



# Cayman Monetary Regulatory Authority International

At the forefront of financial regulation, the Cayman Monetary Regulatory Authority International (CMRAI) is dedicated to upholding the highest standards of financial oversight and compliance. Our mission is to safeguard the stability and integrity of the global financial system by ensuring that financial services operate within a framework of transparency, accountability, and excellence.

As a trusted partner to financial institutions worldwide, CMRAI provides rigorous supervision, innovative solutions, and strategic guidance to foster a secure and thriving financial environment. With decades of experience and a commitment to global standards, we stand as a pillar of trust and security in an ever-evolving financial landscape.

With a legacy of excellence in financial oversight, the Cayman Monetary Regulatory Authority International (CMRAI) is a beacon of trust in the international financial community. Our role extends beyond regulation; we are innovators, collaborators, and protectors of the global financial ecosystem. By fostering compliance, promoting best practices, and embracing technological advancements, CMRAI ensures that financial services remain resilient and adaptable in a dynamic global market.

Our comprehensive approach to regulation encompasses a deep understanding of financial risks and a proactive stance on emerging challenges. We are committed to empowering financial institutions with the tools and guidance necessary to navigate complex regulatory landscapes, thereby contributing to global economic stability and growth.

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As part of its supervisory measures to detect and prevent money laundering, terrorist financing, proliferation financial ( ML/TF/PF) in the Cayman Islands and globally, the Cayman Islands Monetary Authority (the Authority ) distributes the Travel Rule Return to VASP Registrants on a quarterly basis. The VASP Travel Rule Return collects data relating to the originator and beneficiary details of transfers allowing the Authority to analyse the ML/TF/PF and sanctions risk exposures and increase transparency within the cryptoasset sector. Originating virtual asset service providers and beneficiary virtual asset service providers who engage in virtual asset transfers, with both retail and institutional customers, are required to collect, verify and share information about virtual asset transfers for transactions as set out in Part XA of the Virtual Asset Service Providers Act (2022 Revision). Entities are required to provide the necessary data by completing the VASP Travel Rule Return and submitting it through the Authority s web-based data collection software, STRIX, to the Anti-Money Laundering Division (the AMLD ), within ten (10) days after distribution by the Authority. Manual submissions will not be accepted.

The VASP Travel Rule Return is issued in accordance with the section 9(5)(a) and (b) of the Virtual Asset (Service Providers) Act (2022 Revision). 2 FORM INFORMATION The VASP Travel Rule Return is comprised of one (1) schedule and is intended for reporting relevant transfers or payments involving entities within the scope of application. 3

ACCESSING AND SUBMITTING THE VASP TRAVEL RULE RETURN 3.1 ACCESS TO THE VASP TRAVEL RULE RETURN Entities will receive an invitation to the web-based survey by using the current contact details of the Entity which the Authority has on record. Each contact of the Entity who receives an invitation can activate their own account. The invitation is specific to the recipient address and cannot be shared or forwarded. Clicking on the link provided in the invitation will take the user to the account creation webpage. On

successful account activation, the user will receive a confirmation . Logging into the STRIX portal is then accomplished by clicking on the Return Home button available immediately after activating, or via the link provided in the confirmation . Account login is only possible using a two-factor verification code which will be sent by to the individual. If an Entity has multiple points of contact on file, they will all have joint access to the same survey. The Authority is using the following entity contacts to distribute the VASP Travel Rule Return:

Registered Office contact, AMLCO, MLROs, DMLROs, and additional contacts, upon request of the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at .

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To access the VASP Travel Rule Return: 1. When the VASP Travel Rule Return is distributed from STRIX, the recipients will receive an invitation from Cayman Monetary Regulatory Authority International with the address . The will request the recipient to Confirm Account . The recipient should click on the Confirm Account button, which will redirect the recipient to the activation page using their default browser. A modern browser (e.g. MS Edge, Chrome, Safari) should be used for security purposes.

2. The recipient will then be asked to create a password using uppercase, lowercase, number, and a special character. The password is required to be between 8 and 16 characters long.

