



<p style="text-align: center;">Guidance Notes</p> <p style="text-align: center;">CIIPA AML Return 2024</p> <p style="text-align: center;">Designated Non-Financial Businesses and Professions – Firms of Accountants</p>	
<p>These Guidance notes are for use when completing the AML Return for 2024, Designated Non-Financial Businesses and Professions – Firms of Accountants.</p> <p>The deadline for submission is 15 January 2025.</p>	
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<p>General</p>	
1.	This form is for all firms of accountants, a type of designated non-financial business and profession (DNFBP) as defined in the Anti-Money Laundering Regulations (2025 Revision) (the “ AMLRs ”) of the Cayman Islands.
2.	The return may be submitted incomplete when all information on the last tab has been provided, specifically including the reason for submitting incomplete.
3.	Firms should complete a form for each legal entity registered with CIIPA.
4.	Firms that are structured as a single legal entity should complete one form. However, the structure of the controls may be relevant and if there is no or a different control system is extended to non-Relevant Financial Business (RFB), separate forms for each system would be more meaningful. One aspect to consider is where different services are provided to the same client and how those are reported. Firms differ in profile thus we encourage you to speak to us to explain your approach if necessary. You can also add a note in the return. Most important is consistency year to year.
5.	Throughout the return the term ‘client’ is used interchangeably with ‘customer’.

<p>6. Use of the information submitted and disclosure by CIIPA is addressed by Regulations:</p> <p>53C: Requirement to share information</p> <p>55P: Prohibition on disclosure of information</p> <p>55Q: Where disclosure is permitted</p>
<p>7. The information is maintained on CIIPA's cloud.</p>
<p>8. Only CIIPA staff and any authorized agents will have access to the data.</p>
<p>9. Data privacy has been considered. The personal data will potentially be those of UBOs, controllers and AMLCO, MLRO and DMLRO.</p>
<p>10. Beneficial owners exclude potential creditors and shareholders (collectively 'potential stakeholders'). Once the claim is confirmed potential stakeholders may become BOs. There may be no beneficial owner at the time of reporting thus the client should be reported in the same way as e.g. a listed company where beneficial ownership may not be ascertained.</p>
<p>Glossary</p>
<p>"AMLCO" "Anti-Money Laundering Compliance Officer" means the person designated in accordance with regulation 3(1);</p> <p>"BO" "beneficial owner" means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to —</p> <p>(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person;</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person; or</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement;</p> <p>"BOC" means beneficial owners or controllers.</p>



“CIIPA” Cayman Islands Institute of Professional Accountants

“FATF” Financial Action Task Force

“Money Laundering Reporting Officer” means the “nominated officer” as defined in the Regulations and “Deputy Money Laundering Reporting Officer” shall be construed accordingly;

“NON-RFB” non relevant financial business conducted by firms of accountant

“RFB” “relevant financial business” as defined by the Proceeds of Crime Act (2025 Revision).

Instructions, Inherent Risks

Q#	Question Text	Instructions
1.Structure		
1.1 Relevant Financial Business		
1	Firm's legal name.	Provide information correct at the time of submission.
2	Firm's trading name.	
3	Which one of the following best describes the legal form of your firm?	
4	Firm's country of incorporation or formation.	
5	Date of incorporation or formation	
6	Company number.	
7	Principal business address.	
8	Is this also the registered address?	
9	Registered address.	
10	Website address.	
11	Business telephone number.	
12	Ownership and control structure information (at time of submission).	
1.2 Beneficial Owners		
13	Type of Beneficial Owner	Provide information correct at the time of submission. If not applicable, enter N/A.
14	Name of natural person	
15	Nationality	
16	Address	
17	% Shares/Voting Rights	
1.3 Connected Persons		
18	Type of Connected Person	Provide information correct at the time of submission. If not applicable, enter N/A.
19	Name	
20	Nationality	
21	Address	
22	Professional Designations (where applicable)	
1.4 Licensing		
23	Is the firm licensed or regulated by a licensing body or regulator other than CIIPA?	Provide information correct at the time of submission. If not applicable, enter N/A.
24	Type of license held.	
25	Name and address of the applicable licensing body or regulator.	
26	Business activity for which the firm is licensed.	
27	Date of licensing.	
28	Other relevant information.	
1.5 Group Information		
29	Confirm how many years your business has operated in the Cayman Islands.	Provide information correct at the time of submission. If not applicable, enter N/A.
30	Is your business international, multi-jurisdictional or internationally affiliated?	
31	Identify the number of established offices, outside of the Cayman Islands, by country in which your firm has a presence.	This is standard FATF data item. Some firms may structure economically with overseas offices.

