

Wwft & Sw Questionnaire

Wwft & Sw Questionnaire for (managers of)
investment institutions 2023

Publication date: 20 March 2023

If you have any questions that are not answered in this document, please send an email to our Business Desk at ondernemersloket@afm.nl. Alternatively, you may send an email to inform us on which phone number and at what time we can call you. Please specify what you wish to discuss, so that we can address your questions as best as possible. You can also call us on +31 (0)800 6800 680 (free of charge). Check our current opening hours on our website: <https://www.afm.nl/en/contact/ondernemersloket>

Contact details

Who should the AFM contact for questions regarding your answers in this questionnaire?¹

Salutation:

Name of contact person:

Job title of contact person:

Telephone number:

Email:

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

Note:

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

Part I. Inherent Risks

A. Organisation

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

1.

Which of the following categories describes your firm?

In this questionnaire, 'manager' also refers to an investment company without a separate management company.

- A licensed manager as referred to in Section 2:65(a) Wft
- A registered manager as referred to in Section 2:66a Wft
- A UCITS manager as referred to in Section 2:69b Wft
- The company is a branch of a (foreign) manager of investment institutions

Note:

¹⁾ In the case of a branch office, the AFM has been notified by the foreign regulator about your presence as a branch office in the Netherlands. In this case, you are registered with the AFM as a branch office.

2a.

Are you a subsidiary of one or more foreign parent companies?

- Yes
 - No
-

2b.

In which country is/are your firm's foreign parent company/companies established and what is the full name of your parent company/companies under the articles of association? In addition, please specify the Legal Entity Identifier (LEI) and the competent AML/CFT authority for each of the parent companies (where applicable).

Full name of the (foreign) parent company under the articles of association	Country of establishment	LEI ¹⁾	AML/CFT authority

Note:

¹⁾ The LEI is a unique number that identifies entities worldwide.

3.

Do/does your foreign parent company/companies have any additional branches, tied agents and/or subsidiaries outside the Netherlands?

If your firm is the only branch and/or subsidiary of the foreign parent company, please select 'No'.

- Yes
- No

4a.

Does your firm have any branches, tied agents and/or subsidiaries?

- Yes
- No

4b.

In which country (the Netherlands or another country) are they established/registered and what is their full name under the articles of association? In addition, please specify the Legal Entity Identifier (LEI) and the competent AML/CFT authority for each of the entities (where applicable).

Full name under the articles of association of the tied agent/branch/subsidiary	Type	Country of establishment	LEI ¹	AML/CFT authority	Description of the activities
	<input type="checkbox"/> Branch <input type="checkbox"/> Tied agent <input type="checkbox"/> Subsidiary				

Note:

¹) The LEI is a unique number that identifies entities worldwide.

5.

Does your firm provide services as referred to in Section 2:67a(2) Wft or Section 2:69c(2) Wft? If so, which services?

This question concerns any licence extensions that you may have obtained from the AFM on the basis of Section 2:67a(2) of the Wft or Section 2:69c(2) of the Wft.

- Yes, individual asset management
 - Yes, advice on financial instruments in the course of a profession or business
 - Yes, custody and administration of participating units in investment funds and UCITs.
 - Yes, receiving and forwarding client orders with respect to financial instruments in the course of a profession or business.
 - No, our firm did not provide services as referred to in Section 2:67a(2) Wft or Section 2:69c(2) Wft.
-

A. Organisation [new page in portal]

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

In the questions below, the term 'business relation' refers to the natural persons and/or legal entities with which you have a business, professional or commercial relationship that is connected to your firm's professional activities. For example, brokers, trust offices or legal consulting firms. Business relations also include affiliates/associates with which your firm has a business relationship. In this questionnaire, you do not need to enter business relations that are not connected to your professional activities, such as with a cleaning company.

6a.

Did you work with business relations established outside the Netherlands in the period from 1 January 2022 to 31 December 2022?

This question does not refer to your investors and clients for whom you perform investment activities and/or provide investment services.

- Yes
 No

6b.

State the following information for your business relations established outside the Netherlands.

- The number of business relations established outside the Netherlands with which you have worked in the period from 1 January 2022 to 31 December 2022:

- The total amount (in EUR) involved in the cooperation(s) in the period from 1 January 2022 to 31 December 2022¹:

Note:

¹) This is the sum total of all transfers between your firm and the business relation in question, including fees and any delegated assets.

7a.

Did you work with business relations established in a **high-risk country**¹ in the period from 1 January 2022 to 31 December 2022?

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

7b.

For each high-risk country, state the number of business relations you worked with in the period from 1 January 2022 to 31 December 2022 and the amount involved.

High-risk country	Number of business relations	Amount involved (€) ¹

Note:

¹) This is the sum total of all transfers between your firm and the business relation in question, including fees and any delegated assets.

8.

The AFM requests you to state how many investment funds your organisation manages. This concerns the total number of investment funds and investment companies (with or without a separate management company), regardless of whether these are Alternative Investment Funds (AIFs) or Undertakings for Collective Investment in Transferable Securities (UCITSs).

How many investment funds does your firm manage?¹

Note:

¹) If your firm manages only one investment company without a separate management company, enter '1'.

9.

Please complete the table below for each investment fund you manage.

Please write out the names of the investment funds in full.

	Name of investment fund	Type ¹	Total assets under management (EUR) ²	Country of establishment	Closed- or open-end ³	Number of subfunds ⁴
1.						
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						

Note:

¹) Please state whether the investment fund is an AIF or a UCITS.

²) Please state the total assets under management in the investment fund, which the AFM defines as the value of the portfolios of the managed investment fund.

³) 'Open-end' means that investors can join and exit the fund at any time. 'Closed-end' means that investors can only join the fund when it is launched and only exit at the end date.