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3. The recipient will be asked to re-enter their password. 4. Once the recipient s password has been re-entered, and matches, they can submit and finish the activation process. An Notification of Successful Activation will be sent providing a Go to Portal link which can be used for all future access.

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5. The user should then click on the Return To Home button. Version: 1.1 Completion Guide: VASP Travel Rule Return Page 8 of 17

6. The recipient should then enter their username, which is their address where they received the VASP Travel Rule report invite, and the password they just created.

7. A six digit two-factor authentication code will be sent to the survey recipient s

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8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted.

9. Click Open to access the VASP Travel Rule Return request. If a survey recipient is a contact for two (2) or more FSPs, or where an Entity has two or more licences or registrations, related surveys will be listed here for the recipient to view and access.

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3.2 COMPLETING THE VASP TRAVEL RULE RETURN 1. Click the Current Questionnaire to access the VASP Travel Rule Return and start populating the form with the required data.

a. Completion guidance for the VASP Travel Rule Return is available at section 5 of this Guide below. b. The recipient(s) can open, update, and close the VASP Travel Rule Return as many times as needed prior to the survey due date so long as the recipient selects Save .

c. Once the VASP Travel Rule report has been completed it can either be Saved and Exported for internal review or Saved and Submitted to the Authority. d. Upon submission, you will receive a confirmation from Cayman Islands Monetary Authority stating, Notification of Successful Submission . The Entity s name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.

e. Once the VASP Travel Rule Return is Submitted an Excel and PDF copy of the completed survey will be available under Current Questionnaire . f. Upon submission to the Authority a review of the VASP Travel Rule Return will be conducted by a member of the AMLD, if information is missing or needs clarification the Authority will Reject the VASP Travel Rule Return through an notification detailing the specifics. The recipient will then be

required to make the necessary corrections or provide the additional detail to the Authority as indicated in the . g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an Incomplete VASP Travel Rule Return, they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to detailing the following: i. Licence or Registration Name ii. Licence or Registration Number iii. Date of Licence or Registration iv. List of current directors v. Number of Clients vi. Reason for requesting to make an Incomplete Submission. h. The VASP Travel Rule Return is to be completed quarterly and should be submitted through the STRIX portal ten (10) days after being distributed by the Authority.

2. If a user receives or has access to more than one survey, they will not see the additional survey(s) in the Current Surveys section of the web page. At the top of the page, where it shows the Entity name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.

3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there are several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following: a. Open an Excel spreadsheet and using 2 columns enter the question responses (number or value) in the first column and the country details (ISO code or name) in the second column. b. Highlight and copy the information from the 2 columns in Excel, select the upload button next to the relevant question in STRIX and then paste the data into the pop-up window. c. Select Add to upload the desired data into the survey form, or Clear to remove the data. Note: Individual items may also be removed from the list by clicking on the delete button, next to the respective country, on the list.

4 OTHER USEFUL INFORMATION

4.1 EXPORTING AND SAVING THE FORM Once the Entity enters and saves data in the Form it may be exported to Excel or PDF. Users should note that the Excel version cannot be re-uploaded into the STRIX software. Once the Form is submitted to the Authority through STRIX a pdf and Excel copy of their submission will be made available in the user s profile. Users are encouraged to download and save a copy for their records.

4.2 USER ACCOUNT LOCKOUTS In the event a recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An will be sent to the user identifying that they won t be able to log in. There are three (3) stages of lock out: 1) locked out for five (5) minutes; locked out for ten (10) minutes; and, if the user persists, locked out permanently. To avoid being locked out, if the user fails to remember their password, they should update their password on the login page. If the user is permanently locked out, they should contact to request for re-activation of their account.

4.3 INTERNET BROWSER Users should be aware that the VASP Travel Rule Return will not open using the legacy Windows Explorer browser or with dated Windows operating systems for security purposes. If the user s browser is defaulted to Explorer the link should be copied and opened in Chrome, Edge, Safari, or other modern browser.

