

Question	Credit institutions	Payment service providers	Money remitters	Investment firms, management companies, AIFM	Life insurance companies and insurance companies	Virtual currency providers
	<b>x= report</b>					
<b>Private customers</b>						
Report the total number of private customers subject to asset freezes by the UN and EU.	x	x	x	x	x	x
Report the value of private customers' assets subject to asset freezes by the UN and EU in thousand euros.	x	x	x	x	x	x
Report the total number of private customers subject to national freezing decisions (national list of asset freezes, so-called NBI list).	x	x	x	x	x	x
Report the value of private customers' assets subject to national freezing decisions in thousand euros (national list of asset freezes, so-called NBI list).	x	x	x	x	x	x
Report the number of private customers with permanent address in Iran, the Democratic People's Republic of Korea (North Korea), Syria, Belarus and Russia.	x	x	x	x	x	x
<b>Corporate and institutional customers</b>						
Report the total number of corporate and institutional customers subject to asset freezes by the UN and EU.	x	x	x	x	x	x
Report the value of corporate and institutional customers' assets subject to asset freezes by the UN and EU in thousand euros .	x	x	x	x	x	x
Report the total number of corporate and institutional customers subject to national freezing decisions (national list of asset freezes, so-called NBI list).	x	x	x	x	x	x
Report the value of corporate and institutional customers' assets subject to asset national freezing decisions in thousand euros (national list of asset freezes, so-called NBI list).	x	x	x	x	x	x
Report the number of customers designated in the Annexes to Council Regulation (EU) 833/2014 and Council Regulation (EC) 765/2006 (so-called sectoral sanctions).	x	x	x	x	x	x
Report the number of customers which are embassies or consulates.	x				x	
Report the number of corporate and institutional customers whose domicile and/or address of the main location of business is in Iran, the Democratic People's Republic of Korea (North Korea), Syria, Belarus or Russia.	x	x	x	x	x	x
<b>Payments and transactions in the reporting year</b>						
Report the number of payments suspended and frozen by the supervised entity based on UN and EU sanctions.	x	x	x	x	x	x
Report the total value, in thousand euros, of payments suspended and frozen by the supervised entity based on UN and EU sanctions.	x	x	x	x	x	x
Report the number of payments suspended and frozen by the supervised entity based national freezing orders (NBI list).	x	x	x	x	x	x
Report the total value, in thousand euros, of payments suspended and frozen by the supervised entity based on national freezing orders (NBI list).	x	x	x	x	x	x
<b>Private customers</b>						
Report the total value of payments incoming from countries subject to extensive sanctions (Iran, North Korea, Syria, Belarus or Russia) in thousand euros .	x	x	x			x
Report the total value of payments going to countries subject to extensive sanctions (Iran, North Korea, Syria, Belarus or Russia) in thousand euros .	x	x	x			x
Report the number of private customers who are Russian citizens or natural persons residing in Russia with a total value of deposits in your company of 100,000 euros or more.	x					
Report the number of private customers who are Russian citizens or natural persons residing in Russia with a total value of deposits in your company of 90,000–99,000 euros.	x					
Report the number of private customers who are Russian citizens or natural persons residing in Russia.						x
<b>Corporate and institutional customers</b>						

