do you accept electronic money with one or more of these crypto-asset automated teller machines?<sup>1</sup>

- ☐ Yes  
☐ No

**Note:**

<sup>1</sup>) This refers to electronic money as defined in Article 1:1 Wwft.

5. Exchange of crypto-assets for other crypto-assets

When answering these questions, you should include the clients for whom you provide the exchange of crypto-assets for other crypto-assets, as referred to in Article 3(1)(20) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides the exchange of crypto-assets for other crypto-assets.

The term ‘business relations’ refers to the (legal) persons and/or legal entities with whom your company has a business, professional or commercial relationship that is related to the professional activities of your company. An example of a business relation could be a broker, trust company service provider, or a legal consulting firm. This also includes business relationships with affiliates/associated entities with whom your company has a business relationship. In this questionnaire, you do not need to include business relations that are not connected to your professional activities, such as with a cleaning service company.

5.1.1.

Do you maintain business relationships for the purpose of acquiring the proprietary capital used to exchange crypto-assets for other crypto-assets?

- ☐ Yes
- ☐ No

5.1.2.

Please provide the names of the business relations that are used to acquire the proprietary capital used to exchange crypto-assets for other crypto-assets.

5.2.

State the requested information for your clients for whom you provide the exchange of crypto-assets for other crypto-assets.

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

### 5.3.1.

Provide the requested information for the clients, for whom you provide the exchange of crypto-assets for other crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 5.3.2.

Provide the requested information for the clients, for whom you provide the exchange of crypto-assets for other crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <u>not</u> resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

#### 5.4.1.

Do you have clients, for whom you provide the exchange of crypto-assets for other crypto-assets, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

#### Note:

<sup>1</sup> The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

#### 5.4.2.

For each non-EEA country/territory, state the total number of clients for whom you provide the exchange of crypto-assets for other crypto-assets.

Country/territory <sup>1</sup>	Number of clients

#### Note:

<sup>1</sup> The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

#### 5.5.

For each of the categories listed below, state the number of clients for whom you provide the exchange of crypto-assets for other crypto-assets.

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

#### Note:

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

<sup>2</sup> A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup> This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

### 5.6.1.

Please indicate how many clients, for whom you provide the exchange of crypto-assets for other crypto-assets, are active in the following sectors.

Sector	Number of clients
Crypto-asset service providers (including nested services)	
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)	
Charitable institutions or foundations	
Object companies that are managed/directed by trust offices	
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats, and Kickstarter)	
Jewellers and merchants in precious stones and precious metals	
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)	
Art dealers and auction houses	
Religious institutions	
Trust offices	
Real estate operation and development (in the Netherlands and/or abroad)	
Weapons/arms trade	

### 5.6.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide the exchange of crypto-assets for other crypto-assets, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

Sector(s)

5.7.1.

Do you manage one or more crypto-asset automated teller machines, that can be used to purchase and/or sell crypto-assets for other crypto-assets, using proprietary capital?

- ☐ Yes  
☐ No
- 

5.7.2.

In which Dutch postal codes are these crypto-asset automated teller machines located? Please also specify the type of location (i.e. supermarket, restaurants, stations, etc.).

Type of location	Postal code

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5.7.3.

Against which crypto-assets can other crypto-assets be purchased and/or sold through the usage of these crypto-asset automated teller machines?

Crypto-assets

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## 6. Execution of orders for crypto-assets on behalf of clients

When answering these questions, you should include the clients for whom you provide the execution of orders for crypto-assets on behalf of clients, as referred to in Article 3(1)(21) MiCAR. For the purpose of these questions, you do not need to include the activities related to discretionary portfolio management of crypto-assets.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides the execution of orders for crypto-assets on behalf of clients.

### 6.1.

State the requested information for your clients for whom you provide the execution of orders for crypto-assets on behalf of clients.

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

### 6.2.1.

Provide the requested information for the clients, for whom you provide the execution of orders for crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 6.2.2.

Provide the requested information for the clients, for whom you provide the execution of orders for crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <b>not</b> resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 6.3.1.

Do you have clients, for whom you provide the execution of orders for crypto-assets, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

#### Note:

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

### 6.3.2.

For each non-EEA country/territory, state the total number of clients for whom you provide the execution of orders for crypto-assets.

