

## **Circular letter 19/16 of the Commissariat aux Assurances on the collection of quantitative data for the assessment of exposure risks to money laundering and terrorist financing for life insurance companies**

The purpose of this circular letter is to define the content, format and collection dates of the quantitative data that life insurance companies must provide to the Commissariat aux Assurances, in accordance with circular letter 18/9 introducing new harmonised questionnaires for assessing exposure risks to money laundering and terrorist financing.

The Commissariat aux Assurances requires life insurance companies to provide on an annual basis:

- data on new contracts concluded (Point 1.)
- data on the stock of contracts (Point 2.)
- statistics on contract revaluations during the financial year (Point 3.)
- information on refused insurance applications (Point 4.)

The collection of quantitative data will be done in an aggregated manner using harmonised forms, which are largely derived from Annexes I (a), I (b) and I (c) of circular letter 18/9.

### **1. The new contracts**

#### **1.1. Individual life insurance contracts (Annexes I a) scores, I a1) and I a2))**

Circular letter 18/9 requires the mandatory use of the new questionnaires from 1<sup>st</sup> September 2019 at the latest. It also provides that life insurance companies can already use the new questionnaires from January 2019.

Annex I a1) includes in an aggregated form and by type of contract the scores resulting from the answers provided to each question of the questionnaire.

Since all individual life insurance contracts in force at 31 December 2019, including new contracts subscribed in 2019, must have a score from the new questionnaire, it is possible that some contracts subscribed in 2019 before the 1<sup>st</sup> September 2019 have been scored through the old questionnaire and then subsequently taken up on the new questionnaire using the "model point" approach.

The form in Annex I a2) allows this to be taken into account and to show the distribution of new contracts by score obtained while considering the type of contract and the methodology for determining the score (model point/manual scoring).

From 2020 onwards, all new subscribed contracts will have to be scored fully manually. Annex I a2) will be adapted accordingly by the Commissariat aux Assurances for the collection of data for subsequent years.

## **1.2. Group life insurance contracts (Annexes I b) scores, I b1) and I b2))**

Unlike individual life insurance contracts, circular letter 18/9 does not allow the use of the "model point" methodology for group life insurance contracts. As a result, all new contracts subscribed in 2019 must have by 31 December 2019 at the latest a score that has been determined by completing the new questionnaire manually.

## **2. The stock of contracts**

### **2.1. The stock of individual life insurance contracts (Annexes I a3) and I a4))**

### **2.2. The stock of group life insurance contracts (Annexes I b3) and I b4)**

All individual and group life insurance policies (including new contracts already entered under point 1. above) must have a score from the new questionnaires by 31 December 2019, in accordance with the terms and conditions set out in circular letter 18/9.

## **3. Revaluated contracts (Annex II)**

Circular letter 18/9 specifies the terms and conditions for the revaluation of existing contracts.

Annex II allows the Commissariat aux Assurances to collect annual statistics on revaluations carried out by type of individual contract and by reason underlying each revaluation carried out. It is therefore not required for revaluations of group life insurance contracts.

## **4. Refused insurance applications (Annex I c1)**

For refused insurance applications, the answers to five questions must be sent to the Commissariat aux Assurances in an aggregated form, but a score calculation is not performed.

The first data collection will be carried out by the Commissariat aux Assurances on 31 January 2020. It will cover new insurance contracts subscribed in 2019 as well as the situation of contracts in stock at 31 December 2019. For subsequent years, life insurance undertakings must communicate by 31 January of each year at the latest, the data relating to new contracts and the situation of the stock of contracts on the 31 December of the previous year. Annex II will be required for the first time as part of the 2021 data collection.

The Commissariat aux Assurances will send personalized EXCEL files to life insurance companies before the end of 2019. All annexes must be sent to the Commissariat aux Assurances electronically through secure transmission channels only.

