

# Wwft, Sw & TFR Questionnaire

## General (part 1)

### Crypto-asset service providers 2026

Publication date: 29 april 2026

If you have any questions on the Wwft, Sw & TFR Questionnaire, you can consult the online explanatory document. If, after reviewing this information, you still have a question, please contact the AFM at [wwft.sw@afm.nl](mailto:wwft.sw@afm.nl). You may also request a call-back by sending an email including your telephone number and the time at which you can be reached. To assist you as effectively as possible, we kindly ask you to indicate the subject you wish to discuss. You can also reach us by phone at 0800-6800 680 (toll-free). Please consult our website for our current opening hours: <https://www.afm.nl/nl-nl/contact/contactformulier-sector>.

## Introduction

The Wwft, Sw and TFR Questionnaire 2026 consists of two separate parts, which have been made available as separate questionnaires in the AFM portal. These comprise a general questionnaire and a questionnaire specifically tailored to licensed MiCAR services, insofar as these fall within the scope of the Wwft.

This document concerns the PDF version of the general part (Part 1). It primarily contains questions regarding the organisational structure of institutions and the measures implemented pursuant to the Wwft, the Sw and the TFR. The PDF version is made available to support internal distribution of the questionnaire within the organisation, enabling institutions to adequately prepare for completion.

Despite the fixed sequence of the questionnaire, it is not necessary to answer all questions. Only those questions that are applicable to the institution, based on the responses to preceding questions, will be presented. This should be taken into account during preparation in order to avoid unnecessary administrative burden. Both parts of the Questionnaire together constitute a single information request. For that reason, chapter numbers do not always follow consecutively; missing chapters are included in the other part of the Questionnaire.

**Contact details**

Who should the AFM contact for questions regarding your answers in this questionnaire?

Salutation:

Name of contact person:

Job title of contact person:

Telephone number:

Email<sup>1</sup>:

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**Note:**

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

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Which email address should the AFM use for correspondence regarding further Wwft, Sw and TFR questionnaires?

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## 1. Organisation

The reference date for these questions is 31 December 2025.

### 1.1.

Which of the following categories describes your institution?

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

- The institution is a crypto-asset service provider that has obtained a MiCAR license
- The institution is an investment firm that has notified the intention to provide crypto-asset services
- The institution is a manager of (an) undertaking(s) for collective investment in transferable securities (UCITS) that has notified the intention to provide crypto-asset services
- The institution is a manager of (an) alternative investment fund(s) that has notified the intention to provide crypto-asset services
- The institution is a branch of a (foreign), investment firm or manager of (an) undertaking(s) for collective investment in transferable securities (UCITS) or of (an) alternative investment fund(s)

### 1.2.

Is your institution part of a group consisting of two or more credit and/or financial institutions?<sup>1</sup>

- Yes
- No

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**Note:**

<sup>1</sup>) A group refers to a parent undertaking and its subsidiaries. A group exists, at a minimum, when consolidated financial statements are prepared for multiple establishments. At least two establishments within the group must qualify as credit or financial institutions. Examples include crypto-asset service providers, investment firms, undertakings for collective investment in transferable securities, alternative investment funds. The types of entities covered are detailed in [Article 2\(1\), point 5 and 6 of the European Anti-Money Laundering Regulation \(EU 2024/1624\)](#).

1.3.1.

Is your institution the EU parent undertaking of this group?<sup>1</sup>

- Yes
- No

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**Note:**

<sup>1</sup>) Your institution qualifies as a parent undertaking if it exercises control over one or more subsidiaries. A parent undertaking has no entities within the European Union that exercise control over it.

If the group's headquarters is located outside the European Union, your institution may still qualify as the parent undertaking. This applies if your institution meets the requirements set out in [Article 2, paragraph 1, point 42\(b\) of the European Anti-Money Laundering Regulation \(EU 2024/1624\)](#).

1.3.2.

You have indicated that your institution does not qualify as the parent undertaking of the group to which it belongs. In which country is the (European) parent undertaking established and what is its full legal name? We also request that you provide the Legal Entity Identifier (LEI), the national registration number and the competent AML/CFT-supervisory authority of your parent undertaking (if applicable).<sup>1</sup>

(Legal) name parent undertaking	Country of establishment	LEI <sup>2</sup>	National registration number <sup>3</sup>	AML/CFT-supervisory authority

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**Note:**

<sup>1</sup>) If the group's headquarters is located outside the European Union, another European establishment of the group qualifies, for the purposes of this question, as the group's parent company. This refers to the establishment that meets the requirements of Article 2, paragraph 1, point 42(b) of the European Anti-Money Laundering Regulation (EU 2024/1624).

<sup>2</sup>) The LEI is a unique number that can be used to identify entities worldwide. For more information, see <https://lei-europa.eu>

<sup>3</sup>) This is the unique number under which an institution or legal entity is officially registered in the country of establishment. For Dutch entities, this refers to the Chamber of Commerce (KvK) registration number.

1.4.

You have indicated that your institution qualifies as the parent undertaking of a group. For each establishment within the European Union, please provide the full (statutory) name, country of establishment, type of establishment, Legal Entity Identifier (LEI), national registration number and competent AML/CFT supervisory authority for this establishment (if applicable).

(Legal) name establishment	Country of establishment	Type of establishment <sup>1</sup>	LEI <sup>2</sup>	National registration number <sup>3</sup>	AML/CFT-supervisory authority
		Branch/ subsidiary/ other type of establishment			

**Note:**

<sup>1</sup>) For credit institutions and financial institutions, the option 'other type of establishment' may apply if there is an infrastructure that qualifies as an establishment under prudential regulation. This is, in any case, the case if a central contact point (CCP) has been designated.

