

SCHEDULE I – INSURANCE MARKET PLACE PROVIDER RETURN

MATTERS TO BE INCLUDED IN ANNUAL RETURN

1. The following information is required in an annual return—

Section A – All Insurance Marketplace Providers are required to provide the following information:

- (a) Directors:
 - (i) type of director (i.e., whether executive, non- executive, non-executive, independent),
 - (ii) address of all residences of directors;
 - (iii) professional qualifications, experience and years employed by the Insurance Marketplace Provider;
- (b) the organisational structure of the Insurance Marketplace Provider, including but not limited to —
 - (i) name,
 - (ii) role and title,
 - (iii) address of all residences of senior executives,
 - (iv) professional qualifications, experience and years employed of senior executives and officers;
 - (v) the names and roles,
 - (vi) residences, professional qualifications, experience and years employed of key staff and employees;
 - (vii) whether the staff and employees referred to in clause (ii) are employed by an affiliate;
- (c) details of the services provided by the Insurance Marketplace Provider;
- (d) where the services referred to in subparagraph (c) are out-sourced to service providers of the Insurance Marketplace Provider the following information is required to be provided—
 - (i) the names of all service providers;
 - (ii) the jurisdictions where the service providers perform the services;
 - (iii) confirmation as to whether the service provider is an affiliate or not.
 - (iv) the services provided by those service providers under subparagraph (i);
 - (v) confirmation if the outsourced services provided include the appointment of persons as a director of the board to the insurance marketplace provider;
 - (vi) confirmation if the outsourced services provided include the appointment of the role of a senior executive of the Insurance Marketplace Provider;
- (e) where the Insurance Marketplace Provider obtained insurance policies in respect of professional indemnity, directors and officers liability, and errors and omissions insurance—

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

- (i) the full legal name of the entity who issued those policies, and their financial strength rating at the time of provision of filing this information with the Authority;
- (ii) the name of the agency that issued the financial strength rating referred to in clause (i);
- (iii) the line of business protection that was bought by the insurance marketplace provider;
- (iv) the policy limits for each type of insurance indicated on (e);
- (v) Excess/Deductible for each type of insurance indicated on (e);
- (f) a statement that the Insurance Marketplace Provider has met all of the requirements of the minimum criteria for registration in accordance with the Act;
- (g) where an Insurance Marketplace Provider has not met the minimum criteria for registration, a description of the non-compliance and any remedial action taken, if any;
- (h) for the previous 12 months of business carried on by the Insurance Marketplace provider confirm:
 - i. the names, registration numbers, insurance classes of all clients and their roles within the insurance marketplace;
 - ii. whether or not the client is an affiliate;
 - iii. the number of transactions, gross premium volume and statutory lines of business;
- (i) whether the Insurance Marketplace Provider has a conflict of interest policy in place

For the purposes of this Schedule, an “affiliate” refers to an entity belonging to the same group of companies in which the insurance marketplace provider is a part of.

2. CYBER RISK MANAGEMENT

SECTION A - BUSINESS SUMMARY

Geographical details – Confirmation of the following

1. Whether the Insurance Marketplace is headquartered in Bermuda.
 - a. If the answer to the above is no, indicate where the Insurance Marketplace Provider is headquartered.
2. Number of users residing in Bermuda.
3. Number of end users globally.
4. If the company has a data centre in Bermuda to host its servers
5. If the Insurance Marketplace Provider utilizes a cloud hosting company to host the servers of the Insurance Marketplace.
6. If the organisation has cybersecurity insurance coverage (i.e. to cover internal risk)

Confirmation if the following data type is stored/processed

7. Personal data (as defined by any data privacy law) of customers.
8. Payment card data (i.e. credit/debit card).
9. Customer personal data stored/processed on behalf of other entities.

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

Confirmation if the following internet facing services are in place

10. Brochureware (static content only).
11. Web applications.
12. Web applications that process (query, reference, capture, store, transmit) personal data or payment card data.