For the Executive Committee,

Claude WIRION  
Director

## Annex I a) scores

		Score by answer				
		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)
		<b>I. Risks related to the type of contract / product</b>				
I 1	Type of individual contract	0	0	2	4	
<b>II. Risks related to the "Client" and its contract</b>						
<b>The parties to the contract</b>						
I 2	Country of residence of the policyholder	0	0	2	4	
I 3	The policyholder is a natural person and is different from the beneficial owner (other than the accepting beneficiary)	3	0			
I 4	The policyholder is a legal person	2	0			
I 5	Country of residence of the beneficial owner	0	0	2	4	0
I 6	Insured's country of residence	0	0	2	4	0
I 7	Nationality of the policyholder	0	0	2	4	
I 8	Nationality of the beneficial owner	0	0	2	4	0
I 9	Nationality of the insured	0	0	2	4	0
I 10	The Client or the insured changed during the contract	1	0	0		
I 11	Supporting documents establishing the identity of the Client and/or beneficiary have not been obtained/regularized	4	0			
I 12	A legal arrangement (trust or legal structure) is included in the contract	4	0			
I 13	The contract has been reported to the FIU of the Public Prosecutor's Office	4	0			
I 14	The Client or another party of the contract has been identified as being on a list of international financial sanctions	4	0			
I 15	The Client or his entourage or another party to the contract is classified as a PEP within the meaning of the AML/CFT Law	4	0			
I 16	The Client practices a sensitive profession and/or works in a sensitive sector of activity	2	4	0		
I 17	The background check of the client revealed other risk factors	4	0			
I 18	The Client has not completed/responded to all tax compliance requirements	4	0			
I 19	The Client has subscribed to other life insurance contracts with the same characteristics without any clear justification	2	0			
<b>The premium(s)</b>						
I 20	The banking institution from which the first premium or a subsequent premium originates/should originate is located in the/an/a	0	0	2	4	
I 21	The banking institution from which the first premiums originate/should originate is located in a country other than that of the Client's residence without any obvious economic justification	3	0			
I 22	The premium is included (or brings the contract) between 250,000 and 2,500,000 euros included	1	0	0		
I 23	The premium is higher than (or brings the contract to more than) 2,500,000 euros	2	0	0		
I 24	The premium(s) or the payment is/are paid in cash, by bearer cheque, by delivery of securities or bearer value	2	0	0		
I 25	The contract provides for the possibility of free payments	1	0			
I 26	The payments and their frequency do not correspond to the information provided at the time of subscription (respectively during the life) of the contract	3	0			
I 27	The premium(s) contain(s) atypical elements	3	0			
<b>The beneficiary clause and other terms and conditions of the contract</b>						
I 28	The beneficiary clause is not exclusively in favour of family members and/or in favour of a banking institution to guarantee the repayment of the loan	1	0	0		
I 29	The beneficiary clause is established in favour of a legal person outside the circumstances referred to in question I 28 or a de facto association or charity other than those that are fiscally recognized	1	0	0		
I 30	The beneficiary clause is established in favour of a natural person if the contract is subscribed by a legal person	2	0	0		
I 31	The beneficiary clause for the benefit of a person other than those referred to in question I 28 or for the benefit of a person referred to in question I 29 has been accepted by / made irrevocable	2	0	0		
I 32	The contract has been pledged in favour of a natural or legal person other than a banking institution	2	0	0		
I 33	The contract is assigned or its rights are transferred to a third party without any plausible link or justification	2	0			
I 34	The policyholder has designated a correspondence address other than his home address	1	0			
<b>The underlying investments</b>						
I 35	The Client has requested an investment of its premium in unlisted instruments (>50% of the issue of the unlisted securities)	4	0	0		
I 36	The Client has requested an investment of its premium in unlisted instruments (between 10 and 50% of the issue of the unlisted securities)	2	0	0		
I 37	The Client has a close relationship with, an influence or decision-making power over the underlying unlisted asset	4	0	0		
<b>III. Risks related to the distribution of life insurance contracts</b>						
I 38	The distribution of the contract took place through an intermediary established in a high-risk country	3	0	0		
I 39	The intermediary resides in a State (except GDL) other than the Client	1	0	0		
I 40	The intermediary of the contract has been changed at the Client's initiative	1	0	0		
I 41	The intermediary is authorised to collect the premium(s) or to pay the benefits of the contract	2	0	0		
I 42	The distribution of the contract took place via the Internet or another "remote" means	4	0			
<b>IV. Benefit payments</b>						
I 43	The contract was terminated during the renunciation period	2	0			
I 44	Number of redemptions over the last two years	0	3			
I 45	A payment resulted in economically disproportionate penalties	3	0	0		
I 46	The payment had to be split and paid into a number of bank accounts higher than to that of beneficiaries or follows several close redemptions with payments on different accounts	4	0			
I 47	The banking institution to which the payment of a benefit has been made is located in the/an/a	0	0	2	4	0
I 48	There is no apparent economic link between the residence of the recipient of the payment and the State of establishment of the banking institution to which the payment was made or intended	2	0	0		
I 49	The change in the beneficiary clause is executed within the 6 months preceding the expiry of the contract	2	0	0		
I 50	A payment presented another atypical element	4	0			
<b>V. Miscellaneous</b>						
I 51	The file contains another atypical element	4	0			







Annex I a2) : Distribution of contracts by risk score ML/TF obtained and by contract type (I1)