<sup>2</sup>) The LEI is a unique number that can be used to identify entities worldwide. For more information, see <https://lei-europa.eu>.

<sup>3</sup>) This is the unique number under which an institution or legal entity is officially registered in the country of establishment. For Dutch entities, this refers to the Chamber of Commerce (KvK) registration number.

1.5.1.

You have indicated that your institution qualifies as the parent undertaking of a group and in the previous question you specified the establishments of this group. Even without establishment, your group can offer services abroad – for example, if your institution has registered with the supervisory authority of another EU country (European passport). Does your group have clients who are resident/established in an EU country other than where your group's establishments are located?

- Yes
- No

1.5.2.

For each country in the European Union, please provide the total number of clients and their incoming and outgoing transactions for the group. This question only applies to EU countries where your group does not have any establishments.

EU-country	Total number of clients of the group residing/established in this country	Total value of transactions received in 2025 for, or on behalf of, clients residing/established in this country (EUR) <sup>1</sup>	Total value of transactions transferred for, or on behalf of, clients residing/established in this country in 2025 (EUR) <sup>1</sup>

**Note:**

<sup>1</sup>) The type of transaction is not specified and may, for example, take place in cash, electronic funds transfer, or in virtual currency.

1.6.1.

You have indicated that your institution is not part of a group consisting of two or more credit and/or financial institutions. However, your institution may still have branches and other types of establishments, as these fall outside the scope of the term 'group'. Does your institution have branches and/or other types of establishments in other EU countries?

- Yes
- No

### 1.6.2.

You have indicated that your institution is not part of a group consisting of two or more credit and/or financial institutions but does have branches and/or other types of establishments itself. For each establishment within the European Union, please provide the full (statutory) name, country of establishment, type of establishment, Legal Entity Identifier (LEI), national registration number and competent AML/CFT supervisory authority for this establishment (if applicable).

(Legal) name establishment	Country of establishment	Type of establishment <sup>1</sup>	LEI <sup>2</sup>	National registration number <sup>3</sup>	AML/CFT-supervisory authority
		Branch/ other type of establishment			

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**Note:**

<sup>1</sup>) For credit institutions and financial institutions, the option 'other type of establishment' may apply if there is an infrastructure that qualifies as an establishment under prudential regulation. This is, in any case, the case if a central contact point (CCP) has been designated.

<sup>2</sup>) The LEI is a unique number that can be used to identify entities worldwide. For more information, see <https://lei-europa.eu>

<sup>3</sup>) This is the unique number under which an institution or legal entity is officially registered in the country of establishment. For Dutch entities, this refers to the Chamber of Commerce (KvK) registration number.

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### 1.7.1

You have indicated that your institution is not part of a group consisting of two or more credit and/or financial institutions. Even without establishments, your institution can offer services abroad – for example, if your institution is registered with the supervisory authority of another EU country (European passport). Does your institution have clients who are resident/established in another EU country?

- Yes  
 No
-

### 1.7.2

For each country in the European Union, please provide the total number of clients and their incoming and outgoing transactions.

EU-country	Total number of your institution's clients residing/established in this country	Total value of transactions received in 2025 for, or on behalf of, clients residing/established in this country (EUR) <sup>1</sup>	Total value of transactions transferred for, or on behalf of, clients residing/established in this country in 2025 (EUR) <sup>1</sup>

#### Note:

1) The type of transaction is not specified and may, for example, take place in cash, electronic funds transfer, or in virtual currency.

### 1.8.1.

Which of the below services and activities relating to crypto-assets, pursuant to article 3(1)(16) MiCAR, is applicable to your company? (Multiple responses may be selected)

- 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 advice on crypto-assets
- Providing portfolio management on crypto-assets
- Providing transfer services for crypto-assets on behalf of clients
- None of the above

### 1.8.2.

What are the main activities of your company?

### 1.9.1.

In this questionnaire, you will be asked to state the value of crypto-assets in euros at a specific reference date. Please provide a brief explanation of the valuation method applied by your organisation.

1.9.2. According to this valuation method, what is the value in euros, as at the reference date, of the three crypto-assets with the largest exposure within the service(s) for which your company holds a MiCAR license or notification?



## 11. Clients and business relationships

For the questions below, please include all clients, including third parties, offerors and parties related to offerors of crypto-assets, for whom you perform or provide one or more crypto-asset services as referred to in article 3(1)(16) MiCAR.

For each question, provide the total number of unique clients. *'Unique'* here means that if you perform or provide multiple crypto-asset services for the same client should be counted once.

In this section, *business relationship* refers to business relationships **other than** those with clients for whom you provide crypto-asset services. Business relationships are (legal) persons with whom you have a business, professional, or commercial relationship that is connected to the professional activities of your institution. Examples of business relationships within the meaning of this section include a broker, trust office, or legal (advisory) firm. Business relationships with affiliated or related entities also fall within this definition. Business relationships that you maintain, for example, with a cleaning service generally do not relate to the professional (licensed) activities of your firm and therefore do not need to be included in your response.

In case your institution is an establishment of another company, for instance if your institution is a branch, we request you to fill out this part of the questionnaire on behalf of your establishment. Please only include the clients for whom the establishment provides one or multiple crypto-asset services.

UBOs concern ultimate beneficial owners or *'uiteindelijk belanghebbenden'* as defined in Article 1(1) Wwft.

PEPs concern politically exposed persons or *'politiek prominente personen'* as defined in Article 1(1) Wwft.

The reference date for these questions is 31 December 2025.

### 11.1.1

Enter the requested information for your institution's number of unique clients.

