Submit anti-money laundering activity report online

Manual

economie

FPS Economy, S.M.E.s, Self-employed and Energy

.be

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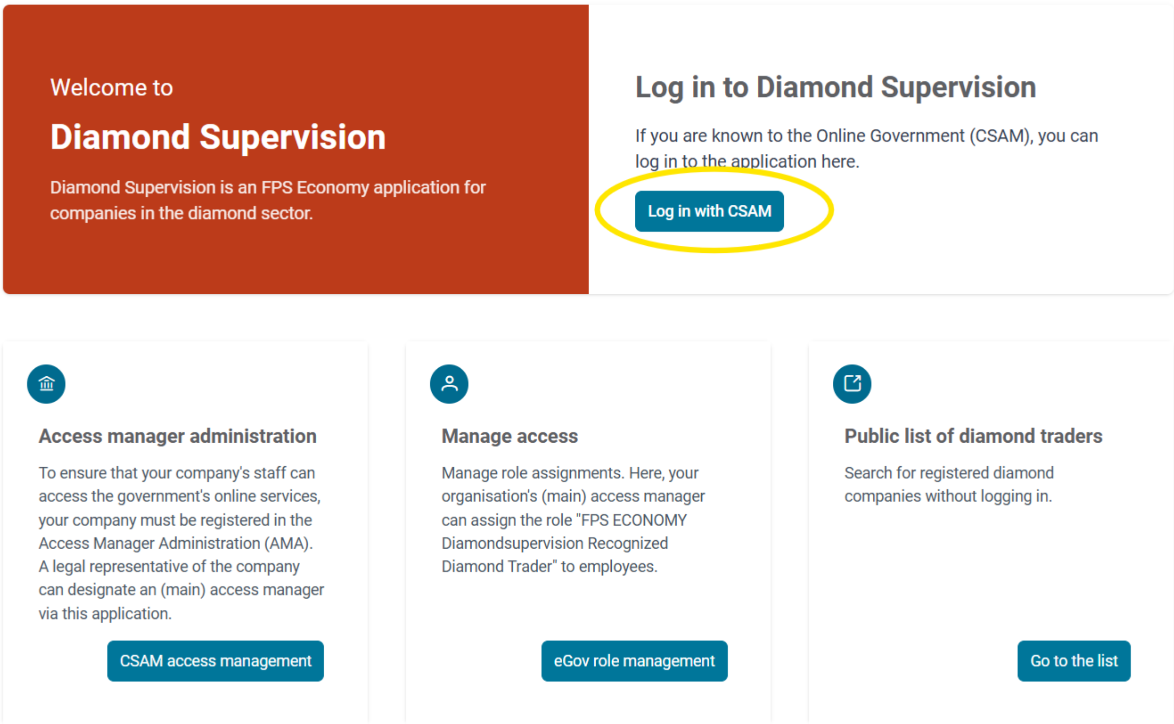
Please find below the instructions on how to submit your annual anti-money laundering report online.

The first part (pp. 1–7) provides technical guidelines on how to access the portal, how to complete the questions and how to submit the report.
The second part (pp. 8-20) provides further explanations of the questions in the report, in a Q&A format.

1. Technical guidelines

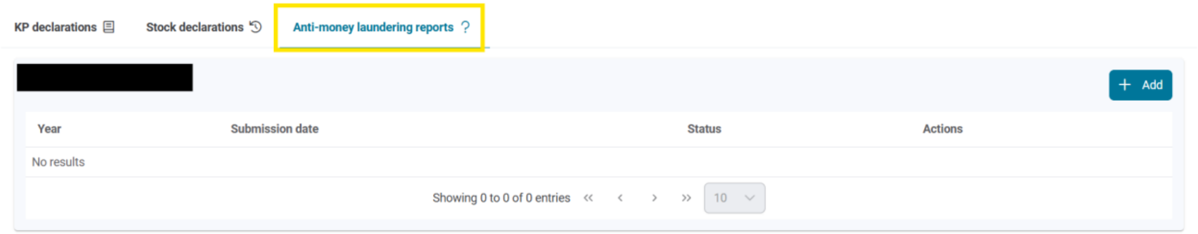
STEP 1: Go to https://diamondsupervision.economie.fgov.be/login and click on the “Log in with CSAM” button. Log in with MyGov.be, eID, itsme or an electronic means of identification recognised at European level (eIDAS).

