

Brussels, 13 March 2024

Annex 1 to Circular NBB_2024_05

Periodic questionnaires on the prevention of money laundering and terrorist financing

Common questionnaire to be completed by all financial institutions falling within the scope of application of the circular

Scope of application

- *Credit institutions, including EU and non-EU branches*
- *Stockbroking firms, including EU and non-EU branches*
- *Insurance companies authorised to conduct life insurance business, including EU and non-EU branches*
- *Payment institutions and electronic money institutions, including EU and non-EU branches*
- *Payment institutions and electronic money institutions authorised in other member states of the European Economic Area and established in Belgium (through one or more agents and/or distributors)*
- *Settlement institutions, including EU and non-EU branches*

General information			
Name of institution:		R10.	[FREE TEXT]
Address of the registered office (or of the establishment):		R20.	[FREE TEXT]
CBE number:		R30.	[FREE TEXT]
Member of the statutory management body (or, where appropriate, the board of directors) responsible at the highest level for compliance with the Belgian AML/CFT legislation:	Name:	R40.	[FREE TEXT]
	Title:	R50.	[FREE TEXT]
	Telephone number:	R60.	[FREE TEXT]
	E-mail address:	R70.	[FREE TEXT]
Compliance officer:	Name:	R80.	[FREE TEXT]
	Telephone number:	R90.	[FREE TEXT]
	E-mail address:	R100.	[FREE TEXT]
Person responsible for AML/CFT:	Name:	R110.	[FREE TEXT]
	Telephone number:	R120.	[FREE TEXT]
	E-mail address:	R130.	[FREE TEXT]

Organisation of the institution for activities performed in Belgium		
Total number of employees, expressed in FTE, working for the institution (only for activities carried out in Belgium):	R140.	[Not available] or [Number]
Number of employees, expressed in FTE, working for the institution's compliance function and who are responsible for activities performed in Belgium (if the tasks of the compliance function have been (partially) outsourced, the number of FTE employed by the internal and/or external service provider(s) should be indicated):	R150.	[Not available] or [Number]
Number of FTE referred to in the previous question who are tasked with AML/CFT in the compliance function (only for activities carried out in Belgium):	R160.	[Not available] or [Number]
Number of employees working for the internal audit function (if the tasks of the internal audit function have been (partially) outsourced, please indicate the number of FTE employed by the internal and/or external service provider(s)) (only for activities carried out in Belgium):	R170.	[Not available] or [Number]

General remarks on the completion of questionnaires by institutions

As indicated in the methodology established by the Bank for answering these questionnaires (see the circular), institutions should, for each question, choose the option that best reflects their internal organisation. The Bank recognises that the options provided may not fully capture the situation within an institution. Therefore, when selecting from among the available options, it is important to choose the one that most accurately corresponds to the situation within your institution, so as to be able to subsequently justify this choice. General comments on the answers submitted on behalf of your institution can be left in the free text field below (limited to 2,000 characters). Please note that these comments will not be taken into account in the initial automated analysis of your institution’s answers.

Comments (limited to 2 000 characters)	R180.	[FREE TEXT, LIMITED TO 2 000 CHARACTERS]
--	-------	--

Geographical presence

Number of subsidiaries of your institution with the legal status of financial institution ¹ (foreign institutions ² should enter the number “0” in answer to these questions):	in Belgium:	R190.	[Not available] or [Number]
	within the EU (excluding Belgium):	R200.	[Not available] or [Number]
	outside the EU (including countries listed in Annex 6):	R210.	[Not available] or [Number]
	in a country listed in Annex 6:	R220.	[Not available] or [Number]
Number of branches of your institution (foreign institutions should enter the number “0” in answer to these questions):	within the EU (excluding Belgium):	R230.	[Not available] or [Number]
	outside the EU (including in a country listed in Annex 6):	R240.	[Not available] or [Number]
	in a country listed in Annex 6:	R250.	[Not available] or [Number]
Commercial network: number of independent agents and/or own places of business in direct contact with customers (including agencies) of your institution or branch in Belgium (foreign institutions should enter the number “0” in answer to this question):		R260.	[Not available] or [Number]
Number of active business introducers (including brokers and tied agents) who regularly refer customers to your institution or branch:	in Belgium:	R270.	[Not available] or [Number]
	within the EU (excluding Belgium):	R280.	[Not available] or [Number]
	outside the EU (including in a country listed in Annex 6):	R290.	[Not available] or [Number]
	in a country listed in Annex 6:	R300.	[Not available] or [Number]

¹ Credit institution, insurance company or other financial institution.

² Branches and other forms of establishment in Belgium of a financial institution subject to the law of another EU member state or of a third country.

Activities			
Which activities did your institution carry out on 31 December of the reporting year? Please specify for each whether it was an important or ancillary activity.	Banking and financing activities ³	R310.	- Important - Ancillary - Not applicable
	Investment and asset management services ⁴	R320.	- Important - Ancillary - Not applicable
	Payment services ⁵ and electronic money activities	R330.	- Important - Ancillary - Not applicable
	Life insurance products and services	R340.	- Important - Ancillary - Not applicable

Number of customers			
Total number of customers on 31 December of the reporting year:		R350.	[Not available] or [Number]
Breakdown of the total number of customers (see question R350) by legal status:	number of natural persons:	R360.	[Not available] or [Number]
	number of legal persons:	R370.	[Not available] or [Number]
	number of trusts or other legal arrangements (without legal personality):	R380.	[Not available] or [Number]
Breakdown of the total number of customers (see question R350) by type of relationship:	number of customers with a business relationship with your institution:	R390.	[Not available] or [Number]
	number of occasional customers:	R400.	[Not available] or [Number]
Total number of new customers acquired over the reporting year:		R410.	[Not available] or [Number]

³ This refers to the provision of products and services to both retail and professional customers, such as short- and medium/long-term loans (including mortgage loans), savings products, trade financing, etc., as well as correspondent banking activities and central securities custody services.