	<b>Number of clients residing/established in the Netherlands</b>	<b>Number of clients not residing/established in the Netherlands</b>
Natural persons		
Legal persons and/or other legal entities and/or legal structures		
<b>Sum total</b>		

### 11.1.2

For each country/territory outside of the Netherlands, state the total number of unique clients residing/established in that country/territory.

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.

### 11.2.1.

Do you have clients of which the UBO(s) is/are residing in a country/territory outside of an EEA country/territory?<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 country/territory outside of the EEA, state the total number of clients' UBOs 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.

### 11.3.1

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

- Yes
- No

11.3.2.

For each country/territory, state the total number of clients that are PEPs. This concerns the country/territory in which the PEP resides.

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

11.4.1.

Do you have any clients of which the UBO(s) are politically exposed persons (PEPs)?

- Yes
- No

11.4.2.

For each country/territory, state the total number of clients' UBOs that are PEPs residing in that country/territory.

Country/territory <sup>1</sup>	Number of clients' UBOs that 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.

11.5.

For each country/territory, state the total number of business relationships with whom you have worked in the period from 1 April 2025 to 31 December 2025.

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

**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.

## 12. Products, services and transactions

For the questions below, please include all clients, including third parties, offerors and parties related to offerors of crypto-assets, for whom you perform or provide one or more crypto-asset services as referred to in article 3(1)(16) MiCAR.

For each question, provide the total number of unique clients. ‘*Unique*’ here means that if you perform or provide multiple crypto-asset services for the same client should be counted once.

In this section, *business relationship* refers to business relationships **other than** those with clients for whom you provide crypto-asset services. Business relationships are (legal) persons with whom you have a business, professional, or commercial relationship that is connected to the professional activities of your institution. Examples of business relationships within the meaning of this section include a broker, trust office, or legal (advisory) firm. Business relationships with affiliated or related entities also fall within this definition. Business relationships that you maintain, for example, with a cleaning service generally do not relate to the professional (licensed) activities of your firm and therefore do not need to be included in your response.

In case your institution is an establishment of another company, for instance if your institution is a branch, we request you to fill out this part of the questionnaire on behalf of your establishment. Please only include the clients for whom the establishment provides one or multiple crypto-asset services.

The reference date for these questions is 31 December 2025.

### 12.1.

Enter for each of the below categories of funds or economic resources from how many clients your institution has received these, as well as the total received value in the period from 1 April 2025 to 31 December 2025.

	Number of clients	Total value (€) <sup>1</sup>
Funds held in a Dutch bank account		
Funds held in an EEA <sup>1</sup> bank account (excluding Dutch)		
Funds held in a bank account outside of EEA countries/territory <sup>1</sup>		
Cash (physical currency)		
Electronic money issued by a Dutch electronic money institution <sup>1</sup>		
Electronic money issued by an electronic money institution established in the EEA <sup>1,2</sup> (excluding the Netherlands)		
Electronic money issued by an electronic money institution established outside the EEA <sup>1,2</sup>		
Crypto-assets originating from an address hosted by a Dutch crypto-asset service provider		
Crypto-assets originating from an address hosted by a crypto-asset service provider established in the EEA <sup>2</sup> (excluding the Netherlands)		
Crypto-assets originating from an address hosted by an entity established outside the EEA <sup>2</sup> that offers services comparable to those of a crypto-asset service provider		
Crypto-assets originating from a self-hosted address		

**Note:**

<sup>1</sup>) Electronic money or 'elektronisch geld', as defined in article 1:1 Wft.

<sup>2</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.

### 12.2.

Does your institution accept and/or place crypto-assets that crypto-assets that have an inbuilt anonymisation function contain?<sup>1</sup>

- Yes  
 Nee

**Note:**

<sup>1</sup>) This concerns crypto-assets pursuant to article 3(1)(5) MiCAR. Examples include Nym, Dash, Zcash and Monero.

12.3.

Which blockchain addresses are used by your institution for the transfer(s) of crypto-assets?<sup>1</sup>

Blockchain address <sup>2</sup>	Explanatory comment (optional)

**Note:**

<sup>1</sup>) If your institution prefers to provide the wallet address(es) in an alternative manner, the AFM requests that you contact [wwft.sw@afm.nl](mailto:wwft.sw@afm.nl).

<sup>2</sup>) This concerns the blockchain addresses that are controlled by your institution and that are used for sending, receiving and/or storing crypto-assets belonging to clients and business relationships — the hot wallets and cold wallets. This does not include those addresses that your institution generates specifically for clients or business relationships, nor addresses that are used only once for the purpose of transferring crypto-assets.

12.4.1.

Has your institution issued prepaid crypto payment cards during the period from 1 April 2025 to 31 December 2025?

- Yes
- No

12.4.2.

With respect to the prepaid crypto payment cards issued by your institution during the period from 1 April 2025 to 31 December 2025, please provide the requested information:

	Answer
Number of prepaid crypto payment cards issued	
Total value of the prepaid crypto payment cards issued	
Outstanding balance of the prepaid crypto payment cards as of the reference date	
Number of clients who have used the prepaid crypto payment cards	
Number of clients who have used more than three prepaid crypto payment cards	

### 13. Delivery and distribution channels

For the questions below, please include all clients, including third parties, offerors and parties related to offerors of crypto-assets, for whom you perform or provide one or more crypto-asset services as referred to in article 3(1)(16) MiCAR.

For each question, provide the total number of unique clients. 'Unique' here means that if you perform or provide multiple crypto-asset services for the same client should be counted once.

In case your institution is an establishment of another company, for instance if your institution is a branch, we request you to fill out this part of the questionnaire on behalf of your establishment. Please only include the clients for whom the establishment provides one or multiple crypto-asset services

#### 13.1.

Please enter the number of clients that your institution has accepted in the period from 1 April 2025 to 31 December 2025.