Please note: Are you logging in to the Diamond Supervision portal for the first time? If so, please first follow the steps in the manual ‘Diamond Supervision-access via CSAM’ on our website. You will need the role “SPF ECONOMIE DiamondSupervision Diamantaire reconnu” to log in to the Diamond Supervision portal.



STEP 2: Click on behind the company for which you wish to complete the anti-money laundering activity report.

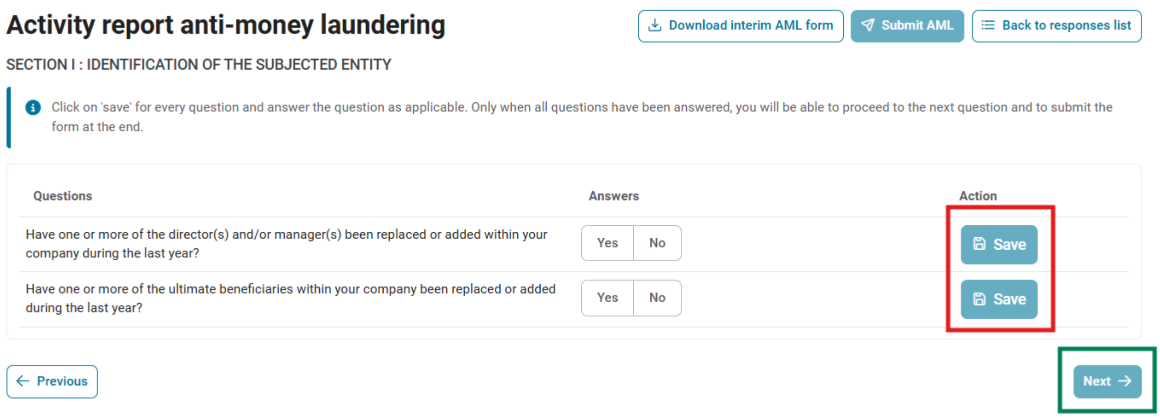
STEP 3: Click on the “Anti-money laundering reports” tab.



STEP 4: Click on the “Add” button. Then select the year for which you want to complete the report and click on the “Add” button again.

STEP 5: Click on to fill in the report.

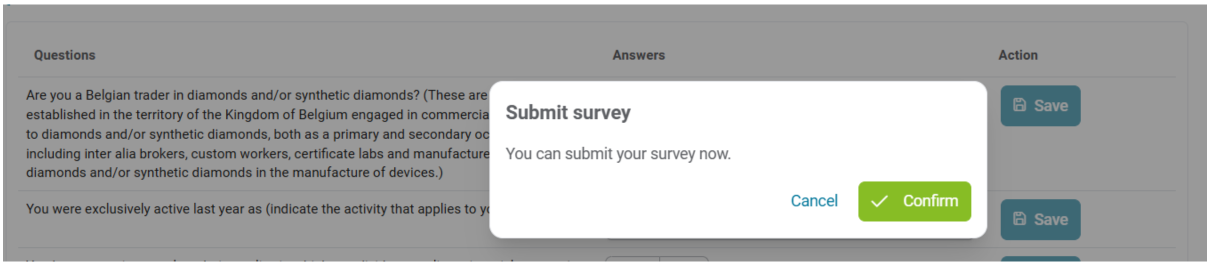
STEP 6: You can now complete the questionnaire. Click on “Save” for each question and answer the question as applicable. Only when all questions have been answered will you be able to click through to the next questions using the “Next” button.



