



12 June 2017

Re: Requirement to produce data as contained in the attached Risk Mitigate Questionnaire Data Call

Dear MLRO,

We write further to our letter of 15 May 2017.

You will recall that in the above-mentioned correspondence, we required your input on a Data Call questionnaire for the completion of the National Risk Assessment. The information collected is currently being analyzed, and will be used to assist the Board in gathering statistics relating to industry inherent risks. We thank those firms who have submitted their respective questionnaires to the Board. If your firm has not yet submitted same, The Board requires that you do so as once.

Further to the above, the Board now requires information concerning the mitigants and controls being adopted by industry, to gain a further understanding of areas of potential vulnerabilities within our AML/ATF regime.

In keeping with the Financial Action Task Force (FATF) 2012 Recommendations, the Board is carrying out this survey to assess the level of Money Laundering and Terrorist Financing risks within the Regulated Professional Firms, particularly as they relate to the mitigants being adopted by your respective firms. This information will also greatly assist the Board and Bermuda as we prepare for the Caribbean Financial Action Task Force's (CFATF) assessment of Bermuda's Anti-Money Laundering/Terrorist Financing regime, currently scheduled to take place in Q3 2018.

To this end, we require that you complete the attached survey, returning same on or before 10 July 2017.



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As is the case with all Data Calls required by the Board, the contents of same will remain confidential to the Board.

We have been advised by the Board to remind you that noncompliance with their request for the supply of information which allows them to better understand the nature of your business and activities as required by Section 30C of the Proceeds of Crime (AML/ATF Supervision and Enforcement) Act 2008, will be considered a serious breach and that consideration will be given to securing compliance, pursuant to section 33 (1) of that Act, which relates to criminal offences.

Please feel free to contact the writer if you have any questions concerning the contents of this letter.

Regards,

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Supervisor

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