## Thematic questionnaire: Wire transfer regulations

- 1. Data notice
- 2. Managing transfer of funds with missing information or inadmissible characters or inputs

1. Banking licence number											
		Response Percent	Response Total								
1	Open-Ended Question	0.00%	0								
	No answers found.										
		answered	0								
		skipped	0								

2. [	o you	ı act as a	Pa	yment S	erv	vice Provider	· (F	SP)?			
										Response Percent	Response Total
1	Yes									0.00%	0
2	No									0.00%	0
3	Not A	pplicable								0.00%	0
Sta	tistics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
		Maximum	0	Variance	0	Std. Error	0		<u> </u>	skipped	0

3.	3. Do you act as an Intermediary Payment Service Provider (IPSP)?													
		Response Percent	Response Total											
1	Yes	0.00%	0											
2	No		0.00%	0										
3	Not App	olicable									0.00%	0		
4	If yes, is PSP?	s this in add	litio	n to acting	as	а					0.00%	0		
St	atistics	Minimum	0	Mean	0	Std.	Deviation	0	Satisfaction Rate	0	answered	0		
			skipped	0										
If y	If yes, is this in addition to acting as a PSP? (0)													
							No ans	we	rs found.					

3. Policy and procedures

# 4. Have you implemented relevant systems and controls, including policies and procedures that set out:

	Yes	No	Not Applicable	Response Total
a) The criteria you use to determine whether or not your services and payment instruments fall under the scope of the wire transfer regulations	0.0% (0)	0.0% (0)	0.0% (0)	0
b) Which of your services and payment instruments fall within the scope of the wire transfer regulations and which do not	0.0% (0)	0.0% (0)	0.0% (0)	0
c) Which information relating to transfers of funds have to be recorded, how this information should be recorded, and where	0.0% (0)	0.0% (0)	0.0% (0)	0
d) That ensure the conditions for the exemptions and derogations from the wire transfer regulations are met	0.0% (0)	0.0% (0)	0.0% (0)	0
e) Whether these policies and procedures been formally adopted?	0.0% (0)	0.0% (0)	0.0% (0)	0
			answered	0
			skipped	0

4.1. a) and pa regula	ayme	Response Percent	Response Total						
1	Yes	1						0.0%	0
2	No							0.0%	0
3	Not	Applicable						0.0%	0
Statis	tics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

4.2. b) scope		Response Percent	Response Total					
1	Yes	<b>;</b>					0.0%	0
2	No						0.0%	0
3	Not	Applicable					0.0%	0
Statis	tics	Minimum	0	Mean	0	Std. Deviation 0	answered	0
		Maximum	0	Variance	0	Std. Error 0	answered	U

	Which information relating to transfers of funds have to be ded, how this information should be recorded, and where	Response Percent	Response Total
1	Yes	0.0%	0
2	No	0.0%	0
3	Not Applicable	0.0%	0
	Minimum 0 Mean 0 Std. Deviation 0	answered	0

4.3. c) Which information relating to transfers of funds have to be recorded, how this information should be recorded, and where	Response Percent	Response Total
Statistics Maximum 0 Variance 0 Std. Error 0		

4.4. d) from t		Response Percent	Response Total							
1	Yes	3						0.0%	0	
2	No							0.0%	0	
3	Not	Applicable						0.0%	0	
Statis	tics	Minimum	0	Mean	0	Std. Deviation	0		0	
		Maximum	0	Variance	0	Std. Error	0	answered	0	

4.5.	e) Whe	Response Percent	Response Total							
1	Yes							0.0%	0	
2	No							0.0%	0	
3	Not Ap	plicable						0.0%	0	
Sta	tistics	Minimum	0	Mean	0	Std. Deviation	0		0	
		Maximum	0	Variance	0	Std. Error	0	answered	0	

5. When were these systems and controls (including policies and procedures) last tested to check that they were complied with?