Country/territory <sup>1</sup>	Number of clients per country/territory

#### Note:

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

#### 6.4.

For each of the categories listed below, state the number of clients for whom you provide the execution of orders for crypto-assets.

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

#### Note:

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

<sup>2</sup>) A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup>) This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

6.5.1.

Please indicate how many clients, for whom you provide the execution of orders for crypto-assets, are active in the following sectors/activities.

*If not applicable, please enter "0".*

Sector/activity	Number of clients
Crypto-asset service providers (including nested services)	
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)	
Charitable institutions or foundations	
Object companies that are managed/directed by trust offices	
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats, and Kickstarter)	
Jewellers and merchants in precious stones and precious metals	
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)	
Art dealers and auction houses	
Religious institutions	
Trust offices	
Real estate operation and development (in the Netherlands and/or abroad)	
Weapons/arms trade	

6.5.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide the execution of orders for crypto-assets, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

Sector(s)

## 7. Placing of crypto-assets

When answering these questions, you must include the offerors or the parties related to the offerors (referred to as clients below), for whom you provide the placing of crypto-assets as referred to in Article 3(1)(22) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides the placing of crypto-assets.

### 7.1.

Do you place crypto-assets for your own account and/or do you place crypto-assets for the account of one or more clients?<sup>1</sup>

- ☐ For own account
- ☐ For the account of one or more clients

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**Note:**

<sup>1</sup>) If you only place crypto-assets for your own account – and you therefore act as the offeror – then you are considered to not have any clients in relation to this service and you will not receive any follow-up questions on this subject matter.

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### 7.2.

State the requested information for your clients for whom you provide the placing of crypto-assets.

	Number of clients	Total number of different crypto-assets <sup>1</sup>
Natural persons		
Legal persons and/or other legal entities		
Total		

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**Note:**

<sup>1</sup>) This concerns the total number of different crypto-assets, not the value of these crypto-assets, that you have marketed, on behalf of or for the account of the offeror or for a party related to the offeror, to purchasers. If you place one crypto-asset for multiple clients, please list this crypto-asset once under the number of different crypto-assets.

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### 7.3.1.

Provide the requested information for the clients, for whom you provide the placing of crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands	Total number of different crypto-assets <sup>1</sup>
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

**Note:**

<sup>1</sup>) This concerns the total number of different crypto-assets, not the value of these crypto-assets, that you have marketed, on behalf of or for the account of the offerer or for a party related to the offerer, to purchasers. If you place one crypto-asset for multiple clients, please list this crypto-asset once under the number of different crypto-assets.

### 7.3.2.

Provide the requested information for the clients, for whom you provide the placing of crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <u>not</u> resident or located in the Netherlands	Total number of different crypto-assets <sup>1</sup>
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

#### Note:

<sup>1</sup>) This concerns the total number of different crypto-assets, not the value of these crypto-assets, that you have marketed, on behalf of or for the account of the offerer or for a party related to the offerer, to purchasers. If you place one crypto-asset for multiple clients, please list this crypto-asset once under the number of different crypto-assets.

### 7.4.1.

Do you have clients, for whom you provide placing of crypto-assets, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

#### Note:

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

#### 7.4.2.

For each non-EEA country/territory, state the total number of clients for whom you provide the placing of crypto-assets.

Country/territory <sup>1</sup>	Number of clients per country/territory	Total number of different crypto-assets <sup>2</sup>

**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

<sup>2</sup>) This concerns the total number of different crypto-assets, not the value of these crypto-assets, that you have marketed, on behalf of or for the account of the offerer or for a party related to the offerer, to purchasers. If you place one crypto-asset for multiple clients, please list this crypto-asset once under the number of different crypto-assets.

#### 7.5.

For each of the categories listed below, state the number of clients for whom you provide the placing of crypto-assets.

Category	Number of clients	Total number of different crypto-assets <sup>5</sup>
Non-profit organisations (NPOs) <sup>1</sup> and public benefit organisations (PBOs) <sup>2</sup>		
Family offices <sup>3</sup>		
High-net worth individuals <sup>4</sup>		

**Note:**

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

<sup>2</sup>) A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup>) This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

<sup>5</sup>) This concerns the total number of different crypto-assets, not the value of these crypto-assets, that you have marketed, on behalf of or for the account of the offerer or for a party related to the offerer, to purchasers. If you place one crypto-asset for multiple clients, please list this crypto-asset once under the number of different crypto-assets.