⁴ Investment services and activities refer to financial activities including, in particular, the acceptance and transmission of orders, the execution of orders on behalf of customers, proprietary trading, portfolio (or asset) management and the provision of investment advice.

⁵ Payment services refer to transactions related to the management of payment accounts, the execution of payment transactions, the issuance and acquisition of payment instruments, money remittance, as well as payment initiation and account information services.

Breakdown of customers by risk category

Please provide a breakdown of your customers by risk category as at 31 December of the reporting year. If you use another type of breakdown, please provide this information in a way that most closely approximates the three categories listed below.

▪ Number of “high-risk” customers:	R420.	[Not available] or [Number]
▪ Number of “medium-risk” customers:	R430.	[Not available] or [Number]
▪ Number of “low-risk” customers:	R440.	[Not available] or [Number]
Please provide a further breakdown of the figures requested in questions R420, R430 et R440 with regard to occasional customers. If your institution has no occasional customers, it should enter the number “0” in answer to these questions).		
▪ Number of occasional “high-risk” customers:	R450.	[Not available] or [Number]
▪ Number of occasional “medium-risk” customers:	R460.	[Not available] or [Number]
▪ Number of occasional “low-risk” customers:	R470.	[Not available] or [Number]

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 December of the reporting year:	R480.	[Not available] or [Number]
Number of customers who are domiciled or have their registered office outside Belgium but within the EU:	R490.	[Not available] or [Number]
Number of customers whose domicile or registered office is neither in Belgium nor elsewhere in the EU:	R500.	[Not available] or [Number]
Number of customers who are domiciled or have their registered office in a country listed in Annex 6:	R510.	[Not available] or [Number]

Please provide a further breakdown by country of the information requested in the preceding question. Note that all customers domiciled or established in 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.

R520.	[AFG][004]	[NUMBER]	R530.	[AGO][024]	[NUMBER]	R540.	[ARG][032]	[NUMBER]	R550.	[BLR][112]	[NUMBER]
R560.	[BEN][204]	[NUMBER]	R570.	[BOL][068]	[NUMBER]	R580.	[BIH][070]	[NUMBER]	R590.	[BFA][854]	[NUMBER]
R600.	[BDI][108]	[NUMBER]	R610.	[KHM][116]	[NUMBER]	R620.	[CAF][140]	[NUMBER]	R630.	[CHN][156]	[NUMBER]
R640.	[COD][180]	[NUMBER]	R650.	[DOM][214]	[NUMBER]	R660.	[EGY][818]	[NUMBER]	R670.	[ERI][232]	[NUMBER]
R680.	[ETH][231]	[NUMBER]	R690.	[GMB][270]	[NUMBER]	R700.	[GIN][324]	[NUMBER]	R710.	[GNB][624]	[NUMBER]
R720.	[HTI][332]	[NUMBER]	R730.	[IRQ][368]	[NUMBER]	R740.	[IRN][364]	[NUMBER]	R750.	[CIV][384]	[NUMBER]
R760.	[YEM][887]	[NUMBER]	R770.	[CPV][132]	[NUMBER]	R780.	[KEN][404]	[NUMBER]	R790.	[LAO][418]	[NUMBER]
R800.	[LSO][426]	[NUMBER]	R810.	[LBN][422]	[NUMBER]	R820.	[LBR][430]	[NUMBER]	R830.	[LBY][434]	[NUMBER]
R840.	[MLI][466]	[NUMBER]	R850.	[MHL][584]	[NUMBER]	R860.	[MRT][478]	[NUMBER]	R870.	[MDA][498]	[NUMBER]