	Response Percent	Response Total
1 Open-Ended Question	0.00%	0
No answers found.	<u>'</u>	
	answered	0
	skipped	0

6. In the testing described in the question above, were there any instances identified of non-compliance with your systems and controls?

										Response Percent	Response Total
1	Yes	3								0.00%	0
2	No									0.00%	0
3	N/A	١								0.00%	0
Statist	ics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
		Maximum	0	Variance	0	Std. Error	0			skipped	0

7. Do your policies and procedures establish appropriate internal procedures for your employees, or persons in a comparable position, to report breaches of the wire transfer regulations internally through a secure, independent, specific and anonymous channel, proportionate to the nature and size of the PSP/IPSP?

									Response Percent	Response Total
1	Υe	es							0.00%	0
2	No	)							0.00%	0
Statisti	ics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate 0	answered	0
		Maximum	0	Variance	0	Std. Error	0		skipped	0

8. Do you make employees aware that should they breach any requirement under the wire transfers regulations, that this could potentially result in an offence, which could result in imprisonment for a term of two years and a fine?

								Response Percent	Response Total
1	Yes							0.00%	0
2	No	0.00%	0						
Statistic	s Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate 0	answered	0
	Maximum	0	Variance	0	Std. Error	0		skipped	0

#### 4. Non-account holders

9. Do you provide non-account holders with the ability to make payments or transfer funds?

										Response Percent	Response Total
1	Yes									0.00%	0
2	No									0.00%	0
Stati	stics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
		Maximum	0	Variance	0	Std. Error	0			skipped	0

10. Are transfers of funds for non-account holders accompanied by the following information on the payer and the payee:

	Yes	No	N/A	Response Total
a) The name of the payer	0.0% (0)	0.0% (0)	0.0%	0
b) A unique transaction identifier (which can trace a transaction back to the payer)	0.0% (0)	0.0% (0)	0.0% (0)	0
c) One of either the payer's address, official personal document number, customer identification number or date and place of birth	0.0% (0)	0.0% (0)	0.0% (0)	0
d) The name of the payee	0.0% (0)	0.0% (0)	0.0% (0)	0

# 10. Are transfers of funds for non-account holders accompanied by the following information on the payer and the payee:

	Yes	No	N/A	Response Total
e) A unique transaction identifier (which can trace a transaction back to the payee)	0.0% (0)	0.0% (0)	0.0% (0)	0
			answered	0
			skipped	0

10.1	. a) The	Response Percent	Response Total							
1	Yes							0.0%	0	
2	No							0.0%	0	
3	3 N/A							0.0%	0	
Sta	tistics	Minimum	0	Mean	0	Std. Deviation	0	answered	0	
	Maximum 0 Variance				0	Std. Error	0	a.io.i/orou		

	•	unique tran e payer)	sa	ction ident	tifie	er (which can trace a transaction	Response Percent	Response Total
1	Yes						0.0%	0
2	No						0.0%	0
3	N/A						0.0%	0
Statis	Statistics Minimum 0 Mean 0					Std. Deviation 0	answered	0
	Maximum 0 Variance 0				0	Std. Error 0	answered	J

							ersonal document d place of birth	Response Percent	Response Total
1	Yes	S						0.0%	0
2	No							0.0%	0
3	N/A	4						0.0%	0
Statist	StatisticsMinimum0Mean0Maximum0Variance0					Std. Deviation Std. Error	0	answered	0

10.4	d. d) The name of the payee	Response Percent	Response Total
1	Yes	0.0%	0
2	No	0.0%	0
3	N/A	0.0%	0
	Minimum 0 Mean 0 Std. Deviation 0	answered	0

10.4. d) The name of the payee	Response Percent	Response Total
Statistics Maximum 0 Variance 0 Std. Error 0		

	,	inique tran e payee)	sac	ction ident	ifie	er (which can ti	race a transaction	Response Percent	Response Total
1	Yes							0.0%	0
2	No							0.0%	0
3	N/A							0.0%	0
Statis	StatisticsMinimum0Mean0Maximum0Variance0					Std. Deviation Std. Error	0	answered	0

11. In the case of payments and transfers of funds for non-account holders, do you make use of the two derogations available (where all PSP's involved are within the British Islands, or where the transfer of funds does not exceed EUR1,000) under the wire transfer regulations?