		Include overseas offices (Back Office) that are part of the economic structure of the Cayman firm and the business being reported on.
32	Has your firm, within the last 12 months, merged with, acquired or had other changes in the ownership or control structure of the firm?	Provide information correct at the time of submission. If not applicable, enter N/A.
33	Specify relevant information for name of business, date of takeover/merger/acquisition or other change, and additional relevant details.	
1.6 Employees		
34	Provide the total number of employees working at your firm at the end of the reporting period.	Include overseas offices (Back Office) that are part of the economic structure of the Cayman firm and the business being reported on.
	Detail the number of employees by category that best describes their role, at the end of the reporting period:	
35	Senior management (incl Partners & Directors)	
36	Compliance	
37	Administrative	
38	Other full-time employees not included in previous categories.	
39	Other staff not included in previous categories	
1.7 Feedback		
40	Do you have feedback related to any questions?	
41	Please provide comments or feedback here.	
2. Customer Risk		
2.1 Relevant Financial Business		
42	Are you conducting relevant financial business (RFB)?	
2.2 Client Summary		
	Confirm the number of RFB customers of the Firm by country of domicile/incorporation, for the reporting period that are:	Clients of the Cayman firm, (for avoidance of doubt RFB services only) and determined by the definition of client for the firm.
43	Natural Persons (individuals)	
44	Corporates	Financial Institutions includes banks, insurance companies, investment companies or some type of company engaged in the business of dealing with financial and monetary transactions such as deposits, loans, investments or currency exchanges. Do not include trust companies in this section. Non-financial Institutions include private commercial non-financial corporations, such as construction companies, hotels, restaurants, retailers and wholesalers. Include designated non-financial business and professions.
45	Financial institutions	
46	Non-financial institution	
47	Trust and Other Legal Arrangements	
48	Partnerships	
49	Other (provide detail in Feedback section)	
50	Total RFB Customers	(Automatic calculation)
51	Of your firm's RFB customers where 30% or more of the shareholders/creditors/stakeholders are located in the same country, indicate the country of the shareholder/creditor/stakeholder concentration. If none, enter zero.	Report based on actual or if not known, estimated/anticipated concentration of 30% of stakeholders from a single country.

52	Provide the number of third parties on whose behalf a RFB customer is acting, by the third party's country of residence.	Third party is any person that a client acts on behalf of rather than as principal. Enter 0 if none.
2.3 Risk Rating		
53	Confirm the number of RFB customers in each category of risk as at the end of the relevant period.	
54	Total RFB Customers	(Automatic calculation, for data validation)
55	Do you rate the beneficial owners/controllers of RFB customers or other persons who must be identified under Part 4 of the AMLRs?	It is a requirement to risk assess the client entity or engagement. You may have or may not have assessed or recorded the risk of the Beneficial Owners and Controllers during 2024, please answer accordingly.
56	Confirm the number of RFB beneficial owners in each category of risk as at the end of the reporting period.	
2.4 High Risk Customers		
	During the reporting period, how many of your RFB customers were classified as entities involving:	
57	Domestic Politically Exposed Persons (PEPs).	Your policy on the classification of customers as a PEP entity will determine your response.
58	Foreign PEPs by primary nationality.	
59	Family members / close associates of PEPs by primary nationality.	
60	Explain your policy on the classification of customers as a PEP.	
61	During the reporting period, how many of your RFB customers were domestic Charities or Non-Profit Organisations (NPOs).	
62	During the reporting period, how many of your RFB customers were foreign Charities or NPOs.	
	During the reporting period, how many of your RFB customers were conducting their principal business in the potentially high-risk industries/sectors detailed below:	If the customer is a holding company, include if its subsidiary operating companies are operating in the listed sectors (the main or highest risk one for each).
63	Cash Intensive Business (not including MSBs)	
64	Cryptocurrencies, Virtual Asset Service Provider	
65	Property Management or Development	
66	High Value, Luxury Goods	
67	Government Schemes	
68	Casinos, Lotteries, Gaming	
69	Shipping and Aviation	
70	Money Service Business	
71	State-Owned Companies, Sovereign Wealth Funds	
72	Oil, Gas	
73	Mining, Natural Resources, Logging	
74	Pharmaceuticals	
75	Defense Procurement	
76	Transportation/Logistics	
77	Tobacco, E-cigarettes, Cannabis Products	
78	Total number of potential high-risk customers	
79	Total RFB Customers	(Automatic calculation, for data validation)