	Number of clients
Total number of clients	
Number of clients that reside/are established in the Netherlands that were <b>not</b> physically present at onboarding	
Number of clients that do <b>not</b> reside/are established in the Netherlands that were <b>not</b> physically present at onboarding	

### 13.2.1.

Please enter the number of clients that your institution has accepted in the period from 1 April 2025 to 31 December 2025 after the client was introduced to your institution by an intermediary.<sup>1</sup>

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

	Number of clients
Introduced by an intermediary established in the Netherlands	
Introduced by an intermediary established in the EEA <sup>2</sup> (excluding the Netherlands)	
Introduced by an intermediary established outside of the EEA <sup>2</sup>	

**Note:**

<sup>1</sup>) If a client has been introduced by an intermediary, but the final agreement is concluded between your institution and the client, the client is considered to have been introduced by an intermediary. Note: you should not include clients who have been introduced by your tied agents in this question.

<sup>2</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, please enter the number of clients that your institution has accepted in the period from 1 April 2025 to 31 December 2025 after the client was introduced to your institution by an intermediary established in that country/territory.

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.

## 14. Risks of money laundering and terrorist financing and risk assessment

The risk assessment is meant for identifying and assessing money laundering and terrorist financing risks that are specific to the institution, as understood under article 2b(1) Wwft. This risk assessment does not refer to the assessment of the risk profile of individual clients. In its risk assessment, an institution must in any case take into account the risk factors relating to its type of clients, products, services, transactions and delivery channels, as well as risks relating to countries or geographic areas. An institution must document the results of its risk identification and assessment and must keep this risk assessment up to date. Furthermore, institutions must have internal procedures and measures in place based on this risk assessment that enable them to meet the requirements under the Wwft.

The reference date for these questions is 31 December 2025.

### 14.1.

Has your institution taken measures to identify and assess your risks in relation to money laundering and terrorist financing?

- Yes
  - No
- 

### 14.2.1.

Has your institution documented the results of the identification and assessment of the risks of money laundering and the terrorist financing?

- Yes
  - No
- 

### 14.2.2.

When were these results updated?

- 2025
  - 2024
  - Before 2024
  - Never
-

14.3.

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

- Yes
- No

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**Note:**

<sup>1</sup>) A gross or inherent risk is a risk that is inherently (in other words, regardless of available control measures) associated with the clients, activities and products of the company or the environment in which a company operates. This concerns threats and vulnerabilities that exist for your company before account is taken of the internal control measures in place.

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14.4.

Does your risk assessment describe the net or residual risks remaining after consideration of your control measures with regard to the gross or inherent risks?<sup>1</sup>

- Yes
- No

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**Note:**

<sup>1</sup>) Net or residual risk is the risk that remains after taking into account the effects of the control measures in place.

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14.5.

Which of the integrity risks listed below have you included and assessed in your most recent risk assessment?

- Money laundering
- Terrorist financing
- Corruption (bribery)
- Circumvention of sanctions regulations
- Evasion of tax regulations
- Internal fraud by employees of your investment fund
- Conflicts of interest
- Proliferation financing<sup>1</sup>
- None of the above

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**Note:**

<sup>1</sup>) Facilitating the proliferation of weapons of mass destruction (nuclear, chemical or biological weapons) by providing financing or through other means.

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14.6.

How do you assess your firm with respect to the following risk categories?<sup>1</sup>

	<b>Very low risk</b>	<b>Low risk</b>	<b>Neutral risk</b>	<b>High risk</b>	<b>Very high risk</b>
Type of clients					
Type of services and/or products					
Risks relating to countries					
Risks relating to delivery channels					

**Note:**

<sup>1</sup>) Please base your answer on the gross risks as defined in the Wwft. In case your institution is an establishment of another company, for instance if your institution is a branch, we request you to fill out this part of the questionnaire on behalf of your establishment.

## 15. Policy, procedures and measures

15.1.

Has your institution incorporated the findings of its risk assessment into its policy, procedures and/or measures?

- Yes
- No

15.2.

Does your institution have a specific policy in relation to the Wwft, the Transfer of Funds Regulation and/or Sanctions regulations and a general integrity policy?

	Yes	No
Wwft	<input type="checkbox"/>	<input type="checkbox"/>
TFR	<input type="checkbox"/>	<input type="checkbox"/>
Sanctions regulations	<input type="checkbox"/>	<input type="checkbox"/>
General integrity policy	<input type="checkbox"/>	<input type="checkbox"/>

15.3.

When were these policies last updated and approved?

	2025	2024	Before 2024
Wwft			

	2025	2024
TFR		

	2025	2024	Before 2024
Sanctions regulations			

	2025	2024	Before 2024
General integrity policy			

15.4.

Does the policy address the subjects listed below?

	Yes	No
Client acceptance	<input type="checkbox"/>	<input type="checkbox"/>
Clients' risk classification	<input type="checkbox"/>	<input type="checkbox"/>
Client review	<input type="checkbox"/>	<input type="checkbox"/>
Termination of relationships with clients	<input type="checkbox"/>	<input type="checkbox"/>
Transaction monitoring	<input type="checkbox"/>	<input type="checkbox"/>
Reporting unusual transactions	<input type="checkbox"/>	<input type="checkbox"/>
Screening business relations, transactions and investments in connection with sanctions regulations	<input type="checkbox"/>	<input type="checkbox"/>
Retention of collected data	<input type="checkbox"/>	<input type="checkbox"/>
Screening, training and qualifications of employees	<input type="checkbox"/>	<input type="checkbox"/>
TFR	<input type="checkbox"/>	<input type="checkbox"/>

15.5.1.