NAME OF LIFE INSURANCE COMPANY  
 New individual contracts subscribed in 2020

Score obtained	Pure protection		Low amount savings and investment		Savings and investment other		Bearer contract	
	Number of	%	Number of	%	Number of	%	Number of	%
0		0,00%		0,00%		0,00%		0,00%
1		0,00%		0,00%		0,00%		0,00%
2		0,00%		0,00%		0,00%		0,00%
3		0,00%		0,00%		0,00%		0,00%
4		0,00%		0,00%		0,00%		0,00%
5		0,00%		0,00%		0,00%		0,00%
6		0,00%		0,00%		0,00%		0,00%
7		0,00%		0,00%		0,00%		0,00%
8		0,00%		0,00%		0,00%		0,00%
9		0,00%		0,00%		0,00%		0,00%
10		0,00%		0,00%		0,00%		0,00%
11		0,00%		0,00%		0,00%		0,00%
12		0,00%		0,00%		0,00%		0,00%
13		0,00%		0,00%		0,00%		0,00%
14		0,00%		0,00%		0,00%		0,00%
15		0,00%		0,00%		0,00%		0,00%
16		0,00%		0,00%		0,00%		0,00%
17		0,00%		0,00%		0,00%		0,00%
18		0,00%		0,00%		0,00%		0,00%
19		0,00%		0,00%		0,00%		0,00%
20		0,00%		0,00%		0,00%		0,00%
21		0,00%		0,00%		0,00%		0,00%
22		0,00%		0,00%		0,00%		0,00%
23		0,00%		0,00%		0,00%		0,00%
24		0,00%		0,00%		0,00%		0,00%
25		0,00%		0,00%		0,00%		0,00%
26		0,00%		0,00%		0,00%		0,00%
27		0,00%		0,00%		0,00%		0,00%
28		0,00%		0,00%		0,00%		0,00%
29		0,00%		0,00%		0,00%		0,00%
30		0,00%		0,00%		0,00%		0,00%
31		0,00%		0,00%		0,00%		0,00%
32		0,00%		0,00%		0,00%		0,00%
33		0,00%		0,00%		0,00%		0,00%
34		0,00%		0,00%		0,00%		0,00%
35		0,00%		0,00%		0,00%		0,00%
36		0,00%		0,00%		0,00%		0,00%
37		0,00%		0,00%		0,00%		0,00%
38		0,00%		0,00%		0,00%		0,00%
39		0,00%		0,00%		0,00%		0,00%
40		0,00%		0,00%		0,00%		0,00%
41		0,00%		0,00%		0,00%		0,00%
42		0,00%		0,00%		0,00%		0,00%
43		0,00%		0,00%		0,00%		0,00%
44		0,00%		0,00%		0,00%		0,00%
45		0,00%		0,00%		0,00%		0,00%
46		0,00%		0,00%		0,00%		0,00%
47		0,00%		0,00%		0,00%		0,00%
48		0,00%		0,00%		0,00%		0,00%
49		0,00%		0,00%		0,00%		0,00%
50		0,00%		0,00%		0,00%		0,00%
51		0,00%		0,00%		0,00%		0,00%
52		0,00%		0,00%		0,00%		0,00%
53		0,00%		0,00%		0,00%		0,00%
54		0,00%		0,00%		0,00%		0,00%
55		0,00%		0,00%		0,00%		0,00%
56		0,00%		0,00%		0,00%		0,00%
57		0,00%		0,00%		0,00%		0,00%
58		0,00%		0,00%		0,00%		0,00%
59		0,00%		0,00%		0,00%		0,00%
60		0,00%		0,00%		0,00%		0,00%
61		0,00%		0,00%		0,00%		0,00%
62		0,00%		0,00%		0,00%		0,00%
63		0,00%		0,00%		0,00%		0,00%
64		0,00%		0,00%		0,00%		0,00%
65		0,00%		0,00%		0,00%		0,00%
66		0,00%		0,00%		0,00%		0,00%
67		0,00%		0,00%		0,00%		0,00%
68		0,00%		0,00%		0,00%		0,00%
69		0,00%		0,00%		0,00%		0,00%
70		0,00%		0,00%		0,00%		0,00%
71		0,00%		0,00%		0,00%		0,00%
72		0,00%		0,00%		0,00%		0,00%