									Response Percent	Response Total
1	Yes								0.00%	0
2	No								0.00%	0
3	N/A								0.00%	0
Statistic	cs Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
	Maximum	0	Variance	0	Std. Error	0			skipped	0

12. In relation to outbound transfers made for non-account holders in the past twelve months, please indicate the total number of such transfers.

	Response Percent	Response Total
1 Open-Ended Question	0.00%	0
No answers found.	'	
	answered	0
	skipped	0

13. In relation to outbound transfers made for non-account holders in the past twelve months, please indicate the number of instances where further information was requested by the receiving institution.

	Response Percent	Response Total
1 Open-Ended Question	0.00%	0
No answers found.		
	answered	0
	skipped	0

#### 5. Account holders

# 14. In respect of payments and transfers of funds completed for account holders, are those transfers accompanied by the following information:

	Yes	No	Response Total
a) The name of the payer	0.0% (0)	0.0% (0)	0
b) The payer's payment account number	0.0% (0)	0.0% (0)	0
c) One of either the payer's address, official personal document number, customer Identification number or date and place of birth	0.0% (0)	0.0%	0
d) Where the payer is a company, an address at which the company's business is conducted, or at which it may be contacted	0.0% (0)	0.0%	0
e) Where the payer is a trustee, the address of the trustee	0.0% (0)	0.0% (0)	0
f) The name of the payee	0.0% (0)	0.0% (0)	0
g) The payee's payment account number	0.0% (0)	0.0% (0)	0
h) If you act as an IPSP, do procedures that ensure all information received on the payer and the payee that accompanies a transfer of funds is retained with the transfer in line with Article 10 of the Wire Transfer Regulations?	0.0% (0)	0.0%	0
		answered	0
		skipped	0

14.1	l. a) Th	e name of	the	payer	Response Percent	Response Total			
1	Yes							0.0%	0
2	No							0.0%	0
Sta	tistics	Minimum	0	Mean	0	Std. Deviation	0	anawarad	0
	Maximum 0 Mean  Maximum 0 Variance					Std. Error	0	answered	0

14.2	2. b) Th	e payer's p	ayr	ment acco	Response Percent	Response Total			
1	Yes							0.0%	0
2	No							0.0%	0
Sta	tistics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

						ress, official pe ber or date an		Response Percent	Response Total
1	Yes	S						0.0%	0
2	No							0.0%	0
Statist	ics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

						y, an address a r at which it ma		Response Percent	Response Total
1	Ye	S						0.0%	0
2	No							0.0%	0
Statist	ics	Minimum	0	Mean	0	Std. Deviation	0	anawarad	0
		Maximum	0	Variance	0	Std. Error	0	answered	0

14.5	i. e) Wh	ere the pa	yer	is a truste	ee,	4.5. e) Where the payer is a trustee, the address of the trustee													
1	Yes						C	0.0%	0										
2	No						C	0.0%	0										
Sta	tistics	Minimum Maximum	0	Mean Variance	0	Std. Deviation 0 Std. Error 0	ans	swered	0										

14.6	i. f) The	name of t	he	payee				Response Percent	Response Total
1	Yes							0.0%	0
2	No							0.0%	0
Sta	tistics	Minimum	0	Mean	0	Std. Deviation	0	anawarad	0
		Maximum	0	Variance	0	Std. Error	0	answered	0

14.7	. g) Th	e payee's p	ay	ment acco	oun	t number		Response Percent	Response Total
1	Yes							0.0%	0
2	No							0.0%	0
Stat	istics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

inforn transf		cedures that ensure all nd the payee that accompanies a e transfer in line with Article 10 of	Response Percent	Response Total
1	Yes		0.0%	0
2	No		0.0%	0

information	n received funds is re	on etai	the payer ned with t	an		sure all at accompanies a with Article 10 of	Response Percent	Response Total
Statistics	Minimum	0	Mean	0	Std. Deviation	0		0
	Maximum	0	Variance	0	Std. Error	0	answered	0