Roles & Responsibilities – Confirmation if the Insurance Marketplace Provider:

13. Has a dedicated IT Risk Manager; if not which job title holds this responsibility
14. Has a dedicated IT Security Manager; if not which job title holds this responsibility
15. Has a dedicated IT Disaster Recovery Manager; if not which job title holds this responsibility
16. Has a dedicated Business Continuity Manager (BCP) in place; if not which job title holds this responsibility
17. Has a designated Data Privacy Officer
18. Has an annual IT audit plan in place i.e. detailing any IT audit activity for the year

SECTION B – GENERAL CONTROL SUMMARY

Confirmation of the following information:

Identificaton

Whether the Insurance Marketplace Provider:

1. has a Cyber Risk Management Programme in place (i.e. assessing all IT risk which includes IT Security Risk).
2. has established a process to communicate the status of the Cyber Risk Management Program-to the Senior Executives and the Board of Directors on a regular basis.
3. has a Cyber Risk Policy (or Cyber Security Policy) that is approved by the Board and is annually updated.
4. has clearly defined the roles and responsibilities of each of the three lines of defence (operations, risk management and compliance and internal audit)
5. has performed an assessment of compliance against any relevant Data Protection regulatory requirements in which the insurance marketplace provider is bound to comply.
6. inventories and manages its physical devices, information systems, and data within the organization and if so, how.
7. has classified all data.
8. has a third party security risk assessment completed every year i.e. to assess IT risks arising from third parties.

Protection

Insurance Marketplace Provider to confirm if:

9. data is classified as critical, encrypted in transit and at rest;
10. there is a formal process established to ensure maintenance of software and hardware (i.e. patching & managing end of life technologies);
11. a Logical Access Management Standard has been implemented defining how systems access is verified, managed, revoked, and audited;
12. all staff complete cybersecurity training annually
13. a penetration test has been completed in the last year;
14. the enterprise network has been segregated into multiple, separate trust zones; (and if not why not);
15. has a process for detailing IT service management controls i.e. change, release and configuration management;
16. documents and enforces security configuration standards of all network devices.

Detection

17. a process has been implemented enabling the review of threat intelligence and vulnerability alerting data;
-

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

18. a process is established ~~in place~~ to monitor information systems and assets to identify cybersecurity events;
19. it stores and archives security event logs centrally.

Response

20. has established a documented security incident response plan, including internal and external communications and crisis management;
21. has contracted a "4th line" IT security expert service (for example a Managed Security Services Provider - MSSP) in the event of a major incident. (what are the first 3?)

Recovery

22. it has performed a test of the Business Continuity and IT Disaster Recovery plans during the past 12 months. Where it has done so, please attach results.
23. has been subject to a significant cyber event? incident during the past 12 months.

SECTION C - Technical Security Controls

Technical controls summary

The Insurance Marketplace Provider shall confirm whether the following Technical Security Controls have been established

1. anti-virus software is installed on all Microsoft Operating System endpoints;
2. there is an endpoint Advanced Persistent Threat (APT) control established;
3. data Loss Prevention (DLP) controls have been implemented i.e.: to prevent unauthorised data use and transmission of company information
4. INTERNAL vulnerability scanning is conducted (and what is the frequency);
5. EXTERNAL vulnerability scanning is conducted and what is the frequency);
6. There is regular (6 monthly minimum) firewall ruleset reviews;
7. whether a network perimeter Intrusion Detection or Prevention (IDS/IPS) control has been implemented;
8. There is a Distributed Denial of Service (DDOS) defence implemented for internet gateways.

3. Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) QUESTIONNAIRE

Every Insurance Marketplace Provider shall provide the information required by this section (Where an Insurance Marketplace is not an "AML/ATF Regulated Financial Institution" for the purposes of the Proceeds of Crime Act 1997, it does not have to complete this section

Section A – Client / Customer Numbers

1. The total Number of clients.
2. Whether clients are risk rated in accordance with Money Laundering (ML)/Terrorist Financing (TF) laws, and any rules and guidance issued by the Authority, as "Low Risk, Medium Risk, High Risk or Unknown assessment categories".
3. The number of clients that have been risk rated using the foregoing assessment categories.

Section B – Products / Services

1. Whether the Insurance Marketplace Provider transacts with any client dealing with Direct Long-Term business in Bermuda;
 - 1.1 If the response to 1. is in the affirmative, please confirm how many.
 - 1.2 List the names and classes of clients under paragraph 1.

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

1.3 Confirm the services and number of entities provided to clients under paragraph 1.

2. Confirm if the Insurance Marketplace Provider has been engaged to provide outsourcing services (particular to AML/ATF activities) on behalf of any clients under paragraph 1.

2.1 Where the response is in the affirmative under paragraph 2, provide ~~entity~~ names of the service providers.

3. Confirm if the Insurance Marketplace Provider has filed Suspicious Activity Reports (SAR) on behalf of any other entity licensed or registered by the Authority.

