

Brussels, 9 March 2021

Annex 3 to circular NBB_2021_07

Periodic questionnaire on combating money laundering and terrorist financing

Scope

- *all stockbroking firms, including EU and non-EU branches;*

1. General information			
Company name:		1.1.	[FREE TEXT]
Address of registered office (or address of the branch):		1.2.	[FREE TEXT]
CBE number:		1.3.	[FREE TEXT]
Member of the statutory governing body (or, where appropriate, the management committee) responsible at the highest level for proper compliance with the Belgian AML/CFT legislation:	Name:	1.4.	[FREE TEXT]
	Function:	1.5.	[FREE TEXT]
	Telephone number:	1.6.	[FREE TEXT]
	E-mail address:	1.7.	[FREE TEXT]
Compliance Officer:	Name:	1.8.	[FREE TEXT]
	Telephone number:	1.9.	[FREE TEXT]
	E-mail address:	1.10.	[FREE TEXT]
Person responsible for AML/CFT:	Name:	1.11.	[FREE TEXT]
	Telephone number:	1.12.	[FREE TEXT]
	E-mail address:	1.13.	[FREE TEXT]

2. Organisation of your institution regarding the activities performed in Belgium			
Total number of employees, expressed in FTEs, working for your institution (only in relation to the activities performed in Belgium):		2.1.	[Not available] or [Number]
Number of employees, expressed in FTEs, who work in your institution's compliance function and who are responsible for the activities performed in Belgium (if the tasks of the compliance function have been (partially) outsourced, please include the FTEs employed by the internal and/or external service provider(s)):		2.2.	[Not available] or [Number]
Number of FTEs referred to in the previous question who are tasked with AML/CFT in the compliance function (only in relation to the activities performed in Belgium):		2.3.	[Not available] or [Number]
Number of employees working in the internal audit function (if the tasks of the internal audit function have been (partially) outsourced, please include the FTEs employed by the internal and/or external service provider(s)) (only for the activities performed in Belgium):		2.4.	[Not available] or [Number]

3. General remarks on the answers submitted by the institutions

As indicated in the methodology established by the Bank for answering this questionnaire (see circular), institutions should, for each of the questions included in this questionnaire, choose the answer option that is best suited to their internal organisation. The Bank acknowledges that the answer options defined by it do not always fully capture the actual situation within each institution. When choosing from the answer options available, it is therefore important to select an option that is a true reflection of the actual situation within your institution and that can be justified later on. In the text box below, you can formulate general remarks (limited to 2,000 characters) on the answers submitted by your institution. Please note that these general remarks are not taken into account in the initial, automated analysis of your institution's answers.

General remarks (limited to 2,000 characters)	3.1.	[FREE TEXT LIMITED TO 2,000 CHARACTERS]
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4. Geographical presence

Number of subsidiaries of your institution holding the legal status of financial institution ¹ (foreign institutions ² should answer “0” (zero) to these questions):	in Belgium:	4.1.	[Not available] or [Number]
	within the EU (excluding Belgium):	4.2.	[Not available] or [Number]
	outside the EU (including in countries listed in Annex 1):	4.3.	[Not available] or [Number]
	in a country listed in Annex 1:	4.4.	[Not available] or [Number]
Number of branches of your institution (foreign institutions should answer “0” (zero) to these questions):	within the EU (excluding Belgium):	4.5.	[Not available] or [Number]
	outside the EU (including in countries listed in Annex 1):	4.6.	[Not available] or [Number]
	in a country listed in Annex 1:	4.7.	[Not available] or [Number]
Commercial network: Number of independent agents and/or own places of business which have a direct relationship with customers (including agencies) of your institution or branch in Belgium (foreign institutions should answer “0” (zero) to this question):		4.8.	[Not available] or [Number]
Number of active third-party business introducers (including banking and investment brokers) used by your institution or branch who regularly introduce new customers:	in Belgium:	4.9.	[Not available] or [Number]
	within the EU (excluding Belgium):	4.10.	[Not available] or [Number]
	outside the EU (including in countries listed in Annex 1):	4.11.	[Not available] or [Number]
	in a country listed in Annex 1:	4.12.	[Not available] or [Number]

¹ Credit institution, insurance company or other financial institution.

² Foreign institutions should be understood to mean branches and other forms of establishment in Belgium of a financial institution subject to the law of another Member State or of a third country.

5. Investment services and activities			
Please indicate which investment services and activities are effectively performed by your institution as at 31/12/2020, and indicate for each activity how important it is to your institution (activities for which your institution has received authorisation but which are not actually performed, need not be mentioned):	1. reception and transmission of orders in relation to one or more financial instruments, including bringing together two or more investors, thereby bringing about a transaction between those investors:	5.1.	- Important activity - Accessory activity - Activity not performed
	2. execution of orders on behalf of customers:	5.2.	- Important activity - Accessory activity - Activity not performed
	3. dealing on own account:	5.3.	- Important activity - Accessory activity - Activity not performed
	4. asset management:	5.4.	- Important activity - Accessory activity - Activity not performed
	5. investment advice:	5.5.	- Important activity - Accessory activity - Activity not performed
	6. underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis:	5.6.	- Important activity - Accessory activity - Activity not performed
	7. placing of financial instruments without a firm commitment basis:	5.7.	- Important activity - Accessory activity - Activity not performed
	8. operation of a multilateral trading facility:	5.8.	- Important activity - Accessory activity - Activity not performed

6. Ancillary services			
Please indicate which ancillary services are effectively performed by your institution as at 31/12/2020 (activities for which your institution has received authorisation but which are not actually performed, need not be mentioned):	1. safekeeping and administration of financial instruments on behalf of customers, including custodianship and related services such as cash/collateral management:	6.1.	[Yes] / [No]
	2. granting credit or loans to an investor enabling him to carry out a transaction in one or more financial instruments, where the institution granting the credit or loan is involved in the transaction:	6.2.	[Yes] / [No]
	3. advising companies on capital structure, industrial strategy and related matters, as well as providing advice and services relating to mergers and the purchase of companies:	6.3.	[Yes] / [No]
	4. foreign exchange services where these are connected to the provision of investment services:	6.4.	[Yes] / [No]
	5. investment research and financial analysis or other forms of general recommendations relating to transactions in financial instruments:	6.5.	[Yes] / [No]
	6. services related to the underwriting of financial instruments:	6.6.	[Yes] / [No]
	7. the above-mentioned investment services and activities as well as ancillary services related to the underlying value of the derivatives as referred to in Article 2, first paragraph, 1°, e), f), g) and j) of the Law of 2 August 2002 where these are connected to the provision of investment or ancillary services.	6.7.	[Yes] / [No]

7. Number of customers			
Total number of customers as at 31/12/2020:		7.1.	[Not available] or [Number]
Breakdown of the total number of customers (see question 7.1) according to their legal status:	number of natural persons:	7.2.	[Not available] or [Number]
	number of legal persons:	7.3.	[Not available] or [Number]
	number of trusts or other legal arrangements (without legal personality):	7.4.	[Not available] or [Number]
Breakdown of the total number of customers (see question 7.1) according to the relationship with the customer:	number of customers with whom a business relationship has been initiated:	7.5.	[Not available] or [Number]
	number of occasional customers:	7.6.	[Not available] or [Number]
Total number of new customers acquired in 2020:		7.7.	[Not available] or [Number]