You have indicated that your institution is part of a group consisting of two or more credit and/or financial institutions and that it is the parent undertaking. Does your institution have a group policy for the purpose of complying with anti-money laundering regulations?

- Yes
- No

15.5.2.

If you do, how do you ensure an effective application of the group policy by your establishments?

15.6.1.

You have indicated that your institution is part of a group consisting of two or more credit and/or financial institutions and that it is not the parent undertaking. Does the parent undertaking of which your firm is an establishment have a group policy for the purpose of complying with anti-money laundering regulations?

- Yes
- No

15.6.2.

If it has, how do you ensure an effective application of the group policy by your own firm?



## 16. Client due diligence

For the questions below, please include all clients, including third parties, offerors and parties related to offerors of crypto-assets, for whom you perform or provide one or more crypto-asset services as referred to in article 3(1)(16) MiCAR. For each question, provide the total number of unique clients. 'Unique' here means that if you perform or provide multiple crypto-asset services for the same client should be counted once.

In this section, *business relationship* refers to business relationships **other than** those with clients for whom you provide crypto-asset services. Business relationships are (legal) persons with whom you have a business, professional, or commercial relationship that is connected to the professional activities of your institution. Examples of business relationships within the meaning of this section include a broker, trust office, or legal (advisory) firm. Business relationships with affiliated or related entities also fall within this definition. Business relationships that you maintain, for example, with a cleaning service generally do not relate to the professional (licensed) activities of your firm and therefore do not need to be included in your response.

In case your institution is an establishment of another company, for instance if your institution is a branch, we request you to fill out this part of the questionnaire on behalf of your establishment. Please only include the clients for whom the establishment provides one or multiple crypto-asset services.

### 16.1.

Do you perform a risk assessment for your clients as part of the Wwft client due diligence?

*We kindly request that you only choose "Not applicable" if you have no clients and/or other business relations.*

	In 0% of cases	In 1-25% of cases	In 26-50% of cases	In 51-75% of cases	In 76-99% of cases	In 100% of cases	Not applicable
Clients							
Other business relationships							

16.2.1.

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

	Answer
Clients	[Yes/No]
Other business relationships	[Yes/No]

16.2.2.

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

	Answer
Clients	[Yes/No]
Other business relationships	[Yes/No]

16.3.

As part of your ongoing client monitoring, do you (where necessary) investigate the source of the funds to be used for the business relationship or transaction?

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

	Answer
Clients	[Yes/No/N.A.]
Other business relationships	[Yes/No/N.A.]

16.4.

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

*We kindly request that you only choose “Not applicable” if you have no clients and/or other business relations.*

	Event-driven	Regular
Clients with low risk	[Yes/No/N.A.]	[Yes/No/N.A.]
Clients with neutral risk	[Yes/No/N.A.]	[Yes/No/N.A.]
Clients with high/increased risk	[Yes/No/N.A.]	[Yes/No/N.A.]
Clients with unacceptable risk	[Yes/No/N.A.]	[Yes/No/N.A.]

16.5.

When does your institution apply additional control measures?

- For Politically exposed persons (PEPs)
- For clients in high-risk countries
- For clients with high risk
- When clients are not physically present during the acceptance process
- No additional control measures are applied

16.6.1.

Do you outsource (a part of) your client due diligence conducted for the purpose of compliance with the Wwft and/or sanctions regulation to a third party?<sup>1</sup>

- Yes
- No

**Note:**

<sup>1</sup>) This refers to Section 10 Wwft, on the basis of which part of the client due diligence may be outsourced. Please note that this does not include the ongoing monitoring (see Section 10(1) Wwft in conjunction with Section 3(2)(d) Wwft). The use of a screening tool by your own institution is not considered outsourcing.

16.6.2.

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

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

16.7.

To which third party/parties do you (partially) outsource client due diligence conducted for the purpose of compliance with the Wwft and/or sanctions regulation?

---

16.8.

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

- More often than once every two years
  - Once every two years
  - Less often than once every two years
  - No, never
- 

16.9.

Do you have an outsourcing agreement with this/these third party/parties?

- Yes
  - No
-

16.10.

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

- Yes
  - No
- 

16.11.

How many prospective clients did your institution decline because of Wwft related reasons in the period from 1 April 2025 to 31 December 2025?

---

16.12.

With how many clients did your institution terminate its relationship because of Wwft-related reasons in the period from 1 April 2025 to 31 December 2025?

---

16.13.

Does your institution allow clients to add one or more authorised representatives to their account?

*If not applicable, please select 'No'.*

- Yes
  - No
- 

16.14.

Does your institution perform client due diligence on these added authorised representative(s)?

- Yes
  - No
-

## 17. Client due diligence (for institutions with a parent undertaking)

You have indicated that your institution is an establishment of a group consisting of two or more credit and/or financial institutions and that it is not the parent undertaking.

For the questions below, please include all clients, including third parties, offerors and parties related to offerors of crypto-assets, for whom your institution or the parent undertaking of your institution performs or provides one or more crypto-asset services as referred to in article 3(1)(16) MiCAR.

### 17.1.

Does your institution perform client due diligence pursuant to the Wwft?

- Yes, my institution performs client due diligence for all our clients.
- My institution performs the client due diligence for a number of our clients; for our other clients, the client due diligence is performed by the (foreign) parent undertaking, of which we are the establishment.
- No, the client due diligence for all clients is performed by the (foreign) parent undertaking, of which we are the establishment.
- No, neither my institution nor the (foreign) parent undertaking, of which my institution is the establishment, performs client due diligence.

---

### 17.2.

Are you aware of the manner in which the (foreign) parent undertaking, of which you are the establishment, performs the client due diligence?

