

Wwft, Sw & TFR Questionnaire

Activities (part 2)

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. 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 are made available as separate questionnaires in the AFM Portal. These comprise a general questionnaire and a questionnaire specifically tailored to licensed MiCAR services, to the extent that these fall within the scope of the Wwft.

This document is the PDF version of the part tailored to licensed MiCAR services (Part 2). This part contains questions that enable an assessment of the inherent risks of money laundering, terrorist financing and sanctions breaches. The PDF version is provided to support internal distribution of the questionnaire within the institution, allowing institutions to prepare adequately for completing it.

Despite the fixed order of the questionnaire, it is not necessary to answer all questions. Only the questions that are applicable to the institution, based on its licence and the responses to previous questions, will be presented. Please take this into account when preparing, in order to avoid unnecessary administrative burden. Both parts of the Questionnaire form part of a single information request. For this reason, chapter numbering is not always sequential; 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:

Email¹:

Note:

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

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

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

Please answer these questions for the clients on behalf of whom your institution provides custody and administration of crypto-assets, as referred to in article 3(1)(17) MiCAR.

The reference date for these questions is 31 December 2025.

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 on behalf of whom your institution provides custody and administration of crypto-assets.

2.1

Your institution provided the service custody and administration of one or multiple crypto-assets on behalf of clients as of the reference date. Please indicate which three crypto-assets have the largest exposure within this service, based on value in euros.

2.2.

Enter the requested information for the clients on behalf of whom your institution provides custody and administration of crypto-assets.

If not applicable, please enter '0'.

| | Number of clients | Total value crypto-assets (€) ¹ |
|---|-------------------|--|
| Natural persons | | |
| Legal persons and/or other legal entities and/or legal structures | | |
| Sum total | | |

Note:

¹) This is the total value of the crypto-assets that you provide the service custody and administration of crypto-assets on behalf of clients for, as of the reference date.

2.3.1.

Enter the requested information with respect to your clients residing/established in the Netherlands on behalf of whom your institution provides custody and administration of crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients in the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands | Total value of crypto-assets (€)¹ |
|---------------------------------------|--|---|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ² | | |
| Not (or not yet) classified | | |

Note:

¹) This is the total value of the crypto-assets that you provide the service custody and administration of crypto-assets on behalf of clients for, as of the reference date.

²) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

2.3.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands on behalf of whom your institution provides custody and administration of crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients in the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands | Total value of crypto-assets (€) ¹ |
|--------------------------------|---|---|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ² | | |
| Not (or not yet) classified | | |

Note:

¹) This is the total value of the crypto-assets that you provide the service custody and administration of crypto-assets on behalf of clients for, as of the reference date.

²) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

2.4.1.

Do you have any clients residing or established outside of an EEA country/territory on behalf of whom your institution provides custody and administration of crypto-assets?¹

Yes

No

Note:

¹) 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.

2.4.2.

For each country/territory outside of the EEA, state the total number of clients on behalf of whom your institution provides custody and administration of crypto-assets, as well as the total value of crypto-assets involved.

| Country/territory ¹ | Total number of clients per country | Total value of crypto-assets (€) ¹ |
|--------------------------------|-------------------------------------|---|
| | | |

Note:

¹) 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.

²) This is the total value of the crypto-assets that you provide the service custody and administration of crypto-assets on behalf of clients for, as of the reference date.

2.5.

For each of the categories listed below, state the number of clients on behalf of whom your institution provides custody and administration of crypto-assets, as well as the total value of crypto-assets involved.

If not applicable, please enter '0'.

| Category | Total number of clients per category | Total value of crypto-assets (€) ⁵ |
|---|--------------------------------------|---|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | |
| Family offices ³ | | |
| High-net worth individuals ⁴ | | |

Note:

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

²) 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 and Customs Administration.

³) Entities that manage assets on behalf of one or more families.

⁴) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high net worth individual, you are requested to include this client as well.

⁵) This is the total value of the crypto-assets that you provide the service custody and administration of crypto-assets on behalf of clients for, as of the reference date.

2.6.1.

Please indicate how many of your clients on behalf of whom your institution provides custody and administration of crypto-assets are active in the following sectors/activities, as well as the total value of crypto-assets involved.