4.4 TWO-FACTOR AUTHENTICATION Due to the security permissions around the two-factor authentication, the invite to the Travel Rule Return, or the access to the portal, cannot be shared with uninvited recipients. If entities wish to add additional users to assist with completing or reviewing the form they can contact .

Version: 1.1 Completion Guide: VASP Travel Rule Return Page 12 of 17 If an Entity s recipient is set up as a contact to the STRIX portal however they are not receiving their two-

factor authentication code, they should attempt the following prior to contacting : 1) Check the date / time settings of the individual s computer and be sure they are set to Automatic 2) Try a different browser on the same computer (a secure modern browser is required Chrome, Edge, Safari, Firefox) 3) Ensure that is not blocked by the individual / entity s network security. 4) Check that third party cookies are allowed:

4.5 DATA AND SECURITY The VASP Travel Rule Return, the auto-generated communication from STRIX, and the data collected from FSPs in the VASP Travel Rule Return are all maintained on-premises on the Authority s server systems. The Authority continues to use the same firewalls and data protection protocols that are deployed for the REEFs portal and other applications.

4.6 APPLICABLE FEES There are no fees associated with this Form.

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4.7 TERMS AND DEFINITIONS Terms/Abbreviations Definition/Meaning AMLRs Anti-Money Laundering Regulations (2023 Revision), as amended. Beneficiary In relation to a transfer of virtual assets, means: a) the client (natural person, legal person, or legal arrangement) that receives virtual assets that were transferred to a virtual asset service provider or directly to the client; or b) where the transfer is received by a virtual asset service provider on behalf of a client or other third party, the natural person, legal person, or legal arrangement that ultimately receives the transfer. Client / Customer A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands. Currency used for the Survey United States Dollars (US\$). All other currencies must be converted to US\$ unless otherwise stated, using the prevailing rate of exchange as at the last day of the reporting period. Country The country of origin is the initial ordering country for transfers received and/or booked by the reporting entity. For example, if an entity in country Y initiates a transfer from its bank or another VASP in country X, then the country of origin is country X. For transfers sent and/or booked by the reporting entity, the end beneficiary country is the country where the end beneficiary s bank or another VASP is located. Legal Person or Arrangement Legal person means a company or other entity created by operation of law with separate legal personality. Legal arrangement means a trust or partnership, foundation or other entity created between parties which lacks separate legal personality.

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Natural Person A human being, as distinguished from a company or other entity created by operation of law with separate legal personality. Originator In relation to a transfer of virtual assets, means: a) the client (natural person, legal person, or legal arrangement) that places an order with the virtual asset service provider for the virtual asset transfer; or b) where the transfer is carried out by a virtual asset service provider on behalf of a client or third party who owned the virtual asset immediately before the transfer. Reporting Periods Every Quarter of each Year as follows: Quarter 1: 1 January to 31 March Quarter 2: 1 April to 30 June Quarter 3: 1 July to 31 September Quarter 4: 1 October to 31 December

4.8 SURVEY COMPLETION GUIDE Ref. No. Question No. Question Description/Explanation

1.1.1 1 Has the Entity conducted any transfers of virtual assets that involved another VASP, unhosted wallet or onchain activity, during the reporting period? Please respond Yes or No as applicable.

1.1.2 2 Did the Entity conduct first-party transactions only during the reporting period? Please respond Yes or No as applicable.

1.2.1 3 Total Clients / Customers during the reporting period. Enter the total number of clients the entity conducted business with during the reporting period. Where applicable, the number of Clients /Customers should only

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Cayman Islands legal entity. Total clients consist of natural persons and legal persons and arrangements.

1.2.2 4 Total Transactions for the reporting period. Enter the total number of all Transactions conducted for clients during the reporting period. Where applicable, the Total Transactions should only include those of the Cayman Islands legal entity.

1.2.3 5 Total Value of Transactions processed during the reporting period. Enter the total Value of Transactions processed for clients during the reporting period. Where applicable, the Total Value of Transactions should only include those of the Cayman Islands legal entity.