R880.	[MOZ][508]	[NUMBER]	R890.	[MMR][104]	[NUMBER]	R900.	[NAM][516]	[NUMBER]	R910.	[NPL][524]	[NUMBER]
R920.	[NER][562]	[NUMBER]	R930.	[NGA][566]	[NUMBER]	R940.	[PRK][408]	[NUMBER]	R950.	[UKR][804]	[NUMBER]
R960.	[PAK][586]	[NUMBER]	R970.	[PAN][591]	[NUMBER]	R980.	[PRY][600]	[NUMBER]	R990.	[RUS][643]	[NUMBER]
R1000.	[RWA][646]	[NUMBER]	R1010.	[STP][678]	[NUMBER]	R1020.	[SLE][694]	[NUMBER]	R1030.	[SDN][736]	[NUMBER]
R1040.	[SOM][706]	[NUMBER]	R1050.	[LKA][144]	[NUMBER]	R1060.	[SYR][760]	[NUMBER]	R1070.	[TJK][762]	[NUMBER]
R1080.	[TZA][834]	[NUMBER]	R1090.	[THA][764]	[NUMBER]	R1100.	[TUN][788]	[NUMBER]	R1110.	[TUR][792]	[NUMBER]
R1120.	[UGA][800]	[NUMBER]	R1130.	[VUT][548]	[NUMBER]	R1140.	[VEN][862]	[NUMBER]	R1150.	[VNM][704]	[NUMBER]
R1160.	[ZMB][894]	[NUMBER]	R1170.	[ZWE][716]	[NUMBER]	R1180.	[SSD][728]	[NUMBER]	R1190.	[ARE][784]	[NUMBER]
R1200.	[AIA][660]	[NUMBER]	R1210.	[BHS][044]	[NUMBER]	R1220.	[BHR][048]	[NUMBER]	R1230.	[BMU][060]	[NUMBER]
R1240.	[VGB][092]	[NUMBER]	R1250.	[CYM][136]	[NUMBER]	R1260.	[GGY][831]	[NUMBER]	R1270.	[JEY][832]	[NUMBER]
R1280.	[IMN][833]	[NUMBER]	R1290.	[FSM][583]	[NUMBER]	R1300.	[MCO][492]	[NUMBER]	R1310.	[MNE][499]	[NUMBER]
R1320.	[NRU][520]	[NUMBER]	R1330.	[UZB][860]	[NUMBER]	R1340.	[PLW][585]	[NUMBER]	R1350.	[PCN][612]	[NUMBER]
R1360.	[BLM][652]	[NUMBER]	R1370.	[TKM][795]	[NUMBER]	R1380.	[TCA][796]	[NUMBER]	R1390.	[WLF][876]	[NUMBER]

Business introducers

Please indicate the total number of new customers referred to your institution by business introducers⁶ over the reporting year:

R1400. [Not available] or [Number]

Customers identified remotely

Please indicate the total number of customers that had been identified remotely by your institution as at 31 December of the reporting year:

R1410. [Not available] or [Number]

Numbered accounts

Note: Numbered accounts are those for which only the account number, with no mention of the customer's name, appears on the bank statements. 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 degree of anonymity. Numbered accounts should not be treated as anonymous accounts (i.e., accounts for which the holder has not been identified by the institution), which are prohibited.

Please indicate the total number of your customers with numbered accounts or contracts as at 31 December of the reporting year:

R1420. [Not available] or [Number]

⁶ For the definition of “business introducer”, please see Article 43 of the Act of 18 September 2017 on the prevention of money laundering and the financing of terrorism and on restriction of the use of cash.

Please indicate the total number of customers for whom your institution opened numbered accounts or with whom it concluded a numbered contract over the reporting year:	R1430.	[Not available] or [Number]
---	--------	-----------------------------

Transactions with occasional customers

Please indicate the number of transactions for an amount equal to or greater than €10,000 carried out by your institution for occasional customers over the reporting year and the total corresponding amount.

▪ Number of transactions:	R1440.	[Not available] or [Number]
▪ Corresponding amount (expressed in euros):	R1450.	[Not available] or [Number]

Please indicate the number of transactions carried out by your institution for occasional customers over the reporting year involving a country listed in Annex 6 and the total corresponding amount.

▪ Number of transactions:	R1460.	[Not available] or [Number]
▪ Corresponding amount (expressed in euros):	R1470.	[Not available] or [Number]

Foreign exchange services

Does your institution offer foreign exchange services (exchange of currencies and/or precious metals)?⁷

	R1480.	[Yes] / [No]
--	--------	--------------

If so, please indicate the number and total corresponding amount of foreign exchange transactions⁸ carried out by your institution over the reporting year.

If your institution does not offer foreign exchange services, please enter the number "0" in answer to these questions.

▪ Number:	R1490.	[Not available] or [Number]
▪ Corresponding amount:	R1500.	[Not available] or [Number]

Please indicate the number of **manual**⁹ currency exchange transactions carried out by your institution over the reporting year and the total corresponding amount.

⁷ Excluding foreign exchange services closely linked to a transaction carried out in connection with the provision of payment services and/or the issuance of electronic money as well as the provision of investment services.

⁸ A foreign exchange transaction is a financial transaction involving the manual or electronic exchange of foreign currencies or precious metals at a fixed exchange rate or one that is determinable at a future date.

⁹ Manual currency exchange refers to spot purchases or sales of foreign currencies in the form of cash or cheques denominated in a foreign currency or using a credit or payment card.

<i>If your institution does not offer manual currency exchange services, please enter the number “0” in answer to these questions.</i>		
▪ Number:	R1510.	[Not available] or [Number]
▪ Corresponding amount:	R1520.	[Not available] or [Number]
Please indicate the number of manual currency exchange transactions ¹⁰ carried out by your institution over the reporting year, involving the purchase or sale of gold or other precious metals, from or to customers, and the corresponding amount.		
<i>If your institution does not provide such services, please enter the number “0” in answer to these questions.</i>		
▪ Number:	R1530.	[Not available] or [Number]
▪ Corresponding amount:	R1540.	[Not available] or [Number]

Politically exposed persons

<i>Note: The number of PEPs should include not only customers who are PEPs but also agents of your customers, ultimate beneficial owners of your customers and ultimate beneficial owners of your customers’ agents who are PEPs.</i>		
Total number of PEPs in your customer database:	R1550.	[Not available] or [Number]
▪ Number of PEPs – customers (holders of products)	R1560.	[Not available] or [Number]
▪ Number of PEPs – agents of customers	R1570.	[Not available] or [Number]
▪ Number of PEPs – UBOs (of both customers and their agents, if the latter are legal persons or other legal arrangements)	R1580.	[Not available] or [Number]
Number of PEPs domiciled outside Belgium:	R1590.	[Not available] or [Number]
Number of PEPs domiciled in any of the countries listed in Annex 6:	R1600.	[Not available] or [Number]

Ultimate beneficial owners (UBOs)

Please provide the following information regarding the ultimate beneficial owners of your customers (on 31 December of the reporting year).		
▪ Number of UBOs domiciled outside Belgium:	R1610.	[Not available] or [Number]
▪ Number of UBOs domiciled in any of the countries listed in Annex 6:	R1620.	[Not available] or [Number]

¹⁰ Transactions involving certificates used to buy, sell or speculate on the value of precious metals (such as gold, silver or platinum) without requiring physical possession of the metal should not be taken into account here.