If not applicable, please enter '0'.

| Sector | Total number of clients per sector | Total value of crypto-assets (€) ¹ |
|--|------------------------------------|---|
| Crypto | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | |
| Weapons/arms trade | | |

Note:

¹) This is the total value of the crypto-assets that you provide the service custody and administration of crypto-assets on behalf of clients for, as of the reference date.

2.6.2.

Which other sectors or activities in which (some of) your clients on behalf of whom your institution provides custody and administration of crypto-assets are active do you consider to be sectors or activities with a higher risk of money laundering or financing of terrorism?

| Sector(s)/activity |
|--------------------|
| |

3. Operation of a trading platform for crypto-assets

Please answer these questions for the third-parties (which will be referred to as 'clients') of which the purchasing and selling interests in crypto-assets are brought together by your institution or for which your institution facilitates the bringing together of the interests, in one or more by your institution managed multilateral systems, pursuant to article 3(1)(18) MiCAR.

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 brings together or facilitates bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems.

The reference date for these questions is 31 December 2025.

3.1.

Your institution operated a trading platform for crypto-assets as of the reference date. Please indicate which three crypto-assets have the largest exposure within this service, based on value in euros.

3.2.

Enter the requested information for the clients for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems.

If not applicable, please enter '0'.

| | Number of clients as of the reference date | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---|---|--|
| Natural persons | | |
| Legal persons and/or other legal entities and/or legal structures | | |
| Sum total | | |

3.3.1.

Enter the requested information with respect to your clients residing/established in the Netherlands for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|--|--|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ¹ | | |
| Not (or not yet) classified | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

3.3.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|--|--|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ¹ | | |
| Not (or not yet) classified | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

3.4.1.

Do you have any clients residing or established outside of an EEA country/territory for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral system(s)?¹

Yes

No

Note:

¹) 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.

3.4.2.

For each country/territory outside of the EEA, state the total number of clients for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems, as well as the total value of crypto-assets involved

| Country/territory ¹ | Total number of clients per country | Executed order value (1 April 2025 to 31 December 2025) (€) |
|--------------------------------|-------------------------------------|---|
| | | |

Note:

1) 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.

3.5.

For each of the categories listed below, state the number of clients for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems, as well as the total value of crypto-assets involved.

If not applicable, please enter '0'.

| Category | Total number of clients per category | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---|--------------------------------------|---|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | |
| Family offices ³ | | |
| High-net worth individuals ⁴ | | |

Note:

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

²) 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 and Customs Administration.

³) Entities that manage assets on behalf of one or more families.

⁴) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

3.6.1.

Please indicate how many of your clients for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems are active in the following sectors/activities, as well as the total value of crypto-assets involved.

If not applicable, please enter '0'.

| Sector | Total number of clients per sector | Executed order value (1 April 2025 to 31 December 2025) (€) |
|--|------------------------------------|---|
| Crypto | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | |
| Weapons/arms trade | | |

3.6.2.

Which other sectors or activities in which (some of) your clients for whom you bring together or facilitate bringing together their purchasing and selling interests in crypto-assets in one or more by your institution managed multilateral systems are active in do you consider to be sectors or activities with a higher risk of money laundering or financing of terrorism?

| Sector(s)/activity |
|--------------------|
| |

4. Exchange of crypto-assets for funds

Please answer these questions for the clients for which your institution exchanged crypto-assets for funds, as referred to in article 3(1)(19) MiCAR.

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 which your institution exchanged crypto-assets for funds.

The reference date for these questions is 31 December 2025.

4.1.

Your institution exchanged crypto-assets for funds in the period from 1 April 2025 through 31 December 2025. Please indicate which three crypto-assets have the largest exposure within this service, based on value in euros.

4.2

Can clients buy and/or sell crypto-assets through your institution?

- Clients can buy crypto-assets with funds through my institution
- Clients can sell crypto-assets for funds through my institution

4.3.

Enter the requested information for the clients for which your institution exchanged crypto-assets for funds.

| | Number of clients as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) | Volume of crypto-assets sold by clients (from 1 April 2025 to 31 December 2025) (€) |
|---|---|---|--|
| Natural persons | | | |
| Legal persons and/or other legal entities and/or legal structures | | | |
| Sum total | | | |

4.4.1.

