



Financial Secrecy Index 2017 Questionnaire

1. *Name of Jurisdiction*

Please write down the name of the jurisdiction on whose behalf you are filling in this survey.

2. *Declaration*

Please take note that all those questions marked with an *asterisk* in this survey directly feed into the secrecy score, and therefore your answers may have a direct impact on your jurisdiction's ranking in the Financial Secrecy Index. **Not answering questions could result in a higher (worse) secrecy score and FSI ranking.**

- I have understood the importance of this survey and acknowledge that not answering the questions included in this survey may lead to a higher (worse) secrecy score and FSI ranking of my jurisdiction.

3. Types of arrangements, entities and professional individuals

How many of each of the following types of financial institutions and designated non-financial businesses and professions (DNFBPs)¹ are registered in your territory at the end (31 of December) of the most recent year for which you have data, and which of those are covered by your preventive anti-money laundering framework?

Casinos, FATF 2012 Rec 22 (a)

- Number of
- Year
- AML covered: Yes No

Real estate agents, FATF 2012 Rec 22 (b), Individuals

- Number of
- Year
- AML covered: Yes No

¹ The full definitions of the categories can be found in this FATF-publication (hereinafter: "FATF 2012"), pages 19-20, 116-117, in: http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf; 23.01.2017.

Real estate agents, FATF 2012 Rec 22 (b), Others²

- Number of
- Year
- AML covered: Yes No

Dealers in precious metals / precious stones, FATF 2012 Rec 22 (c), Individuals

- Number of
- Year
- AML covered: Yes No

Dealers in precious metals / precious stones, FATF 2012 Rec 22 (c), Others²

- Number of
- Year
- AML covered: Yes No

Accountants, FATF 2012 Rec 22 (d), Individuals

- Number of
- Year
- AML covered: Yes No

Accountants, FATF 2012 Rec 22 (d), Others²

- Number of
- Year
- AML covered: Yes No

Lawyers, notaries, other legal professionals, FATF 2012 Rec 22 (d), Individuals

- Number of
- Year
- AML covered: Yes No

Lawyers, notaries, other legal professionals, FATF 2012 Rec 22 (d), Others²

- Number of
- Year
- AML covered: Yes No

Trust and Company Service Providers, FATF 2012 Rec. 22 (e), Individuals

- Number of
- Year
- AML covered: Yes No

² "Others" includes entities, groups and undertakings and any other institution except an individual (=natural person).

Trust and Company Service Providers, FATF 2012 Rec. 22 (e), Others²

- Number of
- Year
- AML covered: Yes No

Banks (incl. branches of foreign banks)

- Number of
- Year
- AML covered: Yes No

Insurance companies

- Number of
- Year
- AML covered: Yes No

Collective Investment Schemes / Investment Funds

- Number of
- Year
- AML covered: Yes No

Foreign exchange traders

- Number of
- Year
- AML covered: Yes No

Fund managers

- Number of
- Year
- AML covered: Yes No

Investment advisers

- Number of
- Year
- AML covered: Yes No

Other financial institutions (see Definition FATF 2012: 116-117; in FN 1 above)

- Number of
- Year
- AML covered: Yes No

4. Number of government agencies and staff members

How many government agencies and how many staff members (full time equivalents, FTE) are in charge of supervising the correct implementation of preventive measures against money laundering (such as customer due diligence regulations) for each of the different types of financial institutions and DNFBPs?

If data is not available in given breakdowns, please provide us with available aggregates.

Please provide the year for which this applies.

- Casinos, FATF 2012 Rec 22 (a)**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Real estate agents, FATF 2012 Rec 22(b)**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Dealers in precious metals / precious stones, FATF 2012 Rec 22(c)**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Accountants, FATF 2012 Rec 22(d)**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Lawyers, notaries, other legal professionals, FATF 2012 Rec 22(d)**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Trust and Company Service Providers, FATF 2012 Rec. 22(e)**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Banks (incl. branches of foreign banks)**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Insurance companies**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Collective Investment Schemes / Investment Funds**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Foreign exchange traders**
 - Number and name of supervising agencies
 - Number of staff (FTE)

- Fund managers**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Investment advisers**
 - Number and name of supervising agencies
 - Number of staff (FTE)
- Other financial institutions** (see Definition FATF 2012: 116-117; in FN 1 above)
 - Number and name of supervising agencies
 - Number of staff (FTE)

5. On-site visits

How many on-site visits were carried out by government agencies (or similar; see question 4 above) in order to supervise the correct implementation of preventive measures against money laundering (such as customer due diligence) for each of the different type of arrangement/entity?

If data is not available in given breakdowns, please provide us with available aggregates.