Rejected customers		
Please indicate the total number of persons or entities that were rejected by your institution over the reporting year for AML/CFT-related reasons even though they met the criteria set out in your institution's customer acceptance policy.	R1630.	[Not available] or [Number]

Cases of fraud ¹¹		
Please provide the following information regarding the number of cases of fraud (payment card fraud, identity fraud, etc.) for the transactions performed/processed by your institution over the reporting year .		
▪ Total number of transactions performed/processed over the reporting year that were found to involve fraud:	R1640.	[Not available] or [Number]
▪ Total amount of the transactions performed/processed over the reporting year that were found to involve fraud:	R1650.	[Not available] or [Number]
▪ Percentage of transactions performed/processed over the reporting year that were found to involve fraud (in relation to the total number of transactions performed/processed over the reporting year):	R1660.	[Not available] or [Number]

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 over the reporting year?	R1670.	[Not available] or [Number]
How many of the abovementioned atypical transactions were detected (i) by staff members who are in direct contact with customers and (ii) by your institution's automated monitoring tool?		
▪ Number of transactions detected by staff members who are in direct contact with customers:	R1680.	[Not available] or [Number]
▪ Number of transactions detected by the automated monitoring tool:	R1690.	[Not available] or [Number]
How many of the reports referred to above pertained to transactions in cash (banknotes and/or coins)?	R1700.	[Not available] or [Number]

Notification of suspicious transactions to the Financial Intelligence Processing Unit (CTIF-CFI)		
Over the course of the reporting year, how many notifications of suspicious transactions did your institution submit to the Financial Intelligence Processing Unit (CTIF-CFI) and what was the total corresponding amount of the transactions that formed the object of these notifications?		

¹¹ Only cases of fraud that were effectively carried out and were detected a posteriori by the financial institution are referred to here. Unsuccessful attempts at fraud (which were thwarted in time by the financial institution) should not be included. Fraud may involve the use of forged documents, identity theft or other methods designed to facilitate an illegal financial activity or transaction. Cases involving social engineering techniques or false communications to obtain personal or financial information, enabling criminals to impersonate customers or unlawfully access financial accounts or carry out unauthorised transactions, should also be included.

▪ Number:	R1710.	[Not available] or [Number]
▪ Corresponding amount (expressed in euros):	R1720.	[Not available] or [Number]
For the reporting year as a whole, please indicate the median time, in calendar days, between the time at which an atypical transaction or event was detected by your institution's staff or automated monitoring tool and the time at which, if applicable, a suspicious transaction report was transmitted to the Financial Intelligence Processing Unit:	R1730.	[Not available] or [Number]

Financial embargoes and freezing of assets		
Over the course of the reporting year, how many warnings in relation to the application of financial embargoes and freezing orders for assets and funds were handled by your institution? <i>Note: "Warnings" should be understood to mean all possible matches with the lists of sanctions or embargoes, i.e. both warnings generated by your institution's automatic screening tools¹² and those detected by first-line monitoring (in the event of manual screening against these lists).</i>	R1740.	[Not available] or [Number]
Over the course of the reporting year, how many asset freezing notifications were transmitted by your institution to the FPS Finance – Treasury and what was the total corresponding amount of these assets? <i>Note: This number should include both notifications made for any natural or legal person as well as any subsequent notifications concerning the same natural or legal person.</i>		
▪ Number:	R1750.	[Not available] or [Number]
▪ Corresponding amount (expressed in euros):	R1760.	[Not available] or [Number]

Termination of the business relationship or the adoption of restrictive measures for AML/CFT-related reasons		
Over the course of the reporting year, how many business relationships with customers were terminated by your institution for AML/CFT-related reasons?	R1770.	[Not available] or [Number]
For how many business relationships did your institution resort to other restrictive measures over the reporting year as it was unable to terminate the relationship due to statutory provisions of public policy or overriding mandatory provisions or because termination of the relationship would have seriously and disproportionately harmed the customer?	R1780.	[Not available] or [Number]

¹² This refers to both tools used to screen customers (as well as agents, beneficiaries and ultimate beneficial owners) and transaction filtering tools.

Of the abovementioned cases involving the termination of a business relationship or the application of restrictive measures, how many gave rise to a notification to the Financial Intelligence Processing Unit (CTIF-CFI) (before or after termination of the relationship or the application of restrictive measures)?	R1790.	[Not available] or [Number]
--	--------	-----------------------------

Overall risk assessment

Has your institution performed an overall risk assessment to identify and assess the AML/CFT risks to which it is exposed?	R1800.	[Yes] / [No] / [Not applicable]
--	--------	---------------------------------

When was this overall risk assessment last carried out by your institution?	R1810.	<ul style="list-style-type: none"> - Less than one year ago - Between one and two years ago - More than two years ago - There has not yet been an overall risk assessment - Not applicable
---	--------	---

If your institution is a group parent company or if it has one or more physical establishments abroad (subsidiaries, branches or agencies), does your institution's overall risk assessment pertain to:

Note: If your institution is not a parent company and/or does not have physical establishments abroad, your answers to these questions should be "not applicable".