8. Breakdown of customers by risk category	
Please provide a breakdown of your customers by risk category as at 31/12/2020 (if you use another breakdown, please fill in this information in a way that most closely approximates the 3 aforementioned categories):	

▪ Number of 'high-risk' customers:	8.1.	[Not available] or [Number]
▪ Number of 'standard-risk' customers:	8.2.	[Not available] or [Number]
▪ Number of 'low-risk' customers:	8.3.	[Not available] or [Number]
Please provide a further breakdown of the numbers submitted in questions 8.1, 8.2 and 8.3 with regard to occasional customers:		
▪ Number of occasional 'high-risk' customers:	8.4.	[Not available] or [Number]
▪ Number of occasional 'standard-risk' customers:	8.5.	[Not available] or [Number]
▪ Number of occasional 'low-risk' customers:	8.6.	[Not available] or [Number]

9. Geographical distribution of customers

Number of customers who are not domiciled in Belgium or whose registered office is not situated in Belgium as at 31/12/2020:	9.1.	[Not available] or [Number]
Number of customers as referred to in question 9.1 who are domiciled or have their registered office outside Belgium but within the EU:	9.2.	[Not available] or [Number]
Number of customers as referred to in question 9.1 who are domiciled or have their registered office outside Belgium and outside the EU:	9.3.	[Not available] or [Number]
Number of customers as referred to in question 9.1 who are domiciled or have their registered office in one of the countries included in Annex 1:	9.4.	[Not available] or [Number]

Please provide a further breakdown of the information requested in question 9.4 by country included in Annex 1. Please note that all customers domiciled or established in one of the United Arab Emirates (Abu Dhabi, Dubai, Sharjah, Ajman, Umm Al Quwain, Ras al-Khaimah and Fujairah) may be grouped under ISO code 784 (ARE - United Arab Emirates) in the table below.

9.5.	[AFG][004]	[NUMBER]	9.6.	[AGO][024]	[NUMBER]	9.7.	[ARG][032]	[NUMBER]	9.8.	[BLR][112]	[NUMBER]
9.9.	[BEN][204]	[NUMBER]	9.10.	[BOL][068]	[NUMBER]	9.11.	[BIH][070]	[NUMBER]	9.12.	[BFA][854]	[NUMBER]
9.13.	[BDI][108]	[NUMBER]	9.14.	[KHM][116]	[NUMBER]	9.15.	[CAF][140]	[NUMBER]	9.16.	[CHN][156]	[NUMBER]
9.17.	[COD][180]	[NUMBER]	9.18.	[DOM][214]	[NUMBER]	9.19.	[EGY][818]	[NUMBER]	9.20.	[ERI][232]	[NUMBER]
9.21.	[ETH][231]	[NUMBER]	9.22.	[GMB][270]	[NUMBER]	9.23.	[GIN][324]	[NUMBER]	9.24.	[GNB][624]	[NUMBER]
9.25.	[HTI][332]	[NUMBER]	9.26.	[IRQ][368]	[NUMBER]	9.27.	[IRN][364]	[NUMBER]	9.28.	[CIV][384]	[NUMBER]
9.29.	[YEM][887]	[NUMBER]	9.30.	[CPV][132]	[NUMBER]	9.31.	[KEN][404]	[NUMBER]	9.32.	[LAO][418]	[NUMBER]
9.33.	[LSO][426]	[NUMBER]	9.34.	[LBN][422]	[NUMBER]	9.35.	[LBR][430]	[NUMBER]	9.36.	[LBY][434]	[NUMBER]
9.37.	[MLI][466]	[NUMBER]	9.38.	[MHL][584]	[NUMBER]	9.39.	[MRT][478]	[NUMBER]	9.40.	[MDA][498]	[NUMBER]
9.41.	[MOZ][508]	[NUMBER]	9.42.	[MMR][104]	[NUMBER]	9.43.	[NAM][516]	[NUMBER]	9.44.	[NPL][524]	[NUMBER]
9.45.	[NER][562]	[NUMBER]	9.46.	[NGA][566]	[NUMBER]	9.47.	[PRK][408]	[NUMBER]	9.48.	[UKR][804]	[NUMBER]
9.49.	[PAK][586]	[NUMBER]	9.50.	[PAN][591]	[NUMBER]	9.51.	[PRY][600]	[NUMBER]	9.52.	[RUS][643]	[NUMBER]
9.53.	[RWA][646]	[NUMBER]	9.54.	[STP][678]	[NUMBER]	9.55.	[SLE][694]	[NUMBER]	9.56.	[SDN][736]	[NUMBER]

9.57.	[SOM][706]	[NUMBER]	9.58.	[LKA][144]	[NUMBER]	9.59.	[SYR][760]	[NUMBER]	9.60.	[TJK][762]	[NUMBER]
9.61.	[TZA][834]	[NUMBER]	9.62.	[THA][764]	[NUMBER]	9.63.	[TUN][788]	[NUMBER]	9.64.	[TUR][792]	[NUMBER]
9.65.	[UGA][800]	[NUMBER]	9.66.	[VUT][548]	[NUMBER]	9.67.	[VEN][862]	[NUMBER]	9.68.	[VNM][704]	[NUMBER]
9.69.	[ZMB][894]	[NUMBER]	9.70.	[ZWE][716]	[NUMBER]	9.71.	[SSD][728]	[NUMBER]	9.72.	[ARE][784]	[NUMBER]
9.73.	[AIA][660]	[NUMBER]	9.74.	[BHS][044]	[NUMBER]	9.75.	[BHR][048]	[NUMBER]	9.76.	[BMU][060]	[NUMBER]
9.77.	[VGB][092]	[NUMBER]	9.78.	[CYM][136]	[NUMBER]	9.79.	[GGY][831]	[NUMBER]	9.80.	[JEY][832]	[NUMBER]
9.81.	[IMN][833]	[NUMBER]	9.82.	[FSM][583]	[NUMBER]	9.83.	[MCO][492]	[NUMBER]	9.84.	[MNE][499]	[NUMBER]
9.85.	[NRU][520]	[NUMBER]	9.86.	[UZB][860]	[NUMBER]	9.87.	[PLW][585]	[NUMBER]	9.88.	[PCN][612]	[NUMBER]
9.89.	[BLM][652]	[NUMBER]	9.90.	[TKM][795]	[NUMBER]	9.91.	[TCA][796]	[NUMBER]	9.92.	[WLF][876]	[NUMBER]

10. Third party business introducers (including banking and investment brokers)

Please provide the total number of new customers introduced in 2020 by a third party business introducer:	10.1.	[Not available] or [Number]
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11. Remotely identified customers

The total number of customers identified remotely by your institution as at 31/12/2020:	11.1.	[Not available] or [Number]
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12. Customers receiving asset management services