Report the total value of payments during the reporting year going to countries subject to extensive sanctions (Iran, Democratic People's Republic of Korea (North Korea), Syria, Belarus or Russia) in thousand euros .	x	x	x			x
Report the total values of payments during the reporting year going to countries subject to extensive sanctions (Iran, Democratic People's Republic of Korea (North Korea), Syria, Belarus or Russia) in thousand euros.	x	x	x			x
Report the number of corporate and institutional customers who are legal persons, entities and bodies domiciled Russia with a total value of deposits in the company of 100,000 euros or more. In this context, legal persons, entities and bodies domiciled in Russia mean legal persons, entities and bodies established in Russia.	x					
Report the number of corporate and institutional customers who are legal persons, entities and bodies domiciled Russia with a total value of deposits in your company of 90,000–99,000 euros. In this context, legal persons, entities and bodies domiciled in Russia mean legal persons, entities and bodies established in Russia.	x					
Report the number of corporate and institutional customers which are legal persons, entities and bodies domiciled outside the Union and directly or indirectly owned for more than 50% by Russian citizens or natural persons residing in Russia with a total value of deposits in the company of 100,000 euros or more.	x					
Report the number of corporate and institutional customers which are legal persons, entities and bodies domiciled outside the Union and directly or indirectly owned for more than 50% by Russian citizens or natural persons residing in Russia with a total value of deposits in the company of 90,000–99,999 euros.	x					
Report the number of corporate and institutional customers who are legal persons, entities and bodies established in Russia.						x
<b>Organisation of activities and operating principles</b>						
Report whether the company has a designated person responsible for monitoring that the company has effective policies, procedures and internal control for ensuring compliance with sanctions regulation and freezing orders. This person could be for example the company's AML Compliance Officer or other specifically designated person.	x	x	x	x	x	x
Report the number of full-time employees whose duties in the company include ensuring compliance with sanctions.	x	x	x	x	x	x
Report the number of full-time employees whose duties in the company include ensuring compliance with sanctions and who work in the company's compliance unit.	x	x	x	x	x	x
Report whether the company has prepared or updated its policies and procedures for ensuring compliance with sanctions regulation and freezing decisions within the past two years.	x	x	x	x	x	x
Report whether the management of the company has approved the company's policies concerning sanctions. In this question, the management of the company refers to the executive management or board of directors of the company.	x	x	x	x	x	x
Report whether the company has practical operating instructions for the freezing of assets. Practical operating instructions refer to detailed hands-on instructions for situations where a freezing of assets must be made.	x	x	x	x	x	x
Report how often the management of the company is reported on the status of sanctions risk monitoring, including frozen assets, the number of sanctions alerts and any sanctions infringements. In this case, the management of the company refers to the executive management or board of directors of the company.	x	x	x	x	x	x
Report whether the company has a whistleblowing channel that also includes misconduct pertaining to sanctions.	x	x	x	x	x	x
Report whether the company has a training plan for training its employees on sanctions. A training plan refers to a documented plan intended to train the company's personnel on financial sanctions and increase awareness on sanctions risk management within the company.	x	x	x	x	x	x
Report the number of training events whose main topic was sanctions and on which the company has verifiable documentation (for example presentation material and list of attendees). Examples of training events include external seminars, participation in training events arranged by a competent authority and internal training events.	x	x	x		x	x

Report the number of findings made by internal audit concerning sanctions which have been reported by internal audit in an audit report and whose agreed remediation deadline has not yet lapsed.	x	x	x		x	x
Report the number of findings made by internal audit concerning sanctions which have been reported by internal audit in an audit report and whose agreed remediation deadline has already lapsed.	x	x	x		x	x
Report the number of findings made by the compliance function concerning sanctions which have been reported by compliance as part of its compliance monitoring obligation and whose agreed remediation deadline has not yet lapsed.	x	x	x		x	x
Report the number of findings made by the compliance function concerning sanctions which have been reported by compliance as part of its compliance monitoring obligation and whose agreed remediation deadline has already lapsed.	x	x	x		x	x
<b>Risk assessment</b>						
Report whether the company has a sanctions risk assessment. It may be part of an anti-money laundering and counter-terrorist financing risk assessment or a separate document focused on sanctions.	x	x	x	x	x	x
Report whether the risk assessment has been updated within the past 12 months. In this context, updating means that the supervised entity has reviewed sanctions risks concerning its activities and documented the reviews and conclusions in the risk assessment.	x	x	x	x	x	x
<b>Customer due diligence</b>						
Report whether the company checks, as part of its customer due diligence procedures, whether a customer manufactures, brokers or sells dual-use items. In this context, dual-use items refer to products listed in Annex I of Regulation (EU) No 2021/821 of the European Parliament and of the Council.	x	x	x			x
<b>Sanctions screening and management of sanctions lists</b>						
Report the name of the system (application/software) if the company conducts the sanctions checks of the customer base using a system.	x	x	x	x	x	x
Report the name of the system (application/software) if the company conducts the sanctions checks of payments and transactions using a system.	x	x	x	x	x	x
Report whether name of the provider of sanctions lists if the company uses an external service provider. In this context, sanctions lists refer to the sanctions lists of the UN, EU or the NBI.	x	x	x	x	x	x
Report the information on payments and transactions covered by a sanctions check:	x	x	x	x	x	x
a) name of the counterparty of the payment/transaction. In this context, payment refers to any transfer of assets, including transfers of a virtual currency.	x	x	x	x	x	x
b) country and address information related to the payment/transaction. In this context, country and address information refers to the address of the counterparty of the payment as well as any country code in the payment or transaction (such as the two-letter country codes under the ISO 3166-1 standard).	x	x	x	x	x	x
c) information of the intermediary and sender or beneficiary bank. In this context, the intermediary bank refers to a bank or other party operating between the sender bank and the beneficiary's bank by transmitting the assets from the sender bank to the beneficiary's bank. In this context, the sender bank refers to the bank whose customer has given the payment order. The beneficiary bank refers to the bank receiving the assets on behalf of its customer.	x	x	x			x
d) information in the free text field. In this context, the free text field refers to the section in the payment where the customer making a transaction order can add a message (for example field 70 in a Swift MT 103 payment).	x	x	x			
Report whether the company screens the customer base, against at least concerning changes made to the sanctions lists, whenever new parties are added to the UN, EU and NBI sanctions lists or the information of a listed party is changed.	x	x	x	x	x	x
Report the period of time in which new UN, EU and NBI sanctions list are included in sanctions screening.	x	x	x	x	x	x