Enter the requested information with respect to your clients residing/established in the Netherlands for which your institution exchanged crypto-assets for funds.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) | Volume of crypto-assets sold by clients (from 1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|---|---|--|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ¹ | | | |
| Not (or not yet) classified | | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

4.4.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands for which your institution exchanged crypto-assets for funds.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) | Volume of crypto-assets sold by clients (from 1 April 2025 to 31 December 2025) (€) |
|--------------------------------|--|--|---|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ¹ | | | |
| Not (or not yet) classified | | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

4.5.1.

Do you have any clients residing or established outside of an EEA country/territory for which your institution exchanged crypto-assets for funds?¹

- Yes
- No

Note:

¹) 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 country/territory outside of the EEA, state the total number of clients for which your institution exchanged crypto-assets for funds.

| Country/territory¹ | Number of clients residing/established outside of the EEA as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) | Volume of crypto-assets sold by clients (from 1 April 2025 to 31 December 2025) (€) |
|--------------------------------------|---|---|--|
| | | | |

Note:

¹) 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 which your institution exchanged crypto-assets for funds.

| Category | Number of clients as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) | Volume of crypto-assets sold by clients (from 1 April 2025 to 31 December 2025) (€) |
|---|--|--|---|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | | |
| Family offices ³ | | | |
| High-net worth individuals ⁴ | | | |

Note:

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

²) 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 and Customs Administration.

³) Entities that manage assets on behalf of one or more families.

⁴) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

4.7.1.

Please indicate how many of clients for which your institution exchanged crypto-assets for funds are active in the following sectors/activities.

If not applicable, please enter '0'.

| Sector | Total number of clients per sector | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) | Volume of crypto-assets sold by clients (from 1 April 2025 to 31 December 2025) (€) |
|--|---|---|--|
| Crypto | | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | | |
| Weapons/arms trade | | | |

4.7.2.

Which other sectors or activities in which (some of) your clients for which your institution exchanged crypto-assets for funds are active in do you consider to be sectors or activities with a higher risk of money laundering or financing of terrorism?

| Sector(s)/activity |
|--------------------|
| |

4.8.1.

Do you operate one or more crypto-asset automated teller machines (or 'crypto-ATMs')¹ through which crypto-assets can be purchased with and/or sold for funds?

- Yes
- No

Note:

¹ See article 3(17) Transfer of Funds Regulation for the definition of crypto-ATMs.

4.8.2.

State the volume of crypto-assets that were purchased with and/or sold for funds through one or more crypto-asset ATMs during the period from 1 April 2025 to 31 December 2025.

| Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) | Volume of crypto-assets sold by clients (from 1 April 2025 to 31 December 2025) (€) |
|--|---|
| | |

4.8.3.

In which Dutch postal codes are these crypto-asset ATMs located? We also request that you specify the type of location (supermarket, restaurant, station, etc.)

| Type of location | Postal code |
|------------------|-------------|
| | |

4.8.4.

Which crypto-assets can be used to buy and/or sell funds at these crypto-asset ATMs?

| Crypto-assets |
|---------------|
| |

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

Please answer these questions for the clients for which your institution exchanged crypto-assets for other crypto-assets, as referred to in article 3(1)(20) MiCAR.

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 which your institution exchanged crypto-assets for other crypto-assets.

The reference date for these questions is 31 December 2025.

5.1.

Your institution exchanged crypto-assets for other crypto-assets in the period from 1 April 2025 through 31 December 2025. Please indicate which three crypto-assets have the largest exposure within this service, based on value in euros.

5.2.

Enter the requested information for the clients for which your institution exchanged crypto-assets for other crypto-assets.

| | Number of clients as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) |
|---|---|---|
| Natural persons | | |
| Legal persons and/or other legal entities and/or legal structures | | |
| Sum total | | |

5.3.1.

Enter the requested information with respect to your clients residing/established in the Netherlands for which your institution exchanged crypto-assets for other crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|---|---|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ¹ | | |
| Not (or not yet) classified | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

5.3.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands for which your institution exchanged crypto-assets for other crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|---|---|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ¹ | | |
| Not (or not yet) classified | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

5.4.1.

Do you have any clients residing or established outside of an EEA country/territory for which your institution exchanged crypto-assets for other crypto-assets?¹

- Yes
- No

Note:

¹) 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 country/territory outside of the EEA, state the total number of clients for which your institution exchanged crypto-assets for other crypto-assets.

| Country/territory¹ | Number of clients residing/established outside of the EEA as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) |
|--------------------------------------|---|---|
| | | |

Note:

¹) 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 which your institution exchanged crypto-assets for other crypto-assets.