3.1 Where the response is affirmative under paragraph 3 is in the affirmative, please confirm how many.

Section C – Delivery Channel

1. Provide the number of customers onboarded for the last 12 months by face to face with clients, via intermediary, by phone, email, fax or post, or other.

Section D – Geography what are you asking to be provided here?

2. Please confirm:

(a) country of residence of Ultimate Beneficial Owners (UBOs) of all clients confirmed under Section A.

(b) any Politically Exposed Persons (PEP) (as such term is defined under the Proceeds of Crime Act 1997) allocated by geographic zone as outlined in Table 1.

3. whether transaction monitoring is performed.

Table 1 Geographic Zone

Geographic Zone	Countries
Zone 1 - Central & Western Asia	Armenia, Azerbaijan, Bahrain, Georgia, Iraq, Israel, Jordan, Kazakhstan, Kuwait, Kyrgyzstan, Lebanon, Oman, Palestinian, Qatar, Saudi Arabia, Saudi Arab Republic, Tajikistan, Turkey, Turkmenistan, United Arab Emirates, Uzbekistan, Yemen
Zone 2 - Eastern Asia	China, Hong Kong, Japan, Macao, Mongolia, North Korea, South Korea, Taiwan
Zone 3 - South and South-Eastern Asia	Afghanistan, Bangladesh, Bhutan, Brunei Darussalam, Cambodia, India, Indonesia, Iran, Lao PDR, Malaysia, Maldives, Myanmar, Nepal, Pakistan, Philippines, Singapore, Sri Lanka, Thailand, Timor-Leste, Vietnam
Zone 4 - Oceania	American Samoa, Australia, Cook Islands, Fiji, French Polynesia, Guam, Kiribati, Marshall Islands, Micronesia, Nauru, New Caledonia, New Zealand, Niue, Norfolk Island, N. Mariana Islands, Palau, Papua New Guinea, Pitcairn, Samoa, Solomon Islands, Tokelau, Tonga, Tuvalu, Vanuatu, Wallis & Futuna Islands
Zone 5 - Northern Africa	Algeria, Benin, Burkina Faso, Cameroon, Cape Verde, Central African Republic, Chad, Cote d' Ivoire, Egypt, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Libya, Mali, Mauritania, Morocco, Niger, Nigeria, Saint Helena, Senegal, Sierra Leone, Sudan, Togo, Tunisia, Western Sahara
Zone 6 - Southern Africa	Angola, Botswana, Burundi, Democratic Republic of Congo, Comoros, Djibouti, Equatorial Guinea, Eritrea, Ethiopia, Gabon, Kenya, Lesotho, Madagascar, Malawi, Mauritius, Mayotte, Mozambique, Namibia, Republic of Congo, Reunion, Rwanda, Sao Tome & Principe, Seychelles, Somalia, South Africa, Swaziland, Uganda, United Republic of Tanzania, Zambia, Zimbabwe
Zone 7 - Eastern Europe	Belarus, Bulgaria, Czech Republic, Hungary, Moldova, Poland, Romania, Russian Federation, Slovakia, Ukraine
Zone 8 - Northern Europe	Aland Islands, Channel Islands, Denmark, Estonia, Faeroe Islands, Finland, Guernsey, Iceland, Republic of Ireland, Isle of Man, Jersey, Latvia, Lithuania, Norway, Svalbard Jan Mayen, Sweden, United Kingdom
Zone 9 - Southern Europe	Albania, Andorra, Bosnia, Croatia, Cyprus, Gibraltar, Greece, Italy, FYR of Macedonia, Malta, Montenegro, Portugal, San Marino, Serbia, Slovenia, Spain, Vatican City,