Report whether supplementary lists are used in sanctions screening in addition to official sanctions lists. In this context, official sanctions lists refer to the sanctions lists published by the UN, EU or the NBI. Supplementary / enhancement lists refer to lists of parties that are not included in official sanctions lists but which are owned for more than 50% or controlled by listed parties.	x	x	x	x	x	x
Report whether financial sanctions imposed by the UN Security Council are included in the sanctions lists used for sanctions screening. Financial sanctions imposed by the UN Security Council with respect to anti-money laundering and counter-terrorist financing refer, for example, to UN Security Council resolutions 1267, 1989 and 2253.	x	x	x	x	x	x
Report whether the screening systems used by the company require a 100% match between the names to trigger an alert.	x	x	x	x	x	x
Report the degree of similarity between the names required in customer sanctions screening. If the respondent's information systems apply fuzzy logic, report the threshold (%) required by the system to trigger an alert.	x	x	x	x	x	x
Report the degree of similarity between the names required in transactions sanctions screening. If the respondent's information systems apply fuzzy logic, report the threshold (%) required by the system to trigger an alert.	x	x	x	x	x	x
Report whether the company has a testing plan to ensure the operability of the sanctions screening systems.	x	x	x		x	x
Report the functions outsourced by the company to an external service provider:	x	x	x	x	x	x
a) Sanctions screening systems and their maintenance. Sanctions screening systems refer to IT-systems to conduct sanctions screening	x	x	x	x	x	x
b) Management of sanctions lists. Sanctions lists refer to the sanctions list of the UN, EU or the National Bureau of Investigation (NBI)	x	x	x	x	x	x
c) Investigation of sanctions alerts. An external service provider refers to a company outside the company or group used in the investigation of alerts arising from sanctions screening	x	x	x	x	x	x
<b>Sanctions alerts</b>						
Report the breakdown of alerts arising from customer sanctions screening in the reporting year:	x	x	x	x	x	x
a)The match was against the UN or EU sanctions list	x	x	x	x	x	x
b) The match was against the national sanctions list (so-called NBI list)	x	x	x	x	x	x
c) True matches, the customer is listed on the UN or EU sanctions list	x	x	x	x	x	x
d) True matches, the customer is listed on the NBI list	x	x	x	x	x	x
Report the breakdown of alerts arising from transaction sanctions screening in the reporting year:	x	x	x	x	x	x
a) The match was against the UN or EU sanctions list	x	x	x	x	x	x
b) The match was against the national sanctions list (so-called NBI list)	x	x	x	x	x	x
c) Number of matches arising from domestic transactions where the match was against the UN or EU sanctions list or the domestic sanctions list (so-called NBI list)	x	x	x	x	x	x
d) Number of sanctions matches identified by the supervised entity as true matches, i.e. where the customer or counterparty is a party named on the UN or EU sanctions list	x	x	x	x	x	x
e)Number of sanctions matches identified by the supervised entity as true matches, i.e. where the customer or counterparty is a party named on the national sanctions list (so-called NBI list)	x	x	x	x	x	x
f) Number of payments returned to the company where the intermediary or beneficiary banks stated sanctions as the reason for the return	x	x				
g) Number of payments returned by the company to sender banks where the reason for the return involved sanctions (for example transactions deemed by the respondent to be against sanctions laws and regulations)	x	x				
Report whether the company conducts quality control regarding the sanctions alerts investigation process. Quality control in this context means an activity performed by the company to assess whether sanctions alerts have been handled in line with the company's internal guidance as well as with relevant laws and regulations.	x	x	x			x

Report whether the company has, as part of the quality control of sanctions alerts, detected errors that are in breach of the company's internal instructions , sanctions regulations or freezing decisions (number).	x	x	x			x
<b>Circumvention of sanctions</b>						
The circumvention of sanctions refers to actions aimed at circumventing prohibitions related to UN, EU or national freezing decisions. The circumvention of sanctions may consist, for example, of intentional and wilful actions by the customer to hide the participation in a transaction by a party identified on a sanctions list.						
Report whether the company has operating instructions to detect the circumvention of sanctions.	x	x	x	x	x	x
Report whether the company has detected circumvention of sanctions by customers or related to customers' payment or transactions in the reporting year.	x	x	x	x	x	x
Report the number of notifications received through the company's internal whistleblowing channels in the reporting year concerning anti-sanctions activities or the circumvention of sanctions.	x	x	x	x	x	x
Report the number of suspicious transaction reports made by the company to the Financial Intelligence Unit during the reporting year on account of the circumvention of sanctions.	x	x	x	x	x	x