If not applicable, please enter '0'.

| Category | Number of clients as of reference date | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) |
|---|--|--|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | |
| Family offices ³ | | |
| High-net worth individuals ⁴ | | |

Note:

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

²) 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 and Customs Administration.

³) Entities that manage assets on behalf of one or more families.

⁴) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

5.6.1.

Please indicate how many of your clients for which your institution exchanged crypto-assets for other crypto-assets are active in the following sectors/activities.

If not applicable, please enter '0'.

| Sector | Total number of clients per sector | Volume of crypto-assets purchased by clients (from 1 April 2025 to 31 December 2025) (€) |
|--|------------------------------------|--|
| Crypto | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | |
| Weapons/arms trade | | |

5.6.2.

Which other sectors or activities in which (some of) your clients for which your institution exchanged crypto-assets for other crypto-assets are active in do you consider to be sectors or activities with a higher risk of money laundering or financing of terrorism?

| |
|---------------------------|
| Sector(s)/activity |
| |

5.7.1.

Do you operate one or more crypto-asset automated teller machines (or 'crypto-ATMs')¹ through which crypto-assets can be purchased with and/or sold for other crypto-assets?

- Yes
- No

Note:

¹) See article 3(17) Transfer of Funds Regulation for the definition of crypto-ATMs.

5.7.2.

In which Dutch postal codes are these crypto-asset ATMs located? We also request that you specify the type of location (supermarket, restaurant, station, etc.)

| Type of location | Postal code |
|------------------|-------------|
| | |

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

Please answer these questions for the clients on whose behalf your institution executes orders for crypto-assets, as referred to in article 3(1)(21) MiCAR.

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 on whose behalf your institution executes orders for crypto-assets.

The reference date for these questions is 31 December 2025.

6.1.

Your institution executed orders for crypto-assets on behalf of clients in the period from 1 April 2025 through 31 December 2025. Please indicate which three crypto-assets have the largest exposure within this service, based on value in euros.

6.2.

Enter the requested information for the clients on whose behalf your institution executed orders for crypto-assets.

| | Number of clients as of the reference date | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---|---|--|
| Natural persons | | |
| Legal persons and/or other legal entities and/or legal structures | | |
| Sum total | | |

6.3.1.

Enter the requested information with respect to your clients residing/established in the Netherlands on whose behalf your institution executed orders for crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|--|--|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ¹ | | |
| Not (or not yet) classified | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

6.3.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands on whose behalf your institution executed orders for crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|--|--|
| Low risk | | |
| Medium risk | | |
| High risk | | |
| Unacceptable risk ¹ | | |
| Not (or not yet) classified | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

6.4.1.

Do you have any clients residing or established outside of an EEA country/territory on whose behalf your institution executed orders for crypto-assets?¹

- Yes
- No

Note:

¹) 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.

6.4.2.

For each country/territory outside of the EEA, state the total number of clients on whose behalf your institution executed orders for crypto-assets, as well as the total value of crypto-assets involved.

| Country/territory ¹ | Total number of clients per country | Executed order value (1 April 2025 to 31 December 2025) (€) |
|--------------------------------|-------------------------------------|---|
| | | |

Note:

1) 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.

6.5.

For each of the categories listed below, state the number of clients on whose behalf your institution executed orders for crypto-assets, as well as the total value of crypto-assets involved.

If not applicable, please enter '0'.

| Category | Total number of clients per category | Executed order value (1 April 2025 to 31 December 2025) (€) |
|---|--------------------------------------|---|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | |
| Family offices ³ | | |
| High-net worth individuals ⁴ | | |

Note:

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

2) 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 and Customs Administration.

3) Entities that manage assets on behalf of one or more families.

4) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

6.6.1.

Please indicate how many of your clients on whose behalf your institution executed orders for crypto-assets are active in the following sectors/activities, as well as the total value of crypto-assets involved.

If not applicable, please enter '0'.

| Sector | Total number of clients per sector | Executed order value (1 April 2025 to 31 December 2025) (€) |
|--|------------------------------------|---|
| Crypto | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | |
| Weapons/arms trade | | |



6.6.2.