Score obtained	Pure protection		Low amount savings and investment		Savings and investment other		Bearer contract	
	Number of	%	Number of	%	Number of	%	Number of	%
73		0,00%		0,00%		0,00%		0,00%
74		0,00%		0,00%		0,00%		0,00%
75		0,00%		0,00%		0,00%		0,00%
76		0,00%		0,00%		0,00%		0,00%
77		0,00%		0,00%		0,00%		0,00%
78		0,00%		0,00%		0,00%		0,00%
79		0,00%		0,00%		0,00%		0,00%
80		0,00%		0,00%		0,00%		0,00%
81		0,00%		0,00%		0,00%		0,00%
82		0,00%		0,00%		0,00%		0,00%
83		0,00%		0,00%		0,00%		0,00%
84		0,00%		0,00%		0,00%		0,00%
85		0,00%		0,00%		0,00%		0,00%
86		0,00%		0,00%		0,00%		0,00%
87		0,00%		0,00%		0,00%		0,00%
88		0,00%		0,00%		0,00%		0,00%
89		0,00%		0,00%		0,00%		0,00%
90		0,00%		0,00%		0,00%		0,00%
91		0,00%		0,00%		0,00%		0,00%
92		0,00%		0,00%		0,00%		0,00%
93		0,00%		0,00%		0,00%		0,00%
94		0,00%		0,00%		0,00%		0,00%
95		0,00%		0,00%		0,00%		0,00%
96		0,00%		0,00%		0,00%		0,00%
97		0,00%		0,00%		0,00%		0,00%
98		0,00%		0,00%		0,00%		0,00%
99		0,00%		0,00%		0,00%		0,00%
100		0,00%		0,00%		0,00%		0,00%
101		0,00%		0,00%		0,00%		0,00%
102		0,00%		0,00%		0,00%		0,00%
103		0,00%		0,00%		0,00%		0,00%
104		0,00%		0,00%		0,00%		0,00%
105		0,00%		0,00%		0,00%		0,00%
106		0,00%		0,00%		0,00%		0,00%
107		0,00%		0,00%		0,00%		0,00%
108		0,00%		0,00%		0,00%		0,00%
109		0,00%		0,00%		0,00%		0,00%
110		0,00%		0,00%		0,00%		0,00%
111		0,00%		0,00%		0,00%		0,00%
112		0,00%		0,00%		0,00%		0,00%
113		0,00%		0,00%		0,00%		0,00%
114		0,00%		0,00%		0,00%		0,00%
115		0,00%		0,00%		0,00%		0,00%
116		0,00%		0,00%		0,00%		0,00%
117		0,00%		0,00%		0,00%		0,00%
118		0,00%		0,00%		0,00%		0,00%
119		0,00%		0,00%		0,00%		0,00%
120		0,00%		0,00%		0,00%		0,00%
121		0,00%		0,00%		0,00%		0,00%
122		0,00%		0,00%		0,00%		0,00%
123		0,00%		0,00%		0,00%		0,00%
124		0,00%		0,00%		0,00%		0,00%
125		0,00%		0,00%		0,00%		0,00%
126		0,00%		0,00%		0,00%		0,00%
127		0,00%		0,00%		0,00%		0,00%
128		0,00%		0,00%		0,00%		0,00%
129		0,00%		0,00%		0,00%		0,00%
130		0,00%		0,00%		0,00%		0,00%
131		0,00%		0,00%		0,00%		0,00%
132		0,00%		0,00%		0,00%		0,00%
133		0,00%		0,00%		0,00%		0,00%
134		0,00%		0,00%		0,00%		0,00%
135		0,00%		0,00%		0,00%		0,00%
136		0,00%		0,00%		0,00%		0,00%
137		0,00%		0,00%		0,00%		0,00%
138		0,00%		0,00%		0,00%		0,00%
139		0,00%		0,00%		0,00%		0,00%
140		0,00%		0,00%		0,00%		0,00%
Total number of contracts	0		0		0		0	
Total score	0		0		0		0	
Average score per contract	0,00		0,00		0,00		0,00	