2.5 Feedback		
80	Do you have feedback related to any questions?	
81	Please provide comments or feedback here.	
3. Products & Services Risk		
3.1 Cash, Bearer Negotiable Instruments, or Virtual Assets		
82	Do you accept cash (physical currency or bearer negotiable instruments) or virtual assets in remittance for your fees?	This is limited to physical currency, bearer shares or virtual assets used to pay fees. Note that there is a limit on cash that can be carried into the Cayman Islands but where fees are paid in cash by a customer representative, the country of origin of that cash should be reported here.
83	Provide the value of payments received in cash, bearer negotiable instruments, and virtual assets by country of remittance, in USD.	
3.2 Bookkeeping		
84	Did your firm provide Bookkeeping services during the reporting period?	
85	Total number of CIMA regulated customers.	
86	Total number of Other customers.	
87	Total Customers - Bookkeeping	(Automatic calculation)
3.3 Accounts Compilation		
88	Did your firm provide Accounts Compilation services during the reporting period?	
89	Total number of CIMA regulated customers.	
90	Total number of Other customers.	
91	Total Customers - Accounts Compilation	(Automatic calculation)
3.4 Forensic Accounting		
92	Did your firm provide Forensic Accounting services during the reporting period?	
93	Total number of CIMA regulated customers.	
94	Total number of Other customers.	
95	Total Customers - Forensic Accounting	(Automatic calculation)
3.5 Payroll (without Payments)		
96	Did your firm provide Payroll services - not including making payments during the reporting period?	
97	Total number of CIMA regulated customers.	
98	Total number of Other customers.	
99	Total Customers - Payroll without Payments	(Automatic calculation)
3.6 Accounting Advisory		
100	Did your firm provide Accounting Advisory services during the reporting period?	
101	Total number of CIMA regulated customers.	
102	Total number of Other customers.	
103	Total Customers - Accounting Advisory	(Automatic calculation)
3.7 Other Accounting		
104	Did your firm provide Other accounting services during the reporting period?	
105	Total number of CIMA regulated customers.	
106	Total number of Other customers.	
107	Total Customers - Other Accounting	(Automatic calculation)
3.8 Assurance		
108	Did your firm provide Assurance including audits and reviews services during the reporting period?	
109	Total number of CIMA regulated customers.	

110	Total number of Other customers.	
111	Total Customers - Assurance	(Automatic calculation)
3.9 Related Services		
112	Did your firm provide Related Services including Agreed Upon Procedures during the reporting period?	
113	Total number of CIMA regulated customers.	
114	Total number of Other customers.	
115	Total Customers - Related Services	(Automatic calculation)
3.10 Payroll		
116	Did your firm provide Payroll services - including making payments during the reporting period?	
117	Total number of CIMA regulated customers.	
118	Total number of Other customers.	
119	Total Customers - Payroll	(Automatic calculation)
3.11 Approval Rights to Bank Accounts		
120	Did your firm provide Approval rights to customer bank accounts services during the reporting period?	
121	Total number of CIMA regulated customers.	
122	Total number of Other customers.	
123	Total Customers - Approval Rights to Bank Accounts	(Automatic calculation)
3.12 Safekeeping/Custody		
124	Did your firm provide Safekeeping/custody of others' funds in Firm's account services during the reporting period?	
125	Total number of CIMA regulated customers.	
126	Total number of Other customers.	
127	Total Customers - Safekeeping/Custody	(Automatic calculation)
3.13 Initiate Access to Bank Accounts		
128	Did your firm provide Initiate Only Access to customer bank accounts services during the reporting period?	
129	Total number of CIMA regulated customers.	
130	Total number of Other customers.	
131	Total Customers - Initiate Access to Bank Accounts	(Automatic calculation)
3.14 Act as Agent		
132	Did your firm provide Act as agent other than C.1C.4 with or without power of attorney services during the reporting period?	
133	Total number of CIMA regulated customers.	
134	Total number of Other customers.	
135	Total Customers - Act as Agent	(Automatic calculation)
3.15 Liquidations and Receiverships		
136	Did your firm provide Liquidations and Receiverships services during the reporting period?	"Client" in a liquidation, report here only the entity that firm are liquidators of, not its shareholders or creditors/stakeholders.
137	Total number of CIMA regulated customers.	
138	Total number of Other customers.	
139	Total Customers - Liquidations and Receiverships	
3.16 Controllorship		
140	Did your firm provide Controllorship services during the reporting period?	“Controller” in a liquidation is not the previous controllers except where control is still held (e.g. in voluntary liquidations). The liquidator is not a controller for the purpose of the Return (this has no bearing on the qualification of the
141	Total number of CIMA regulated customers.	
142	Total number of Other customers.	