<i>If your institution does not perform any asset management activities, your answer to the following questions should be 0 (zero).</i>		
Number of customers receiving asset management services domiciled in Belgium as at 31/12/2020:	12.1.	[Not available] or [Number]
Number of customers receiving asset management services domiciled outside Belgium as at 31/12/2020:	12.2.	[Not available] or [Number]
Number of customers receiving asset management services domiciled in one of the countries included in Annex 1 as at 31/12/2020:	12.3.	[Not available] or [Number]
What amount does your institution use as a threshold in order to determine whether customers are eligible for asset management (as at 31/12/2020)?	12.4.	[Number] / [Not applicable]

13. Numbered accounts

<i>Note: numbered accounts are accounts of which only the account number appears on bank statements and not the name of the customer. As a result, only a small number of persons within the financial institution know the name of the account holder and the customer is guaranteed a certain amount of anonymity. However, numbered accounts are not anonymous accounts (accounts of which the holder has not been identified by the institution). Such anonymous accounts are prohibited.</i>		
The total number of your customers that have numbered accounts or numbered contracts as at 31/12/2020:	13.1.	[Not available] or [Number]
The total number of your customers for whom your institution opened numbered accounts or with whom it concluded a numbered contract in 2020:	13.2.	[Not available] or [Number]

14. Politically exposed persons (PEPs)		
<i>Note: when calculating the number of PEPs, you should not only include the number of PEP customers, but also the number of PEP agents of your customers, the number of PEP ultimate beneficial owners of your customers and the number of PEP ultimate beneficial owners of your customers' agents.</i>		
Total number of PEPs in your customer base:	14.1.	[Not available] or [Number]
▪ Number of PEPs – customers (holders of products)	14.2.	[Not available] or [Number]
▪ Number of PEPs – customers' agents	14.3.	[Not available] or [Number]
▪ Number of PEPs – UBOs (of both customers and their agents, if the latter are legal persons or other legal arrangements)	14.4.	[Not available] or [Number]
Number of PEPs domiciled outside Belgium:	14.5.	[Not available] or [Number]
Number of PEPs domiciled in one of the countries included in Annex 1:	14.6.	[Not available] or [Number]

15. Ultimate beneficial owners (UBOs)		
Please provide the following information regarding the ultimate beneficial owners of your customers (as at 31/12/2020):		
▪ Number of UBOs domiciled outside Belgium:	15.1.	[Not available] or [Number]
▪ Number of UBOs domiciled in one of the countries included in Annex 1:	15.2.	[Not available] or [Number]

16. Rejected customers		
Please provide the total number of persons or entities that fitted into your institution's customer acceptance policy but were rejected by your institution for AML/CFT-related reasons in 2020:	16.1.	[Not available] or [Number]

17. Customer onboarding and transactions		
<i>Note: Please indicate whether your institution uses the following distribution methods and specify the importance of each distribution method used:</i>		
A. [question deleted]	17.1.	- Important distribution method - Less important distribution method - Unused distribution method
B. Customer onboarding occurs through face-to-face contact with a staff member/authorised representative of your institution (main office, independent agent/own employee, regional sales team, customer relationship manager) but subsequent transactions are performed through non-face-to-face channels (internet, (mobile) phone, etc.)	17.2.	- Important distribution method - Less important distribution method - Unused distribution method

C. Both customer onboarding and subsequent transactions are performed through non-face-to-face contact (online sales, etc.)	17.3.	<ul style="list-style-type: none"> - Important distribution method - Less important distribution method - Unused distribution method
D. Outsourcing / Brokers – Customer onboarding and subsequent customer relationship management are performed by external service providers (e.g. insurance brokers) or by entities related to the group, in accordance with your institution’s AML/CFT policies and procedures.	17.4.	<ul style="list-style-type: none"> - Important distribution method - Less important distribution method - Unused distribution method

18. Status of the financial instruments balance

Please provide below – for the last completed financial year – the information (expressed in euro) from section XXX of the annex to the Royal Decree of 23 September 1992 on the annual accounts of credit institutions, investment firms and collective investment management companies:

1. Total financial instruments to be received by the institution on behalf of customers:	18.1.	[Not available] or [Number]
2. Total financial instruments to be delivered by the institution to customers:	18.2.	[Not available] or [Number]
3. Total financial instruments of customers deposited with the institution:	18.3.	[Not available] or [Number]
4. Total financial instruments of customers deposited by the institution:	18.4.	[Not available] or [Number]
5. Total financial instruments of customers received as collateral by the institution:	18.5.	[Not available] or [Number]
6. Total financial instruments of customers given as collateral by the institution:	18.6.	[Not available] or [Number]

19. Transactions

Please provide the number of payments (and the corresponding amount) received by your institution in 2020 from (or on behalf of) customers. This covers all incoming payments: payments for fees or commissions, payments to your institution for the purchase of financial instruments, repayments of the credit granted by your institution, payments for the purchase of foreign exchange, etc.).

▪ Number of payments received:	19.1.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	19.2.	[Not available] or [Number]
Please provide the number and the total amount of the transactions as referred to in question 19.1 that were paid from a foreign bank account or other type of account (from a country other than Belgium):		
▪ Number of payments received:	19.3.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	19.4.	[Not available] or [Number]
Please provide the number and the total amount of the transactions as referred to in question 19.1 that were paid from a bank account or other type of account from one of the countries included in Annex 1:		
▪ Number of payments received:	19.5.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	19.6.	[Not available] or [Number]

Please provide the number of payments (and the corresponding amount) made by your institution in 2020 to (or on behalf of) customers. This covers all outgoing payments: disbursement of proceeds from the sale of financial instruments, the disbursed countervalue of foreign exchange transactions, payments of credit granted, etc.).		
▪ Number of disbursements:	19.7.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	19.8.	[Not available] or [Number]
Please provide the number of outgoing payments and the total amount of the transactions as referred to in question 19.7 that were paid to a foreign bank account or other type of account:		
▪ Number of disbursements:	19.9.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	19.10.	[Not available] or [Number]
Please provide the number of outgoing payments and the total amount of the transactions as referred to in question 19.7 that were paid to a bank account or other type of account from one of the countries included in Annex 1:		
▪ Number of disbursements:	19.11.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	19.12.	[Not available] or [Number]

20. Manual foreign exchange activities

If your institution does not perform any manual foreign exchange activities, your answer to the following questions should be 0 (zero).

