



Anti-Money Laundering Return 2021

Footer References

Please see below for a quick reference sheet which details all footnotes on the AML Return.

FOOTNOTE LIST

- 1 This encompasses estimates where appropriately used.
- 2 or equity participant in a Firm.
- 3 or equivalent.
- 4 Support staff such as secretaries or corporate administrators.
- 5 i.e., any attorneys-at-law not in a previous category.
- 6 any employee not covered by other categories.
- 7 Excludes use of third-party software applications and lists.
- 8 Accepting all Firms offering RFB services are vulnerable to ML, TF and PF. Inherent risk represents the level of risk that exists in the absence of AML controls.
- 9 Active domestic RFB clients are clients of record in respect of whom one or more RFB matter files were open during the relevant period (or had been open and were closed in the Relevant Period), and are Cayman Islands residents or companies/partnerships geographically resident in or operating solely within the Cayman Islands, including Cayman Islands trusts. Entities are 'geographically resident' in Cayman if they are incorporated here, established here, or registered here (including foreign registered companies) as would be foreign companies that only operate here (we think this unlikely).
- 10 This is to determine the extent of RFB as an individual active client may have more than one matter.
- 11 Active International RFB clients are clients of record in respect of whom one or more matter files were open during the relevant period (or had been open and were closed in the Relevant Period), and are clients who are not included in the definition of domestic clients, see footnote 9.
- 12 All client matter numbers categorized here are to total all active client matters disclosed in questions 5b and 5d.
- 13 An "ultra-high net worth person" is an individual whose net worth is over \$30,000,000 USD. UHNWIs indicate higher risk.
- 14 Section 2 of the Securities Investment Business Law (SIBL) defines "high net worth person" as an individual whose net worth is at least \$800,000 KYD or any person that has total assets of not less than \$4,000,000 KYD. HNWIs indicate higher risk.
- 15 We appreciate you may not have these figures aggregated to date. Please provide robust estimates. You are on notice that for the 2022 Return accurate aggregate figures will be required. This will help inform your business risk assessment.
- 16 Includes matters for clients that deal in high value goods (for example, a diamond dealer) and matters for clients that deal with transfers of high value goods (for example, sale of a yacht).
- 17 Relates to your Firm's risk appetite and whether certain types of clients are not accepted as a general rule. Also Includes business that was declined or terminated for AML compliance reasons.
- 18 This question is asking about the genesis of the professional business relationship. How did the Firm initially meet and contract with the client?
- 19 Answers may include a robust and reliable estimate at this stage.
- 20 Including an instructing lawyer.
- 21 This does not include professional fees received or paid.
- 22 The categories of RFB overlap and Firms should avoid double counting where possible.



- ²³ 'prepared for' includes giving legal advice or assistance, preparing a document on behalf of another person, or preparing an instrument governed by law that relates to real, personal, or intangible property.
- ²⁴ Cash transaction not involving any form of financing or loan.
- ²⁵ Include currently open matters and those closed within the Relevant Period. Pick the most appropriate box (any PEP involvement should be recorded) and do not double-count. You are expected to provide a robust figure but not required to spend a disproportionate amount of time or resource on the task. Please read 'Individual' as being non-PEP individuals. Robust estimates are permissible at this stage, accurate aggregated data will be required in 2022.
- ²⁶ We recognize that there will be overlap in these categories, so please construe formation of legal persons in a narrow sense. Only record clients here for whom no other work is done. Please use the separate 'Investment Funds' category where appropriate.
- ²⁷ For the purposes of the Return, Charitable trust includes only non-STAR trusts.
- ²⁸ Only non-STAR unless otherwise stated.