	NAME OF THE LIFE INSURANCE COMPANY	Pure protection					Low amount savings and investment					Savings and investment other					Bearer contract																																																														
		Number of contracts signed with					Score by question	Number of contracts signed with					Score by question	Number of contracts signed with					Score by question																																																												
		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)																																																							
<b>I. Risks related to the type of contract / product</b>																																																																															
I 1	Type of individual contract					0					0					0					0																																																										
<b>II. Risks related to the "Client" and its contract</b>																																																																															
<b>The parties to the contract</b>																																																																															
I 2	Country of residence of the policyholder					0					0					0					0																																																										
I 3	The policyholder is a natural person and is different from the beneficial owner (other than the accepting beneficiary)					0					0					0					0																																																										
I 4	The policyholder is a legal person					0					0					0					0																																																										
I 5	Country of residence of the beneficial owner					0					0					0					0																																																										
I 6	Insured's country of residence					0					0					0					0																																																										
I 7	Nationality of the policyholder					0					0					0					0																																																										
I 8	Nationality of the beneficial owner					0					0					0					0																																																										
I 9	Nationality of the insured					0					0					0					0																																																										
I 10	The Client or the insured changed during the contract					0					0					0					0																																																										
I 11	Supporting documents establishing the identity of the Client and/or beneficiary have not been obtained/regularized					0					0					0					0																																																										
I 12	A legal arrangement (trust or legal structure) is included in the contract					0					0					0					0																																																										
I 13	The contract has been reported to the FIU of the Public Prosecutor's Office					0					0					0					0																																																										
I 14	The Client or another party of the contract has been identified as being on a list of international financial sanctions					0					0					0					0																																																										
I 15	The Client or his entourage or another party to the contract is classified as a PEP within the meaning of the AML/CFT Law					0					0					0					0																																																										
I 16	The Client practices a sensitive profession and/or works in a sensitive sector of activity					0					0					0					0																																																										
I 17	The background check of the client revealed other risk factors					0					0					0					0																																																										
I 18	The Client has not completed/responded to all tax compliance requirements					0					0					0					0																																																										
I 19	The Client has subscribed to other life insurance contracts with the same characteristics without any clear justification					0					0					0					0																																																										
<b>The premium(s)</b>																																																																															
I 20	The banking institution from which the first premium or a subsequent premium originates/should originate is located in the/an/a					0					0					0					0																																																										
I 21	The banking institution from which the first premiums originate/should originate is located in a country other than that of the Client's residence without any obvious economic justification					0					0					0					0																																																										
I 22	The premium is included (or brings the contract) between 250,000 and 2,500,000 euros included					0					0					0					0																																																										
I 23	The premium is higher than (or brings the contract to more than) 2,500,000 euros					0					0					0					0																																																										
I 24	The premium(s) or the payment is/are paid in cash, by bearer cheque, by delivery of securities or bearer value					0					0					0					0																																																										
I 25	The contract provides for the possibility of free payments					0					0					0					0																																																										
I 26	The payments and their frequency do not correspond to the information provided at the time of subscription (respectively during the life) of the contract					0					0					0					0																																																										
I 27	The premium(s) contain(s) atypical elements					0					0					0					0																																																										
<b>The beneficiary clause and other terms and conditions of the contract</b>																																																																															
I 28	The beneficiary clause is not exclusively in favour of family members and/or in favour of a banking institution to guarantee the repayment of the loan					0					0					0					0																																																										
I 29	The beneficiary clause is established in favour of a legal person outside the circumstances referred to in question I 28 or a de facto association or charity other than those that are fiscally recognized					0					0					0					0																																																										
I 30	The beneficiary clause is established in favour of a natural person if the contract is subscribed by a legal person					0					0					0					0																																																										
I 31	The beneficiary clause for the benefit of a person other than those referred to in question I 28 or for the benefit of a person referred to in question I 29 has been accepted by / made irrevocable					0					0					0					0																																																										
I 32	The contract has been pledged in favour of a natural or legal person other than a banking institution					0					0					0					0																																																										
I 33	The contract is assigned or its rights are transferred to a third party without any plausible link or justification					0					0					0					0																																																										
I 34	The policyholder has designated a correspondence address other than his home address					0					0					0					0																																																										
<b>The underlying investments</b>																																																																															
I 35	The Client has requested an investment of its premium in unlisted instruments (>50% of the issue of the unlisted securities)					0					0					0					0																																																										
I 36	The Client has requested an investment of its premium in unlisted instruments (between 10 and 50% of the issue of the unlisted securities)					0					0					0					0																																																										
I 37	The Client has a close relationship with, an influence or decision-making power over the underlying unlisted asset					0					0					0					0																																																										
<b>III. Risks related to the distribution of life insurance contracts</b>																																																																															
I 38	The distribution of the contract took place through an intermediary established in a high-risk country					0					0					0					0																																																										
I 39	The intermediary resides in a State (except GDL) other than the Client					0					0					0					0																																																										
I 40	The intermediary of the contract has been changed at the Client's initiative					0					0					0					0																																																										
I 41	The intermediary is authorised to collect the premium(s) or to pay the benefits of the contract					0					0					0					0																																																										
I 42	The distribution of the contract took place via the Internet or another "remote" means					0					0					0					0																																																										
<b>IV. Benefit payments</b>																																																																															
I 43	The contract was terminated during the renunciation period					0					0					0					0																																																										
I 44	Number of redemptions over the last two years					0					0					0					0																																																										
I 45	A payment resulted in economically disproportionate penalties					0					0					0					0																																																										
I 46	The payment had to be split and paid into a number of bank accounts higher than to that of beneficiaries or follows several close redemptions with payments on different accounts					0					0					0					0																																																										
I 47	The banking institution to which the payment of a benefit has been made is located in the/an/a					0					0					0					0																																																										
I 48	There is no apparent economic link between the residence of the recipient of the payment and the State of establishment of the banking institution to which the payment was made or intended					0					0					0					0																																																										
I 49	The change in the beneficiary clause is executed within the 6 months preceding the expiry of the contract					0					0					0					0																																																										
I 50	A payment presented another atypical element					0					0					0					0																																																										
<b>V. Miscellaneous</b>																																																																															
I 51	The file contains another atypical element					0					0					0					0																																																										
																		TOTAL SCO	0																			TOTAL SCO	0																			TOTAL SCO	0																			TOTAL SCO	0