⁴) Please state the number of subfunds within each investment fund. If a fund has no subfunds, please enter '0'. In the 'Number of subfunds' column, you only have to state how many subfunds fall under each investment fund. You do not need to state the names of the subfunds.

10.

How are the units in your investment fund(s) traded?¹

NB: This question concerns all units in your investment fund(s).

- Directly
- Indirectly
- Directly and indirectly

Note:

¹) By 'direct trading', the AFM means that investors can acquire units in one or more of your investment funds without the intermediation of third parties, such as investment firms or banks. The units are registered in the name of the investor. By 'indirect trading', the AFM means that units are not traded directly.

11a.

Do you have investments in underlying funds?¹

- Yes
- No

Note:

¹) 'Investments in underlying funds' refers to investments in other funds. Examples include a feeder fund that invests in a master fund, or a fund-of-funds that invests in other funds. In these cases, the top-level fund (e.g. feeder fund or fund-of-funds) invests in one or more underlying funds that make the actual investments in shares, bonds or other securities.

11b.

Do you know the geographic locations of the positions you invest in through your investments in underlying funds?

- Yes
 - No
-

12a.

Do you have positions in assets in one or more high-risk countries?

This question concerns the locations of your direct investments and investments in underlying funds (as far as you are aware of this). This concerns all your assets, regardless of the category of these assets.¹

- Yes
- No

Note:

¹) In this question, the AFM defines a ‘direct investment’ as any investment held directly by your investment fund(s) in assets in a high-risk country. ‘Investments in underlying funds’ refers to investments in other funds. Examples include a feeder fund that invests in a master fund, or a fund-of-funds that invests in other funds. In these cases, the top-level fund (e.g. feeder fund or fund-of-funds) invests in one or more underlying funds that make the actual investments in shares, bonds or other securities. If you click ‘Yes’ here, you will see a list of high-risk countries in part b of this question.

12b.

For each **high-risk country**, state the value of the position(s).

High-risk country	Value of the position(s) (€) ¹

Note:

¹) The AFM requests you to state the (measured or estimated) market value of the position(s) as at the reference date. If this value cannot be easily estimated, you may state the most recent market value.

13.

State the value of the positions of your investment fund(s) in the listed asset categories.

This concerns all such positions, irrespective of the country in which these assets are located. If you do not have positions in a particular asset category, please enter '0'.

'Investments in underlying funds' refers to investments in other funds. Examples include a feeder fund that invests in a master fund, or a fund-of-funds that invests in other funds. In these cases, the top-level fund (e.g. feeder fund or fund-of-funds) invests in one or more underlying funds that make the actual investments in shares, bonds or other securities.

Asset categories	Total value of investment (€) ¹
Cryptocurrency	
Miscellaneous tangible assets, such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

Note:

¹) The AFM requests you to state the (measured or estimated) market value of the position(s) in each of the listed asset categories as at the reference date. If this value cannot be easily estimated, you may state the most recent market value. With respect to indirect investments, you may estimate the value of the assets involved.

B. Direct investors

You have stated that the units in your investment fund(s) are traded directly.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

If you are a branch, then in the following questions the term 'investors' should be understood to include investors that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

14.

For each of the categories listed below, state the total number of direct investors in all your investment funds and the total assets invested by those investors.

Category	Number	Total assets invested (€) ¹
Natural persons		
Legal entities and/or other entities and/or legal structures		
Sum total		

Note:

¹) The AFM requests you to state the (measured or estimated) market value as at the reference date. If this value cannot be easily estimated, you may state the most recent market value.

15a.

Enter the requested information with respect to your direct investors residing/established in the Netherlands.

If you do not have direct investors in a particular risk classification, please enter '0'. This risk classification does not refer to the risk appetite of your direct investors, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your direct investors.

Risk classification of direct investors	Number of direct investors residing/established in the Netherlands	Total assets invested (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) The AFM requests you to state the (measured or estimated) market value as at the reference date. If this value cannot be easily estimated, you may state the most recent market value.

15b.

Enter the requested information with respect to your direct investors not residing/established in the Netherlands.

If you do not have direct investors in a particular risk classification, please enter '0'. This risk classification does not refer to the risk appetite of your direct investors, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your direct investors.

Risk classification of direct investors	Number of direct investors not residing/established in the Netherlands	Total assets invested (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) The AFM requests you to state the (measured or estimated) market value as at the reference date. If this value cannot be easily estimated, you may state the most recent market value.

16a.

Do you have any direct investors residing or established in a **high-risk country**?¹

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

16b.

For each high-risk country, state the total number of direct investors and the total assets invested.

High-risk country	Number of direct investors residing/established in this country	Total assets invested (€) ¹

Note:

¹) The AFM requests you to state the (measured or estimated) market value as at the reference date. If this value cannot be easily estimated, you may state the most recent market value.

17.

For each of the risk categories listed below, state the number of direct investors and total assets invested by them in this category on the reference date.

If not applicable, please enter '0'.

	Number of direct investors	Total assets invested (€) ¹
Non-profit organisations and public benefit organisations (PBOs) ²		
Family offices ³		
High-net worth individuals ⁴		
Sum total		

Note:

¹) The AFM requests you to state the (measured or estimated) market value as at the reference date. If this value cannot be easily estimated, you may state the most recent market value.

²) The AFM applies the definition used by the FATF: 'A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works".' A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax and Customs Administration.

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

⁴) This refers to natural persons with a net worth in excess of EUR 2.5 million on the reference date.

18.

For each of the sectors/activities listed below, state your number of direct investors from this sector or carrying out this activity and the total assets invested by them.

If not applicable, please enter '0'.