1.3.1 6 Do you have any comments or feedback for this tab? Please select Yes or No.

1.3.2 7 Please use this area to provide any comments or feedback for this tab. If Yes to Q6, please input any comments or feedback for this tab.

2.1.1 8 Number of all outgoing Transactions from an Originator client, for the reporting period, broken down by the transaction destination country. Enter the total number of all transactions transferred out (by or on behalf of clients), during the reporting period, where the entity is the Originator. Refer to section 3.2(3) above for detail on how to respond to this question using Excel.

2.1.2 9 Total value of all outgoing Transactions from an Originator client for the reporting period, broken down by the transaction destination country. Enter the total value of all transactions transferred out (by or on behalf of clients), during the reporting period, where the entity is the Originator. Refer to section 3.2(3) above for detail on how to respond to this question using Excel.

2.1.3 10 Number of all incoming Transfers to a Beneficiary client for the reporting period, broken down by Country of origin. Enter the total number of all incoming transfers received by beneficiary clients, during the reporting period, broken down by country of origin. Version: 1.1 Completion Guide: VASP Travel Rule Return Page 16 of 17

Refer to section 3.2(3) above for detail on how to respond to this question using Excel.

2.1.4 11 Total value of all incoming Transfers to a Beneficiary client for the reporting period, broken down by Country of origin. Enter the total value of all incoming transfers received by beneficiary clients, during the reporting period, broken down by country of origin. Refer to section 3.2(3) above for detail on how to respond to this question using Excel.

2.1.5 12 Number of transactions not executed due to incomplete / insufficient CDD, during the reporting period. Enter the total number of incoming and outgoing transactions not executed due to incomplete client due diligence CDD on either the Originator or Beneficiary, during the reporting period.

2.1.6 13 Total number of incoming transactions rejected due to insufficient applicant for business or beneficiary information. The number of incoming transactions the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.

2.1.7 14 Total value of incoming funds rejected due to insufficient applicant for business or beneficiary information. The value of incoming funds the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.

2.1.8 15 Total number of outgoing transactions rejected due to insufficient applicant for business or beneficiary information. The number of outgoing transactions the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.

2.1.9 16 Total value of outgoing funds rejected due to insufficient applicant for business or beneficiary information. The value of outgoing funds the entity declined to process, during the reporting period, due to insufficient CDD information on an applicant for business or beneficiary.

2.1.10 17 Total number of prospective client business relationships that were declined due to ML/TF/PF or sanctions concerns, during the reporting period. The number of potential new client relationships that were declined, during the reporting period, because of ML/TF/PF or sanctions concerns, during the

reporting period. ML/TF concerns are known events or red flags that may be raised. Known events include lack of CDD, the potential client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through screening of potential clients via both internal systems and/or external databases. Note: These examples are not exhaustive.

2.1.11 18 Total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF or sanctions concerns during the reporting period. Total number of transactions (both incoming and outgoing) the entity stopped or declined, during the reporting period, due to ML/TF/PF or sanctions concerns. ML/TF concerns are known events or red flags that may be raised. Known events include lack of CDD, client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through ongoing transaction monitoring and routine screening of remitters and beneficiary clients via both internal systems and/or external databases. Note: These examples are not exhaustive.

2.1.12 19 Total number of client business relationships that have been terminated due to ML/TF/PF or sanctions concerns during the reporting period. The number of client business relationships the entity terminated, during the reporting period, due to ML/TF/PF or sanctions concerns. ML/TF concerns are known events or red flags that may be raised. Known events include lack of CDD, the client behaviour such as unwillingness to provide requested documentation. Red flags include adverse hits generated through screening of existing clients via both internal systems and/or external databases. Note: These examples are not exhaustive.

2.2.1 20 Do you have any comments or feedback for this tab? Please select Yes or No .

2.2.2 21 Please use this area to provide any comments or feedback for this tab. If Yes to Q20, please input any comments or feedback for this tab.