- Banks** (incl. branches of foreign banks)
 - 2014
 - 2015
 - 2016
- Insurance companies**
 - 2014
 - 2015
 - 2016
- Collective Investment Schemes / Investment Funds**
 - 2014
 - 2015
 - 2016
- Foreign exchange traders**
 - 2014
 - 2015
 - 2016
- Fund managers**
 - 2014
 - 2015
 - 2016
- Investment advisers**
 - 2014
 - 2015
 - 2016

Other financial institutions (see Definition FATF 2012: 116-117; in FN 1 above)

- 2014
- 2015
- 2016

Casinos, FATF 2012 Rec 22 (a)

- 2014
- 2015
- 2016

Real estate agents, FATF 2012 Rec 22(b)

- 2014
- 2015
- 2016

Dealers in precious metals / precious stones, FATF 2012 Rec 22(c)

- 2014
- 2015
- 2016

Accountants, FATF 2012 Rec 22(d)

- 2014
- 2015
- 2016

Lawyers, notaries, other legal professionals, FATF 2012 Rec 22(d)

- 2014
- 2015
- 2016

Trust and Company Service Providers, FATF 2012 Rec. 22(e)

- 2014
- 2015
- 2016

6. Results of on-site visits

With regard to the on-site visits mentioned in question 5 above, please provide us with statistics about the level of compliance found during these on-site visits. Please mention if there were significant differences in the compliance levels either in years or in type of financial institutions/DNFBPs.

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7. Administrative sanctions

Have any administrative sanctions been imposed as a result of noncompliance discovered by those onsite visits mentioned in question 5 (above)? Please provide statistics.

8. Criminal sanctions

Have any criminal sanctions been imposed as a result of noncompliance discovered by those onsite visits mentioned in question 5 (above)? Please provide statistics.

9. *Commercial Cash Vaults and / or Safe Deposit Boxes*

Are commercial cash vaults and / or safe deposit boxes available in your jurisdiction as places to commercially store valuable assets (e.g. gold bullion, art, precious stones, jewelry, cash, antiques, wines, cigars, cars, etc.)?

- Yes
- No [please jump to question 14 below]

10. *Identifying Beneficial Owners of Commercial Cash Vaults and / or Safe Deposit Boxes*

Does your jurisdiction require clients and beneficial owners of commercial cash vaults and / or safe deposit boxes to be identified and recorded?

If you choose the affirmative answer, please specify the type of assets you refer to by ticking **one or more** of the relevant boxes.

- No
- Yes
 - for all clients and beneficial owners of **gold bullion**
 - for all clients and beneficial owners of **art**
 - for all clients and beneficial owners of **precious stones**
 - for all clients and beneficial owners of **jewelry**
 - for all clients and beneficial owners of **cash**

- for all clients and beneficial owners of **antiquities**
- for all clients and beneficial owners of **wines**
- for all clients and beneficial owners of **cigars**
- for all clients and beneficial owners of **cars**

11. *Are the identities of all clients and beneficial owners of commercial cash vaults and / or safe deposit boxes automatically reported to a government agency (i.e. customs office, a commercial registry, tax administration, central bank or a similar body)?*

You can choose more than one answer.

Please provide legal source (Law/§, URL) to support any of the affirmative answers.

- No
- No, only upon government's request
- Yes, regarding **gold bullion**
- Yes, regarding **art**
- Yes, regarding **precious stones**
- Yes, regarding **jewelry**
- Yes, regarding **cash**
- Yes, regarding **antiquities**
- Yes, regarding **wines**
- Yes, regarding **cigars**
- Yes, regarding **cars**
- Yes, regarding **all** types mentioned above

12. *Does the jurisdiction send information (spontaneously or automatically) on the identities of clients and beneficial owners of commercial cash vaults and / or safe deposit boxes to the countries of residence of the clients and the beneficial owners?*

You can choose more than one answer.

Please provide legal source (Law/§, URL) to support any of the affirmative answers.

- No
- Yes, regarding **gold bullion**
- Yes, regarding **art**
- Yes, regarding **precious stones**
- Yes, regarding **jewelry**
- Yes, regarding **cash**
- Yes, regarding **antiquities**
- Yes, regarding **wines**
- Yes, regarding **cigars**
- Yes, regarding **cars**
- Yes, regarding **all types mentioned above**

13. *Does the jurisdiction publish the identities of clients and beneficial owners of commercial cash vaults and / or safe deposit boxes?*

You can choose more than one answer.

Please provide legal source (Law/§, URL) to support any of the affirmative answers.

- No
- Yes, regarding **gold bullion**
- Yes, regarding **art**

- Yes, regarding **precious stones**
- Yes, regarding **jewelry**
- Yes, regarding **cash**
- Yes, regarding **antiquities**
- Yes, regarding **wines**
- Yes, regarding **cigars**
- Yes, regarding **cars**
- Yes, regarding **all** types mentioned above

14. ***Freeports***

Are freeports / free trade zones / foreign trade zones / bonded warehouses (see pages 9-10, [here](#)) available as places to store valuable assets (e.g. gold bullion, art, precious stones, jewelry, cash, antiquities, wines, cigars, cars) in your jurisdiction?