Please provide the number of manual foreign exchange transactions performed by your institution in 2020, as well as the corresponding amount:		
▪ Number:	20.1.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	20.2.	[Not available] or [Number]
Please provide the number of manual foreign exchange transactions for which your institution purchased or sold gold or other precious metals from or to customers in 2020, as well as the corresponding amount:		
▪ Number:	20.3.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	20.4.	[Not available] or [Number]

21. Crowdfunding, crowdlending and/or crowd equity investment

Does your institution provide services related to crowdfunding, crowdlending and/or crowd equity investment projects?	21.1.	[YES] / [NO]
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22. Asset management		
<i>If your institution does not provide this service, your answer to each question in this chapter should be 0 (zero).</i>		
What is the total volume (expressed in euro) of the assets held by your institution as at 31/12/2020 on behalf of customers in the context of asset management services?	22.1.	[Not available] or [Number]
What is the total volume (expressed in euro) of new assets that have been attracted by your institution in 2020 on behalf of customers in the context of asset management services?	22.2.	[Not available] or [Number]
23. Transactions with occasional customers		
Number of transactions amounting to 3,000 euro or more performed by your institution for occasional customers in 2020:	23.1.	[Not available] or [Number]
Please provide the number of transactions (and the total corresponding amount) that were performed by your institution for occasional customers in 2020 and which involved one of the countries included in Annex 1 (e.g. transfers to a bank account from a country included in Annex 1):		
▪ Number of transactions:	23.2.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	23.3.	[Not available] or [Number]
24. Payments by and/or to third parties		
Do your institution's procedures impose restrictions or conditions on payments by and/or to third parties? - Example: payments by third parties are excluded, and customers may only make payments to your institution (e.g. for the purchase of financial instruments) from an account held in their name with another institution. - Example: customers may only deposit the proceeds of the sale of their financial instruments on an account held in their name with another institution. Transfers of funds to accounts belonging to third parties are prohibited or are only possible in exceptional circumstances (e.g. to notaries, to children of customers and/or to other third parties that are known or have already been identified by your institution).	24.1.	[YES] / [NO]
If you answered 'yes' to the previous question, does your institution take concrete verification measures to ensure that incoming or outgoing payments are only received from or made to accounts held in the name of your customers? (e.g. by verifying whether the account numbers from or to which the payments are made, correspond with the accounts provided by your customers, possibly on a sample basis)	24.2.	[Yes] / [No] / [Not applicable]
25. Cash		
Do your institution's internal procedures allow customers to use cash (coins and notes) in order to purchase financial instruments, to pay for commissions, etc.? This does not include the use of cash for the foreign exchange services as referred to in chapter 20.	25.1.	[YES] / [NO]

Please provide the total amount of the cash funds (coins and notes) as referred to in the previous question received by your institution from customers in 2020. If your institution prohibits the use of cash, your answer should be 0 (zero).	25.2.	[Not available] or [Number]
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26. Significant deposits

Please provide the number of incoming payments (transfers of funds and/or cash) amounting to 200,000 euro or more that were made to your institution by (or on behalf of) your customers, as well as the total amount of these payments.

▪ Number:	26.1.	[Not available] or [Number]
▪ Total amount (expressed in euro):	26.2.	[Not available] or [Number]

27. Significant disbursements

Please provide the number of outgoing payments (transfers of funds and/or cash) amounting to 200,000 euro or more that were made by your institution to (or on behalf of) customers, as well as the total amount of these payments.

▪ Number of payments:	27.1.	[Not available] or [Number]
▪ Total amount (expressed in euro):	27.2.	[Not available] or [Number]

28. Analysis of atypical transactions

How many atypical transactions for which an internal report was transmitted to the person responsible for AML/CFT were detected by your institution in 2020?

28.1. [Not available] or [Number]

How many of the atypical transactions as referred to in question 28.1 were detected (i) by staff members who are in direct contact with customers, and how many (ii) by your institution's automated monitoring tool?

▪ Number detected by staff members who are in direct contact with customers:	28.2.	[Not available] or [Number]
▪ Number detected by the automated monitoring tool:	28.3.	[Not available] or [Number]
How many of the reports as referred to in question 28.1 pertained to transactions in cash (coins and notes)?	28.4.	[Not available] or [Number]

29. Notification of suspicious transactions to the Financial Intelligence Processing Unit (CTIF-CFI)

Over the course of 2020, how many notifications of suspicious transactions did your institution submit to the Financial Intelligence Processing Unit (CTIF-CFI), and what was the total amount of the transactions covered by these notifications?

▪ Number:	29.1.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	29.2.	[Not available] or [Number]

30. Funds and asset freezing		
Over the course of 2020, how many warnings were handled by your institution in relation to the implementation of financial embargoes and asset freezing orders? <i>Note: 'warnings' should be understood to mean all possible correspondence with the lists of sanctions or embargoes: both the warnings generated by your institution's automatic screening tools and the warnings detected by first-line monitoring (in case of manual screening against the lists).</i>	30.1.	[Not available] or [Number]
Over the course of 2020, how many notifications for asset freezing were sent by your institution to the FPS Finance – Treasury, and what was the total amount of the assets? <i>Note: the term 'number of notifications' comprises any natural or legal person concerned by a notification to the Treasury as well as any subsequent notification concerning the same natural or legal person.</i>		
▪ Number:	30.2.	[Not available] or [Number]
▪ Corresponding amount (expressed in euro):	30.3.	[Not available] or [Number]
31. Termination of the business relationship or adoption of restrictive measures for AML/CFT-related reasons		
Over the course of 2020, how many business relationships with customers were terminated by your institution for AML/CFT-related reasons?	31.1.	[Not available] or [Number]
If your institution could not terminate the business relationship because of legal provisions of public policy or mandatory legal provisions, or if the termination of the business relationship would cause severe and disproportionate damage to your customer, for how many of your business relationships did your institution take other restrictive measures in 2020?	31.2.	[Not available] or [Number]
How many of the terminations as referred to in question 31.1 and the other restrictive measures as referred to in question 31.2 regarding business relationships with customers were the subject of a notification to the Financial Intelligence Processing Unit (CTIF-CFI) (notifications before as well as after the termination or the adoption of restrictive measures):	31.3.	[Not available] or [Number]
32. Overall risk assessment		
Did your institution perform an overall risk assessment during which it identified and assessed the AML/CFT risks to which it is exposed?	32.1.	[Yes] / [No] / [Not applicable]
Has this overall risk assessment been laid down in writing (on paper or electronically) and documented?	32.2.	[Yes] / [No] / [Not applicable]
Does your institution's overall risk assessment identify and assess:		
▪ the risks related to money laundering?	32.3.	[Yes] / [No] / [Not applicable]
▪ the risks related to terrorist financing?	32.4.	[Yes] / [No] / [Not applicable]
▪ the risks related to providing services and/or performing transactions that are subject to financial sanctions, embargoes and/or other restrictive measures?	32.5.	[Yes] / [No] / [Not applicable]