Which other sectors or activities in which (some of) your clients on whose behalf your institution executed orders for crypto-assets are active in do you consider to be sectors or activities with a higher risk of money laundering or financing of terrorism?

| Sector(s)/activity | |
|--------------------|--|
| | |



7. Placing of crypto-assets

Please answer these questions for your institution's clients that are offerors or parties related to offerors of crypto-assets to purchasers for which your institution provided the service of placing of crypto-assets, as well as the purchasers with whom your institution entered into a business relationship, with reference to article 3(1)(22) MiCAR.

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 which your institution provides the service placing of crypto-assets (offerors or parties related to offerors of crypto-assets to purchasers, or purchasers with whom your institution entered into a business relationship).

The reference date for these questions is 31 December 2025.

7.1.

Enter the requested information for the clients for which your institution provides the service placing of crypto-assets.

| | Number of clients as of reference date | Total number of distinct placed crypto-assets¹ (1 April 2025 to 31 December 2025) (€) | Volume of transactions² (1 April 2025 to 31 December 2025) (€) |
|---|---|---|--|
| Natural persons | | | |
| Legal persons and/or other legal entities and/or legal structures | | | |
| Sum total | | | |

Note:

¹) This concerns the number of distinct crypto-assets, not their value, that you have placed on the market, on behalf of or for the account of the offeror or a party related to offeror, to purchasers.

²) This concerns the total volume of transactions between the offeror, or a party related to the offeror, and the purchasers. This does not include any fees or commissions you receive for placing the crypto-assets.

7.2.1.

Enter the requested information with respect to your clients residing/established in the Netherlands for which your institution provides the service placing of crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands as of reference date | Total number of distinct placed crypto-assets¹ (from 1 April 2025 to 31 December 2025) (€) | Volume of transactions² (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|---|--|--|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ³ | | | |
| Not (or not yet) classified | | | |

Note:

¹) This concerns the number of distinct crypto-assets, not their value, that you have placed on the market, on behalf of or for the account of the offeror or a party related to offeror, to purchasers.

²) This concerns the total volume of transactions between the offeror, or a party related to the offeror, and the purchasers. This does not include any fees or commissions you receive for placing the crypto-assets.

³) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

7.2.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands clients for which your institution provides the service placing of crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands as of reference date | Total number of distinct placed crypto-assets¹ (from 1 April 2025 to 31 December 2025) (€) | Volume of transactions² (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|---|--|--|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ³ | | | |
| Not (or not yet) classified | | | |

Note:

¹) This concerns the number of distinct crypto-assets, not their value, that you have placed on the market, on behalf of or for the account of the offeror or a party related to offeror, to purchasers.

²) This concerns the total volume of transactions between the offeror, or a party related to the offeror, and the purchasers. This does not include any fees or commissions you receive for placing the crypto-assets.

³) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

7.3.1.

Do you have any clients residing or established outside of an EEA country/territory for whom your institution provides the service placing of crypto-assets?¹

- Yes
 No

Note:

¹ 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.

7.3.2.

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

| Country/territory¹ | Number of clients residing/established outside of the EEA as of reference date | Total number of distinct placed crypto-assets² (from 1 April 2025 to 31 December 2025) (€) | Volume of transactions² (1 April 2025 to 31 December 2025) (€) |
|--------------------------------------|---|--|--|
| | | | |

Note:

¹ 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.

² This concerns the number of distinct crypto-assets, not their value, that you have placed on the market, on behalf of or for the account of the offeror or a party related to offeror, to purchasers.

³ This concerns the total volume of transactions between the offeror, or a party related to the offeror, and the purchasers. This does not include any fees or commissions you receive for placing the crypto-assets.

7.4.

For each of the categories listed below, state the number of clients for which your institution provides the service placing of crypto-assets.

If not applicable, please enter '0'.

| Category | Number of clients as of reference date | Total number of distinct placed crypto-assets ⁵ (from 1 April 2025 to 31 December 2025) (€) | Volume of transactions ² (1 April 2025 to 31 December 2025) (€) |
|---|--|--|--|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | | |
| Family offices ³ | | | |
| High-net worth individuals ⁴ | | | |

Note:

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

²) 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 and Customs Administration.

³) Entities that manage assets on behalf of one or more families.