	Number of direct investors	Total assets invested (€) ¹
Religious institutions		
Charitable institutions or foundations		
Games of chance and online or offline gaming (casinos, amusement arcades, poker, etc.)		
Cryptocurrency (including data mining, exchanging, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Target companies managed/directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, eBay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

Note:

¹) The AFM requests you to state the (measured or estimated) market value as at the reference date. If this value cannot be easily estimated, you may state the most recent market value.

19.

Enter the requested information for each of your 10 largest investors (in terms of total assets invested in all investments funds managed by your firm).

If you have less than 10 investors, enter this information for each of your investors and leave the remaining rows empty.

Investor	Type of investor (natural person or legal entity)	Total assets invested (€)	Number of years this party has been a direct investor in your firm (round to whole years)	Country of residence/establishment
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				

C. Indirect investors

You have stated that the units in your investment fund(s) are traded indirectly. By 'indirect trading', the AFM means that investors acquire units in one or more of your investment funds through the intermediation of third parties, such as investment firms or banks.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

If you are a branch, then in the following questions the term 'investors' should be understood to include investors that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

20a.

Through how many of the following types of external businesses are the units in your investment fund(s) traded?

Type	Number
Investment firms (other than trading platforms)	
Trading platforms (e.g. an MTF)	
Regulated markets (RMs)	
Banks	
Other	

20b.

Please indicate what is meant by 'other':

20c.

Do you ascertain that these external businesses have adequate anti-money laundering and anti-terrorist financing procedures and that they comply with these procedures?

Yes

No

21a.

Are any of these businesses **established in a high-risk country**?¹

You have stated that the units in your investment fund(s) are traded indirectly through external businesses.

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

21b.

For each **high-risk country**, state how many of the external businesses are established there.

High-risk country	Number of external businesses

22.

Do you know the identity of your indirect investor(s)?

- Yes
 - No
-

23.

How many indirect investors had indirectly bought units in one or more investment funds that you manage?

24.

Answer the following questions with respect to each of your indirect investors.

	Number	Total assets invested (€)
Indirect investors not residing or established in the Netherlands		

25a.

Do you have any indirect investors residing or established in a **high-risk country**?¹

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

25b.

For each **high-risk country**, state your total number of indirect investors and total assets invested by indirect investors per high-risk country on the reference date.

High-risk country	Total number of indirect investors per country	Total assets invested by indirect investors per country (€)

D. Management of individual capital

This section relates to the services as referred to in Section 2:67a(2) Wft or Section 2:69c(2) Wft that you selected in answering question 5. The questions in this section only concern clients for which you perform asset management services. Our definition of 'clients' includes natural persons, legal entities and/or other entities and/or legal structures.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

If you are a branch, then in the following questions the term 'clients' should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

26.

Enter the requested information with respect to your asset management clients.

	Number of clients	Value of investment portfolio (€) ¹	Total amount of orders (1 January 2022 to 31 December 2022) (€) ²
Natural persons			
Legal entities and/or other entities and/or legal structures			
Sum total			

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account, as at the reference date.

²) This is the total amount of orders executed for the purposes of individual asset management.

27a.

Enter the requested information with respect to your asset management clients residing/established in the Netherlands

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. Even if your firm uses different names for the risk classifications, the AFM requests you to use the classifications stated in this table.

If not applicable, please enter '0'.

Risk classification of clients	Number of clients residing/established in the Netherlands	Value of investment portfolio (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account, as at the reference date.

27b.

Enter the requested information with respect to your asset management clients not residing/established in the Netherlands

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. Even if your firm uses different names for the risk classifications, the AFM requests you to use the classifications stated in this table.

If not applicable, please enter '0'.

Risk classification of clients	Number of clients not residing/established in the Netherlands	Value of investment portfolio (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account, as at the reference date.

28a.

Do you have any clients residing or established in a **high-risk country** for which you perform individual asset management?¹

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

28b.

For each **high-risk country**, state your total number of clients and the total value of the investment portfolio.

High-risk country	Total number of clients per country	Value of investment portfolio (€) ¹

Note:

¹) This is the value of your clients' investment portfolio, including the balance of cash and cash equivalents in the investment account, as at the reference date.

29.

For each of the categories listed below, state the number of clients whose individual assets you manage and the total value of the investment portfolio.

If not applicable, please enter '0'.

	Number of clients	Value of investment portfolio (€)¹
Non-profit organisations and public benefit organisations (PBOs) ²		
Family offices ³		
High-net worth individuals ⁴		

Note:

¹) This is the value of your clients' investment portfolio, including the balance of cash and cash equivalents in the investment account, as at the reference date.

²) The AFM applies the definition used by the FATF: 'A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works".'

A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax and Customs Administration.

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

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

30.

For each of the sectors/activities listed below, state the number of clients from this sector or carrying out this activity whose individual assets you manage and the total value of the investment portfolio.

If not applicable, please enter '0'.

	Number of clients	Value of investment portfolio (€) ¹
Religious institutions		
Charitable institutions or foundations		
Games of chance and online or offline gaming (casinos, amusement arcades, poker, etc.)		
Cryptocurrency (including data mining, exchanging, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Target companies managed/directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, eBay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account.

31.

For each of the asset categories listed below, state the total amount in assets invested by the clients whose individual assets you manage.

If not applicable, please enter '0'.

Asset categories	Total assets invested (€) ¹
Cryptocurrency	
Miscellaneous tangible assets, such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

Note:

¹) The AFM requests you to state the (measured or estimated) market value of the investments in each of the listed asset categories as at the reference date. If this value cannot be easily estimated, you may state the most recent market value. This concerns all such investments, irrespective of the country where these assets are located. If your clients do not invest in a particular asset category, please enter '0'.