## 8. Reception and transmission of orders for crypto-assets on behalf of clients

When answering these questions, you must include the clients for whom you provide the reception and transmission of orders for crypto-assets, as referred to in Article 3(1)(23) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides the reception and transmission of orders for crypto-assets.

### 8.1.

State the requested information for your clients for whom you provide the reception and transmission of orders for crypto-assets.

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

### 8.2.1.

Provide the requested information for the clients, for whom you provide the reception and transmission of orders for crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 8.2.2.

Provide the requested information for the clients, for whom you provide the reception and transmission of orders for crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <u>not</u> resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 8.3.1.

Do you have clients, for whom you provide the reception and transmission of orders for crypto-assets, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

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**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

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### 8.3.2.

For each non-EEA country/territory, state the total number of clients for whom you provide the reception and transmission of orders for crypto-assets.

Country/territory <sup>1</sup>	Number of clients

**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

### 8.4.

For each of the categories listed below, state the number of clients for whom you provide the reception and transmission of orders for crypto-assets.

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

**Note:**

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

<sup>2</sup>) A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup>) This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

### 8.5.1.

Please indicate how many clients, for whom you provide the reception and transmission of orders for crypto-assets, are active in the following sectors.

*If not applicable, please enter "0".*

Sector	Number of clients
Crypto-asset service providers (including nested services)	
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)	
Charitable institutions or foundations	
Object companies that are managed/directed by trust offices	
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats, and Kickstarter)	
Jewellers and merchants in precious stones and precious metals	
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)	
Art dealers and auction houses	
Religious institutions	
Trust offices	
Real estate operation and development (in the Netherlands and/or abroad)	
Weapons/arms trade	

### 8.5.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide the reception and transmission of orders for crypto-assets, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

Sector(s)

## 9. Providing portfolio management of crypto-assets

When answering these questions, you must include the clients for whom you provide the portfolio management of crypto-assets, as referred to in Article 3(1)(25) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides the portfolio management of crypto-assets.

### 9.1.

State the requested information for your clients for whom you provide the portfolio management of crypto-assets.

	Number of clients	Total value of portfolios (€) <sup>1</sup>
Natural persons		
Legal persons and/or other legal entities		
Total		

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**Note:**

<sup>1</sup>) This concerns the value of the portfolios that you manage on a discretionary client-to-client basis, in accordance with mandates given by clients, where such portfolios include one or more crypto-assets.

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### 9.2.1.

Provide the requested information for the clients, for whom you provide the portfolio management of crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands	Total value of portfolios (€) <sup>1</sup>
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

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**Note:**

<sup>1</sup>) This concerns the value of the portfolios that you manage on a discretionary client-to-client basis, in accordance with mandates given by clients, where such portfolios include one or more crypto-assets.

---

### 9.2.2.

Provide the requested information for the clients, for whom you provide the portfolio management of crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <u>not</u> resident or located in the Netherlands	Total value of portfolios (€) <sup>1</sup>
Low risk		
Neutral risk		
High/increased risk		
Unacceptable risk		
Not (yet) categorised		

#### Note:

<sup>1</sup>) This concerns the value of the portfolios that you manage on a discretionary client-to-client basis, in accordance with mandates given by clients, where such portfolios include one or more crypto-assets.

### 9.3.1.

Do you have clients, for whom you provide the portfolio management of crypto-assets on the reference date, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

#### Note:

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

### 9.3.2.

For each non-EEA country/territory, state the total number of clients for whom you provide the portfolio management of crypto-assets.

Country/territory <sup>1</sup>	Number of clients per country/territory	Total value of portfolios (€) <sup>2</sup>

**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

<sup>2</sup>) This concerns the value of the portfolios that you manage on a discretionary client-to-client basis, in accordance with mandates given by clients, where such portfolios include one or more crypto-assets.

### 9.4.

For each of the categories listed below, state the number of clients for whom you provide the portfolio management of crypto-assets.

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

**Note:**

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

<sup>2</sup>) A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup>) This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

<sup>5</sup>) This concerns the value of the portfolios that you manage on a discretionary client-to-client basis, in accordance with mandates given by clients, where such portfolios include one or more crypto-assets.

### 9.5.1.

Please indicate how many clients, for whom you provide the portfolio management of crypto-assets, are active in the following sectors/activities.