STEP 7: You can submit the report definitively in two ways, depending on how the questionnaire is completed:

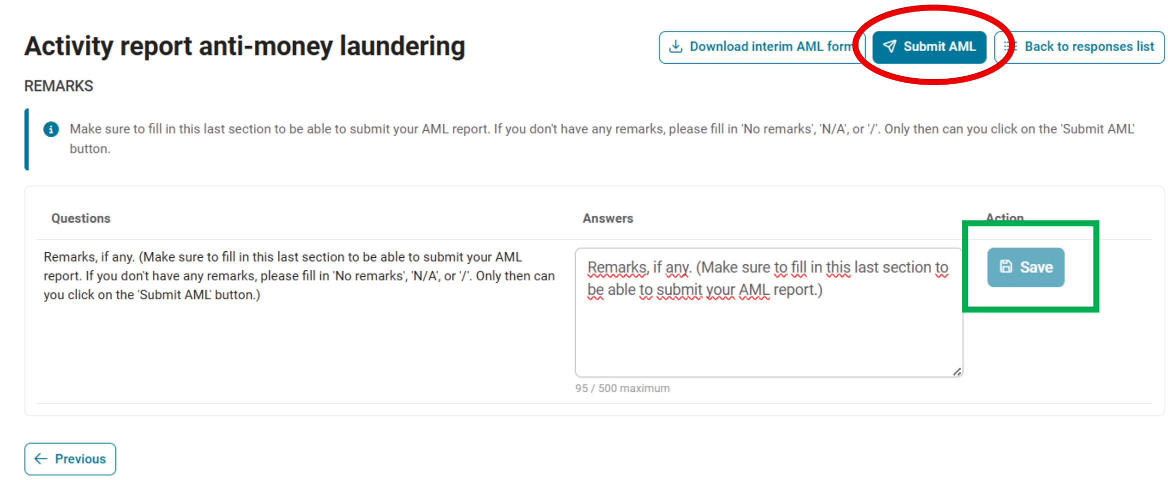
1. **Via the pop-up screen**:

A pop-up screen will appear automatically, allowing you to confirm and submit the report immediately.



2. **Via the 'Submit AML' button**:

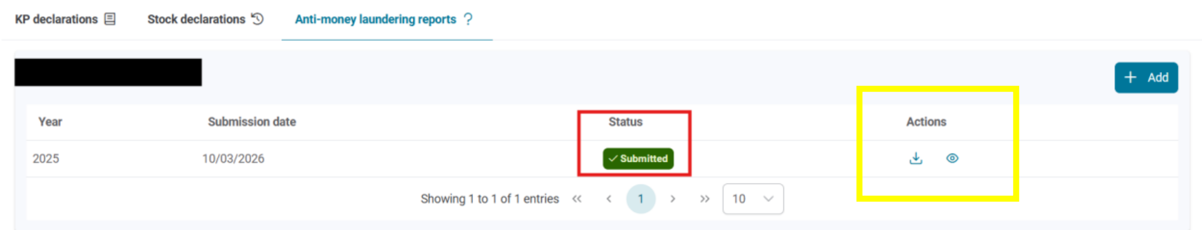
If no pop-up appears, you can still submit the report by filling in the comments box and clicking on the "Save" button. You can then click on the "Submit AML" button. A pop-up screen will appear and you can click on the "Confirm" button.



Both ways of submitting are correct. It is normal for one or the other process to appear, depending on how you answer the questions.

STEP 8: Once you have submitted the report, its status will change to "Submitted". Use the button to download a PDF form of the submitted report. Use the button to view your answers from the submitted report.

If your report does not have the status "Submitted", repeat the steps from step 5 onwards.



QUESTIONS:

If you have any questions about the report or do not understand any of the questions, please refer to the second part of this guide.