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

Zone 10 - Western Europe	Austria, Belgium, France, Germany, Liechtenstein, Luxembourg, Monaco, Netherlands, Switzerland
Zone 11 - Northern America (Excluding USA)	Canada, Greenland, St Pierre & Miquelon
Zone 12 - Caribbean	Anguilla, Antigua & Barbuda, Aruba, Bahamas, Barbados, British Virgin Islands, Cayman Islands, Cuba, Dominica, Dominican Republic, El Salvador, Grenada, Guadeloupe, Haiti, Montserrat, Netherlands Antilles, Puerto Rico, St-Barthelemy, St Kitts & Nevis, St Lucia, St Martin, St Vincent, Trinidad & Tobago, Turks & Caicos Islands, US Virgin Islands, Jamaica
Zone 13 - Eastern South America	Brazil, Falkland Islands, French Guiana, Guyana, Paraguay, Suriname, Uruguay
Zone 14 - Northern, Southern and Western South America	Argentina, Bolivia, Chile, Colombia, Ecuador, Peru, Venezuela
Zone 15 - North-East United States	Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont
Zone 16 - South-East United States	Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, Virginia, West Virginia
Zone 17 - Mid-West United States	Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, Wisconsin
Zone 18 - Western United States	Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, New Mexico, Oregon, Texas, Utah, Washington, Wyoming
Zone 19 - Central America	Belize, Costa Rica, Guatemala, Honduras, Mexico, Nicaragua, Panama,
Zone 20 - Bermuda	Bermuda

Section E – Reporting

1. Confirm if the Insurance Marketplace Provider is registered with GoAML at www.fia.bm.
 - 1.1 If the answer is in the affirmative to paragraph 1, confirm the name and the date registered.
 - 1.2 If the answer is in the negative to paragraph 1, confirm whether the Insurance Marketplace Provider has access to GoAML through another registration.
 - 1.3 If the answer is in the negative to paragraphs 1.1 and 1.2, confirm who would file a SAR on behalf of the Insurance Marketplace Provider.
2. Confirm the number of Suspicious Activity Reports (SAR) filed by the Insurance Marketplace Provider within 4 years from the date of this filing.

Section F – Training / Personnel

1. Confirm if the Insurance Marketplace Provider provides employees with training in relating to ML and TF
 - 1.1 If yes, confirm if:
 - (a) ML/TF training is included in the induction program of new employees.
 - (b) The ML/TF training provided is specific to the business of insurance conducted by the Insurance Marketplace Provider or is of general application.
 - (c) The frequency that employees must undertake ML/TF training.
2. Confirm the number of persons employed by the Insurance Marketplace Provider on a full time and part time basis.
 - 2.1 Confirm the work arrangement of the Compliance Officer
 - 2.2 Confirm the work arrangement of the (Money Laundering) Reporting Officer.
3. Indicate the requirements undertaken in accordance with policies and procedures implemented by the Insurance Marketplace Provider when recruiting staff.

Verify name	
Verify residential address	

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

Check if the individual should be considered as PEP	
Check individual against sanctions lists	
Check for any negative press against the individual	
Confirm employment history	
Confirm references	
Request details on any regulatory action taken against the individual	

4. Confirm if the Insurance Marketplace Provider's Senior Compliance Officer is a senior executive

Section G – AML / ATF Controls

Confirm:

1. whether the Insurance Marketplace Provider has AML/ATF controls that are specific for its business.
2. whether the Insurance Marketplace Provider has AML/ATF controls that are specific for all other services entities.
3. Whether the Insurance Marketplace Provider has other specific AML/ATF controls. If yes, describe the AML/ATF controls
4. the frequency with which the Insurance Marketplace Provider rates the AML/ATF risks.
5. whether senior management approval of the Insurance Marketplace Provider is required to approve new business, if a client has been risk rated as Low, Medium or High.
6. if senior management approval is required to retain an existing client, where the client's risk rating has changed to Low, Medium or High.
7. if the AML/ATF policies and procedure manuals of the Insurance Marketplace Provider meet all applicable laws and regulations.
8. the frequency for which the Insurance Marketplace Provider's AML/ATF policies and procedures are reviewed. Attach a copy of the AML/ATF policies and procedures if they have been updated in the last 12 months.
9. the date the Insurance Marketplace Provider last performed an entity-wide AML/ATF risk assessment.
10. the date the Insurance Marketplace Provider last conducted an independent audit of its AML/ATF program and attach a copy of the audit report.
11. the date of the last Compliance/Reporting Officer report on the operation and effectiveness of the Insurance Marketplace Provider AML/ATF policies, procedures and controls.
12. if the Insurance Marketplace Provider documents the ML/TF risks associated with a product/service prior to launch.

Section H – Company Data

Confirm whether:

1. the Insurance Marketplace Provider is a Part of a group. If yes, provide the name of the group and Registrar of Company number (where relevant)
2. the Insurance Marketplace Provider is listed on a stock exchange. If yes, list the name of the exchange.