*If not applicable, please enter "0".*

Sector/activity	Number of clients	Total value of portfolios (€) <sup>1</sup>
Crypto-asset service providers (including nested services)		
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)		
Charitable institutions or foundations		
Object companies that are managed/directed by trust offices		
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats, and Kickstarter)		
Jewellers and merchants in precious stones and precious metals		
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)		
Art dealers and auction houses		
Religious institutions		
Trust offices		
Real estate operation and development (in the Netherlands and/or abroad)		
Weapons/arms trade		

**Note:**

<sup>1</sup>) This concerns the value of the investment portfolios that you manage on a discretionary client-to-client basis, in accordance with mandates given by clients, where such portfolios include one or more crypto-assets.

### 9.5.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide the portfolio management of crypto-assets, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

Sector(s)

## 10. Providing transfer services for crypto-assets on behalf of clients

When answering these questions, you must include the clients for whom you provide transfer services for crypto-assets, as referred to in Article 3(1)(26) MiCAR.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides transfer services for crypto-assets.

### 10.1.

State the requested information for your clients for whom you provide transfer services for crypto-assets.

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

### 10.2.1.

Provide the requested information for the clients, for whom you provide transfer services for crypto-assets, residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 10.2.2.

Provide the requested information for the clients, for whom you provide transfer services for crypto-assets, not residing/established in the Netherlands.

*This risk classification does not refer to the risk appetite of your clients. It relates to the Wwft-risk of 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 one of the mentioned classifications, please answer with '0'.*

Client classification	Number of clients <b>not</b> resident or located in the Netherlands
Low risk	
Neutral risk	
High/increased risk	
Unacceptable risk	
Not (yet) categorised	

### 10.3.1.

Do you have clients, for whom you provide transfer services for crypto-assets on the reference date, that are resident or located in countries/territories outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

#### Note:

<sup>1</sup> The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

### 10.3.2.

For each non-EEA country/territory, state the total number of clients you have on the reference date for which you provide transfer services for crypto-assets.

Country/territory <sup>1</sup>	Number of clients

#### Note:

<sup>1</sup> The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

#### 10.4.

For each of the risk categories listed below, state the number of clients for whom you provide transfer services for crypto-assets.

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

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**Note:**

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

<sup>2</sup>) A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax Administration.

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

<sup>4</sup>) This refers to natural persons with assets to be invested in excess of EUR 2.5 million.

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10.5.1.

Please indicate how many clients, for whom you provide transfer services for crypto-assets, are active in the following sectors/activities.

*If not applicable, please enter "0".*

Sector/activity	Number of clients
Crypto-asset service providers (including nested services)	
Cash-intensive retail business (phone shops, florists, coffeeshops, window cleaners, hospitality, massage parlor, beauty and personal care, sun tanning salons, etc.)	
Charitable institutions or foundations	
Object companies that are managed/directed by trust offices	
Users of digital peer-to-peer platforms (comparable to Uber, Marktplaats, and Kickstarter)	
Jewellers and merchants in precious stones and precious metals	
Gambling and gaming, both on- and offline (casinos, arcades, poker, etc.)	
Art dealers and auction houses	
Religious institutions	
Trust offices	
Real estate operation and development (in the Netherlands and/or abroad)	
Weapons/arms trade	

10.5.2.

Which sector or sectors in which (some of) your clients are active, for whom you provide transfer services of crypto-assets, do you consider to be sectors with a higher risk of money laundering or financing of terrorism?

Sector(s)

## 11. Clients and business relations

When answering these questions, you must include all clients falling under the definition of 'clients', including third parties, offerors and parties related to the offerors, for whom you provide one or more crypto-asset services, as referred to in Article 3(1)(16) MiCAR.

State per question the total number of unique clients. A unique client refers to the situation that, if a client receives multiple crypto-asset services provided by you, you only count this client once towards the total number of unique clients.

The reference date for these questions is 31 March 2025.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides crypto asset services.

UBO stands for ultimate beneficial owner or 'uiteindelijk belanghebbende' as defined in Article 1(1) Wwft.

PEP stands for politically exposed person or 'politiek prominente persoon' as defined in Article 1(1) Wwft.