## Annex I b scores

		Score by answer				
		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)
<b>I. Risk related to the type of contract / product</b>						
G 1	Type of group contract	0	0	1		
<b>II. Premium risks</b>						
G 2	There is an overrun of the tax deductibility threshold	1	0	0		
G 3	There was a premium payment with excessive catch-up for the liabilities ("back service")	1	0			
G 4	The banking institution from which the first premium or subsequent premium originates/should originate is located in	0	0	2	4	
G 5	Premiums do not/shall not come from the policyholder's account or from accounts of the affiliated	2	0			
<b>III. Risks related to the parties to the contract</b>						
G 6	Policyholder's registered office is in	0	0	2	4	
G 7	Country of residence of the beneficial owner (other than affiliates)	0	0	2	4	0
G 8	Nationality of the beneficial owner (other than affiliates)	0	0	2	4	0
G 9	The group contract is an unregulated plan and includes only one affiliate	2	0			
G 10	A legal arrangement (trust or legal structure) is included in the contract	4	0			
G 11	The contract has been reported to the FIU of the Public Prosecutor's Office	4	0			
G 12	The client or another party to the contract has been identified as being on a list of international financial sanctions	4	0			
G 13	The client or his entourage or another party to the contract is classified as a PEP within the meaning of the AML/CFT Law	4	0			
G 14	The client operates in a sensitive sector	2	4	0		
G 15	Supporting documents establishing the identity of the client have not been obtained/regularized	4	0			
<b>IV. Risks related to distribution</b>						
G 16	The distribution of the contract took place through an intermediary established in a high-risk country	3	0	0		
G 17	The intermediary of the contract has been changed	2	0	0		
G 18	The intermediary is authorised to collect the premium(s) or to pay benefits under the contract	2	0	0		
G 19	The distribution of the contract took place via the Internet or other "remote" means	3	0			
<b>V. Payments</b>						
G 20	The payment is paid or to be paid into an account of an institution established in a high-risk country	3	0			
G 21	There is no apparent economic link between the residence of the recipient of the payment and the State of establishment of the banking institution to which the payment was made or intended	3	0			
G 22	The payment has another atypical element	4	0			
<b>VI. Miscellaneous</b>						
G 23	The file has another atypical element	4	0			

NAME OF THE LIFE INSURANCE COMPANY		Regulated and registered plans					Contracts without a savings element					Other group contract								
		Number of contracts signed with					Score by question	Number of contracts signed with					Score by question	Number of contracts signed with					Score by question	
		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		
<b>I. Risk related to the type of contract / product</b>																				
G 1	Type of group contract					0						0						0		
<b>II. Premium risks</b>																				
G 2	There is an overrun of the tax deductibility threshold					0						0						0		
G 3	There was a premium payment with excessive catch-up for the liabilities ("back service")					0						0						0		
G 4	The banking institution from which the first premium or subsequent premium originates/should originate is located in					0						0						0		
G 5	Premiums do not/shall not come from the policyholder's account or from accounts of the affiliated					0						0						0		
<b>III. Risks related to the parties to the contract</b>																				
G 6	Policyholder's registered office is in					0						0						0		
G 7	Country of residence of the beneficial owner (other than affiliates)					0						0						0		
G 8	Nationality of the beneficial owner (other than affiliates)					0						0						0		
G 9	The group contract is an unregulated plan and includes only one affiliate					0						0						0		
G 10	A legal arrangement (trust or legal structure) is included in the contract					0						0						0		
G 11	The contract has been reported to the FIU of the Public Prosecutor's Office					0						0						0		
G 12	The client or another party to the contract has been identified as being on a list of international financial sanctions					0						0						0		
G 13	The client or his entourage or another party to the contract is classified as a PEP within the meaning of the AML/CFT Law					0						0						0		
G 14	The client operates in a sensitive sector					0						0						0		
G 15	Supporting documents establishing the identity of the client have not been obtained/regularized					0						0						0		
<b>IV. Risks related to distribution</b>																				
G 16	The distribution of the contract took place through an intermediary established in a high-risk country					0						0						0		
G 17	The intermediary of the contract has been changed					0						0						0		
G 18	The intermediary is authorised to collect the premium(s) or to pay benefits under the contract					0						0						0		
G 19	The distribution of the contract took place via the Internet or other "remote" means					0						0						0		
<b>V. Payments</b>																				
G 20	The payment is paid or to be paid into an account of an institution established in a high-risk country					0						0						0		
G 21	There is no apparent economic link between the residence of the recipient of the payment and the State of establishment of the banking institution to which the payment was made or intended					0						0						0		
G 22	The payment has another atypical element					0						0						0		
<b>VI. Miscellaneous</b>																				
G 23	The file has another atypical element					0						0						0		
					TOTAL SCO	0						TOTAL SCO	0						TOTAL SCO	0