<ul style="list-style-type: none"> ▪ the risks related to the activities of the Belgian parent company? 	R1820.	[Yes] / [No] / [Not applicable]
--	--------	---------------------------------

<ul style="list-style-type: none"> ▪ the risks related to the activities of the group in its entirety and those of physical establishments abroad? 	R1830.	[Yes] / [No] / [Not applicable]
---	--------	---------------------------------

Group policy

<p>If your institution is a subsidiary or branch that forms 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 Belgian law on the subject and, if not, did your institution take the additional measures necessary to ensure 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 is itself a group parent company, please answer "not applicable" to this question.</i></p>	R1840.	[Yes] / [No] / [Not applicable]
---	--------	---------------------------------

If your institution is physically established in another EU member state or in a third country (through one or more subsidiaries, branches, agents or distributors), please indicate if your institution has:

Note: If your institution does not have any physical establishments abroad, your answer to the following questions should be "not applicable".

<ul style="list-style-type: none"> ▪ defined a group policy based on an overall risk assessment for the group as a whole, taking into account the specific risks of each physical establishment: 	R1850.	[Yes] / [No] / [Not applicable]
---	--------	---------------------------------

<ul style="list-style-type: none"> ▪ verified whether this group policy is in accordance with the local AML/CFT legislation applicable to each establishment: 	R1860.	[Yes] / [No] / [Not applicable]
--	--------	---------------------------------

<ul style="list-style-type: none"> ▪ if the group policy was found not to comply with local legislation for a given location, taken the necessary additional measures to align its policy and procedures with local law: <p><i>Note: If the group policy was found to comply with local legislation for all locations, please answer “not applicable” to this question.</i></p>	R1870.	[Yes] / [No] / [Not applicable]
--	--------	---------------------------------

Guidelines, internal controls and internal procedures

Please indicate for each of the following whether your institution has appropriate written guidelines, internal controls and/or internal procedures.		
<ul style="list-style-type: none"> ▪ the identification and verification of customers, their agents and their ultimate beneficial owners: 	R1880.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the identification of the customer’s characteristics and of the purpose and nature of the business relationship or of the intended occasional transaction: 	R1890.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ customer acceptance policy: 	R1900.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the periodic customer survey (verification and update of available information)/client review: 	R1910.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ due diligence with regard to customers and transactions: 	R1920.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the internal notification of atypical transactions to the person responsible for AML/CFT: 	R1930.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the notification of transactions that are known or suspected to be related to ML/FT to the Financial Intelligence Processing Unit (CTIF-CFI): 	R1940.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ compliance with binding rules on financial sanctions, embargoes and other restrictive measures: 	R1950.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ compliance with Regulation (EU) 2015/847 on information accompanying transfers of funds: 	R1960.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the recruitment or appointment of staff members and the designation of agents or distributors, and the monitoring of their trustworthiness: 	R1970.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ the outsourcing of the functions, checks or other tasks to ensure proper compliance with the Belgian AML/CFT legislation: 	R1980.	[Yes] / [No] / [Not applicable]

Internal audit

Does your institution have an independent internal audit function which tests its organisation in terms of AML/CFT (regardless of whether this function has been outsourced and of whether it depends on the parent company abroad if your institution is a branch or operates in Belgium through agents)?	R1990.	[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 legislation .		
<ul style="list-style-type: none"> ▪ Is there a fixed schedule/cycle for performing audits regarding proper compliance with the Belgian AML/CFT legislation? 	R2000.	[Yes] / [No] / [Not applicable]

<ul style="list-style-type: none"> When was the last time your internal audit function carried out activities regarding proper compliance with the Belgian AML/CFT legislation? 	R2010.	<ul style="list-style-type: none"> 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? 	R2020.	<ul style="list-style-type: none"> Sufficient Sufficient, with remarks Insufficient Not applicable
<p>Please answer the following questions pertaining to the activities of your institution's internal audit function in terms of compliance with the binding rules on financial sanctions, embargoes and other restrictive measures.</p>		
<ul style="list-style-type: none"> Is there a fixed schedule/cycle for performing audits regarding proper compliance with the Belgian financial sanctions and embargoes regime? 	R2030.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> When was the last time your internal audit function carried out activities regarding proper compliance with the Belgian financial sanctions and embargoes regime? 	R2040.	<ul style="list-style-type: none"> 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? 	R2050.	<ul style="list-style-type: none"> Sufficient Sufficient, with remarks Insufficient Not applicable
<p>Please indicate for each of the following whether your institution's internal audit function carried out audit activities over the reporting year regarding proper implementation of the relevant Belgian legislation and, if so, the results thereof.</p>		
<ul style="list-style-type: none"> Identification and identity verification (customers, agents, ultimate beneficial owners): 	R2060.	<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: 	R2070.	"
<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: 	R2080.	"
<ul style="list-style-type: none"> Customer acceptance policy: 	R2090.	"
<ul style="list-style-type: none"> Ongoing due diligence: 	R2100.	"
<ul style="list-style-type: none"> Periodic reassessment of customer risk (client review): 	R2110.	"
<ul style="list-style-type: none"> Compliance with the binding rules on financial sanctions and embargoes and other restrictive measures: 	R2120.	"
<ul style="list-style-type: none"> Compliance with Regulation (EU) 2015/847 on information accompanying transfers of funds: 	R2130.	"