E. Advice on financial instruments

This section relates to the services as referred to in Section 2:67a(2) Wft or Section 2:69c(2) Wft that you selected in answering question 5. The questions in this section only concern clients for which you perform advisory services. If you also perform asset management for these clients and advise them on these assets, you should not enter these clients in this section. Our definition of 'clients' includes natural persons, legal entities and/or other entities and/or legal structures.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

If you are a branch, then in the following questions the term 'clients' should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

32.

Enter the requested information with respect to the clients you advise on financial instruments.

	Number of clients	Value of advised assets (€) ¹
Natural persons		
Legal entities and/or other entities and/or legal structures		
Sum total		

Note:

¹) This is the value of the assets you advised on. If you also perform asset management for these clients and advise them on these assets, you should not enter these assets here, but instead in the section on asset management.

33a.

Enter the requested information with respect to the clients you advise on financial instruments residing/established in the Netherlands.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. Even if your firm uses different names for the risk classifications, the AFM requests you to use the classifications stated in this table.

If you do not have clients in a particular risk classification, please enter '0'.

Risk classification of clients	Number of clients residing/established in the Netherlands	Total amount of advised assets (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) This is the value of the assets you advised on. If you also perform asset management for these clients and advise them on these assets, you should not enter these assets here, but instead in the section on asset management.

33b.

Enter the requested information with respect to the clients you advise on financial instruments not residing/established in the Netherlands.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. Even if your firm uses different names for the risk classifications, the AFM requests you to use the classifications stated in this table.

If you do not have clients in a particular risk classification, please enter '0'.

Risk classification of clients	Number of clients not residing/established in the Netherlands	Total amount of advised assets (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) This is the value of the assets you advised on. If you also perform asset management for these clients and advise them on these assets, you should not enter these assets here, but instead in the section on asset management.

34a.

Do you have any clients residing or established in a **high-risk country** that you advise on financial instruments?¹

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

34b.

For each **high-risk country**, state the total number of clients and the total amount of the advised assets.

High-risk country	Total number of clients per country	Total amount of advised assets (€) ¹

Note:

¹) This is the value of the assets you advised on. If you also perform asset management for these clients and advise them on these assets, you should not enter these assets here, but instead in the section on asset management.

35.

For each of the categories listed below, state the number of clients that you advise on financial instruments and the total amount of the advised assets.

If not applicable, please enter '0'.

	Number of clients	Total amount of advised assets (EUR) ¹
Non-profit organisations and public benefit organisations (PBOs) ²		
Family offices ³		
High-net worth individuals ⁴		

Note:

¹) This is the value of the assets you advised on. If you also perform asset management for these clients and advise them on these assets, you should not enter these assets here, but instead in the section on asset management.

²) The AFM applies the definition used by the FATF: 'A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works".' A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax and Customs Administration.

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

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

36.

For each of the sectors/activities listed below, state the number clients you advised on financial instruments and the total amount of the advised assets.

If not applicable, please enter '0'.

	Number of clients	Total amount of advised assets (€)¹
Religious institutions		
Charitable institutions or foundations		
Games of chance and online or offline gaming (casinos, amusement arcades, poker, etc.)		
Cryptocurrency (including data mining, exchanging, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Target companies managed/directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, eBay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

Note:

¹) This is the value of the assets you advised on. If you also perform asset management for these clients and advise them on these assets, you should not enter these assets here, but instead in the section on asset management.

37.

Do you advise on financial instruments in any of the following asset categories?

Asset categories	Answer
Cryptocurrency	[Yes/No]
Miscellaneous tangible assets, such as horses, teak, whisky, gold, wine, etc.	[Yes/No]
Art and/or antiques	[Yes/No]
Real estate	[Yes/No]
Microfinance	[Yes/No]
CO2 emission rights	[Yes/No]
Oil, gas, minerals	[Yes/No]

F. Receiving and/or forwarding orders

This section relates to the services as referred to in Section 2:67a(2) Wft or Section 2:69c(2) Wft that you selected in answering question 5. The questions in this section only concern clients for which you receive and/or forward orders. Our definition of 'clients' includes natural persons, legal entities and/or other entities and/or legal structures.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

If you are a branch, then in the following questions the term 'clients' should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

38.

Enter the requested information with respect to the clients for which you receive and/or forward orders relating to financial instruments.

	Number of clients	Value of investment portfolio (€) ¹	Total amount of orders (1 January 2022 to 31 December 2022) (€) ²
Natural persons			
Legal entities and/or other entities and/or legal structures			
Sum total			

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account, as at the reference date.

²) This is the total amount in orders that you have received and forwarded. This amount excludes any orders for the purposes of individual asset management performed by your firm (if applicable).

39a.

Enter the requested information with respect to the clients for which you receive and/or forward orders relating to financial instruments residing/established in the Netherlands.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. Even if your firm uses different names for the risk classifications, the AFM requests you to use the classifications stated in this table.

If you do not have clients in a particular risk classification, please enter '0'.

Risk classification of clients	Number of clients residing/established in the Netherlands	Value of investment portfolio (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account.

39b.

Enter the requested information with respect to the clients for which you receive and/or forward orders relating to financial instruments not residing/established in the Netherlands.

This risk classification does not refer to the risk appetite of your clients, but to the money laundering and/or terrorist financing (ML/TF) risk posed by your clients. Even if your firm uses different names for the risk classifications, the AFM requests you to use the classifications stated in this table.

If you do not have clients in a particular risk classification, please enter '0'.

Risk classification of clients	Number of clients <u>not</u> residing/established in the Netherlands	Value of investment portfolio (€) ¹
Low risk		
Medium risk		
High/increased risk		
Unacceptable risk		
Not (or not yet) classified		

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account.

40a.