## 15. In the case of the information described above, please answer the following questions:

	Yes	No	Response Total
Is the mandatory wire transfer information transmitted in the designated data fields of the payment message scheme for every wire transfer made by you?	0.0% (0)	0.0% (0)	0
Do your payment procedures for wire transfers include controls to prevent wire transfers from being made without the mandatory wire transfer information being transmitted and being included in the designated data fields of the payment message scheme?	0.0% (0)	0.0% (0)	0
		answered	0
		skipped	0

15.1. Is design transfe	nated	Response Percent	Response Total						
1	Yes	3						0.0%	0
2	No							0.0%	0
Statis	tics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

to pre transf	vent er in	wire transf	s include controls the mandatory wire cluded in the eme?	Response Percent	Response Total				
1	Yes	1						0.0%	0
2	No							0.0%	0
					0	Std. Deviation Std. Error	0	answered	0

16. In the case of payments and transfers of funds for account holders, do you make use of the two derogations available (where all PSP's involved are within the British Islands or where the transfer of funds does not exceed EUR 1,000) under the Wire Transfer Regulations?

										Response Percent	Response Total
1	Yes									0.00%	0
2	No									0.00%	0
3	N/A									0.00%	0
Statistic	Minimum	0	Mean	0	Std	l. Deviation	0	Satisfaction Rate	0	answered	0
	Maximum	0	Variance	0	Std	l. Error	0			skipped	0

17. In relation to outbound transfers made for account holders in the past twelve months, please indicate the total number of such transfers:

		Response Percent	Response Total
1	Open-Ended Question	0.00%	0
	No answers found.	'	
		answered	0
		skipped	0

18. In relation to outbound transfers made for account holders in the past twelve months, please indicate the number of instances where further information was requested by the receiving institution.

		Response Percent	Response Total
1	Open-Ended Question	0.00%	0
	No answers found.		
		answered	0
		skipped	0

19. Have you implemented procedures to detect transfers of funds for the same payer made in a short time-frame that appear to be linked?

									Response Percent	Response Total
1	Ye	s							0.00%	0
2	No	)							0.00%	0
Statist	ics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate 0	answered	0
		Maximum	0	Variance	0	Std. Error	0		skipped	0

20. Do you process batch file payments?

	Response Percent	Response Total
1 Yes	0.00%	0

20. [	20. Do you process batch file payments?													
										Response Percent	Response Total			
2	No									0.00%	0			
3	N/A									0.00%	0			
Stati	Statistics Minimum 0 Mean 0		Std. Deviation	0	Satisfaction Rate	0	answered	0						
		Maximum	0	Variance	0	Std. Error	0			skipped	0			

21. If you process batch file payments and threshold does it include:	he transfer	is at or belo	w EUR1,000	0
	Yes	No	N/A	Response Total
a) The names of the payer and or payee	0.0%	0.0% (0)	0.0% (0)	0
b) The payment account numbers of the payer and the payee or a unique transaction identifier if there is no payment account for one or both parties	0.0% (0)	0.0% (0)	0.0% (0)	0

## **Matrix Charts**

answered

skipped

0

21.1	. a) The	Response Percent	Response Total					
1	Yes						0.0%	0
2	2 No						0.0%	0
3	N/A						0.0%	0
Statistics Minimum 0 Mea		Mean	0	Std. Deviation 0	anawarad	0		
		Maximum	0	Variance	0	Std. Error 0	answered	0

21.2. b unique both p	tra	Response Percent	Response Total					
1	Ye	S					0.0%	0
2	No						0.0%	0
3	N/A	4					0.0%	0
StatisticsMinimum0Mean0Maximum0Variance0					-	Std. Deviation 0 Std. Error 0	answered	0

## 6. Incoming payments and funds transfers

# 22. Please provide information on how you monitor that incoming traffic of funds transfers contains all mandatory wire transfer information which must be transmitted in the designated data fields of the payment message scheme.