⁴) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

⁵) This concerns the number of distinct crypto-assets, not their value, that you have placed on the market, on behalf of or for the account of the offeror or a party related to offeror, to purchasers.

⁶) This concerns the total volume of transactions between the offeror, or a party related to the offeror, and the purchasers. This does not include any fees or commissions you receive for placing the crypto-assets.

7.5.1.

Please indicate how many of your clients for which your institution provides the service placing of crypto-assets are active in the following sectors/activities.

If not applicable, please enter '0'.

| Sector | Number of clients as of reference date | Volume of transactions ¹ (1 April 2025 to 31 December 2025) (€) |
|--|--|--|
| Crypto | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | |
| Weapons/arms trade | | |

Note:

¹) This concerns the total volume of transactions between the offeror, or a party related to the offeror, and the purchasers. This does not include any fees or commissions you receive for placing the crypto-assets.

7.5.2.

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

| Sector(s)/activity |
|--------------------|
| |

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

Please answer these questions for the clients on whose behalf your institution receives and transmits orders for crypto-assets, as referred to in article 3(1)(23) MiCAR.

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 on whose behalf the establishment receives and transmits orders for crypto-assets.

The reference date for these questions is 31 December 2025.

8.1.

Your institution received and transmitted orders for crypto-assets in the period from 1 April 2025 through 31 December 2025. Please indicate which three crypto-assets have the largest exposure within this service, based on value in euros.

8.2.

Enter the requested information for the clients on whose behalf your institution receives and transmits orders for crypto-assets.

| | Number of clients as of reference date | Transmitted order value (1 April 2025 to 31 December 2025) (€) | Total number of transmitted orders (1 April 2025 to 31 December 2025) (€) |
|---|---|---|--|
| Natural persons | | | |
| Legal persons and/or other legal entities and/or legal structures | | | |
| Sum total | | | |

8.3.1.

Enter the requested information with respect to your clients residing/established in the Netherlands on whose behalf your institution receives and transmits orders for crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands as of reference date | Transmitted order value (1 April 2025 to 31 December 2025) (€) | Total number of transmitted orders (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|---|---|--|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ¹ | | | |
| Not (or not yet) classified | | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

8.3.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands on whose behalf your institution receives and transmits orders for crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands as of reference date | Transmitted order value (1 April 2025 to 31 December 2025) (€) | Total number of transmitted orders (1 April 2025 to 31 December 2025) (€) |
|---------------------------------------|---|---|--|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ¹ | | | |
| Not (or not yet) classified | | | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

8.4.1.

Do you have any clients residing or established outside of an EEA country/territory on whose behalf your institution receives and transmits orders for crypto-assets?¹

Yes

No

Note:

¹) 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.

8.4.2.

For each country/territory outside of the EEA, state the total number of clients on whose behalf your institution receives and transmits orders for crypto-assets, as well as the transmitted order value and the total number of transmitted orders.

| Country/territory ¹ | Number of clients as of reference date | Transmitted order value (1 April 2025 to 31 December 2025) (€) | Total number of transmitted orders (1 April 2025 to 31 December 2025) (€) |
|--------------------------------|--|--|---|
| | | | |

Note:

¹⁾ 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.

8.5.

For each of the categories listed below, state the number of clients on whose behalf your institution receives and transmits orders for crypto-assets, as well as the transmitted order value and the total number of transmitted orders.

If not applicable, please enter '0'.

| Category | Number of clients as of reference date | Transmitted order value (1 April 2025 to 31 December 2025) (€) | Total number of transmitted orders (1 April 2025 to 31 December 2025) (€) |
|---|--|--|---|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | | |
| Family offices ³ | | | |
| High-net worth individuals ⁴ | | | |

Note:

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

²⁾ 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 and Customs Administration.

³⁾ Entities that manage assets on behalf of one or more families.

⁴⁾ This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

8.6.1.

Please indicate how many of your clients on whose behalf your institution receives and transmits orders for crypto-assets are active in the following sectors/activities.

If not applicable, please enter '0'.

| Sector | Number of clients as of reference date | Transmitted order value (1 April 2025 to 31 December 2025) (€) | Total number of transmitted orders (1 April 2025 to 31 December 2025) (€) |
|--|---|---|--|
| Crypto | | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | | |
| Weapons/arms trade | | | |

8.6.2.