Do you have any clients residing or established in a **high-risk country** for which you receive and/or forward orders?¹

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

40b.

For each **high-risk country**, state your total number of clients and the total value of the investment portfolio for which you received and/or forwarded orders per country.

High-risk country	Total number of clients per country	Value of investment portfolio (€) ¹

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account.

41.

For the categories listed below, state the number clients for which you receive and/or forward orders and the value of the investment portfolio in each of the categories.

If not applicable, please enter '0'.

	Number of clients	Value of investment portfolio (€) ¹
Non-profit organisations and public benefit organisations (PBOs) ²		
Family offices ³		
High-net worth individuals ⁴		

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account, as at the reference date.

²) The AFM applies the definition used by the FATF: 'A legal person or arrangement or organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works".'

A PBO is an institution that is entitled to certain tax benefits if it meets certain conditions. Further information on PBOs is available on the website of the Dutch Tax and Customs Administration.

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

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

42.

For each of the sectors/activities listed below, state the number of clients for which you receive and/or forward orders and the value of the investment portfolio in this sector/activity.

If not applicable, please enter '0'.

	Number of clients	Value of investment portfolio (€) ¹
Religious institutions		
Charitable institutions or foundations		
Games of chance and online or offline gaming (casinos, amusement arcades, poker, etc.)		
Cryptocurrency (including data mining, exchanging, etc.)		
Cash-intensive retail businesses (hospitality, sun bed salons, personal care, massage salons, florists, phone shops, pawnshops, etc.)		
Trust offices		
Target companies managed/directed by trust offices		
Art dealers, auction houses		
Real estate operation and development (in the Netherlands and/or abroad)		
Jewellers and merchants in precious stones and precious metals		
Digital peer-to-peer marketplaces (such as Uber, eBay, Airbnb, bol.com, Marktplaats)		
Arms dealers		

Note:

¹) This is the value of your clients' investment portfolio, including the cash balance in the investment account, as at the reference date.

43.

For each of the asset categories listed below, state the total amount in assets invested by the clients for which you receive and/or forward orders.

If not applicable, please enter '0'.

Asset categories	Total assets invested (€)¹
Cryptocurrency	
Miscellaneous tangible assets, such as horses, teak, whisky, gold, wine, etc.	
Art and/or antiques	
Real estate	
Microfinance	
CO2 emission rights	
Oil, gas, minerals	

Note:

¹) The AFM requests you to state the (measured or estimated) market value of the investments in each of the listed asset categories as at the reference date. If this value cannot be easily estimated, you may state the most recent market value. This concerns all such investments, irrespective of the country where these assets are located. If your clients do not invest in a particular asset category, please enter '0'.

G. Clients

In the questions below, the term 'clients' refers to all direct investors and other clients for which your firm performs any investment activities and/or services. For each question, you should state the total number of unique clients. 'Unique' here means that a client for which you perform multiple investment activities and/or services should be counted once.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

If you are a branch, then in the following questions the term 'clients' should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

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

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

44.

For each of the categories listed below, state the total number of clients.

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

45a.

Do you have any clients whose UBOs reside in a high-risk country?¹

- Yes
 No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

45b.

For each high-risk country, state the number of UBOs residing there.

High-risk country	Number of UBOs

46.

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

- Yes
- No

47.

How many clients are PEPs?

48a.

Do you have any clients who are politically exposed persons (PEPs) that reside in a **high-risk country**?¹

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

48b.

For each **high-risk country**, state the number of PEPs residing there that are clients of your firm. This concerns the country of residence of the PEPs.

High-risk country	Number of PEPs per country

49.

Do you have any clients whose UBOs are PEPs?

- Yes
- No

50.

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

51a.

Do you have any clients whose UBOs are PEPs that reside in a **high-risk country**?¹

- Yes
- No

Note:

¹) If you click 'Yes' here, you will see a list of high-risk countries in part b of this question.

51b.

For each **high-risk country**, state the number of UBOs of individual asset management clients of your firm who are PEPs residing there. This concerns the country of residence of the PEPs.

High-risk country	Number of UBOs of individual asset management clients of your firm who are PEPs

H. Products, services and transactions

In the questions below, the term 'clients' refers to all direct investors and other clients for which your firm performs any investment activities and/or services. For each question, you should state the total number of unique clients. 'Unique' here means that a client for which you perform multiple investment activities and/or services should be counted once.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

If you are a branch, then in the following questions the term 'clients' should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

52a.

Enter the requested information with respect to the clients that have placed funds with/via your firm in the period from 1 January 2022 to 31 December 2022.

	Number of clients	Number of transactions	Total amount (€)
Funds originating from Dutch bank accounts			
Funds originating from bank accounts in the EEA (excluding the Netherlands, Cyprus and Malta) ¹			
Funds originating from bank accounts outside the EEA (<u>excluding high-risk countries</u>) ¹			
Funds originating from bank accounts in high-risk countries ²			

Note:

¹) The European Economic Area (EEA) has 30 member states: the 27 EU states and three of the four EFTA member states (Norway, Iceland and Liechtenstein). Switzerland is a member of the EFTA but is not part of the EEA. Cyprus and Malta are part of the EEA but are also high-risk countries. We therefore request that you include Cyprus and Malta exclusively as high-risk countries. The next question includes a list of the countries designated as high-risk countries.

²) If you enter a number of cliets, you will see a list of high-risk countries in part b of this question.

52b.

For each high-risk country, state the total number of clients, the number of transactions and the total amount of those transactions.

High-risk country	Number of clients	Number of transactions	Total amount (€)

53.

In the period from 1 January 2022 to 31 December 2022, did you receive any cash payments, payments made using prepaid payment cards or cryptocurrency payments from your clients?