	Response Percent	Response Total
1 Open-Ended Question	0.00%	0
No answers found.		
	answered	0
	skipped	0

## 23. Please indicate whether you use centralised group functions to carry out this activity.

									Response Percent	Response Total
1	Yes								0.00%	0
2	No								0.00%	0
Stati	stics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate 0	answered	0
		Maximum	0	Variance	0	Std. Error	0		skipped	0

#### 24. Is this monitoring carried using automated systems?

										Response Percent	Response Total
1	Yes									0.00%	0
2	No									0.00%	0
Stati	stics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
		Maximum	0	Variance	0	Std. Error	0			skipped	0

## 25. Has this monitoring resulted in any suspicious activity reports being made to your Money Laundering Reporting Officer?

									Response Percent	Response Total
1	Ye	S							0.00%	0
2	No								0.00%	0
Statis	tics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate 0	answered	0
		Maximum	0	Variance	0	Std. Error	0		skipped	0

#### 26. For the past 12 months please let us know:

		Response Percent	Response Total
1	The total number of transfers received by you	0.00%	0
	No answers found.		

26	26. For the past 12 months please let us know:							
		Response Percent	Response Total					
2	The total number of transfers where it was identified that information was absent or incomplete.	0.00%	0					
	No answers found.							
		answered	0					

27. Please describe and provide information on your risk-based policies and procedures to determine whether to execute, reject or suspend a transfer of funds that lacks the required information.

skipped

		Response Percent	Response Total
1	Open-Ended Question	0.00%	0
	No answers found.		
		answered	0
		skipped	0

28. Please indicate whether this activity to execute, reject or suspend is carried out by group functions?

										Response Percent	Response Total
1	Yes									0.00%	0
2	No									0.00%	0
Stati	stics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
		Maximum	0	Variance	0	Std. Error	0			skipped	0

29. Is this activity undertaken using automated systems?

										Response Percent	Response Total
1	Yes									0.00%	0
2	No									0.00%	0
Stati	stics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
		Maximum	0	Variance	0	Std. Error	0			skipped	0

30. Has this monitoring resulted in any suspicious activity reports being made to your Money Laundering Reporting Officer?

		Response Percent	Response Total
1	Yes	0.00%	0
2	No	0.00%	0

## 30. Has this monitoring resulted in any suspicious activity reports being made to your Money Laundering Reporting Officer?

									Response Percent	Response Total
Statistics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
	Maximum	0	Variance	0	Std. Error	0			skipped	0

# 31. Please provide details of your policies and procedures to subject incoming payment traffic to an appropriate level of risk-based sampling to detect non-compliant payments.

	Response Percent	Response Total
1 Open-Ended Question	0.00%	0
No answers found.		
	answered	0
	skipped	0

#### 32. Please indicate whether this activity is carried out by group functions?

										Response Percent	Response Total
1	Yes									0.00%	0
2	No									0.00%	0
Stati	stics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate	0	answered	0
		Maximum	0	Variance	0	Std. Error	0			skipped	0

# 33. Has this monitoring of incoming payment traffic to detect non-compliant payments resulted in any suspicious activity reports being made to your Money Laundering Reporting Officer?

