

## ANNEX 1

**Table 1.1. Origin of the suspicious activity reports made during the audited year**

	Audited year
A] The total number of alerts generated by the transaction monitoring system	
A.1] Archived alerts	
A.2] Alerts that have resulted in a SAR	
B] Total number of internal suspicious communications reported by the employees of the entity to the Compliance Department, the Internal Control and Communication Body, or equivalent	
B.1] Archived internal suspicious communications	
B.2] Internal suspicious communications that have resulted in a SAR	
C] Total number of operations analysed by the Compliance Department or by the Internal Control and Communication Body (besides the ones derived from the alerts generated by the monitoring system and the internal suspicious communications)	
C.1] Archived operations	
C.2] Operations that have resulted in a SAR	
<b>Total SARs presented to the UIFAND</b>	

## ANNEX 2

### Subsidiaries, branches or delegations located abroad

**Table 2.1.** *General data*

	Entity name	Subsidiary, branch, delegation, or others, located abroad (specify)	Country / Jurisdiction	Activity	% of the bank's participation
1					
2					
...					
N					

**Table 2.2.** *AML/CFT supervision and control*

	Entity name	Competent supervisory authority (AML/CF)	Number of on-site inspections carried out by the competent supervisory authority	Shortcomings detected by the competent supervisory authority	Sanctions imposed by the competent supervisory authority (even if these have not yet been confirmed)	Number of inspections carried out at the subsidiary, branch or bank's foreign delegation by the audited entity	Shortcomings detected by the bank	Number of external audits in relation to AML / TF carried out during the audited year	Shortcomings detected by the external auditor
1									
2									
...									
N									

## ANNEX 3

### Number of randomly selected samples

Table 3.1.

Nominative accounts of resident clients opened during the audited year
<p>M<sub>1</sub>: number of random samples selected from nominative accounts of resident clients opened during the audited year.</p> <p>N<sub>1</sub>: number of nominative accounts of resident clients opened during the audited year.</p>
<hr/>
<p><b>M<sub>1</sub>=0,16*N<sub>1</sub>; if N<sub>1</sub> &lt; 150</b></p> <p><b>M<sub>1</sub>=0,14*N<sub>1</sub>; if 150 ≤ N<sub>1</sub> &lt; 300</b></p> <p><b>M<sub>1</sub>=0,12*N<sub>1</sub>; if 300 ≤ N<sub>1</sub> &lt; 450</b></p> <p><b>M<sub>1</sub>=0,10*N<sub>1</sub>; if 450 ≤ N<sub>1</sub> &lt; 600</b></p> <p><b>M<sub>1</sub>=0,08*N<sub>1</sub>; if N<sub>1</sub> ≥ 600</b></p>

Table 3.2.

Nominative accounts of non-resident clients <sup>1</sup> opened during the audited year
<p>M<sub>2</sub>: number of random samples selected from nominative accounts of non-resident clients opened during the audited year.</p> <p>N<sub>2</sub>: number of nominative accounts of non-resident clients opened during the audited year.</p>
<hr/>
<p><b>M<sub>2</sub>=0,16*N<sub>2</sub>; if N<sub>2</sub> &lt; 150</b></p> <p><b>M<sub>2</sub>=0,14*N<sub>2</sub>; if 150 ≤ N<sub>2</sub> &lt; 300</b></p> <p><b>M<sub>2</sub>=0,12*N<sub>2</sub>; if 300 ≤ N<sub>2</sub> &lt; 450</b></p> <p><b>M<sub>2</sub>=0,10*N<sub>2</sub>; if 450 ≤ N<sub>2</sub> &lt; 600</b></p> <p><b>M<sub>2</sub>=0,08*N<sub>2</sub>; if N<sub>2</sub> ≥ 600</b></p>

Table 3.3.

Numbered accounts with registered activity during the audited year and / or a positive balance at the end of the year
<p>M<sub>3</sub>: number of random samples selected from numbered accounts with registered activity during the audited year and / or a positive balance at the end of the year.</p> <p>N<sub>3</sub>: number of numbered accounts with registered activity during the audited year and / or a positive balance at the end of the year.</p>
<hr/>
<p><b>M<sub>3</sub>=0,16*N<sub>3</sub>; if N<sub>3</sub> &lt; 150</b></p> <p><b>M<sub>3</sub>=0,14*N<sub>3</sub>; if 150 ≤ N<sub>3</sub> &lt; 300</b></p> <p><b>M<sub>3</sub>=0,12*N<sub>3</sub>; if 300 ≤ N<sub>3</sub> &lt; 450</b></p> <p><b>M<sub>3</sub>=0,10*N<sub>3</sub>; if 450 ≤ N<sub>3</sub> &lt; 600</b></p> <p><b>M<sub>3</sub>= 80 accounts; if N<sub>3</sub> ≥ 600</b></p>

<sup>1</sup> In order to determine if the person is resident or non-resident, the existence of the non-resident beneficial owners which appear in the correspondent account will serve as a reference.