If you did not receive such payments from clients, please enter '0'

	Number of clients	Amount (€) ¹
Cash receipts (banknotes and coins)		
Prepaid payment cards		
Cryptocurrency		

Note:

¹) Where amounts were not denominated in euros, please convert to euros.

54a.

In the period from 1 January 2022 to 31 December 2022, did you accept any participation in kind in any of the investment funds you managed?

- Yes
- No

54b.

Was an auditor's report issued for the participation in kind?

- Yes
- No

I. Delivery and distribution channels

If you are a branch, then in the following questions the term 'clients' should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

55.

State the requested numbers with respect to the clients you had in the period from 1 January 2022 to 31 December 2022.

	Number of clients
Total number of clients accepted in the period (both physically present and not physically present)	
Acceptance of not physically present clients residing or established in the Netherlands	
Acceptance of not physically present clients <u>not</u> residing or established in the Netherlands	

56a.

State the number of new clients your firm accepted in the period from 1 January 2022 to 31 December 2022 that were introduced to your firm by an intermediary.

If not applicable, please enter '0'.

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

	Number of clients
Introduced through an intermediary established in the Netherlands	
Introduced through an intermediary established in the EEA (excluding the Netherlands, Cyprus and Malta) ¹	
Introduced through an intermediary established outside the EEA (excluding high-risk countries) ¹	
Introduced through an intermediary established in a high-risk country ²	

Note:

¹) The European Economic Area (EEA) has 30 member states: the 27 EU states and three of the four EFTA member states (Norway, Iceland and Liechtenstein). Switzerland is a member of the EFTA but is not part of the EEA. Cyprus and Malta are part of the EEA but are also high-risk countries. We therefore request that you include Cyprus and Malta exclusively as high-risk countries. The next question includes a list of the countries designated as high-risk countries.

²) If you enter a number of clients, you will see a list of high-risk countries in part b of this question.

56b.

For each high-risk country, state the number of new clients your firm accepted in the period from 1 January 2022 to 31 December 2022 that were introduced to your firm through an intermediary established in that country.

High-risk country	Number of clients accepted through an intermediary



Part II. Control Measures

J. Risks of money laundering and terrorist financing and risk assessment

In its risk assessment, an investment fund must in any case take into account the risk factors relating to its type of clients, products, services, transactions and delivery channels and those relating to countries or geographic areas. An investment fund must document the results of its risk identification and assessment and must keep this risk assessment up to date. Furthermore, investment funds must have internal procedures and measures in place based on this risk assessment that enable them to meet the requirements under the Wwft.

Unless indicated otherwise, the reference date for the questions below is 31 December 2022.

57.

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

- Yes
 - No
-

58.

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

- Yes
 - No
-

59.

When were these results updated?

- 2022
 - 2021
 - 2020
 - Before 2020
 - Never
-

60.

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

- Yes
- No

Note:

¹) A gross or inherent risk is a risk that is not taking into account the control measures in place associated with an investment fund's clients, activities and products or the environment in which a fund operates. This concerns threats and vulnerabilities that exist for your firm before taking into account the effects of the internal control measures in place.

61.

Does your risk assessment describe the net or residual risks that exist after taking into account the effects of your control measures on the gross/inherent risks?¹

- Yes
- No

Note:

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

62a.

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

- Money laundering
- Terrorist financing
- Corruption (bribery)
- Market manipulation
- Circumvention of sanctions regulations
- Evasion and avoidance of tax regulations
- Internal fraud by employees of your investment fund
- External fraud by clients or business relations
- Conflicts of interest
- WMD proliferation financing¹
- Other
- None of the above

Note:

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

62b.

Explain below what you mean by 'other'.

63.

How do you assess your firm with respect to the following risk categories?¹

	Very low risk	Low risk	Medium risk	High risk	Very high risk
Type of clients					
Type of services and products					
Risks relating to countries					
Risks relating to delivery channels					

Note:

¹) Please base your answer on the gross risks as defined in the Wwft. If you are a branch, then in the following questions the term 'clients' should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s).

K. Policy, procedures and measures

64.

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

- Yes
- No

65.

Does your firm have a specific policy in relation to the Wwft and/or sanctions regulations and a general integrity policy?

	Answer
Wwft	[Yes/No]
Sanctions regulations	[Yes/No]
General integrity policy	[Yes/No]

66.

When was this policy last updated and approved?

	2022	2021	2020	Before 2020
Wwft				

	2022	2021	2020	Before 2020
Sanctions regulations				

	2022	2021	2020	Before 2020
General integrity policy				

67.

Does this policy address the matters listed below?

	Answer
Client acceptance	[Yes/No]
Clients' risk classification	[Yes/No]
Client review	[Yes/No]
Termination of relationships with clients	[Yes/No]
Transaction monitoring	[Yes/No]
Reporting unusual transactions	[Yes/No]
Screening business relations, transactions and investments in connection with sanctions regulations	[Yes/No]

68a.

Do you have a group policy for compliance with anti-money laundering regulations?

You have stated that you have branches, tied agents and/or subsidiaries.

- Yes
- No

68b.

If you do, how do you ensure an effective application of the group policy by your branches, tied agents and/or subsidiaries?

69a.

Has the (foreign) investment firm drawn up a group policy for compliance with anti-money laundering regulations?

You have stated that your company is a branch of a (foreign) investment firm.

- Yes
- No

69b.

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



L. Client due diligence

In the questions below, the term 'clients' refers to all direct investors and other clients for which your firm performs any investment activities and/or services. For each question, you should state the total number of unique clients. 'Unique' here means that a client for which you perform multiple investment activities and/or services should be counted once.

You have stated that your firm is a branch or subsidiary of one or more foreign parent companies.

70.