The term 'business relations' refers to the (legal) persons and/or legal entities with whom your company has a business, professional or commercial relationship that is related to the professional activities of your company. An example of a business relation could be a broker, trust company service provider, or a legal consulting firm. This also includes business relationships with affiliates/associated entities with whom your company has a business relationship. In this questionnaire, you do not need to include business relations that are not connected to your professional activities, such as with a cleaning service company.

### 11.1.

State the requested information per category for the total number of unique clients.

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

11.2.1.

Do you have any clients whose UBOs reside in a country/territory outside of the EEA? <sup>1</sup>

- ☐ Yes  
☐ No

**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

11.2.2.

For each non-EEA country/territory, state the total number of UBO's residing in that country/territory.

Country/territory <sup>1</sup>	Number of UBOs

**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

11.3.

Do you have any clients who are PEPs?

- ☐ Yes  
☐ No

11.4.

How many PEPs do you have in total as clients?

#### 11.5.1.

Do you have PEPs as clients who are resident in a country/territory outside of the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

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**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

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#### 11.5.2.

For each country/territory outside of the EEA, please state the number of PEPs residing there that are clients of your company. This concerns the country of residence of the PEPs.

Country/territory <sup>1</sup>	Number of PEPs

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**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

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#### 11.6.1.

Do you have any clients whose UBOs are PEPs?

- ☐ Yes  
☐ No
- 

#### 11.6.2.

What is the total number of clients whose UBOs are PEPs?

11.7.1.

Do you have any clients whose UBOs are PEPs that reside in a country/territory outside of the EEA on the reference date?<sup>1</sup>

- ☐ Yes  
☐ No

**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

11.7.2.

For each country/territory outside of the EEA, state the number of UBOs of clients who are PEPs. This concerns the country of residence of the PEP.

Country/territory <sup>1</sup>	Number of UBOs of clients who are PEPs

**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

11.8.1.

Do you maintain business relationships that are established outside of the Netherlands?

- ☐ Yes  
☐ No

11.8.2.

State the amount of business relations that are established outside of the Netherlands.

### 11.9.1.

Have you worked with business relations located outside the EEA?<sup>1</sup>

- ☐ Yes  
☐ No

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**Note:**

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

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### 11.9.2.

For each non-EEA country/territory, state the total number of business relations that you have worked with on reference date.

Country/territory <sup>1</sup>	Number of business relations

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**Note:**

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

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## 12. Products, services and transactions

When answering these questions, you must include all clients falling under the definition of ‘clients’, including third parties, offerors and parties related to the offerors, for whom you provide one or more crypto-asset services, as referred to in Article 3(1)(16) MiCAR.

State per question the total number of unique clients. A unique client refers to the situation that, if a client receives multiple crypto-asset services provided by you, you only count this client once towards the total number of unique clients.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides crypto asset services.

The reference date for these questions is 31 March 2025.

The term ‘business relations’ refers to the (legal) persons and/or legal entities with whom your company has a business, professional or commercial relationship that is related to the professional activities of your company. An example of a business relation could be a broker, trust company service provider, or a legal consulting firm. This also includes business relationships with affiliates/associated entities with whom your company has a business relationship. In this questionnaire, you do not need to include business relations that are not connected to your professional activities, such as with a cleaning service company.

### 12.1.

Does your company accept the following funds from your clients?

	Answer
Funds originating from Dutch bank accounts	Yes/no
Funds originating from bank accounts in the EEA <sup>1</sup> (excluding the Netherlands)	Yes/no
Funds originating from bank accounts outside the EEA <sup>1</sup>	Yes/no
Cash receipts (banknotes and coins)	Yes/no
Electronic money, issued by a Dutch electronic money institution	Yes/no
Electronic money, issued by an electronic money institution established within the EEA <sup>1</sup> (excluding the Netherlands)	Yes/no
Electronic money, issued by an electronic money institution established in a non-EEA country/territory <sup>1</sup>	Yes/no
Crypto-assets originating from an address hosted by a Dutch crypto asset service provider	Yes/no
Crypto-assets originating from an address hosted by a crypto asset service provider established within the EEA <sup>1</sup> (excluding the Netherlands)	Yes/no
Crypto-assets originating from an address hosted by an entity outside the EEA <sup>1</sup> , which offers similar services to a provider of crypto asset services	Yes/no
Crypto-assets originating from a self-hosted address	Yes/no

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#### Note:

The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

## 12.2.

Does your company accept crypto-assets that have an inbuilt anonymisation function?<sup>1</sup>

☐ Yes

☐ No

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**Note:**

<sup>1</sup>) This concerns, among others, Nym Dash, Zcash en Monero.