	3								
								Response Percent	Response Total
1	Yes							0.00%	0
2	No							0.00%	0
Statistic	s Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate 0	answered	0
	Maximum 0 Variance 0 St							skipped	0

## 7. Managing transfer of funds with missing information or inadmissible characters or inputs

# 34. Where transfers of funds are identified as missing information or inadmissible characters or inputs, do your procedures require the business to document and record the following:

	Yes	No	Response Total
a) Making a decision on rejecting the transfer and informing the prior PSP in the payment chain of the reason for the rejection	0.0% (0)	0.0% (0)	0

# 34. Where transfers of funds are identified as missing information or inadmissible characters or inputs, do your procedures require the business to document and record the following:

	Yes	No	Response Total
b) Making a decision on execution of the transfer and sending of a request for information, before or after crediting the payee's payment account or making the funds available to the payee	0.0% (0)	0.0% (0)	0
c) All appropriate follow up steps taken to obtain the response, including the issuing of warnings and setting of deadlines, before either rejecting any future transfers of funds from that payment service provider or restricting or terminating its business relationship with the PSP	0.0% (0)	0.0% (0)	0
d) The consideration of whether there are reasonable grounds for suspicion of money laundering or the financing of terrorism in the absence of information or the use of inadmissible characters or inputs, that would require an employee to submit a suspicious activity report	0.0% (0)	0.0% (0)	0
		answered	0
		skipped	0

		king a dec n the payn			Response Percent	Response Total			
1	Yes	S						0.0%	0
2	No							0.0%	0
Statist	ics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

a requ	iest f	or informa	tio	n, before c	r a	on of the transfer and sending of fter crediting the payee's s available to the payee	Response Percent	Response Total
1	Yes	3					0.0%	0
2	No						0.0%	0
Statis	tics	Minimum Maximum	0	Mean Variance	0	Std. Deviation 0 Std. Error 0	answered	0

34.3. d include either service with the	ling t rejec e pro	Response Percent	Response Total						
1	Yes	i						0.0%	0
2	No							0.0%	0
Statis	tics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

suspi absen	cion ice of s, tha	of money la	aur on c	ndering or or the use	the of	there are reasonable grounds for e financing of terrorism in the inadmissible characters or ee to submit a suspicious activity		Response Total
1	Yes						0.0%	0
2	No						0.0%	0
Statis	tics	Minimum Maximum	0	Mean Variance	0	Std. Deviation 0 Std. Error 0	answered	0

#### 8. Failure to provide information

35. Do you have procedures in place should a PSP repeatedly fail to provide the required information on the payer or the payee, even after warnings and deadlines, to:

	Yes	No	Response Total
a) Either reject any future transfers of funds from that PSP	0.0% (0)	0.0% (0)	0
b) Restrict or terminate its business relationship with that PSP	0.0% (0)	0.0% (0)	0
		answered	0
		skipped	0

35.1	. a) Eit	her reject a	any	future tra	nsf	ers of funds fr	om that PSP	Response Percent	Response Total
1	Yes							0.0%	0
2	No							0.0%	0
Sta	tistics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

35.2	. b) Re	strict or te	rmi	nate its bu	ısir	ness relationsh	nip with that PSP	Response Percent	Response Total
1	Yes							0.0%	0
2	No						0.0%	0	
Stat	istics	Minimum Maximum	0	Mean Variance	0	Std. Deviation Std. Error	0	answered	0

## 36. Is this activity carried out by a centralised group function, if so, where is the centralised group function located? And If not, please provide an explanation here:

	F	Response Percent	Response Total
1	Open-Ended Question	0.00%	0
	No answers found.		
	i de la companya de	answered	0
		skipped	0

## 37. In the past 24 months have you taken any action to reject any future payments or terminate the business. in respect of a PSP?

									Response Percent	Response Total
1	Ye	S							0.00%	0
2	No								0.00%	0
Statist	ics	Minimum	0	Mean	0	Std. Deviation	0	Satisfaction Rate 0	answered	0
		Maximum	0	Variance	0	Std. Error	0		skipped	0

#### 9. Reporting of breaches

38. Please confirm how many breaches of the wire transfer regulations have been recorded by you, or on your behalf by group functions, in the past 12 months and if these breaches have been notified to the JFSC. Please send any details/ information of the breaches to your Supervisor via email.

	Response Percent	Response Total				
1 Open-Ended Question	0.00%	0				
No answers found.						
	answered	0				
	skipped	0				