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

- Yes, our firm performs client due diligence for all our clients.
 - Our firm performs the client due diligence for a number of our clients; for our other clients, the client due diligence is performed by the (foreign) parent company.
 - No, the client due diligence for our clients is performed by the (foreign) parent company.
 - No, neither our firm nor the (foreign) parent company performs due diligence in respect of our clients.
-

71.

Are you aware of the manner in which the (foreign) parent company performs the client due diligence?

- Yes
 - No
-

72.

When it performs client due diligence, does your firm apply courses of action, procedures and measures put in place by the (foreign) parent company?

- Yes
 - No
-

L. Client due diligence [new page in portal]

In the questions below, the term ‘clients’ refers to all direct investors and other clients for which your firm performs any investment activities and/or services. For each question, you should state the total number of unique clients. ‘Unique’ here means that a client for which you perform multiple investment activities and/or services should be counted once.

The term ‘business relation’ refers to the legal persons and/or legal entities with which your firm has a business, professional or commercial relationship that is connected to your firm’s professional activities. For example, a legal consulting firm that assists you in drawing up your client agreements. Business relations also include affiliates/associates with which your firm has a business relationship. In this questionnaire, you do not need to enter business relations that are not connected to your professional activities, such as with a cleaning company.

If you are a branch, then in the following questions the term ‘clients’ should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

73.

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

Please distinguish between clients and other business relations in your answer.

	In 100% of cases	In 50- 99% of cases	In > 0- 49% of cases	In 0% of cases
Clients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other business relations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

74.

Do you perform Wwft client due diligence when entering into a business relationship or effecting a one-off transaction?¹

Please distinguish between clients and other business relations in your answer.

	Always beforehand	Sometimes beforehand, sometimes afterwards	Always afterwards	No client due diligence is performed
Clients	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other business relations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Note:

¹) A transaction is an action or combination of actions by or on behalf of a client that your firm has become aware of in the performance of its services to the client in question. This also includes intended transactions.

75.

As part of your ongoing client monitoring, do you (where necessary) investigate the source of the funds to be used for the business relationship or transaction?¹

Please distinguish between clients and other business relations in your answer.

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

Note:

¹) A transaction is an action or combination of actions by or on behalf of a client that your firm has become aware of in the performance of its services to the client in question. This also includes intended transactions.

76.

Do you perform a regular review of the risk profile of all your clients?

If you do not have clients in a particular risk classification, please select 'NA' (not applicable).

	Event-driven	Regular
Clients with low risk	Yes/No/NA	Yes/No/NA
Clients with medium risk	Yes/No/NA	Yes/No/NA
Clients with high/increased risk	Yes/No/NA	Yes/No/NA
Clients with unacceptable risk	Yes/No/NA	Yes/No/NA

77.

When does your firm apply additional control measures?

- For PEPs
- For clients in high-risk countries
- For clients with high/increased risk
- When clients are not physically present during the acceptance process
- No additional control measures are applied

78a.

Do you outsource (a part of) your client due diligence to (a) third party/parties?¹

- Yes
- No

Note:

¹) This refers to Section 10 Wwft, on the basis of which part of the client due diligence may be outsourced. Please note that this does not include the ongoing monitoring (see Section 10(1) Wwft in conjunction with Section 3(2)(d) Wwft).

78b.

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

- Identification of clients and/or other business relationships
 - Verification of the identity of clients and/or other business relationships
 - PEP check
 - Adverse media check
 - Sanction check
 - Other
 - None
-

78c.

Please indicate what is meant by 'Other':

78d.

To which third party/parties do you (partially) outsource client due diligence?

79.

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

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

80.

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

- Yes
 - No
-

81.

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

- Yes
 - No
-

L. Client due diligence [new page in portal]

In the questions below, the term ‘clients’ refers to all direct investors and other clients for which your firm performs any investment activities and/or services. For each question, you should state the total number of unique clients. ‘Unique’ here means that a client for which you perform multiple investment activities and/or services should be counted once.

The term ‘business relation’ refers to the legal persons and/or legal entities with which your firm has a business, professional or commercial relationship that is connected to your firm’s professional activities. For example, a legal consulting firm that assists you in drawing up your client agreements. Business relations also include affiliates/associates with which your firm has a business relationship. In this questionnaire, you do not need to enter business relations that are not connected to your professional activities, such as with a cleaning company.

If you are a branch, then in the following questions the term ‘clients’ should be understood to include clients that enter into a contract with your firm and/or (foreign) (manager of) investment institution(s) through your intermediation.

82.

How many prospective clients did your firm decline because of Wwft- and Sw-related reasons in the period from 1 January 2022 to 31 December 2022?

Number:

83.

With how many clients did your firm terminate its relationship because of Wwft-related reasons in the period from 1 January 2022 to 31 December 2022?

Number:

84.

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

If not applicable, please select ‘No’.

- Yes
- No

85.

Does the client due diligence also cover the added authorised representative(s)?

- Yes
 - No
-

M. Transaction monitoring

A transaction is an action or combination of actions by or on behalf of a client that your firm has become aware of in the performance of its services to the client in question. This also includes intended transactions.

86.

Does your firm use an automated or manual system to monitor transactions?¹

- Exclusively automated
- Exclusively manual
- Combination of automated and manual
- No such system is used

Note:

¹) 'Automated' here means that the monitoring takes place without any human intervention. Updating an Excel sheet, for example, does not qualify as automated monitoring.

87.

When does the monitoring of transactions take place?

	In most cases prior to execution	In most cases within one week of execution	In most cases later than one week after execution
Transactions initiated by your firm			
Transactions by or on behalf of a client			

88.

Does your firm create an expected transaction profile for a new client when it starts to provide services to this client?

