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### IMPORTANT! **Do not** fill out this form!

## 1 Information about the activities of the undertaking

This question refers to beneficial owners of the undertaking to which this periodic reporting refers. "Beneficial owner" refers to the same definition as set out in sections 3-7 of the Registration of Beneficial Owners Act (2017:631).

How many (if any) of the undertakings's beneficial owners have their legal tax domicile abroad?
Number
In which countries besides Sweden (if any) do the undertakings's beneficial owners have their legal tax domicile?
Countries
Does the undertaking have any cross-border operations in Sweden (branch, agent)?
□Yes
□ No
In which country is the Parent undertaking domiciled?
Country
As per the most recent annual accounts, specify: The undertakings's net sales
The undertakings's balance sheet total
For Swedish management companies and AIF managers, specify the total fund value under management for the past year
Enter the total number of employees (in Sweden) Number



The question refers to all of the undertakings's employees and is not limited to employees working with measures to counteract money laundering and terrorism financing. "Employee" refers to all employees (regardless of the type of employment) as well as other workers, such as consultants and persons engaged via staffing agencies.

The undertakings's product range:	Yes No
Deposits on account with deposit insurance	
Deposits on account without deposit insurance	
Loans with collateral	
Loans without collateral	
Money remittance	
Securities trading	Yes No □ □
Pension solutions	
	Yes No
Insurance	
Cash handling (Provision or receipt of cash	
as payment or deposits into an account).	
Debit card	
Pre-paid debit card	
Swish	
	Yes No
Private Banking	
Currency exchange	
Leasing	
Payment services ("Payment services" refers to	
the definition set out in the Payment	
Services Act (2010:751)).	
Electronic money ("Electronic money" refers to	
the definition set out in the Electronic Money Act (2011:755)).	
Cryptocurrency	
Trade finance products	

## 2 The undertakings's risk assessment and procedures



According to Chapter 2, section 1 of the Money Laundering and Terrorist Financing (Prevention) Act (2017:630), a undertaking shall conduct an assessment of how the products and services it provides can be used for money laundering or terrorism financing and how large the risk is that this occurs (general risk assessment).

Has the undertaking conducted a general risk assessment?

Most recent update (if applicable) to the general risk as Date (MMYY)	ssessment
Most recent previous update (if applicable) to the generate (MMYY)	ral risk assessment
Does the undertaking have procedures and guidelines Chapter 2 and 5 of the Money Laundering and Terrori (Prevention) Act (2017:630) for	
	Yes No
Gathering customer due diligence Monitoring Reporting to the Swedish Police (Financial Intelligence Unit)	
Handling of personal data	
Suitability assessmentEducationProtection of employeesMaintenance of a register	Yes No
How many countries (if any) has the undertaking asses in the general risk assessment? Number	ssed to be a high risk



Which functions/persons in the undertaking and updating of the general risk assessment	
and apadiing of the general risk assessment	Yes No
Specially appointed executive	
Management	
	Yes No
Persons in each business area	
Other function/person in the undertaking (s	specify)
Which customer category(-ies) (if any) has a relationships because the risk associated with (multiple answers possible)?  Open answer	
3 Customer due diligence	
Provide information about customers	
The terms established business relationships definitions set out in Chapter 1, section 8, see Money Laundering and Terrorist Financing	ctions I and 4, respectively, of the
Number of established business relationship 100)?	os in Sweden (rounded to nearest
Specify the number of customers with legal	tax domicile in Sweden
Natural persons Legal persons	
Specify the number of customers with legal Sweden)	tax domicile in EU/EEA (not
Natural persons	-
Legal persons	_
Specify the number of customers with legal	tax domicile outside of EU/EEA
Natural persons	
Legal persons	-



How many customers are considered to be high risk? Specify number
Natural persons
Legal persons
For how many established business relationships does the undertaking not have current and adequate information for customer due diligence?
Due diligence measures refer to the measures regulated in Chapter 3 of the Money Laundering and Terrorist Financing (Prevention) Act (2017:630) and Chapter 3 of Finansinspektionen's Regulations, FFFS 2017:11.
Natural persons
Legal persons
How many of the undertakings's customers have been identified as PEP (politically exposed person) (Specify the number)?
PEP refers to the definition set out in Chapter 1, section 8, point 5p and section 9 of the Money Laundering and Terrorist Financing (Prevention) Act (2017:630).
with legal tax domicile in Sweden
Natural persons
Beneficial owners for legal persons
with legal tax domicile in EU/EEA (not Sweden)
Natural persons
Beneficial owners for legal persons
with legal tax domicile outside of EU/EEA
Natural persons
Beneficial owners for legal persons
Where appropriate for banks, specify information about correspondent bank with legal tax domicile in (specify number)
Sweden
EU/EEA (not Sweden)
Outside of the EU/EEA (not Sweden)