Which other sectors or activities in which (some of) your clients on whose behalf your institution receives and transmits orders for crypto-assets are active in do you consider to be sectors or activities with a higher risk of money laundering or financing of terrorism?

| Sector(s)/activity |
|--------------------|
| |



9. Providing portfolio management of crypto-assets

Please answer these questions for the clients for whom your institution provides portfolio management of crypto-assets, as referred to in article 3(1)(25) MiCAR.

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 which the establishment provides portfolio management of crypto-assets.

The reference date for these questions is 31 December 2025.

9.1.

Your institution provides portfolio management of crypto-assets in the period from 1 April 2025 through 31 December 2025. Please indicate which three crypto-assets have the largest exposure within this service, based on value in euros.

9.2.

Enter the requested information for whom your institution provided portfolio management of crypto-assets.

| | Number of clients as of reference date | Total value portfolios as of reference date (€)¹ | Executed order value (1 April 2025 to 31 December 2025) (€)² |
|---|---|--|--|
| Natural persons | | | |
| Legal persons and/or other legal entities and/or legal structures | | | |
| Sum total | | | |

Note:

¹) This concerns the total value of the client portfolios that your institution manages in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more crypto-assets

²) This concerns the value of orders that have been executed as part of the portfolio management of crypto-assets.

9.3.1.

Enter the requested information with respect to your clients residing/established in the Netherlands for whom your institution provides portfolio management of crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands as of reference date | Total value portfolios as of reference date (€)¹ | Executed order value (1 April 2025 to 31 December 2025) (€)² |
|---------------------------------------|---|--|--|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ³ | | | |
| Not (or not yet) classified | | | |

Note:

¹) This concerns the total value of the client portfolios that your institution manages in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more crypto-assets

²) This concerns the value of orders that have been executed as part of the portfolio management of crypto-assets.

³) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

9.3.2.

Enter the requested information with respect to your client not residing/established in the Netherlands for whom your institution provides portfolio management of crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands as of reference date | Total value portfolios as of reference date (€)¹ | Executed order value (1 April 2025 to 31 December 2025) (€)² |
|---------------------------------------|---|--|--|
| Low risk | | | |
| Medium risk | | | |
| High risk | | | |
| Unacceptable risk ³ | | | |
| Not (or not yet) classified | | | |

Note:

¹) This concerns the total value of the client portfolios that your institution manages in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more crypto-assets

²) This concerns the value of orders that have been executed as part of the portfolio management of crypto-assets.

³) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

9.4.1.

Do you have any clients residing or established outside of an EEA country/territory for whom your institution provides portfolio management of crypto-assets?¹

- Yes
- No

Note:

¹ 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.

9.4.2.

For each country/territory outside of the EEA, state the total number of clients for whom your institution provides portfolio management of crypto-assets.

| Country/territory ¹ | Number of clients residing/established outside of the EEA as of reference date | Total value portfolios as of reference date (€) ² | Executed order value (1 April 2025 to 31 December 2025) (€) ³ |
|--------------------------------|--|--|--|
| | | | |

Note:

- ¹ 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.
- ² This concerns the total value of the client portfolios that your institution manages in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more crypto-assets.
- ³ This concerns the value of orders that have been executed as part of the portfolio management of crypto-assets.

9.5.

For each of the categories listed below, state the number of clients for whom your institution provides portfolio management of crypto-assets.

If not applicable, please enter '0'.

| Category | Number of clients |
|---|-------------------|
| Portfolio exceeding €5,000,000 and less than or equal to €50,000,000. | |
| Portfolio exceeding € 50,000,000 | |

9.6.

For each of the categories listed below, state the number of clients for whom your institution provides portfolio management of crypto-assets.

| Category | Number of clients as of reference date | Total value portfolios as of reference date (€) ⁵ | Executed order value (1 April 2025 to 31 December 2025) (€) ⁶ |
|---|--|--|--|
| Non-profit organisations (NPOs) ¹ and public benefit organisations (PBOs) ² | | | |
| Family offices ³ | | | |
| High-net worth individuals ⁴ | | | |

Note:

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

²) 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 and Customs Administration.

³) Entities that manage assets on behalf of one or more families.

⁴) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

⁵) This concerns the total value of the client portfolios that your institution manages in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more crypto-assets

⁶) This concerns the value of orders that have been executed as part of the portfolio management of crypto-assets.