Activities of the person responsible for AML/CFT		
Does the person responsible for AML/CFT within your institution draw up annually a written action plan for monitoring and testing compliance of the institution's policies, internal procedures and guidelines:		
▪ with the AML/CFT legislation?	R2140.	[Yes] / [No] / [Not applicable]
▪ with the binding rules on financial sanctions, embargoes and other restrictive measures?	R2150.	[Yes] / [No] / [Not applicable]
Was the action plan drawn up for the reporting year fully implemented?	R2160.	[Yes] / [No] / [Not applicable]
Did the tests performed by the person responsible for AML/CFT over the reporting year reveal any major shortcomings and/or incidents:		
▪ regarding compliance with the AML/CFT legislation?	R2170.	[Yes] / [No] / [Not applicable]
▪ regarding compliance with the binding rules on financial sanctions, embargoes and other restrictive measures?	R2180.	[Yes] / [No] / [Not applicable]
Are the results of the audit carried out by the person responsible for AML/CFT documented (audit trail) and/or summarised in reports?	R2190.	[Yes] / [No] / [Not applicable]

Employees, officers and agents + training		
Has your institution established a procedure stipulating 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, independent channel?	R2200.	[Yes] / [No] / [Not applicable]
Did your institution face serious integrity incidents involving employees (staff, representatives, agents, etc.) during the reporting year (fraud, deliberate involvement in money laundering or terrorist financing, serious violations of your institution's internal AML/CFT procedures, etc.)?	R2210.	[Yes] / [No] / [Not applicable]
Does your institution have a training programme for the Belgian AML/CFT legislation?	R2220.	[Yes] / [No] / [Not applicable]
Does your institution have a training programme for compliance with the binding rules on financial sanctions, embargoes and other restrictive measures?	R2230.	[Yes] / [No] / [Not applicable]
Does your institution's training program provide, for the areas mentioned above, a refresher and/or an update, at regular intervals, of the knowledge that employees, agents and/or representatives have of AML/CFT matters whenever necessary (for example for new regulations, new products or activities, new procedures, regular (periodic) refresher courses, etc.)?	R2240.	[Yes] / [No] / [Not applicable]

Identification and verification of identity and identification of the customer's characteristics, the purpose and nature of the business relationship or occasional transaction

Do your institution's internal procedures concretely determine, taking into account the risk classification of the business relationship or occasional transaction, the documents to be submitted by the customer or the other evidence to be collected by your institution which are necessary to verify the identity of the customer and related parties? ¹³	R2250.	[Yes] / [No] / [Not applicable]
How does your institution gather information about the customer and the purpose and nature of the business relationship or occasional transaction prior to the provision of services?	R2260.	- Interview - Questionnaire - Combination of the two - Other - Not applicable

Politically exposed persons (PEPs)		
Do your institution's procedures stipulate that, prior to offering services, it is necessary to determine whether any of the following persons is a PEP or not:		
▪ the customer:	R2270.	[Yes] / [No] / [Not applicable]
▪ the customer's family members:	R2280.	[Yes] / [No] / [Not applicable]
▪ the customer's close associates:	R2290.	[Yes] / [No] / [Not applicable]
▪ the customer's agents:	R2300.	[Yes] / [No] / [Not applicable]
▪ the customer's ultimate beneficial owners:	R2310.	[Yes] / [No] / [Not applicable]
▪ the ultimate beneficial owners of the customer's agents:	R2320.	[Yes] / [No] / [Not applicable]
▪ the beneficiary of a life insurance policy taken out by the customer and the beneficial owner of that beneficiary, where applicable:	R2330.	[Yes] / [No] / [Not applicable]
Please indicate for each of the following sources of information whether it is used by your institution to check if its customers should be designated as PEPs:		
▪ information collected from the customer (e.g. a statement from the customer):	R2340.	[Yes] / [No] / [Not applicable]
▪ internal lists:	R2350.	[Yes] / [No] / [Not applicable]
▪ external lists or databases:	R2360.	[Yes] / [No] / [Not applicable]
▪ other sources of information:	R2370.	[Yes] / [No] / [Not applicable]
Does your institution systematically and without exception maintain an audit trail of the actions taken by it to determine whether its customers (or their relations) are PEPs?	R2380.	[Yes] / [No] / [Not applicable]

¹³ Agents, ultimate beneficial owners, beneficiaries of insurance contracts.