Annex I b2)

Distribution of contracts by risk score ML/FT obtained and type of contract (G1)

NAME OF LIFE INSURANCE COMPANY  
New group contracts signed in 2019

Score obtained	Regulated and registered plans		Contracts without a saving element		Other group contracts	
	Number of	%	Number of	%	Number of	%
0						
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
32						
33						
34						
35						
36						
37						
38						
39						
40						
41						
42						
43						
44						
45						
46						
47						
48						
49						
50						
51						
52						
53						
54						
55						
56						
57						
58						
59						
60						
61						
62						
63						
64						
65						
66						
67						
68						
69						
70						
71						
Total number of contracts	0		0		0	
Total score	0		0		0	
Average score per contract	0,00		0,00		0,00	

NAME OF THE LIFE INSURANCE COMPANY		Regulated and registered plans					Contracts without a savings element					Other group contract								
		Number of contracts signed with					Score by question	Number of contracts signed with					Score by question	Number of contracts signed with					Score by question	
		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		Answer a)	Answer b)	Answer c)	Answer d)	Answer e)		
<b>I. Risk related to the type of contract / product</b>																				
G 1	Type of group contract					0						0						0		
<b>II. Premium risks</b>																				
G 2	There is an overrun of the tax deductibility threshold					0						0						0		
G 3	There was a premium payment with excessive catch-up for the liabilities ("back service")					0						0						0		
G 4	The banking institution from which the first premium or subsequent premium originates/should originate is located in					0						0						0		
G 5	Premiums do not/shall not come from the policyholder's account or from accounts of the affiliated					0						0						0		
<b>III. Risks related to the parties to the contract</b>																				
G 6	Policyholder's registered office is in					0						0						0		
G 7	Country of residence of the beneficial owner (other than affiliates)					0						0						0		
G 8	Nationality of the beneficial owner (other than affiliates)					0						0						0		
G 9	The group contract is an unregulated plan and includes only one affiliate					0						0						0		
G 10	A legal arrangement (trust or legal structure) is included in the contract					0						0						0		
G 11	The contract has been reported to the FIU of the Public Prosecutor's Office					0						0						0		
G 12	The client or another party to the contract has been identified as being on a list of international financial sanctions					0						0						0		
G 13	The client or his entourage or another party to the contract is classified as a PEP within the meaning of the AML/CFT Law					0						0						0		
G 14	The client operates in a sensitive sector					0						0						0		
G 15	Supporting documents establishing the identity of the client have not been obtained/regularized					0						0						0		
<b>IV. Risks related to distribution</b>																				
G 16	The distribution of the contract took place through an intermediary established in a high-risk country					0						0						0		
G 17	The intermediary of the contract has been changed					0						0						0		
G 18	The intermediary is authorised to collect the premium(s) or to pay benefits under the contract					0						0						0		
G 19	The distribution of the contract took place via the Internet or other "remote" means					0						0						0		
<b>V. Payments</b>																				
G 20	The payment is paid or to be paid into an account of an institution established in a high-risk country					0						0						0		
G 21	There is no apparent economic link between the residence of the recipient of the payment and the State of establishment of the banking institution to which the payment was made or intended					0						0						0		
G 22	The payment has another atypical element					0						0						0		
<b>VI. Miscellaneous</b>																				
G 23	The file has another atypical element					0						0						0		
					SCORE TOT,	0						SCORE TOT,	0						SCORE TOT,	0



Annex I b4)