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

3. there is any additional information/comments which the Insurance Marketplace Provider is of the view might be relevant to this exercise.

Section I – Corporate Governance

If the Insurance marketplace provider is a company, complete this section. Otherwise, proceed to Section J.

The Insurance Marketplace Provider shall confirm the following information (to the best of its knowledge and belief) as at the reporting period:

	<u>Corporate Governance</u>	<u>Confirm Yes or No</u>
1	Whether the powers, roles, responsibilities and accountabilities between the board of directors of the Insurance Marketplace Provider and senior executive are clearly defined, segregated and understood.	
2	That the Insurance Marketplace Provider reviews and monitors the structure, size and composition of the Board and recommends improvements to ensure its compliance with the applicable laws, regulations, listing rules and Insurance Marketplace Provider's policies.	
3	That the Audit and Risk Management Committee of the Board or any related Board committee, assists the Board in fulfilling its oversight function through the review and evaluation of the financial reporting process and adequacy and effectiveness of the system of internal controls; including financial reporting and information technology security controls.	
4	Confirmation that the Board receives sufficient AML/ATF information to assess and understand the senior executive's process for evaluating the Insurance Marketplace Provider's system of internal controls.	
5	Whether the Board ensures that the Insurance Marketplace Provider complies with all relevant laws and regulations and endeavours to adopt accepted best business practices.	
6	That the Board and senior management declare any personal dealings to HR and the Compliance department when applicable or required.	
7	That the Board provides oversight to the insurance marketplace provider with regard to enterprise risk management and identifies key risk areas and key performance indicators and monitor these factors with due diligence.	
8	Whether Board members ensure there is appropriate oversight by the senior management that is consistent with the insurance marketplace provider policies and procedures.	
9	Whether the Board sets and enforces clear lines of responsibility and accountability throughout the organisation.	
10	That at least annually the Board monitors the senior management's compliance with policies set by the Board and its performance based on approved targets and objectives.	
11	That the Board receives advice on all major financing transactions, principal agreements and capitalisation requiring Board approval and makes appropriate recommendations for their consideration	
12	Whether the compliance and audit function are independent of all operational and business functions as far as practicable and have direct lines of communication to the senior management.	
13	That the insurance marketplace provider has instituted policies or procedures to provide for the Senior Compliance Officer to have regular contact with and direct access to, the senior management	
	<u>Employee Integrity</u>	
14	Whether the Insurance Marketplace Provider has established and, maintains and operates appropriate procedures in order to be satisfied of the integrity of new employees.	
15	That appropriate mechanisms have been established to ensure the protection of the Insurance Marketplace Provider's relevant employee to report suspicious transactions and other actions to comply with AML/ATF obligations.	
16	That adequate procedures or management information systems are in place to provide relevant employees with timely information which may include information regarding connected accounts or relationships.	
17	Whether adequate procedures or document information systems are in place to ensure relevant legal obligations are understood and practiced by relevant employees and adequate guidance and training is provided by the Insurance Marketplace Provider to employees.	

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

18	Whether the incidences of financial crime committed by relevant employees (e.g. theft, fraud) is low.	
	<u>Employee Knowledge</u>	
19	That all relevant staff are aware of the identity of the Reporting Officer and how to report suspicious activity.	
20	Confirm whether training programs are designed to cover the AML/ATF risks of the Insurance Marketplace Provider	
21	Whether the Insurance Marketplace Provider has an appropriate number of suitably trained staff and other resources necessary to implement and operate its AML/ATF program.	
22	Whether staff fully comply with all AML/ATF procedures in respect of customer identification, account monitoring, record keeping and reporting.	
23	That relevant employees are expected to remain vigilant to the possibility of ML/TF.	
24	Whether staff that violate Bermuda AML/ATF laws, regulations or policies and procedures outlined by the Insurance Marketplace Provider are subject to disciplinary action.	
25	That all staff are required to (at least annually) undertake training to ensure that their knowledge of AML/ATF laws, policies and procedure is current.	
26	Whether relevant employees are updated on ML/TF schemes and typologies on a regular basis.	
27	That staff are required to declare <u>personal dealings</u> relevant in the jurisdictions that the Insurance Marketplace Provider operates in on a regular basis (at least annually).	
	<u>Employee Compliance</u>	
28	Whether the Insurance Marketplace Provider ensures that the Senior Compliance Officer has been charged with the oversight and implementation of all activities relating to the prevention and detection of ML/TF.	
29	That the Senior Compliance Officer is trained in the latest Bermuda law regulatory requirements and ML/TF risks arising from the Insurance Marketplace Provider's business.	
30	That the Board monitors compliance with corporate governance regulations and guidelines.	
31	Whether the Board supports the senior management's scope of AML/ATF internal control assessment and receives regular (at least annually) reports from the senior management.	