Was the overall risk assessment conducted taking into account:		
▪ the risks related to your institution’s customers?	32.6.	[Yes] / [No] / [Not applicable]
▪ the risks related to the products and services offered by your institution?	32.7.	[Yes] / [No] / [Not applicable]
▪ the risks related to specific countries or geographical areas?	32.8.	[Yes] / [No] / [Not applicable]
▪ the risks related to the distribution channels used by your institution?	32.9.	[Yes] / [No] / [Not applicable]
Was this overall risk assessment drawn up under the responsibility of the person responsible for AML/CFT in your institution?	32.10.	[Yes] / [No] / [Not applicable]
Was this overall risk assessment approved by the senior management of your institution?	32.11.	[Yes] / [No] / [Not applicable]
When was the overall risk assessment of your institution last performed or updated?	32.12.	- Less than 1 year ago - Between 1 and 2 years ago - More than 2 years ago - Never before - Not applicable
Do your institution’s internal procedures provide for a regular update of the overall risk assessment, or at least for a periodic assessment verifying that its overall risk assessment is still complete and up to date?	32.13.	[Yes] / [No] / [Not applicable]
How often does your institution’s overall risk assessment have to be redone, updated or assessed for completeness?	32.14.	- Twice a year - Once a year - Less than once a year - Not applicable
Please indicate whether your institution’s overall risk assessment also includes the following:		
▪ a description of the risk management measures taken by your institution to manage the risks identified?	32.15.	[Yes] / [No] / [Not applicable]
▪ a description and assessment of the residual risk that your institution is prepared to accept?	32.16.	[Yes] / [No] / [Not applicable]
Does your institution have a written document (on paper or in electronic form) explicitly stating how the overall risk assessment was taken into account for the elaboration of the concrete internal control measures and/or procedures of your institution?	32.17.	[Yes] / [No] / [Not applicable]
If your institution is a parent company of a group, or if it has one or more physical establishments (subsidiaries, branches or established agents) abroad, does your institution’s overall risk assessment pertain to: <i>Note: if your institution is not a parent company and/or does not have physical establishments abroad, your answer to these questions should be ‘not applicable’.</i>		
▪ the risks related to the activities of the Belgian parent company?	32.18.	[Yes] / [No] / [Not applicable]
▪ the risks related to the activities of the group in its entirety and of the physical establishments abroad?	32.19.	[Yes] / [No] / [Not applicable]

33. Guidelines, internal control measures and internal procedures		
Please indicate for each of the following subjects whether your institution has appropriate written guidelines, internal control measures and/or internal procedures:		
▪ the identification and verification of customers, their agents and their ultimate beneficial owners:	33.1.	[Yes] / [No] / [Not applicable]
▪ the identification of the customer’s characteristics and of the purpose and nature of the business relationship or of the intended occasional transaction:	33.2.	[Yes] / [No] / [Not applicable]
▪ customer acceptance policy:	33.3.	[Yes] / [No] / [Not applicable]
▪ the periodic customer survey (verification and update of available information)/client review:	33.4.	[Yes] / [No] / [Not applicable]
▪ due diligence with regard to customers and transactions:	33.5.	[Yes] / [No] / [Not applicable]
▪ the internal notification of atypical transactions to the person responsible for AML/CFT:	33.6.	[Yes] / [No] / [Not applicable]
▪ the notification of transactions that are known or suspected to be related to ML/FT to the Financial Intelligence Processing Unit (CTIF-CFI):	33.7.	[Yes] / [No] / [Not applicable]
▪ compliance with the mandatory provisions on financial sanctions and embargoes and other restrictive measures:	33.8.	[Yes] / [No] / [Not applicable]
▪ the recruitment or appointment of staff members or the designation of agents or distributors, and the monitoring of their appropriate reliability:	33.9.	[Yes] / [No] / [Not applicable]
▪ the outsourcing of the functions, checks or other tasks that are relevant for proper compliance with the Belgian AML/CFT regulations:	33.10.	[Yes] / [No] / [Not applicable]

34. Self-assessment						
<i>Please indicate for each of the following subjects:</i>						
<i>i. whether you believe that your institution’s internal procedures are completely, mostly, partially or insufficiently in accordance with the relevant legal and regulatory requirements, and,</i> <i>ii. whether you believe that these procedures are effectively implemented in your institution in a completely, mostly, partially or insufficiently satisfactory manner.</i>						
		<table border="1"> <thead> <tr> <th>i. Compliance of procedures with the Belgian AML/CFT regulations</th> <th>ii. Effectiveness of the implementation</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> - Completely - Mostly - Partially - Insufficient - Not applicable </td> <td> <ul style="list-style-type: none"> - Completely - Mostly - Partially - Insufficient - Not applicable </td> </tr> </tbody> </table>	i. Compliance of procedures with the Belgian AML/CFT regulations	ii. Effectiveness of the implementation	<ul style="list-style-type: none"> - Completely - Mostly - Partially - Insufficient - Not applicable 	<ul style="list-style-type: none"> - Completely - Mostly - Partially - Insufficient - Not applicable
i. Compliance of procedures with the Belgian AML/CFT regulations	ii. Effectiveness of the implementation					
<ul style="list-style-type: none"> - Completely - Mostly - Partially - Insufficient - Not applicable 	<ul style="list-style-type: none"> - Completely - Mostly - Partially - Insufficient - Not applicable 					
▪ identification of customers, agents, ultimate beneficial owners	34.1.					

▪ identification of the customer’s characteristics, the purpose and nature of the business relationship or of the intended occasional transaction	34.2.	“	“
▪ customer acceptance policy	34.3.	“	“
▪ ongoing due diligence	34.4.	“	“
▪ compliance with mandatory provisions on financial sanctions and embargoes and other restrictive measures	34.5.	“	“
▪ group policy (if your institution is not a parent company or does not have physical establishments abroad, your answer to this question should be ‘not applicable’)	34.6.	“	“

35. Internal audit

Does your institution have an independent internal audit function which tests your institution’s organisation in terms of AML/CFT (regardless of whether this function has been outsourced, and regardless of whether or not it is dependent on the mother company abroad if your institution is a branch or operates in Belgium through established agents)?	35.1.	[Yes] / [No] / [Not applicable]
Please answer the following questions pertaining to the activities of your institution’s internal audit function in terms of compliance with the Belgian AML/CFT regulations :		
▪ Is there a fixed schedule/cycle for performing audits with regard to proper compliance with the Belgian AML/CFT regulations?	35.2.	[Yes] / [No] / [Not applicable]
▪ When was the last time your internal audit function carried out activities relating to proper compliance with the Belgian AML/CFT regulations?	35.3.	- Less than 1 year ago - Between 1 and 2 years ago - More than 2 years ago - Never before - Not applicable
▪ What was the result of the audit referred to in the previous question?	35.4.	- Sufficient - Sufficient, with remarks - Insufficient - Not applicable
Please answer the following questions pertaining to the activities of your institution’s internal audit function in terms of compliance with the mandatory provisions on financial sanctions and embargoes and other restrictive measures :		
▪ Is there a fixed schedule/cycle for performing audits with regard to proper compliance with the Belgian financial sanctions and embargo regime?	35.5.	[Yes] / [No] / [Not applicable]
▪ When was the last time your internal audit function carried out activities relating to proper compliance with the Belgian financial sanctions and embargo regime?	35.6.	- Less than 1 year ago - Between 1 and 2 years ago - More than 2 years ago - Never before - Not applicable