		liquidator as controller for the purpose of other legislation e.g. the Companies Act.) Thus, in certain liquidation cases there may be no controller to report (as the liquidator is the sole controller). (Automatic calculation)
143	Total Customers - Controllership	
3.17 Transaction Due Diligence		
144	Did your firm provide Transaction Diligence Advice and Valuations services during the reporting period?	
145	Total number of CIMA regulated customers.	
146	Total number of Other customers.	
147	Total Customers - Transaction Due Diligence	(Automatic calculation)
3.18 Advisory: M&A, Securities Issuance		
148	Did your firm provide Business Advisory in relation to mergers and acquisitions or securities issuance services during the reporting period?	
149	Total number of CIMA regulated customers.	
150	Total number of Other customers.	
151	Total Customers - Advisory: M&A, Securities Issuance	(Automatic calculation)
3.19 Advisory: Tax/Compliance		
152	Did your firm provide Tax advisory/Compliance services during the reporting period?	
153	Total number of CIMA regulated customers.	
154	Total number of Other customers.	
155	Total Customers - Advisory: Tax Compliance	(Automatic calculation)
3.20 Summary		
156	Number of customers not regulated by CIMA (Other customers), by country to which you provided these services.	
3.21 Feedback		
157	Do you have feedback related to any questions?	
158	Please provide comments or feedback here.	
4. Distribution Channel Risk		
4.1 Delivery Channel		
	Indicate the number of new RFB customers accepted in each channel during the reporting period:	
159	Direct	
160	Introduction from third parties within Cayman Islands	
161	Introduction from third parties outside Cayman Islands	
162	Introductions from Group entities (outside Cayman Islands)	
163	Other (specify Feedback section)	
164	Total New RFB Customers	(Automatic calculation)
165	Total RFB Customers	(Automatic calculation, for data validation)
4.2 Eligible Introducers		
166	Number of RFB customers where reliance has been placed on Eligible Introducers during the reporting period.	When RFB clients are referred by an introducer that is relevant to the risk. If reliance was placed in whole or in part on an eligible introducer, this is to be reported in Q166. The remaining referrals are reported in Q168.
167	Total RFB Customers (Automatic calculation for data validation)	
168	Number of EIs on which reliance was placed, by country as at the end of the reporting period.	
	Number of EIs carrying on financial services business or equivalent business, relied upon as at the end of the reporting period, involved in:	



169	Deposit Taking	
170	Investment Business	
171	Fund services business	
172	Trust company business	
173	Lawyers	
174	Accountant	
175	Other	
176	Number of EIs relied upon who failed to provide information and evidence on demand and without delay, during the reporting period.	
4.3 Referred Business		
177	Number of persons who referred RFB customers during the reporting period by country of nationality of the referrer.	
4.4 Feedback		
178	Do you have feedback related to any questions?	
179	Please provide comments or feedback here.	