4 Monitoring and reporting



to identify suspicious transactions or deviant a	
□ Yes □ No	
Which type of transaction review system is use	ed (if any)?
Automatic transaction review system Manuel transaction review system	
Does the undertaking document the reasoning suspicious transactions or deviant activities is Financial Intelligence Unit?	
Tinanciai Intelligence Unit:	Yes No □ □
IMPORTANT! The next three questions about to be answered until the reporting occasi not answer these questions during the period	on in 2019. In other words, do
If the undertaking has an automatic monitoring for suspicious transactions or deviant activities year?  Number	
How many money laundering reports did the the Financial Intelligence Unit in the past year?  Number	undertaking submit to the
How long did it take from when the alarm for deviant activities was generated in the underta automatic transaction system until a report was Intelligence Unit?	kings's manual and/or
Shortest time until a report was submitted to the <i>Number of days</i>	_
Longest time until a report was submitted to the Number of days	e Financial Intelligence Unit
The median of all cases in the past year Number of days	
The calculation of the median is dependent on veven or uneven number of values.	whether the dataset contains an
Example 1: If five cases are sorted by the numb median is 7 days.	per of days (1,4,7,11,12), the



Example 2: If four cases are sorted by the number of days (1,4,7,11), the median is the average of the two middle numbers, i.e. 5.5 days.

# 5 Compliance Do any of the following control functions exist? Yes No Specially appointed executive Appointed officer for controlling and reporting obligations $\Box$ Independent audit function Has any control function identified deficiencies in the undertakings's compliance with the money laundering regulations during the past year? □ Yes $\square$ No If deficiencies were identified by the control function, were any measures taken with regard to them? ☐ Deficiencies identified by the control function are rectified ☐ The deficiencies identified by the control function are not rectified, but the process to rectify them is currently underway □ No, no measures have been taken with regard to the deficiencies EU regulations regarding sanctions Financial undertakings are obligated to follow the international sanctions that are decided by the EU (independently or to implement sanctions decided by the UN) and refer to limitations to the discretionary actions of companies and individuals. This entails, for example, that financial firms in some cases must freeze accounts and transactions, monitor changes to accounts and inform Finansinspektionen about such measures. Sweden has an official website for information about existing sanctions (the sanction lists) at www.regeringen.se/sanktioner. This web page also contains information about which authorities have been appointed to fulfil the various information requirements set out in the EU sanction regulations. The information in the sanction lists is updated on an ongoing basis. Are new customers checked against the sanction lists before a business relationship is entered into? ☐ Yes $\square$ No



Is a new beneficial owner checked against the sanction lists before a business
relationship is entered into?
□ Yes
□ No
How often are existing customers checked against the sanction lists?
☐ Daily
☐ Less frequently
□ Never
How often is a beneficial owner checked against the sanction lists?
□ Daily
☐ Less frequently
□ never
Are cross-border transactions checked against the sanction lists?
□ Yes
□ No
Does the undertakings have assets or economic resources belonging to
natural or legal persons, units or bodies that are identified on the sanction
lists?
□ Yes
□ No

### 6 Training

According to Chapter 2, section 14 of the Money Laundering and Terrorist Financing (Prevention) Act (2017:630) and Chapter 2, section 5 of Finansinspektionen's regulations FFFS 2017:11, an undertaking shall ensure that employees, contractors and other persons involved in its activities in a similar capacity who perform significant tasks to prevent the operations from being used for money laundering or the financing of terrorism receive on an ongoing basis relevant training and information in order to be able to discharge their obligations in accordance with the law. Such training as a minimum shall include relevant parts of the content of applicable regulations, the undertakings's total risk assessment, procedures and guidelines and information that would facilitate the identification of suspected money laundering and financing of terrorism.



Does the undertaking offer training for employees, consultants and other persons involved in its activities in a similar capacity with the aim of identifying suspected money laundering or financing of terrorism?  Yes No
What components are included in the training (if applicable):  ☐ Content of applicable regulations
☐ The undertakings's general risk assessment
☐ The undertakings's procedures, guidelines, etc., to facilitate the identification of suspected money laundering and financing of terrorism ☐ Typologies and methods for money laundering and the financing of terrorism
If the company does offer such training, has the content been updated in the past year?
☐ Yes ☐ No
If the undertaking offer such training, has the undertaking held any type of training for money laundering and the financing of terrorism in the past year?  \[ \text{Yes} \] \[ \text{No} \]
If the undertaking does offer such training, has the content been adapted to the needs of different personnel categories?  \[ Yes \] \[ No \]