<ul style="list-style-type: none"> What was the result of the audit referred to in the previous question? 	35.7.	<ul style="list-style-type: none"> Sufficient Sufficient, with remarks Insufficient Not applicable
Please indicate for each of the subjects below whether your institution's internal audit function carried out audit activities in the past calendar year relating to the proper implementation of the relevant Belgian legislation, and if so, the results thereof:		
<ul style="list-style-type: none"> Identification and identity verification (customers, agents, ultimate beneficial owners): 	35.8.	<ul style="list-style-type: none"> Sufficient Sufficient, with remarks Insufficient No activities were carried out Not applicable
<ul style="list-style-type: none"> Identification of politically exposed persons: 	35.9.	“
<ul style="list-style-type: none"> Identification of the customer's characteristics and of the purpose and nature of the business relationship or of the occasional transaction: 	35.10.	“
<ul style="list-style-type: none"> Customer acceptance policy: 	35.11.	“
<ul style="list-style-type: none"> Ongoing due diligence: 	35.12.	“
<ul style="list-style-type: none"> Periodic reassessment of customer risk (client review): 	35.13.	“
<ul style="list-style-type: none"> Compliance with the mandatory provisions on financial sanctions and embargoes and other restrictive measures: 	35.14.	“

36. Activities of the person responsible for AML/CFT

Does the compliance function and/or the person responsible for AML/CFT in your institution annually draw up a written action plan for monitoring and testing the institution's proper compliance with its policy, internal procedures and guidelines:

<ul style="list-style-type: none"> regarding compliance with the AML/CFT regulations? 	36.1.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> regarding compliance with the provisions on financial sanctions and embargoes and other restrictive measures? 	36.2.	[Yes] / [No] / [Not applicable]
Was the action plan drawn up for the calendar year 2020 fully implemented?	36.3.	[Yes] / [No] / [Not applicable]
Did the tests performed by the compliance officer and/or the person responsible for AML/CFT in 2020 reveal any major shortcomings and/or incidents:		
<ul style="list-style-type: none"> regarding compliance with the AML/CFT regulations? 	36.4.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> regarding compliance with the provisions on financial sanctions and embargoes and other restrictive measures? 	36.5.	[Yes] / [No] / [Not applicable]
Are the results of the audit activities carried out by the person responsible for AML/CFT documented (audit trail) and/or summarised in reports?	36.6.	[Yes] / [No] / [Not applicable]

Please indicate which documented supervisory and audit actions are applied by the compliance function and/or person responsible for AML/CFT in your institution when testing your institution's compliance with its policy, internal procedures and guidelines regarding the above matters:

▪ Supervision and audit using the audit results of your institution’s operational services:	36.7.	[Yes] / [No] / [Not applicable]
▪ Conducting and assessing random checks in-house (e.g. monitoring (i) the correct identification and verification of customers, agents, UBOs, (ii) the storing of identification documents, (iii) the collection of information on the nature and business profile of the customers, (iv) the performance of screenings related to the proper implementation of the financial sanctions and embargo regime, etc.):	36.8.	[Yes] / [No] / [Not applicable]
▪ Tracking and monitoring risk indicators such as the number of complaints and violations:	36.9.	[Yes] / [No] / [Not applicable]
▪ Observing the performance of transactions with and on behalf of customers:	36.10.	[Yes] / [No] / [Not applicable]
▪ Having conversations with employees:	36.11.	[Yes] / [No] / [Not applicable]
▪ Other:	36.12.	[Yes] / [No] / [Not applicable]

37. Employees, officers and agents + training

Has your institution established a procedure which stipulates how staff members, agents or distributors can notify shortcomings in fulfilling AML/CFT obligations or other AML/CFT-related incidents to the person responsible for AML/CFT anonymously and through a specific and independent channel?	37.1.	[Yes] / [No] / [Not applicable]
Did your institution in 2020 face severe integrity incidents involving employees (staff members, officers, agents, etc.) of your institution (fraud, deliberate involvement in money laundering or terrorist financing, severe violations of your institution’s internal AML/CFT procedures, etc.)?	37.2.	[Yes] / [No] / [Not applicable]
Does your institution have a training programme with regard to the Belgian AML/CFT regulations?	37.3.	[Yes] / [No] / [Not applicable]
Does your institution have a training programme with regard to compliance with the provisions on financial sanctions and embargoes and other restrictive measures?	37.4.	[Yes] / [No] / [Not applicable]
With regard to the above matters, is your institution’s training programme imposed on everyone in the institution equally, or is it differentiated according to the specific tasks of the staff and to the relevance of their tasks for the correct implementation of the above regulations by your institution?	37.5.	- Equally for everyone - Differentiated - Not applicable
Does your institution’s training programme allow employees, officers and/or agents to regularly refresh and/or update their knowledge of AML/CFT whenever needed (e.g. in case of new regulations, new products or activities, new procedures, regular (periodic) refreshing, etc.)?	37.6.	[Yes] / [No] / [Not applicable]

38. Identification and identity verification of customers, agents, ultimate beneficial owners		
Does your institution, before providing services, identify and verify the identity of the customers with whom a business relationship is initiated or for whom occasional transactions are performed for which identification is required by law? ³	38.1.	[Yes] / [No] / [Not applicable]
Does your institution identify and verify the identity of any agents of customers as referred to in the previous question before they use their powers of representation? ³	38.2.	[Yes] / [No] / [Not applicable]
Does your institution identify the ultimate beneficial owners of its customers before providing services to the latter? ³	38.3.	[Yes] / [No] / [Not applicable]
Do your institution's internal procedures stipulate the appropriate and risk-adapted measures to be taken to verify the identity of these ultimate beneficial owners (insight into the customer's ownership and control structure)?	38.4.	[Yes] / [No] / [Not applicable]
If the identity of the ultimate beneficial owners of your institution's customers could not be verified, do the customer files provide a justification in writing for the investigative measures implemented in the matter?	38.5.	[Yes] / [No] / [Not applicable]
Do your institution's procedures provide for the mandatory identification and identity verification of customers wishing to perform an occasional transaction:		
<ul style="list-style-type: none"> ▪ consisting of one or more transactions that appear to be linked and amount to 10,000 euro or more? 	38.6.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ consisting of one or more transfers of funds that appear to be linked and amount to 1,000 euro or more, or regardless of the amount if your institution received the funds concerned in cash or in the form of anonymous electronic money? 	38.7.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ whenever there is a suspicion of money laundering or terrorist financing, regardless of whether the transactions the occasional customer wishes to perform exceed the thresholds above? 	38.8.	[Yes] / [No] / [Not applicable]
Please answer the following questions relating to occasional customers who regularly and repeatedly call on your institution:		
<ul style="list-style-type: none"> ▪ are occasional customers who have not entered into a contractual relationship with your institution, but who regularly and repeatedly call on your institution to perform a number of distinct and consecutive financial transactions, considered customers with whom your institution has initiated a business relationship? 	38.9.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ do your institution's internal procedures specify the exact criteria that should be applied to determine when an occasional customer who regularly and repeatedly calls on your institution should be considered a customer with whom a business relationship has been initiated (e.g. by precisely stating the number of transactions a customer must have performed, possibly in a well-defined period)? 	38.10.	[Yes] / [No] / [Not applicable]
Do your institution's internal procedures specify the documents to be submitted by the customer or the other evidence to be collected by your institution that are necessary for verifying the customer's identity, taking into account the customer's risk classification?	38.11.	[Yes] / [No] / [Not applicable]
Does your institution make use of new or innovative technology in order to identify or verify the identity of its customers, their agents and/or their ultimate beneficial owners?	38.12.	[Yes] / [No] / [Not applicable]

³ If your institution makes use of the possibility provided for by law to delay customer identification temporarily, you may answer this question affirmatively if your institution performs the identification systematically and without exception before providing services in all other cases.