- Yes, in all cases
 - Yes, for clients with high/increased risk
 - Yes, for clients with medium risk
 - No
-

89.

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

- Yes
 - No
-

90.

Is it possible that funds are received for the benefit of a client that originate from an account that is not in that client's name?¹

- Yes
 - No
-

Note:

¹) This does not include a client's joint account.

91.

Is it possible that funds are paid to an account that is not in the client's name?¹

- Yes
 - No
-

Note:

¹) This does not include a client's joint account.

92.

Does your firm perform audit procedures in such situations?

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

- Yes
 - No
-

93.

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

- Yes
 - No
-

94.

How many alerts were generated in the period from 1 January 2022 to 31 December 2022?

95a.

Was there a backlog in your assessment of these alerts on the reference date of 31 December 2022?

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

95b.

Number of alerts still to be assessed:

96.

How many transactions did your firm refuse in the period from 1 January 2022 to 31 December 2022 due to suspicion of involvement in money laundering and/or terrorist financing?

N. Reporting of unusual transactions

A firm must have courses of action, procedures and measures in place that enable it to recognise unusual transactions and to report these unusual transactions to the Financial Intelligence Unit - Nederland (FIU-Nederland). The reporting procedure is explained on the website of FIU-Nederland under 'Reporting' and 'Reporting groups'.

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

Please note that when you register with FIU-Nederland or make a report, you need to ensure that you do so on the basis of your own registration as an investment fund.

97.

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

Yes

No

98.

How many unusual transactions did you report to FIU-Nederland in the period from 1 January 2022 to 31 December 2022?

O. Sanctions screening

By "relationship" the AFM means not only the client, but also the UBO, the representative and/or other relevant natural and/or legal persons involved in the business relationship. The AFM hereby uses the definition of relationship from the Regeling Toezicht Sanctiewet 1977 ("relatie is eenieder die betrokken is bij een financiële dienst of een financiële transactie").

99a.

Which of the following sanctions lists (one or more) do you use in the screening of your business relations?¹

- Dutch terrorism sanctions list
- EU sanctions lists
- UN sanctions lists
- Other
- None

Note:

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

99b.

Please indicate what is meant by 'other':

100.

Do you check if a prospective or existing business relation appears in one or more sanctions lists **before** providing your services?

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

101.

Do you conduct a daily check of sanctions lists?¹

- Yes
- No

Note:

¹) With this question you can think of a daily screening of all relations using an automated system.

102.

Do you check if a prospective or existing business relation appears in one or more sanctions lists **during** providing your services?

- Yes, in case of changes to the sanctions lists
 - Yes, in case of changes on the side of the relationship
 - Yes, at the end of the relationship
 - No
-

103.

When investing funds, entering into a business relationship or effecting transactions, do you check whether the party concerned appears in one or more sanctions lists?

- Yes
 - No
-

104.

How many business relations (including clients, UBOs, and beneficiaries of payments) have had their funds frozen by you on the basis of sanctions regulations in the period from 1 January 2022 to 31 December 2022?

105.

How many business relations whose funds were frozen did you report to the AFM in this period?

P. Training

106a.

Does your firm employ staff?

- Yes
- No

106b.

Does your firm provide a facility enabling the employees of your firm to receive training on the Wwft and/or sanctions regulations?

This concerns any form of training, whether offered internally or externally.

	Answer
Wwft	[Yes/No]
Sanctions regulations	[Yes/No]

107.

Enter the requested information with respect to your employees:¹

	How many employees took this training in the past 24 months? ¹	How many employees still have to take this training?
Training on Wwft		
Training on sanctions regulations		

Note:

¹) You may need to answer this question even though you stated that your firm does not provide such a training facility. You may have hired employees who completed such training before joining your firm.

108.

Did one or more of your day-to-day policymakers take one or more training courses on the Wwft and/or sanctions regulations in the past 24 months?

- Yes, training on Wwft
- Yes, training on sanctions regulations
- No

Q. Compliance and audit

109.

How many FTEs in your internal compliance function perform activities relating to the Wwft and the Sw?¹

Note:

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

110.

Do you use the services of an external compliance function that performs activities relating to the Wwft and the Sw?

- Yes
 No
-

111.

How many FTEs in the external compliance function perform activities relating to the Wwft and the Sw?¹

Note:

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

112.

For each of the items listed below, state whether compliance monitoring took place for this item in the past 24 months, and if so, what the resulting assessment was.

	Adequate	Adequate, with findings	Inadequate	Did not take place
Client acceptance / due diligence				
Transaction monitoring				
Sanctions screening				
Reassessment of client risks (client review)				

113.

When was the last Wwft audit performed?

- 2022
- 2021
- 2020
- Before 2020
- Never

114.

When was the last sanctions regulations audit performed?

- 2022
- 2021
- 2020
- Before 2020
- Never

R. Governance

115.

Does your firm have two or more policymakers?

- Yes
 - No
-

116.

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

- Yes
 - No
-

117.

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

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

Concluding remarks

118.

Do you have any comments you would like to make in relation to this questionnaire?¹

You have reached the end of the questionnaire.

Question number/general	Comments
Number/general	
Number/general	
Number/general	

Note:

¹) Your comments may be general or they may relate to a specific question.

Declaration

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

Salutation:

Initials:

Surname prefix:

Surname:

Policymaker declares that questionnaire has been completed truthfully

By checking this box, the above policymaker declares that this Wwft & Sw Questionnaire for (managers of) investment institutions 2023 has been completed truthfully.



Dutch Authority for the Financial Markets

PO Box 11723 | 1001 GS Amsterdam

www.afm.nl

Mission

The AFM is committed to promoting fair and transparent financial markets.

As an independent market conduct authority, we contribute to a sustainable financial system and