Instructions, Controls

C#	Question Text	Instructions
1. Controls		
1.1 Relevant Financial Business		
1	Are you conducting relevant financial business (RFB)?	
1.2 Business Risk Assessment		
2	Does your firm have a documented Business Risk Assessment (BRA)?	
3	Please attach a copy of your current Business Risk Assessment.	
4	Please advise the date of the current BRA.	
5	Has the BRA has been updated since it was last submitted to CIIPA?	
6	Does the BRA consider the risks of your firm to Money Laundering?	
7	Does the BRA consider the risks of your firm to Terrorist Financing?	
8	Does the BRA consider the risks of your firm to Proliferation Financing?	
9	Specify the level of overall risk of your Firm.	
10	Has the Senior Management approved the BRA?	
1.3 Employee and Management Checks		
	Confirm that your business has continuing procedures first implemented no later than the first day of the reporting period that cover:	
11	Previous employment checks	
12	Open source searches	
13	Police checks	
14	Qualification checks	
15	Professional membership checks	
16	Reference checks	
17	Sanctions and PEP checks	
18	Social media review	
19	Other	
20	If 'Other', specify the other employee and management checks made.	
21	In the last 10 years, has any Beneficial Owner, Officer, Manager or Director of your business had any professional disciplinary findings against them in any jurisdiction?	
22	In the last 10 years has any Beneficial Owner, Officer, Manager or Director of your business had any criminal convictions (other than minor traffic matters dealt with by way of a fine/points)?	
23	In the last 10 years has any Beneficial Owner, Officer, Manager or Director of your business been involved in any other business which has been in administration or liquidation other than in a capacity of providing professional services?	
24	If 'Yes' to any of the three above questions, provide relevant details. If 'No', please enter N/A.	
1.4 Anti-Money Laundering Compliance Officer		
	Please note that the completion and submission of a Fit and Proper Questionnaire is not required for all Anti-Money Laundering Compliance Officers (AMLCO). A questionnaire must be submitted only for AMLCOs who have not previously provided to CIIPA, or for any new AMLCOs being identified as part of the current return.	

25	Have you appointed an Anti-Money Laundering Compliance Officer?	
26	AMLCO name.	
27	Date appointed.	
28	Email address	
29	Direct telephone number.	
30	Detail number of years AML experience.	
31	Detail number of years as the currently appointed AMLCO.	
1.5 Money Laundering Reporting Officer		
32	Have you appointed a Money Laundering Reporting Officer (MLRO)?	
33	MLRO name.	
34	Date appointed.	
35	Email address	
36	Direct telephone number.	
37	Detail number of years AML experience.	
1.6 Deputy Money Laundering Reporting Officer		
38	Have you appointed a Deputy MLRO?	
39	Deputy MLRO name.	
40	Date appointed.	
41	Email address	
42	Direct telephone number.	
43	Detail number of years AML experience.	
1.7 System of Controls Amendments		
44	Does your firm have any material amendments (planned or executed) to the system of controls since the end of the reporting period?	
45	Provide details.	
1.8 Compliance budget		
46	Annual budget (in USD) allocated for AML compliance.	
47	Total expenditure incurred (in USD) for AML compliance during the reporting period.	
1.9 Internal Systems and Controls, Policies and Procedures		
48	Do you have documented AML policies and procedures which details related systems and controls?	
	Confirm whether your AML policies, procedures, systems and controls address each of the following areas:	
49	Applying a risk-based approach	
50	Screening employees	
51	Customer due diligence	
52	Enhanced customer due diligence	
53	Simplified customer due diligence	
54	Sanctions screening	
55	Ongoing monitoring	
56	Record keeping	
57	Suspicious activity reporting	
58	Audit	
59	Staff training	
60	Frequency of review and update of the AML policies and procedures, in number of years between reviews.	
61	Do the AML policies & procedures define events which trigger a review?	
62	Confirm the date of the last review of the effectiveness of the firm's AML systems and controls.	
63	Confirm who the review was undertaken by:	
64	If 'Other', specify the type of Other reviewer, otherwise enter 'N/A'.	