39. Identification of the customer's characteristics and of the purpose and nature of the business relationship or occasional transaction		
Do your institution's procedures provide that your institution, before the commencement of the service, gains insight into and collects information on the customer's characteristics and on the purpose and nature of the business relationship or intended occasional transaction?	39.1.	[Yes] / [No] / [Not applicable]
Are the insights gained and the information obtained, as referred to in the previous question, registered in writing (on paper or electronically) in the customer files?	39.2.	[Yes] / [No] / [Not applicable]
Are the insights gained and the information obtained, as referred to in the question above, used specifically by your institution for the implementation of its customer acceptance policy and its due diligence policy?	39.3.	[Yes] / [No] / [Not applicable]
In what manner does your institution, before the commencement of the service, collect information on the customer's characteristics and on the purpose and nature of the business relationship or occasional transaction?	39.4.	- Interview - Questionnaire - Combination of both - Other - Not applicable
Please indicate, for all your customers or, depending on the risk, only for a specific part of your customers, whether your institution collects the following information on customers' characteristics or on the purpose and nature of the business relationship initiated with them or the occasional transaction performed for them:		
▪ Information on the professional activities and on the level of professional income or turnover:	39.5.	[Yes] / [No] / [Not applicable]
▪ Information on any sources of income aside from the professional income:	39.6.	[Yes] / [No] / [Not applicable]
▪ Information on the origin of the funds held by your institution on behalf of the customer:	39.7.	[Yes] / [No] / [Not applicable]
▪ Information on the overall size of the customer's funds (including the funds not held by your institution):	39.8.	[Yes] / [No] / [Not applicable]
▪ Information on the expected frequency, the geographical distribution and/or the size of the transactions and cash flows:	39.9.	[Yes] / [No] / [Not applicable]
▪ Other:	39.10.	[Yes] / [No] / [Not applicable]
Are the risk profiles of your customers, including those with a low risk profile, regularly updated or possibly reassessed?	39.11.	[Yes] / [No] / [Not applicable]

40. Politically exposed persons (PEPs)		
Do your institution's procedures require it to determine, before the commencement of the service, whether or not one of the following persons is a PEP:		
▪ the customer:	40.1.	[Yes] / [No] / [Not applicable]
▪ the customer's family members:	40.2.	[Yes] / [No] / [Not applicable]
▪ the customer's close associates:	40.3.	[Yes] / [No] / [Not applicable]
▪ the customer's agents:	40.4.	[Yes] / [No] / [Not applicable]
▪ the customer's ultimate beneficial owners:	40.5.	[Yes] / [No] / [Not applicable]

<ul style="list-style-type: none"> ▪ the ultimate beneficial owners of the customer’s agents: 	40.6.	[Yes] / [No] / [Not applicable]
Do your institution’s procedures specify the measures to be taken in order to verify whether or not one of the persons referred to in questions 40.1 to 40.6 is a PEP?	40.7.	[Yes] / [No] / [Not applicable]
Please indicate for each of the following sources of information whether they are used by your institution to verify whether or not its customers should be designated as PEPs:		
<ul style="list-style-type: none"> ▪ information collected from the customer (e.g. a simple statement from the customer): 	40.8.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ internal lists: 	40.9.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ external lists or databases: 	40.10.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ other sources of information: 	40.11.	[Yes] / [No] / [Not applicable]
Are the methods referred to in question 40.7 for verifying whether or not a customer should be designated as a PEP applied to your institution’s customers equally, or in a differentiated manner according to the risk?	40.12.	<ul style="list-style-type: none"> - Equally - In a differentiated manner - Not applicable
Does your institution systematically and without exception maintain an audit trail of the actions taken by your institution to determine whether or not your customers (or one of their relationships) are PEPs?	40.13.	[Yes] / [No] / [Not applicable]
Do your institution’s procedures provide that the checks referred to in questions 40.1 to 40.6 should be repeated periodically for customers with whom your institution has initiated a business relationship?	40.14.	[Yes] / [No] / [Not applicable]
How often are the periodic checks referred to in the previous question performed?	40.15.	<ul style="list-style-type: none"> - At least once every month - At least quarterly - At least annually - Less than once a year - Not applicable

41. Customer acceptance policy

Does your institution, before the commencement of the service, assess the reputational risks associated with the profile and the nature of the business relationship or the intended transaction, taking into account the information collected on the customer and his relations (identification and identity verification, insight into the nature and purpose of the business relationship or occasional transaction, sanctions lists check, information on legal status of or ties with politically exposed persons, distribution channel used, nature of the product or service)?	41.1.	[Yes] / [No] / [Not applicable]
Does your institution’s customer acceptance policy apply to all customers in a differentiated manner, depending on whether customers wish to initiate a business relationship or perform an occasional transaction?	41.2.	[Yes] / [No] / [Not applicable]
Are the customers with whom your institution has initiated a business relationship classified in a risk category defined by your institution based on the assessment referred to in question 41.1?	41.3.	[Yes] / [No] / [Not applicable]

How many different risk categories did your institution define for the classification of customers?	41.4.	<ul style="list-style-type: none"> - 1 category - 2 or 3 categories - 4 to 10 categories - More than 10 categories - Not applicable
Do your institution's procedures specify the hierarchical level responsible for deciding on whether or not to accept a customer or perform a transaction, depending on and taking into account the risk assessment referred to in question 41.1?	41.5.	[Yes] / [No] / [Not applicable]

42. Due diligence – instructions for staff

Does your institution have written procedures and/or instructions for staff members who are in direct contact with customers or who are involved in performing or processing their transactions, and which		
<ul style="list-style-type: none"> ▪ should enable them to detect atypical transactions that they should pay special attention to? 	42.1.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ contain the procedure for drawing up and submitting written reports on atypical transactions to the person responsible for AML/CFT, including the time limits within which these reports should be submitted? 	42.2.	[Yes] / [No] / [Not applicable]

43. Due diligence regarding transactions

Does your institution draw up an expected transaction profile for every customer at the commencement of the service?	43.1.	[Yes] / [No] / [Not applicable]
In the context of transaction monitoring, does your institution verify whether a customer's transaction pattern aligns with the transaction profile drawn up for this customer?	43.2.	[Yes] / [No] / [Not applicable]
Are customers' transactions monitored in real-time, post-event or a combination of both?	43.3.	<ul style="list-style-type: none"> - Real-time - Post-event - Combination of both - Not applicable
Please indicate whether your institution's monitoring system meets the following conditions:		
<ul style="list-style-type: none"> ▪ is the system based on accurate and relevant criteria (scenarios) defined by your institution which primarily take into account the characteristics of the products and services offered, the characteristics of the customers, the characteristics of the relevant countries and geographical areas and the characteristics of the distribution channels used, and which are sufficiently sophisticated to effectively detect atypical transactions? 	43.4.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ are the criteria or scenarios referred to in the previous question regularly updated or assessed for efficiency? 	43.5.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ does the system apply to all accounts and to all transactions of regular and occasional customers? 	43.6.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ does it apply to securities transactions? 	43.6 bis	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ does it allow for a fast detection of atypical transactions? 	43.7.	[Yes] / [No] / [Not applicable]