- Yes
- No

---

### 17.3.

When performing client due diligence, does your institution apply policies, procedures and measures put in place by the foreign parent undertaking of which your institution is an establishment?

- Yes
  - No
-

## 18. Transaction monitoring

In this section, 'transaction monitoring' refers to the monitoring of transactions, as well as the monitoring of transfers of crypto-assets. Transaction monitoring also includes the monitoring of blockchains.

18.1.

Does your institution have one or more systems in place to monitor transactions for the purpose of detecting unusual transactions?

- Yes, the system monitors fiat transactions
- Yes, the system monitors transfers of crypto-assets
- Yes, the system monitors both fiat transactions and transfers of crypto-assets
- No

---

18.2.

Which system does your institution have in place for monitoring transfers of crypto-assets from/to the blockchain?

---

18.3.

Is a profile of expected transactions prepared for a client at the start of the business relationship?

- Yes, in all cases
- Yes, for clients with a high risk profile
- Yes, for clients with a medium risk profile
- No

---

18.4.

Does your transaction monitoring involve an assessment of whether a client's transaction pattern corresponds to the transaction profile previously created for that client?

- Yes
  - No
-

18.5.

Does your institution allow that funds or crypto-assets are received by your institution for clients that originate from an account or wallet-address that is not in the client's name?<sup>1</sup>

- Yes, in case funds originate from an account
- Yes, in case crypto-assets originate from a wallet-address
- Yes, in case funds originate from an account and crypto-assets originate from a wallet-address
- No

---

**Note:**

<sup>1</sup>) This does not include a client's joint account

---

18.6.

Does your institution allow that funds or crypto-assets are transferred by your institution to an account that is not in the client's name?<sup>1</sup>

- Yes, in case funds are transferred to an account
- Yes, in case crypto-assets are transferred to a wallet-address
- Yes, in case funds are transferred to an account and crypto-assets are transferred to a wallet address
- No

---

**Note:**

<sup>1</sup>) This does not include a client's joint account.

---

18.7.

Does your institution perform additional control measures in such situations?

*You have stated that it is possible that funds or crypto-assets are received from or paid to an account that is not in the client's name.*

- Yes
  - No
- 

18.8.

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

- Yes
  - No
-

18.9.

How many alerts were generated in the period from 1 April 2025 to 31 December 2025?

18.10.1.

Was there a backlog in your assessment of these alerts on the reference date of 31 December 2025?

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

18.10.2.

Number of alerts still to be assessed:

18.11.

How many transactions did your institution refuse, reject or send back in the period from 1 April 2025 to 31 December 2025 due to suspicion of involvement in money laundering and/or terrorist financing?

## 19. Reporting of unusual transactions

An institution must have policies, procedures and measures in place that enable the detection of unusual transactions and the reporting of unusual transactions to the Financial Intelligence Unit-Nederland (FIU-Nederland). The reporting procedure is explained on the website of the FIU-Nederland via 'Reporting & supervision' and 'Obligation to report'.

Under article 16 Wwft, an executed or intended transaction that is unusual must be reported to FIU-Nederland without undue delay once the unusual nature of the transaction is identified.

19.1.

Are you registered as a reporting entity with FIU-NL?

Yes

No

---

19.2.

How many unusual transactions did your institution report to FIU-Nederland in the period from 1 April 2025 to 31 December 2025?

## 20. Sanctions screening

The AFM uses the definition of 'relationship' ('relatie') from the Regeling Toezicht Sanctiewet 1977 ("relatie is eenieder die betrokken is bij een financiële dienst of een financiële transactie", which translates to: "a relationship means anyone involved in a financial service or a financial transaction"). The AFM does not only include your institution's clients within the definition of 'relationship', but also its UBO(s), the representative and/or other relevant natural and/or legal persons involved in the business relationship.

### 20.1.1

Which of the following sanctions lists (one or multiple) does your institution use in the screening of your business relations?<sup>1</sup>

- Dutch terrorism sanctions list ('Nationale sanctielijst terrorisme')
- EU sanctions lists
- UN sanctions lists
- Other
- None

---

**Note:**

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

---

### 20.1.2

Other, please specify:

### 20.2

Does your institution screen on whether a prospective or existing relationship appears in one or more sanctions lists **before** providing your services?

- Yes, always
  - Yes, regularly
  - Yes, occasionally
  - No, never
-

20.3

Does your institution screen on sanctions lists daily?<sup>1</sup>

- Yes
- No

---

**Note:**

<sup>1</sup>) For example a daily screening of all relationships through an automated screening tool.

---

20.4.

Does your institution check whether a prospective or existing business relationship appears in one or more sanctions lists **during** the continuing duration of the relationship?

- In case of updated sanctions lists
  - In case of changes on the side of the relationship
  - At the termination of the relationship
  - No, never
- 

20.5.

When transferring crypto-assets from and/or to a crypto-asset service provider, or a provider of similar services not based in the EU, does your institution check/screen whether sanctions apply to **this provider**?

- Yes
  - No
- 

20.6

When transferring crypto-assets from and/or to a crypto-asset service provider, or a provider of similar services not based in the EU, does your institution check/screen whether sanctions apply to the (custodial) **wallet address**?

- Yes
  - No
- 

20.7

When transferring crypto-assets from/to a selfhosted address, does your institution check/screen whether sanctions apply to the (selfhosted) address?

- Yes
  - No
-

20.8.

How many relationships (including clients, UBOs, beneficiaries of payments) have had their funds or economic resources frozen by you on the basis of sanctions regulations in the period from 1 April 2025 to 31 December 2025?

20.9.

Concerning how many relationships, whose funds or economic resources were frozen by your institution, has your institution filed a report to the AFM in the period from 1 April 2025 to 31 December 2025?