If you still have additional questions after reading this, please send an email to diamond@economie.fgov.be for further clarification.

2. Q&A annual anti-money laundering report

2.1. General

2.1.1. Are you required to submit your anti-money laundering report?

All registered diamond traders are required to submit their annual anti-money laundering report relating to the activities of the previous year[1]. The deadline is 31 March each year.

If you are registered with the FPS Economy due to diamond-related activities but are not a diamond trader (e.g. jeweller, supplier of materials, etc.), you only need to submit the report partially. You only need to complete the report up to the question: “Are you a Belgian registered trader in diamonds and/or synthetic diamonds?” You may answer “no” and indicate your activities.

If you are a diamond trader but had no activities during the previous year, you are still required to submit the report. In that case, the report only needs to be completed up to the question: “Have you been commercially active during the past year?” You may answer “no”. The remaining sections do not need to be completed and you may then submit the report.

2.1.2. How do you submit your annual anti-money laundering report?

You can submit your anti-money laundering report online, as explained in part 1 of this manual. Submission is entirely online and this is the only available method.

If, due to technical problems, you are unable to submit the report online, you may obtain the report via diamond@economie.fgov.be. You can then send the completed report to the FPS Economy via the same email address. You may also print the report and send it by post to the competent department.

[1] in accordance with Article 5 §2 of the Royal Decree of 17 March 2024 implementing the Anti-Money Laundering Act of 18 September 2017

2.2. Section I: identification of the subjected entity

2.2.1. Have one or more directors and/or managers (Q1) or ultimate beneficial owners (Q2) been replaced or added during the past year? What should you answer?

The report always relates to the year preceding the year in which you complete the report. If there have been changes in the board of directors or in the ultimate beneficial owners of your company (in particular when new persons have been added), you must answer **“YES”**.

Ultimate beneficial owners are:

1) Natural persons who own 25% or more of the shares or voting rights in your company;
2) Natural persons who exercise control in any other way:
    - Persons entitled to appoint or dismiss the majority of the members of the administrative, management or supervisory body;
    - Persons who, alone or by agreement with other shareholders or members, control the majority of shares or voting rights;
3) A natural person who is a member of senior management (e.g. CEO), if none of the above criteria apply.

You must send the names and identity documents of the new directors and/or ultimate beneficial owners separately to the FPS Economy via diamond@economie.fgov.be.

If there were no changes in your governance or ownership structure during the previous year, you may answer “**NO**”.

2.3. Section II: organisation and internal monitoring

2.3.1. Are you a Belgian registered trader in diamonds and/or synthetic diamonds? What should you answer?

If, during the previous year, you were only active as a jeweller/supplier of materials/other professional activities not involving the purchase or sale of diamonds, you may answer **"NO"**. In the next question, you will be asked to indicate which activities you carried out (e.g. jewellery activities only, polishing activities, etc.). You do not need to complete the remaining questions and may submit your report.

If, during the previous year, you were registered as a diamond trader for the purchase/sale of diamonds, even if you had no commercial activities, you must answer **"YES"**.

2.3.2. You have an anti-money laundering policy in which you divide your clients into risk categories based on objective criteria, taking into account the nature and size of your company? What does this mean?

All diamond traders (natural diamonds and/or synthetic diamonds) must have an internal anti-money laundering policy[2]. This is a document explaining how the company applies anti-money laundering legislation within the organisation.

Companies may:

- draft their own policy document, or
- use the AWDC anti-money laundering policy template and adapt it to their company's reality.

If you have such a written anti-money laundering policy, you may answer **"YES"**. If not, you must answer **"NO"** and ensure that you establish one, as this is a mandatory anti-money laundering obligation. The AWDC anti-money laundering policy template is available in English and Dutch on the AWDC website.

2.3.3. You participated in an anti-money laundering seminar last year (e.g. one organised by AWDC)? What should you answer?