<ul style="list-style-type: none"> ▪ does it generate written reports (on paper or in electronic form) that are delivered to the person responsible for AML/CFT, describing the atypical transactions that have been detected and indicating the criteria on the basis of which these transactions were designated as atypical? 	43.8.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ is it able to detect transactions linked to high-risk countries (FATF, EU sanctions countries, etc.)? 	43.9.	[Yes] / [No] / [Not applicable]
Is your institution's due diligence system for monitoring transactions (mostly) automated?	43.10.	[Yes] / [No] / [Not applicable]

44. Outsourcing

Has your institution outsourced tasks (within or outside the group) regarding compliance with the AML/CFT regulations or with the provisions pertaining to the financial sanctions and embargo regime?	44.1.	[Yes] / [No] / [Not applicable]
Did your institution and the party to which these tasks are outsourced (within or outside the group) conclude a written agreement stipulating mutual commitments, responsibilities and obligations?	44.2.	[Yes] / [No] / [Not applicable]
Has your institution defined a policy (process/cycle) for checking the quality of the outsourced tasks (within or outside the group)?	44.3.	[Yes] / [No] / [Not applicable]
When did your institution last perform a quality check of the tasks outsourced (within or outside the group)?	44.4.	<ul style="list-style-type: none"> - Less than 1 year ago - Between 1 and 2 years ago - More than 2 years ago - Never as yet - Not applicable
Did the quality check referred to in the previous question reveal any severe shortcomings?	44.5.	[Yes] / [No] / [Not applicable]
If you answered 'yes' to the previous question, did your institution take the measures necessary to remedy the shortcomings found?	44.6.	[Yes] / [No] / [Not applicable]

45. Implementation of financial sanctions and embargoes

Does your institution, before the commencement of the service, systematically and without exception verify whether the following persons appear on the Belgian or European sanctions lists:		
<ul style="list-style-type: none"> ▪ new customers of your institution: 	45.1.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ their agents: 	45.2.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the ultimate beneficial owners associated with customer relations (UBOs of customers, customers' agents, etc.): 	45.3.	[Yes] / [No] / [Not applicable]
Does your institution verify periodically, i.e. within a reasonable period after each update of the existing sanctions lists or after the publication of new sanctions lists, whether the following persons appear on the updated or new Belgian or European sanctions lists:		
<ul style="list-style-type: none"> ▪ the customers of your institution: 	45.4.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ their agents: 	45.5.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the ultimate beneficial owners associated with customer relations (UBOs of customers, customers' agents, etc.): 	45.6.	[Yes] / [No] / [Not applicable]

When performing or receiving <u>international</u> transfers of funds (payments from or to persons or entities outside Belgium) on behalf of your customers, does your institution verify whether the counterparties of these customers appear on the Belgian or European sanctions lists, or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match on these lists?	45.7.	[Yes] / [No] / [Not applicable]
When performing or receiving <u>national</u> transfers of funds (payments within Belgium) on behalf of your customers, does your institution verify whether the counterparties of these customers appear on the Belgian or European sanctions lists, or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match on these lists?	45.8.	[Yes] / [No] / [Not applicable]
When providing resources (e.g. in the context of payments, repayments, credit, etc.), does your institution verify whether a sanctioned party is potentially involved?	45.9.	[Yes] / [No] / [Not applicable]
Please indicate whether your institution performs the screenings as referred to in the questions above based on the following lists:		
- The European sanctions lists:	45.10.	[Yes] / [No] / [Not applicable]
- The Belgian sanctions lists:	45.11.	[Yes] / [No] / [Not applicable]
- The U.S. sanctions lists (OFAC):	45.12.	[Yes] / [No] / [Not applicable]
Please indicate below whether your institution uses an automated system (e.g. a software application), a manual system (e.g. a manual comparison of the customer database with the sanctions lists in place) or a combination of both for the aforementioned verifications:		
▪ the verifications referred to in questions 45.1 to 45.3:	45.13.	[Automated] / [Manual] / [Combination of both] / [Not applicable]
▪ the verifications referred to in questions 45.4 to 45.6:	45.14.	[Automated] / [Manual] / [Combination of both] / [Not applicable]
▪ the verifications referred to in question 45.7:	45.15.	[Automated] / [Manual] / [Combination of both] / [Not applicable]
▪ the verifications referred to in question 45.8:	45.16.	[Automated] / [Manual] / [Combination of both] / [Not applicable]
Does your institution have procedures clarifying how its staff members or officers should investigate possible matches between the information provided by customers and their relations (agents, UBOs and/or counterparties) and the Belgian and European sanctions lists, in order to be able to determine, based on this investigation, whether it is a false or genuine or positive match?	45.17.	[Yes] / [No] / [Not applicable]
Does your institution have procedures which clarify the course of action to be followed in your institution when one of your customers (or one of their relations) is found to effectively appear on the Belgian or European sanctions lists (positive match)? (e.g. procedure for freezing funds and/or assets, intervention by the appropriate hierarchical level, notification to the Minister of Finance, etc.)	45.18.	[Yes] / [No] / [Not applicable]

When investing funds, does your institution verify whether this potentially involves a sanctioned transaction or facilitates a sanctioned activity (embargoes or other restrictive measures)?	45.19.	[Yes] / [No] / [Not applicable]
When providing resources (e.g. in the context of payments, repayments, credit, etc.) does your institution verify whether this possibly involves a sanctioned transaction or facilitates a sanctioned activity (embargoes or other restrictive measures)?	45.20.	[Yes] / [No] / [Not applicable]
Does your institution systematically and without exception maintain an audit trail of the investigations and/or verifications referred to in the previous questions?	45.21.	[Yes] / [No] / [Not applicable]

46. Group policy

<p>If your institution is a subsidiary or branch that is part of a group of which the parent company is established in another EU Member State or in a third country, did your institution verify whether the AML/CFT policies and procedures imposed by the group comply with the Belgian legislation on the subject and, if they did not, did your institution take the additional measures necessary to guarantee that its policies and procedures are in accordance with the Belgian legislation?</p> <p><i>Note: If your institution is not part of a group or if your institution is itself a parent company of a group, your answer to this question should be 'not applicable'.</i></p>	46.1.	[Yes] / [No] / [Not applicable]
<p>If your institution is physically established in another EU Member State or in a third country (through one or more subsidiaries, branches or established agents or distributors), did your institution:</p> <p><i>Note: If your institution does not have any physical establishments abroad, your answer to the following questions should be 'not applicable'.</i></p>		
<ul style="list-style-type: none"> ▪ define a group policy based on an overall risk assessment for the entire group, taking into account the specific risks of each physical establishment? 	46.2.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ verify whether this group policy is in accordance with the local AML/CFT legislation of each establishment and, if not, did your institution take the additional measures necessary to guarantee the compliance of its policy and procedures with each local legislation? 	46.3.	[Yes] / [No] / [Not applicable]