## 21. Transfer of Funds Regulation

The Transfer of Funds Regulation (TFR) refers to the Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets and amending Directive (EU) 2015/849. The TFR contains obligations that apply when transferring crypto-assets. The European Banking Authority has provided guidance on these obligations in the Guidelines on information requirements in relation to transfers of funds and certain crypto-assets transfers under Regulation (EU) 2023/1113 (EBA/GL/2024/11, “EBA Travel Rule Guidelines”).

### 21.1

Does your institution provide services in which ‘transfers of crypto-assets’ take place?<sup>1</sup>

- Yes, the institution is the CASP of the beneficiary and/or the originator that carries out the transfers of crypto-assets on their behalf
- Yes, the institution is an intermediary crypto-asset service provider
- Yes, crypto-assets are transferred from/to selfhosted addresses
- No

---

**Note:**

<sup>1</sup>) Pursuant to article 3(10) TFR.

---

### 21.2

Does your institution provide services in which ‘batch file transfers’ take place?<sup>1</sup>

- Yes
- No

---

**Note:**

<sup>1</sup>) Pursuant to article 3(11) TFR.

---

### 21.3.1.

In what (primary) manner does your institution ensure that information on the originator and the beneficiary is attached to transfers of crypto-assets, in its capacity as the crypto-asset service provider of the originator?<sup>1</sup>

- Travel rule (software) solution through a subscription/contract with a third party (e.g. Notabene, Sumsb)
- Travel rule protocol without a subscription/contract with a third party
- By an alternative method
- No solution is in place for attaching information to transfers of crypto-assets
- This obligation does not apply

---

**Note:**

<sup>1</sup>) Pursuant to article 14(1) and (2) TFR.

---

### 21.3.2.

You have indicated that your institution primarily ensures the attachment of information on the originator and the beneficiary to transfers of crypto-assets in an alternative manner, in its capacity as the crypto-asset service provider of the originator.<sup>1</sup> Please describe this method:

---

**Note:**

<sup>1</sup>) Pursuant to article 14(1) and (2) TFR.

---

### 21.4.1.

Does your institution have a secondary method (a fallback option) available for attaching information on the originator and the beneficiary to transfers of crypto-assets, in its capacity as the crypto-asset service provider of the originator?<sup>1</sup>

*This refers to situations in which the primary solution fails, for example due to a system outage or due to interoperability issues with the travel rule solution used by the counterparty's crypto-asset service provider.*

- Yes
- No, failure of the primary solution does not prevent the transfer of crypto-assets.
- No, however, transfers only take place when the primary solution is functioning.

---

**Note:**

<sup>1</sup>) Pursuant to article 14(1) and (2) TFR.

---

21.4.2.

You have indicated that your institution has a secondary method (a fallback option) available for attaching information on the originator and the beneficiary to transfers of crypto-assets. Please describe this method:

21.5.

At what point does your institution, in its capacity as the crypto-asset service provider of the originator, transmit the information on the originator and the beneficiary in relation to transfers of cryptoassets?<sup>1</sup>

- At the same time as / prior to the transfer of crypto-assets
- After the transfer of crypto-assets

---

**Note:**

<sup>1</sup>) Pursuant to article 14(1) and (2) TFR.

---

21.6.1.

Does your institution, in its capacity as the crypto-asset service provider of the beneficiary, verify the accuracy of the information received on the client of the crypto-asset service provider of the originator?<sup>1</sup>

- Yes
- No

---

**Note:**

<sup>1</sup>) Pursuant to article 16(3) and (4) TFR.

---

21.6.2.

In what manner does your institution, in its capacity as the crypto-asset service provider of the beneficiary, verify the accuracy of the information received on the client of the crypto-asset service provider of the originator?<sup>1</sup>

- Verification is performed automatically as part of the travel rule solution
- Verification is performed manually on the basis of the client due diligence information obtained under the Wwft
- Verification is performed manually in another manner

---

**Note:**

<sup>1</sup>) Pursuant to article 16(3) and (4) TFR.

---

21.6.3.

You have indicated that your institution, in its capacity as the crypto-asset service provider of the beneficiary, verifies the accuracy of the information received on the client of the crypto-asset service provider of the originator manually in another manner. Please provide a description of this method:

21.7.

At what point does your institution, in its capacity as the crypto-asset service provider of the beneficiary, verify the accuracy of the information received on the client of the crypto-asset service provider of the originator?<sup>1</sup>

- Before the crypto-assets are made available to the beneficiary
- After the transfer of crypto-assets

**Note:**

<sup>1</sup>) Pursuant to article 16(3) and (4) TFR.

21.8.

Does your institution, in its capacity as the crypto-asset service provider of the beneficiary, have procedures in place for situations in which it is detected that the required information on the originator and the beneficiary is missing for a transfer of crypto-assets?

- Yes
- No

21.9.

Does your institution, in its capacity as the crypto-asset service provider of the beneficiary, have procedures in place to address cases where the crypto-asset service provider of the originator repeatedly fails to provide the required complete and accurate travel rule information?

- Yes
- No

21.10.

In the case of transfers of crypto-assets to a selfhosted address: Does your institution, in its capacity as the crypto-asset service provider of the originator, have procedures in place for collecting the required travel rule information on the originator and the beneficiary?

- Yes
- No

21.11.

Are transfers of crypto-assets by the originator to or from a selfhosted address individually identifiable for your institution?

- Yes
- No

---

21.12.

Does your institution have procedures in place for verifying the ownership and control of a self-hosted address, when transferring crypto-assets to or from a self-hosted address?

- Yes
- No

---

21.13.