Section J – Corporate Governance

The section is to be completed by insurance marketplace provider who are partnerships, sole proprietorships or individuals

The Insurance Marketplace Provider shall confirm the following information (to the best of its knowledge and belief) as at the reporting period:

	<u>Corporate Governance</u>	<u>Confirm Yes or No</u>
1	The Insurance Marketplace Provider reviews and monitors its structure, size and composition and recommends improvements to ensure its compliance to the applicable laws, regulations and policies.	
2	The Insurance Marketplace Provider has an effective oversight function through the review and evaluation of the financial reporting process and adequacy and effectiveness of the system of internal controls, including financial reporting control and information technology security.	
3	The Insurance Marketplace Provider complies with all relevant laws and regulations and endeavours to adopt accepted best business practices.	
4	A qualified party provides oversight with regard to enterprise risk management and identifies key risk areas and key performance indicators and monitor these factors with due diligence.	
5	The compliance and audit function are independent of all operational and business functions as far as practicable.	
	<u>Employee Integrity</u>	
6	The Insurance Marketplace Provider establishes, maintains and operates appropriate procedures in order to be satisfied of the integrity of any new employees.	

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

7	There are appropriate mechanisms that ensure the protection of the Insurance Marketplace Provider staff for reporting suspicious transactions and their other actions to comply with AML/ATF obligations.	
8	There are adequate procedures or management information systems in place to provide relevant staff with timely information that might include any information on any connected accounts or relationships.	
9	There are adequate procedures or management information systems in place to ensure relevant legal obligations are well understood by staff and adequate guidance and training is provided.	
	<u>Employee Knowledge</u>	
10	All staff are aware of the AML/ATF Compliance Officer and have been trained on how to report suspicious activities.	
11	Training programs are designed to cover the AML/ATF risks of the Insurance Marketplace Provider in order to ensure that all appropriate staff members are trained.	
12	The Insurance Marketplace Provider has an appropriate number of suitably trained staff and other resources necessary to implement and operate its AML/ATF program.	
13	Staff comply with all AML requirements and established procedures in respect of customer identification, account monitoring, record keeping and reporting.	
14	Staff remain vigilant to the possibility of ML/TF offences.	
15	Staff who violate AML/ATF laws, regulations or the policies and procedures outlined by the Insurance Marketplace Provider are subject to disciplinary action.	
16	All staff are required to undergo refresher training at least annually to ensure that their knowledge of AML/ATF laws, policies and procedure is current .	
17	Staff are updated on ML/TF schemes and typologies on a regular basis.	
18	Staff are required to declare their <u>personal dealings</u> on a regular basis (at least annually).	
	<u>Employee Compliance</u>	
19	The Insurance Marketplace Provider ensures that the Compliance Officer has been charged with the oversight of all activities relating to the prevention and detection of ML/TF.	
20	The Compliance Officer is fully conversant in regulatory requirements and AML/ATF risks arising from the business conducted .	
21	The Insurance Marketplace Provider monitors compliance with corporate governance requirements imposed on it and has taken into account where applicable, relevant guidelines.	

SCHEDULE I – INSURANCE MARKETPLACE PROVIDER RETURN

4. INTERNATIONAL SANCTIONS LAWS QUESTIONNAIRE.

All Insurance Marketplace Providers shall confirm whether it:

1. screens clients, to determine if they are subject to measures imposed under Bermuda sanctions laws.
2. screens employees to determine if they are subject to measures imposed under Bermuda’s sanctions laws.
3. has had its assets frozen in the last twelve (12) months in accordance with Bermuda sanctions laws or any international sanctions laws.
 - 3.1 If the answer is in the affirmative to paragraph 3, confirm the type (and amount where applicable) of assets frozen.
 - 3.2 provide the following details for asset freezes:

	Group ID	Name of the designated person as given on the consolidated list	Name of the person/entity if owned/controlled by a designated person.	Value of Assets
1				
2				
3				
4				

The Insurance Marketplace Provider shall confirm any additional information/comments which in its view is relevant to this exercise.