## ANNEX 4

### Number of randomly selected samples

**Table 4.1.**

Investment life- insurance policies opened during the audited year
<p>M<sub>4</sub>: number of random samples selected from investment life-insurance policies opened during the audited year.</p> <p>P: Total number of investment life-insurance policies opened during the audited year to which simplified due diligence measures <u>cannot</u> be applied<sup>2</sup>.</p> <hr/> <p><b>M<sub>4</sub> = 0,20*P; if P &lt; 150</b></p> <p><b>M<sub>4</sub> = 30 accounts; if P ≥ 150</b></p>

### Data on life-insurance policies opened during the audited year

**Table 4.2.**

	Audited year	
A] Total number of life insurance policies		
A.1] Maximum amount of paid premiums		
A.2] Average amount of paid premiums		
A.3] Is it possible surrender paid premiums?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
A.3.1] Number of surrenders during the audited year		
A.3.2] Maximum surrender amount of life-insurance policies		
B] Total number of life-investment insurance policies		
B.1] Maximum amount of paid premiums		
B.2] Average amount of paid premiums		
B.3] Is it possible surrender paid premiums?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
B.3.1] Number of surrenders during the audited year		
B.3.2] Maximum surrender amount of life-investment insurance		
<b>Total number of life-insurance policies opened since the beginning of the activity (A+B)</b>		

<sup>2</sup> The sample **does not include** life insurance policies subjected to the simplified customer due diligence measures, in other words:

*"a) Life insurance policies where the annual premium is no more than EUR 1,000 or the single premium is no more than EUR 2,500.*

*b) Insurance policies for pension schemes if there is no early surrender option and the policy cannot be used as collateral."*

## ANNEX 5

**Table 5.1.** *Shortcomings detected as a result of the analysis of the random sample - nominal accounts of resident clients opened during the audited year -*

	Internal reference of the sample	Residence of the client	Residence of the beneficial owner	Type of operations	Overall rated position	Detected shortcoming	Shortcoming assessment <sup>1</sup>	Comments	Current situation	Action plan
1										
2										
...										
N										

**Table 5.2.** *Shortcomings detected as a result of the analysis of the random sample - nominal accounts of non-resident clients opened during the audited year -*

	Internal reference of the sample	Residence of the client	Residence of the beneficial owner	Type of operations	Overall rated position	Detected shortcoming	Shortcoming assessment	Comments	Current situation	Action plan
1										
2										
...										
N										

**Table 5.3.** *Shortcomings detected as a result of the analysis of the random sample - numbered accounts with activity during the audited year and / or positive balance at the end of the year --*

	Internal reference of the sample	Residence of the client	Residence of the beneficial owner	Type of operations	Overall rated position	Detected shortcoming	Shortcoming assessment	Comments	Current situation	Action plan
1										
2										
...										
N										

<sup>1</sup> The importance of each shortcoming must be assessed and enough motivated with the auditor reasoned opinion considering the risk profile (client profile, type of operation, amounts, transfer's beneficiary country, deposits and withdrawals of cash, etcetera.).

**Table 5.4.** *Shortcomings detected as a result of the analysis of the random sample - investment life insurance policies opened during the audited year -*

	Internal reference of the sample	Residence of the client	Residence of the beneficial owner	Type of operations	Overall rated position	Detected shortcoming	Shortcoming assessment	Comments	Current situation	Action plan
1										
2										
...										
N										

## ANNEX 6

**Table 6.1.** Status of the recommendations issued by the UIFAND in relation to the analysis of previous audit reports.

	<b>Audited exercise</b>	<b>Pending recommendations from previous reports</b>	<b>Current status of the recommendation</b>	<b>Comments - actions carried out or in course of implementation</b>	<b>Timeline for the implementation of the recommendation <sup>1</sup></b>
<b>1</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		
<b>2</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		
<b>...</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		
<b>N</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		

<sup>1</sup> Only apply to the recommendations “partially adopted” or “not adopted”.

**Table 6.2.** Status of the recommendations made by the UIFAND following an on-site inspection

	<b>Date of the <i>on-site</i> inspection report</b>	<b>Description of the recommendation</b>	<b>Current status of the recommendation</b>	<b>Comments - actions carried out or in course of implementation</b>	<b>Timeline for the implementation of the recommendation <sup>1</sup></b>
<b>1</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		
<b>2</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		
<b>...</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		
<b>N</b>			<input type="checkbox"/> Adopted <input type="checkbox"/> Partially Adopted <input type="checkbox"/> Not adopted		

<sup>1</sup> Only apply to the recommendations “partially adopted” or “not adopted”.