You have indicated that your institution has procedures in place for verifying the ownership and control of a selfhosted address. Which (primary) verification method does your institution apply for transfers with a value of EUR 1 000 or more?<sup>1</sup>

- The client sends a pre-determined amount of a crypto-asset to your institution (Satoshi test)
- The client signs a cryptographic message using the private key of the wallet (message signing / wallet signature)
- The client provides a selfie or video recording with the wallet
- The client provides a declaration regarding ownership and control
- Another verification method

---

**Note:**

<sup>1</sup>) This concerns your company's primary verification method and not the secondary method (fallback option)

---

21.14.

You have indicated that your institution applies another verification method for verifying the ownership and control of a selfhosted address.

Please provide a description of this method:

21.15.

Does your institution also verify the ownership and control of selfhosted addresses for transfers with a value below EUR 1 000?

- Yes, verification takes place for every transfer, regardless of the amount
  - Yes, where increased AML/CFT risks apply to the client or the transfer
  - Yes, where increased sanctions risks apply to the client or the transfer
  - No
- 

21.16.

Does your institution, under certain circumstances, apply an alternative verification method for verifying the ownership and control of a selfhosted address? This refers to a verification method that differs from the primary verification method you indicated.

- Yes, the verification method differs where there is an increased risk
  - Yes, the verification method differs where there is a decreased risk
  - No
- 

21.17.

You have indicated that your institution applies an alternative verification method for verifying the ownership and control of a selfhosted address where there is an increased risk. Which verification method does your institution use in that situation?

- The client sends a pre-determined amount of a crypto-asset to your institution (Satoshi test)
  - The client signs a cryptographic message using the private key of the wallet (message signing / wallet signature)
  - The client provides a selfie or video recording with the wallet
  - The client provides a declaration regarding ownership and control
  - Another verification method
- 

21.18.

You have indicated that your institution applies another verification method for verifying the ownership and control of a selfhosted address where there is an increased risk.

Please provide a description of this method:

---

21.19.

You have indicated that your institution applies an alternative verification method for verifying the ownership and control of a selfhosted address where there is a decreased risk. Which verification method does your institution use in that situation?

- The client sends a pre-determined amount of a crypto-asset to your institution (Satoshi test)
  - The client signs a cryptographic message using the private key of the wallet (message signing / wallet signature)
  - The client provides a selfie or video recording with the wallet
  - The client provides a declaration regarding ownership and control
  - Another verification method
- 

21.20.

You have indicated that your institution applies another verification method for verifying the ownership and control of a selfhosted address where there is a decreased risk.

Please provide a description of this method:

---

## 22. Governance, risk en compliance

22.1.

Does your company have two or more policymakers?

- Yes  
 No

22.2.

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

- Yes  
 No

22.3.

How many FTEs were employed by your company per the reference date? Please specify the number of FTEs based on the categories listed below.<sup>1</sup>

FTEs	Internal	External
FTEs employed in a compliance function (including compliance officers)		
FTEs employed in an audit function (including accountants, controllers and auditors)		
FTEs employed in other functions		

**Note:**

<sup>1</sup>) One FTE is one full-time position. Please round the number of FTE to one decimal place. For example, 6.75 FTE becomes 6.8 FTE. Part-time employees should be included in proportion to a full-time position. Two part-time employees who each work for 50% of a full-time position are thus one FTE. Policymakers who determine the policy of the company via a holding company, for example, are not employees and should therefore not be included.

22.4.

For each of the items listed below, state whether compliance monitoring took place for this item in 2025, and if so, what the resulting assessment was.

	<b>Adequate</b>	<b>Adequate, with findings</b>	<b>Inadequate</b>	<b>Did not take place</b>
Identification and verification of the identity of the client				
Identification and verification of the identity of the Ultimate Beneficial Owner of the client				
Investigating the purpose and intended nature of the business relationship				
Ongoing monitoring of the business relationship (including reassessing the risk profile, transaction monitoring, and investigating the source of funds)				
Reporting unusual transactions to the Financial Intelligence Unit – Nederland (FIU-NL)				
Training and qualifications of employees				
Screening of relations, transactions and investments for the purpose of Sanctions regulations				
Compliance with the Transfer of Funds Regulation				

22.5.

When was the last Wwft audit performed?

- 2025
- 2024
- Before 2024
- Never

22.6.

When was the last sanctions regulations audit performed?

- 2025
  - 2024
  - Before 2024
  - Never
- 

22.7.

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

- Yes, a standard or frequent agenda item
  - Yes, an ad hoc item based on incidents or current developments
  - Never or only rarely
-

## 23. Training

23.1.

Does your institution provide its employees internal or external trainings on the Wwft, TFR and/or Sanctions regulations?

	<b>Answer</b>
Wwft	[Yes/No]
TFR	[Yes/No]
Sanctions regulations	[Yes/No]

23.2.

Enter the requested information with respect to your employees:

	<b>How many employees took this training in 2025?</b>	<b>How many employees still have to take this training?</b>
Training on Wwft		
Training on TFR		
Training on sanctions regulation		

23.3.

Did one or more of your day-to-day policymakers take one or more training courses on the Wwft, TFR and/or sanctions regulations in 2025?

- Yes, training on Wwft
- Yes, training on TFR
- Yes, training on Sanctions regulations
- No

**Concluding remarks**

You have reached the end of part 1 of the questionnaire. Do you have any comments you would like to make in relation to this questionnaire?<sup>1</sup>

Question number	Remarks
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 & TFR Questionnaire for crypto-asset service providers 2026 has been completed truthfully.



**Autoriteit Financiële Markten**

Postbus 11723 | 1001 GS Amsterdam

**Telefoon**

020 797 2000

[www.afm.nl](http://www.afm.nl)