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## 12.3.1

Which wallet addresses are used by your company for the transfer(s) of crypto assets to and from your clients?

Wallet address	Optional clarification

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**Note:**

If your company prefers to provide its wallet addresses using an alternative method, the AFM kindly requests that you contact the AFM via [wwft.sw@afm.nl](mailto:wwft.sw@afm.nl).

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## 12.3.2

Which wallet addresses are used by your company to receive transfers of crypto assets, initiated by business relations, to your company?

Wallet address	Optional clarification

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**Note:**

If your company prefers to provide its wallet addresses using an alternative method, the AFM kindly requests that you contact the AFM via [wwft.sw@afm.nl](mailto:wwft.sw@afm.nl).

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12.3.3 Which wallet addresses are used by your company for sending transfers of crypto assets, initiated by your company, to business relations?

Wallet address	Optional clarification

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**Note:**

If your company prefers to provide its wallet addresses using an alternative method, the AFM kindly requests that you contact the AFM via [wwft.sw@afm.nl](mailto:wwft.sw@afm.nl).

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### 13. Delivery and distribution channels

When answering these questions, you must include all clients falling under the definition of 'clients', including third parties, offerors and parties related to the offerors, for whom you provide one or more crypto-asset services, as referred to in Article 3(1)(16) MiCAR.

State per question the total number of unique clients. A unique client refers to the situation that, if a client receives multiple crypto-asset services provided by you, you only count this client once towards the total number of unique clients.

In the case of a branch office, only the activities of the branch should be considered when completing this section. You should only include those clients on whose behalf the branch office provides crypto asset services.

The reference date for these questions is 31 March 2025.

#### 13.1.

State the requested number for the clients you had on the reference date, specifying whether or not they were physically present during client acceptance.

	Number
Total number of clients that were physically present during the client acceptance	
Total number of clients that were <u>not</u> physically present during the client acceptance	
Clients that were <u>not</u> physically present during the client acceptance AND are <u>not</u> residing or located within the Netherlands	

### 13.2.1.

State the number of clients your company accepted that were introduced by an intermediary.

If a client is introduced by an intermediary and the agreement is made between your company and the client, then this counts as a client who is introduced through an intermediary. NB: Here you should not include any clients introduced by one of your own tied agents.

*If not applicable, please enter '0'.*

	Number of clients
Introduced through an intermediary established in the Netherlands	
Introduced through an intermediary established in the EEA <sup>1</sup> (excluding the Netherlands)	
Introduced through an intermediary established outside the EEA <sup>1</sup>	

#### Note:

<sup>1</sup>) The European Economic Area (EEA) contains **30 Member States**: the 27 EU Member States and three of the four EFTA-Member States (Norway, Iceland, and Lichtenstein). Jurisdictions that are affiliated with EU Member States but are not part of the EEA include: Faroe Islands and Greenland (Denmark), and Aruba, Curaçao, St. Maarten, Bonaire, St. Eustatius and Saba (The Netherlands). Jurisdictions affiliated with EU member states that do belong to the EEA are French Guiana, Guadeloupe, Martinique, Mayotte, La Réunion and Saint-Martin (France), Azores and Madeira (Portugal) and Balearic and Canary Islands (Spain). Switzerland, while otherwise a member of EFTA, is not part of the EEA.

### 13.2.2.

**For each country/territory outside of the EEA**, state the number of clients your company has accepted on the reference date that were introduced to your company through an intermediary established in that country.

Country/territory <sup>1</sup>	Number of clients accepted through an intermediary

#### Note:

<sup>1</sup>) The list of countries that is used in this question is based on the ISO 3166-1 coding for countries and their subdivisions. The use of this coding is suggested by the Standardisation Forum.

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? <sup>1</sup>

Question number	Comments
Number/general	

**Note:**  
<sup>1</sup>) Your comments may be general or they may relate to a specific question.

Declaration

It is important that your response to this request for information is correct and complete. Therefore, we request that you declare that you have completed the questionnaire truthfully and in accordance with the facts.

Salutation:

Initials:

Surname prefix:

Surname:

☐ By checking this box, the above policymaker declares that this Wwft & Sw Questionnaire for crypto asset service providers 2025 has been completed truthfully.



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**Dataclassification**

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