How often do your institution's procedures stipulate that it is necessary to check whether the abovementioned persons are PEPs?	R2390.	<ul style="list-style-type: none"> - At least once a month - At least quarterly - At least once a year - Less than once a year - Not applicable
---	--------	--

Client acceptance policy

Does your institution assess, on an individual basis and prior to the provision of services, the ML/FT risks associated with the profile and nature of the business relationship or occasional transaction, taking into account the information gathered on the customer and their relations (identification and verification of identity, examination of the nature and purpose of the business relationship or occasional transaction, checks against sanctions lists, information on legal status or ties to politically exposed persons, the distribution channel used, the nature of the product or service)?	R2400.	[Yes] / [No] / [Not applicable]
Do your institution's policies and procedures identify categories of customers with which your institution excludes a priori any business relationship due to a perception of heightened ML/FT risk?	R2410.	[Yes] / [No] / [Not applicable]
Do your institution's procedures determine the hierarchical level responsible for deciding whether to accept a customer or carry out a transaction, based on and taking into account the individual risk assessment referred to above?	R2420.	[Yes] / [No] / [Not applicable]
Based on the risk assessment referred to above, has your institution introduced a fee structure that varies depending on the level of AML/CFT risk identified, the purpose of which is to cover the costs generated by the implementation of AML/CFT due diligence measures in respect of the business relationships concerned?	R2430.	[Yes] / [No] / [Not applicable]

Transaction due diligence

In the context of transaction monitoring, does your institution check whether a customer's transaction pattern aligns with the transaction profile that has been drawn up for this customer?	R2440.	[Yes] / [No] / [Not applicable]
Are customer transactions monitored in real time or post-event or a combination of the two?	R2450.	<ul style="list-style-type: none"> - In real time - Post-event - Combination of the two - Not applicable
Please indicate whether your institution's monitoring system meets the following conditions:		
<ul style="list-style-type: none"> Is the monitoring system based on accurate and relevant criteria, algorithms or 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? 	R2460.	[Yes] / [No] / [Not applicable]

<ul style="list-style-type: none"> Are the criteria, algorithms or scenarios referred to in the previous question regularly updated or assessed for efficiency? 	R2470.	[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 (including, if applicable, securities transactions)? 	R2480.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> Does the system 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? 	R2490.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> Does the system allow transactions linked to high-risk third countries to be detected?¹⁴ 	R2500.	[Yes] / [No] / [Not applicable]
Is your institution's transaction monitoring system (largely) automated?	R2510.	[Yes] / [No] / [Not applicable]

Use of innovative solutions		
Does your institution use one or more innovative solutions ¹⁵ to fulfil its “know your customer” (KYC) and/or “know your transaction” (KYT) obligations?	R2520.	[Yes] / [No]
If the answer to the above question is “yes”, please indicate whether:		
<ul style="list-style-type: none"> the innovative solutions relate to the performance of KYC and/or KYT due diligence measures. 	R2530.	[KYC] / [KYT] / [Both – separate solutions] / [Both – single solution]
<ul style="list-style-type: none"> the innovative KYC solutions were developed or acquired exclusively or mainly within your institution or within an entity of the group to which it belongs (in-house). 	R2540.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> the innovative KYT solutions were developed exclusively or mainly by an external designer/distributor/user/service provider. 	R2550.	[Yes] / [No] / [Not applicable]
For innovative solutions developed exclusively or mainly by an external designer/distributor/user/service provider:		
<ul style="list-style-type: none"> Did your institution carry out an assessment prior to introduction of the tool to ensure that it meets all requirements applicable within your institution: <ul style="list-style-type: none"> - as regards KYC? 	R2560.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> - as regards KYT? 	R2570.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> Does your institution have the contractual possibility to propose changes to the tool used to implement: 		

¹⁴ See Article 4(9) of the Act of 18 September 2017 on the prevention of money laundering and terrorist financing and on restriction of the use of cash.

¹⁵ The term “innovative solutions” refers to advanced and/or emerging technological solutions that facilitate not only the identification or verification of the identity of customers, their agents and/or their ultimate beneficial owners, but also the monitoring of customer transactions. These technologies may include, but are not limited to, biometrics (fingerprint, facial or voice recognition), advanced data analysis, artificial intelligence, blockchain and digital identity verification systems.

- innovative solutions in the area of KYC?	R2580.	[Yes] / [No] / [Not applicable]
- innovative solutions in the area of KYT?	R2590.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ Does your institution have the contractual possibility to authorise and refuse changes proposed by a third party (designer/distributor/user/service provider) to the tool implementing: 		
- innovative solutions in the area of KYC?	R2600.	[Yes] / [No] / [Not applicable]
- innovative solutions in the area of KYT?	R2610.	[Yes] / [No] / [Not applicable]
Do your institution's procedures provide for a periodic and documented review (effectiveness, update, etc.) of the tool implementing:		
<ul style="list-style-type: none"> ▪ innovative solutions in the area of KYC? 	R2620.	[Yes] / [No] / [Not applicable]
<ul style="list-style-type: none"> ▪ innovative solutions in the area of KYT? 	R2630.	[Yes] / [No] / [Not applicable]
How often are the periodic reviews referred to in the previous question conducted for the tool implementing innovative solutions:		
<ul style="list-style-type: none"> ▪ in the area of KYC? 	R2640.	<ul style="list-style-type: none"> - At least quarterly - At least annually - Less than once a year - Not applicable
<ul style="list-style-type: none"> ▪ in the area of KYT? 	R2650.	<ul style="list-style-type: none"> - At least quarterly - At least annually - Less than once a year - Not applicable

Outsourcing		
Has your institution outsourced tasks (within or outside the group) regarding compliance with the AML/CFT legislation, the binding rules on financial sanctions and embargoes, or Regulation 2015/847? ¹⁶	R2660.	[Yes] / [No] / [Not applicable]
Did your institution and the party to which these tasks were outsourced (within or outside the group) conclude a written agreement stipulating mutual commitments, responsibilities and obligations?	R2670.	[Yes] / [No] / [Not applicable]
Has your institution defined a policy (process/cycle) for checking the quality of outsourced tasks?	R2680.	[Yes] / [No] / [Not applicable]
When did your institution last perform a quality check of outsourced tasks?	R2690.	<ul style="list-style-type: none"> - Less than one year ago - Between one and two years ago