1.10 Targeted Financial Sanctions		
65	Do you screen all of your customers against local and international lists? Specify which lists you screen against:	
66	HM Treasury - Office of Financial Sanctions Implementation ("OFSI")	
67	Office of Foreign Assets Control ("OFAC")	
68	United Nations Security Council ("UNSC")	
69	Other	
70	Specify other lists. Any Cayman sanctions issued if ever different from UK?	
71	Is your screening mechanism against TFS lists automated, manual, or a combination of both?	
72	What is the frequency with which you screen all relevant names against TFS lists?	
73	If 'Other', specify the frequency with which you screen all relevant names against TFS lists, otherwise enter 'N/A'.	
74	Is the AMLCO and other relevant staff subscribed to receive Financial Reporting Authority (FRA) alerts and sanctions list updates?	
1.11 Training and Awareness		
75	Have you provided AML training to staff, appropriate to roles and responsibilities, in the reporting period?	
76	Confirm the date of the most recent AML training session.	
77	Confirm the topic of the most recent AML training session.	
78	Confirm the date of the 2nd most recent AML training session.	
79	Confirm the topic of the 2nd most recent AML training session.	
80	Have any employees been disciplined internally for non-compliance with your AML policies, procedures, systems, and controls during the reporting period?	
1.12 Suspicious Activity Reporting		
81	Confirm the number suspicious activities/transactions reported to the MLRO in the reporting period.	
82	Confirm the number of the suspicious activities/transactions reported to the MLRO in the reporting period, resulting in a SAR being filed with the FRA.	
83	Where suspicious activities/transactions did not result in the filing of a SAR with the FRA, was the reason for such decision taken documented in each instance?	
84	Confirm the value (in USD) of the associated transactions of the SARs reported to the FRA.	
85	Confirm the average time taken (in days) from the date of activity/transaction to the time reported to the MLRO.	
86	Confirm the average time taken (in days) by the MLRO to analyse a suspicious transaction/activity before filing a SAR with the FRA.	
1.13 Client Risk Assessment		
87	Is there a documented process, procedures and control for conducting RFB customer risk assessments?	
88	Confirm whether your client risk rating methodology include factors other than ML/TF/PF.	
89	Provide details below.	
90	Is senior management approval is required for the acceptance of PEP RFB customers?	
91	Is senior management approval is required for the acceptance of non-PEP high-risk RFB customers?	
92	Is a PEP register maintained?	
93	At which frequency is the PEP register reviewed by senior management?	
94	If 'Other', specify the other PEP review frequency used, otherwise enter 'N/A'.	

95	Confirm the percentage of RFB customers that have been rated as high risk where Enhanced Due Diligence (EDD) has been applied.	
1.14 Simplified Due Diligence		
96	Do you have customers that were onboarded/accepted following Simplified Due Diligence?	
97	Number of RFB customers where simplified due diligence measures (SDD) have been applied by country of nationality/incorporation at the end of the reporting period.	Number of clients by country where simplified due diligence measures have been applied as at end of the relevant period.
	Number of RFB customers who are acceptable applicants (for whom it may be appropriate to apply SDD) that are:	
98	RFB (or majority owned subsidiary of the RFB)	
99	Central or local government organisation / statutory body or agency of government	
100	Supervised business in a jurisdiction assessed as Low Risk regarding ML/TF/PF	
101	Company listed on recognized stock exchange	
102	Pension fund for professional association	
	-	
103	Do you have RFB customers to whom further exemptions from CDD measures have been applied during the reporting period?	
	Number of RFB customers to whom further exemptions from CDD measures have been applied during the reporting period that are:	
104	Pension, superannuation, employee benefit, share option or similar scheme	
105	Insurance policies	
106	Public authorities, companies listed on an IOSCO compliant market or regulated market	
107	Regulated business or equivalent	
108	Employees of regulated businesses or equivalent	
1.15 Declined, Terminated or Withdrawn Business		
109	Provide the number of applications from prospective RFB customers to either establish a customer relationship or carry out a one-off transactions, declined due to Customer Due Diligence (CDD) issues or other financial crime concerns during the reporting period.	
110	Number of RFB customer relationships terminated due to CDD issues or other financial crime concerns during the reporting period.	
111	Number of applications from prospective RFB customers who have withdrawn due to CDD issues during the reporting period (where this data is collected).	
112	Number of relationships with person who referred RFB customers during the reporting period that were terminated due to CDD issues.	
1.16 Feedback		
113	Do you have feedback related to any questions?	
114	Please provide comments or feedback here.	