- Yes
- No [please jump to question 19 below]

15. ***Identifying Beneficial Owners of Freeports***

Does your jurisdiction require that identities of the beneficial owners of all who operate and / or who are clients of storage facilities in all freeports / free trade zones / foreign trade zones / bonded warehouses to be identified and recorded?

If you choose the affirmative answer, please specify the type of assets you refer to by ticking **one or more** of the relevant boxes.

- No
- Yes
 - for all clients and beneficial owners of **gold bullion**
 - for all clients and beneficial owners of **art**
 - for all clients and beneficial owners of **precious stones**

- for all clients and beneficial owners of **jewellery**
- for all clients and beneficial owners of **cash**
- for all clients and beneficial owners of **antiquities**
- for all clients and beneficial owners of **wines**
- for all clients and beneficial owners of **cigars**
- for all clients and beneficial owners of **cars**

16. ***Are all the identities of beneficial owners of all who operate and / or who are clients of storage facilities in freeports / free trade zones / foreign trade zones / bonded warehouse automatically reported to a government agency (i.e. customs office, a commercial registry, tax administration, central bank or a similar body)?***

You can choose more than one answer.

Please provide legal source (Law/§, URL) to support any of the affirmative answers.

- No
- No, only upon government's request
- Yes, regarding **gold bullion**
- Yes, regarding **art**
- Yes, regarding **precious stones**
- Yes, regarding **jewelry**
- Yes, regarding **cash**
- Yes, regarding **antiquities**
- Yes, regarding **wines**
- Yes, regarding **cigars**
- Yes, regarding **cars**
- Yes, regarding **all** types mentioned above

17. *Does the jurisdiction send information (spontaneously or automatically) on the beneficial owners of all who operate and / or who are clients of storage facilities in freeports / free trade zones / foreign trade zones / bonded warehouse to the countries of residence of the beneficial owners?*

You can choose more than one answer.

Please provide legal source (Law/§, URL) to support any of the affirmative answers.

- No
- Yes, regarding **gold bullion**
- Yes, regarding **art**
- Yes, regarding **precious stones**
- Yes, regarding **jewelry**
- Yes, regarding **cash**
- Yes, regarding **antiquities**
- Yes, regarding **wines**
- Yes, regarding **cigars**
- Yes, regarding **cars**
- Yes, regarding **all** types mentioned above

18. *Does the jurisdiction publish the identities of beneficial owners of all who operate and / or who are clients of storage facilities in freeports / free trade zones / foreign trade zones / bonded warehouse?*

You can choose more than one answer.

Please provide legal source (Law/§, URL) to support any of the affirmative answers.

- No
- Yes, regarding **gold bullion**

- Yes, regarding **art**
- Yes, regarding **precious stones**
- Yes, regarding **jewelry**
- Yes, regarding **cash**
- Yes, regarding **antiquities**
- Yes, regarding **wines**
- Yes, regarding **cigars**
- Yes, regarding **cars**
- Yes, regarding **all types mentioned above**

19. ***Large Cash Bills***

Does your jurisdiction issue or tolerate circulation of large cash bills of domestic currency (of value greater than 200 US\$ or equivalent)?

Please provide legal source (Law/§, URL) to support your answer.

- Yes, issuance of cash bills of domestic currency of value higher than 200 US\$ or equivalent is ongoing.
- Yes, while issuance of cash bills of domestic currency of value higher than 200 US\$ or equivalent has stopped, the circulation is still tolerated.
- No
- Comments

Please use the text box to write any comments you may have

20. *Consequences of Managing Illicit Assets by a Bank Employee*

Does a local bank employee risk a prison sentence or other penalties in your jurisdiction if s/he is caught with managing client assets of the equivalent of 50.000€ (Euro) or more from a foreign tax resident, while knowing that these assets under management stem from tax evasion or embezzlement committed under the laws of another jurisdiction?

You may choose more than one answer.

If you choose one of the two affirmative answers, please:

- 1. Specify the type of penalty*
- 2. Provide legal source (Law/§, URL)*
- 3. Provide statistics or examples of court cases illustrating the way your laws are applied*

No

Yes, if the assets were stemming from **tax evasion** committed under the laws of another jurisdiction.

Yes, if the assets were stemming from **embezzlement** committed under the laws of another jurisdiction.

21. Contact Details

In order to efficiently process your answers, we would be grateful if you could kindly fill in your contact details in the following lines below. We may contact you if a need for a clarification arises.

Full Name

Affiliation / Position

Email address

Phone

Thank you for completing this survey!

We would like to thank you very much for helping us.

If you have any queries, please contact: fsi@taxjustice.net

Tax Justice Network 2017