¹⁶ Outsourcing within a group, by a subsidiary to its head office or to another subsidiary of the group to which it belongs (intra-group outsourcing) is subject to the same requirements as outsourcing to an external service provider. Similarly, given the territorial scope of application of the AML/CFT legislation, transfer of the performance of tasks relating to compliance with the AML/CFT legislation or with the binding rules on financial embargoes, by a branch of a financial institution governed by the law of another EEA country or a third country to its head office or to another branch of the group to which it belongs, is considered outsourcing and thus must meet the prudential requirements in this area.

		- More than two years ago - Never as yet - Not applicable
Did the quality check referred to in the previous question reveal any serious shortcomings?	R2700.	[Yes] / [No] / [Not applicable]

Application of financial sanctions and embargoes

Please indicate if your institution, prior to the provision of services, systematically and without exception verifies whether the following persons appear on the Belgian, European or United Nations Security Council sanctions lists (hereinafter “the sanctions lists”):		
▪ new customers of your institution:	R2710.	[Yes] / [No] / [Not applicable]
▪ their agents:	R2720.	[Yes] / [No] / [Not applicable]
▪ the ultimate beneficial owners involved in customer relationships (UBOs of customers, UBOs of customer agents, etc.):	R2730.	[Yes] / [No] / [Not applicable]
Please indicate if your institution verifies 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 sanctions lists:		
▪ the customers of your institution:	R2740.	[Yes] / [No] / [Not applicable]
▪ their agents:	R2750.	[Yes] / [No] / [Not applicable]
▪ the ultimate beneficial owners involved in customer relationships (UBOs of customers, UBOs of customer agents, etc.):	R2760.	[Yes] / [No] / [Not applicable]
When <u>performing international SWIFT transfers</u> (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 sanctions lists or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match with these lists?	R2770.	[Yes] / [No] / [Not applicable]
When <u>receiving international SWIFT transfers</u> (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 sanctions lists or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match with these lists?	R2780.	[Yes] / [No] / [Not applicable]
When <u>performing international SEPA transfers</u> (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 sanctions lists or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match with these lists?	R2790.	[Yes] / [No] / [Not applicable]
When <u>receiving international SEPA transfers</u> (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 sanctions lists or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match with these lists?	R2800.	[Yes] / [No] / [Not applicable]

When performing national transfers (payments within Belgium) on behalf of your customers, does your institution verify whether the counterparties of these customers appear on the sanctions lists or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match with these lists?	R2810.	[Yes] / [No] / [Not applicable]
When receiving national transfers (payments within Belgium) on behalf of your customers, does your institution verify whether the counterparties of these customers appear on the sanctions lists or whether the other information accompanying the transfer of funds (such as a payment reference) generates a match with these lists?	R2820.	[Yes] / [No] / [Not applicable]
If your answer to the previous question is “yes”, does your institution participate in the multilateral Domestic Sanction Screening System, which provides for the reciprocal outsourcing (between participants) of customer counterparties in the context of domestic transactions?	R2830.	[Yes] / [No] / [Not applicable]
When providing funds (e.g. in the context of payments, repayments, credit, etc.), does your institution verify whether a sanctioned party could be involved?	R2840.	[Yes] / [No] / [Not applicable]
Please indicate if your institution carries out the abovementioned screening based on the following lists:		
- EU sanctions lists:	R2850.	[Yes] / [No] / [Not applicable]
- Belgian sanctions lists:	R2860.	[Yes] / [No] / [Not applicable]
- UN Security Council sanctions lists:	R2870.	[Yes] / [No] / [Not applicable]
For each of the following, please indicate whether your institution uses an automated system (for example, a software application), a manual system (for example, a manual comparison of the customer file against the applicable sanctions lists) or a combination of the two:		
▪ the verifications referred to in questions R2710 to R2730:	R2880.	[Automated] / [Manual] / [Combination of the two] / [Not applicable]
▪ the verifications referred to in questions R2740 to R2760:	R2890.	[Automated] / [Manual] / [Combination of the two] / [Not applicable]
▪ the verifications referred to in questions R2770 to R2780:	R2900.	[Automated] / [Manual] / [Combination of the two] / [Not applicable]
▪ the verifications referred to in questions R2790 to R2800:	R2910.	[Automated] / [Manual] / [Combination of the two] / [Not applicable]
▪ the verifications referred to in questions R2810 to R2820:	R2920.	[Automated] / [Manual] / [Combination of the two] / [Not applicable]

<ul style="list-style-type: none"> ▪ the verifications referred to in question R2840: 	R2930.	[Automated] / [Manual] / [Combination of the two] / [Not applicable]
When investing funds, does your institution verify whether this could involve a sanctioned transaction or facilitate a sanctioned activity (embargoes or other restrictive measures)?	R2940.	[Yes] / [No] / [Not applicable]
When providing funds (e.g. in the context of payments, repayments, credit, etc.) does your institution verify whether this could involve a sanctioned transaction or facilitate a sanctioned activity (an embargo or other restrictive measure)?	R2950.	[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?	R2960.	[Yes] / [No] / [Not applicable]