9.7.1.

Please indicate how many of your clients for whom your institution provides portfolio management of crypto-assets are active in the following sectors/activities.

If not applicable, please enter '0'.

| Sector | Number of clients | Total value portfolios as of reference date (€) ¹ | Executed order value (1 April 2025 to 31 December 2025) (€) ² |
|--|-------------------|--|--|
| Crypto | | | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | | | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | | | |
| Weapons/arms trade | | | |

Note:

¹) This concerns the total value of the client portfolios that your institution manages in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more crypto-assets

²) This concerns the value of orders that have been executed as part of the portfolio management of crypto-assets.

9.7.2.

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

| Sector(s)/activity |
|--------------------|
| |



10. Providing transfer services for crypto-assets

Please answer these questions for the clients on whose behalf your institution provides transfer services for crypto-assets, as referred to in article 3(1)(26) MiCAR.

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 on whose behalf the establishment provides transfer services for crypto-assets.

The reference date for these questions is 31 December 2025.

10.1.

Enter the requested information for the clients on whose behalf your institution provides transfer services for crypto-assets.

| | Number of clients |
|---|--------------------------|
| Natural persons | |
| Legal persons and/or other legal entities and/or legal structures | |
| Sum total | |

10.2.1.

Enter the requested information with respect to your clients residing/established in the Netherlands on whose behalf your institution provides transfer services for crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients residing/established in the Netherlands |
|---------------------------------------|--|
| Low risk | |
| Medium risk | |
| High risk | |
| Unacceptable risk ¹ | |
| Not (or not yet) classified | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, in case the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

10.2.2.

Enter the requested information with respect to your clients not residing/established in the Netherlands on whose behalf your institution provides transfer services for crypto-assets.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. If your firm uses different names for the risk classifications, the AFM requests you to enter the number of clients at the category that matches the situation of your clients best.

If not applicable, please enter '0'.

| Risk classification of clients | Number of clients not residing/established in the Netherlands |
|--------------------------------|---|
| Low risk | |
| Medium risk | |
| High risk | |
| Unacceptable risk ¹ | |
| Not (or not yet) classified | |

Note:

¹) It can occur that a client is assigned an unacceptable risk classification by your firm. For example, if the client does no longer fall within your firm's risk appetite, while the termination of the business relationship (offboarding) has not yet taken place. If these clients are classified differently in your firm's systems (for example as high-risk), please only enter these clients under 'unacceptable risk' when answering this question.

10.3.1.

Do you have any clients residing or established outside of an EEA country/territory on whose behalf your institution provides transfer services for crypto-assets?¹

- Yes
 No

Note:

¹) 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 country/territory outside of the EEA, state the total number of clients on whose behalf your institution provides transfer services for crypto-assets.

| Country/territory ¹ | Number of clients residing/established outside of the EEA |
|--------------------------------|---|
| | |

Note:

¹) 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 categories listed below, state the number of clients on whose behalf your institution provides transfer services for crypto-assets.

If not applicable, please enter '0'.

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

Note:

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

²) 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 and Customs Administration.

³) Entities that manage assets on behalf of one or more families.

⁴) This refers to natural persons with investable assets exceeding €2.5 million. If your client is a personal holding company of a high-net-worth individual, you are requested to include this client as well.

10.5.1.

Please indicate how many of your clients on whose behalf your institution provides transfer services for crypto-assets are active in the following sectors/activities.

If not applicable, please enter '0'.

| Sector | Total number of clients per sector |
|--|------------------------------------|
| Crypto | |
| Cash-intensive retail business (phone shops, florists, hospitality, massage shops, beauty and personal care, sun tanning salons, etc.) | |
| Charitable organisations 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 development (in the Netherlands and/or abroad) | |
| Weapons/arms trade | |

10.5.2.

Which other sectors or activities in which (some of) your clients on whose behalf your institution provides transfer services for crypto-assets are active in do you consider to be sectors or activities with a higher risk of money laundering or financing of terrorism?

| Sector(s)/activity |
|--------------------|
| |

Concluding remarks

You have reached the end of part 2 of the questionnaire. Do you have any comments you would like to make in relation to this questionnaire?¹

| Question number | Remarks |
|-----------------|---------|
| Number/general | |

Note:

¹) 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.



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