Distribution of contracts by risk score ML/TF obtained and type of contract (G1)

NAME OF LIFE INSURANCE COMPANY  
 Stock of group contracts as at 31 December 2019

Score obtained	Regulated and registered plans		Contracts without a saving element		Other group contracts	
	Number of	%	Number of	%	Number of	%
0						
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
32						
33						
34						
35						
36						
37						
38						
39						
40						
41						
42						
43						
44						
45						
46						
47						
48						
49						
50						
51						
52						
53						
54						
55						
56						
57						
58						
59						
60						
61						
62						
63						
64						
65						
66						
67						
68						
69						
70						
71						
Total number of contracts	0		0		0	
Total score	0		0		0	
Average score per contract	0,00		0,00		0,00	

## Annex I c1)

## INSURANCE PROPOSALS REFUSED BY THE COMPANY

NAME OF THE LIFE INSURANCE COMPANY		Number of proposals with			
		Answer a)	Answer b)	Answer c)	Answer d)
R 1	Type of contract proposal				
R 2	Country of residence of the policyholder				
R 3	Reason for rejection of the proposal				
R 4	In the event of a refusal for ML/TF reasons, was the decision to refuse formulated by the acceptance committee?				
R 5	In the event of a refusal for ML/TF reasons, did the refusal lead to a denunciation to the public prosecutor's office?				

## Annex II

Statistics on revaluations<sup>(1)</sup> during the financial year 20xx

NAME OF THE LIFE INSURANCE COMPANY  Revaluation category	Pure protection			Low amount savings and investment			Savings and investment other			Bearer contracts		
	Number of contracts	Average risk score at 1 January of the financial year <sup>(5)</sup>	Average risk score at 31 December of the financial year <sup>(6)</sup>	Number of contracts	Average risk score at 1 January of the financial year	Average risk score at 31 December of the financial year	Number of contracts	Average risk score at 1 January of the financial year	Average risk score at 31 December of the financial year	Number of contracts	Average risk score at 1 January of the financial year	Average risk score at 31 December of the financial year
<b>A. Contracts scored through the model point approach on 1 January of the financial year</b>												
1. Completion or update of the questionnaire following a movement/significant modification <sup>(2)</sup> (LC 18/9 - Point 3.3.)												
1.1. Total redemption/payment of the final benefit <sup>(3) (4)</sup>												
1.2. Other movement/significant modification												
2. Manual review of contracts scored through the "model point" approach in the absence of a movement/significant modification (LC 18/9 - Point 3.5.)												
<b>B. Contracts scored manually using the questionnaire on 1 January of the financial year</b>												
1. Update of the questionnaire following a movement/significant modification <sup>(2)</sup> (LC 18/9 - Point 3.3.)												
1.1. Total redemption/payment of the final benefit <sup>(3)</sup>												
1.2. Other movement/significant modification												
2. Update of the questionnaire in the absence of a movement/significant modification (LC 18/9 - Point 3.4.)												
<b>C. Total of revaluated contracts</b>												
1. Completion or update of the questionnaire following a movement/significant modification (LC 18/9 - Point 3.3.)												
1.1. Total redemption/payment of the final benefit												
1.2. Other movement/significant modification												
2. Update of the questionnaire in the absence of a movement/significant modification (LC 18/9 - Point 3.4.)												
3. Manual review of contracts scored through the "model point" approach in the absence of a movement/significant modification (LC 18/9 - Point 3.5.)												
<b>OVERALL TOTAL</b>												

(1) Where the same contract has been subject to several revaluations during the financial year, it shall be considered only once at the level of the category of the last revaluation.  
The change in score to be considered is the one existing between the score on 1 January of the financial year (or on the subscription date for contracts subscribed during the financial year) and that on 31 December of the financial year (respectively on the date of total redemption/payment of the final benefit).

(2)  $\Sigma$  of 1.1. and 1.2. for the number of contracts;  $\Sigma$  average risk scores weighted by the number of contracts of 1.1. and 1.2. respectively

(3) Contracts no longer in the stock at 31 December of the financial year

(4) For contracts that have been scored through the "model point" approach and that are subject to full redemption or payment of the final benefit, it is not mandatory to determine a new score through a manual revaluation of the questionnaire (LC 18/9 - Point 3.3).  
Only contracts which, notwithstanding the absence of an obligation, have nevertheless been manually revaluated are therefore included.

(5) Average risk score of the contracts considering for each contract the score on 1 January of the financial year (or on the subscription date for contracts subscribed during the financial year)

(6) Average risk score of the contracts considering for each contract the score on 31 December of the financial year (or on the date of total redemption/payment of the final benefit)