This question concerns whether you attended an AWDC anti-money laundering seminar during the past year.
These seminars can be followed online at any time via www.myawdc.be. If you, or one of your employees, attended such a seminar during the past year, answer **"YES"**. If no one within your company attended, answer **"NO"**.

Attention: under the new registration rules, at least one company director must attend an anti-money laundering seminar at least once per year. Proof must be provided to the FPS Economy via diamond@economie.fgov.be.

[2] in accordance with Article 6 §1 of the Royal Decree of March 17, 2024, implementing the Anti-Money Laundering Act of September 18, 2017

2.3.4. You have appointed at least one anti-money laundering officer in writing at the highest level of your company, and this name is stated in the internal procedures? What should you answer?

In principle, legislation requires companies to appoint at least two anti-money laundering officers. One of them must be positioned at the highest level within the company (director and/or manager) and is responsible for supervising the application of and compliance with anti-money laundering legislation. In addition, in principle a second anti-money laundering officer must be appointed who is responsible for the practical implementation and follow-up of the (internal) organisation and the implementation of the anti-money laundering law and the associated recommendations. This anti-money laundering officer must have the necessary reliability, expertise, experience, hierarchical level and competencies in order to perform these functions in an effective, independent and integrity-based manner.

For small organisations, it is possible to appoint only one anti-money laundering officer: a person at the highest level (director and/or manager) who is responsible for both the practical implementation and the follow-up of the (internal) organisation and the implementation of the anti-money laundering law. In addition, the name(s) of the anti-money laundering officer(s) must be recorded in writing in the internal procedures of your company.

If you have formally designated a person in your company as an anti-money laundering officer, you may answer "**YES**" to this question.

If you do not have an anti-money laundering officer, you must answer "**NO**". When answering "NO", you may indicate the reason in the next question. You may, for example, mention that your company is small and that the person at the highest level is responsible for both supervision and implementation, or indicate another reason..

2.3.5. Your company is part of a (international) group? What should you answer?

Your company is part of an international group when, for example, your company is a subsidiary of a foreign parent company, or when your company itself is the parent company of international subsidiaries. Companies that are part of an international group are expected to ensure an equivalent level of compliance with anti-money laundering obligations across all entities within the group. The idea is that not only the Belgian entity complies with anti-money laundering legislation, but that this also applies to the other group companies.

If your company is part of an international group, you must answer **"YES"** to this question. In the following question, you must then indicate whether the affiliated companies within the group apply similar standards regarding the prevention of money laundering and terrorist financing as those you apply (again a "YES"/"NO" answer). If your company is not part of an international group, you may answer **"NO"** to this question.

2.3.6. You had employees during the last year? What should you answer?

If you did not have any employees in your company during the past year, or if you are, for example, a sole trader, you must answer **"NO"** to this question. If you did have employees during the past year, you must answer **"YES"**. You will then receive several additional questions regarding your employees. You must, among other things, indicate how many employees you had.

You must also indicate whether you applied monitoring procedures and whether you took appropriate measures to raise your employees' awareness of anti-money laundering obligations (answer: "YES"/"NO"). It is important that all employees for whom this is relevant are well informed about anti-money laundering legislation (for example, employees involved in the purchase or sale of diamonds, financial administration, or KYC tasks). You can ensure that they are well informed, for example, by allowing them to participate in an anti-money laundering and compliance seminar (organised by AWDC), or by sharing the information you received during such a seminar with your staff afterwards.

You must also indicate whether you organised an internal anti-money laundering seminar within your company organised by AWDC. Larger companies wishing to ensure that all employees are thoroughly informed about anti-money laundering legislation may request AWDC to organise an internal seminar at their company premises. In that case, employees do not need to follow an online seminar individually; the training is provided on site. A minimum number of participants applies for organising such an in-house seminar. For smaller companies, it is recommended to follow the online anti-money laundering seminar via www.myawdc.be.

If you are interested in organising an in-house anti-money laundering seminar, you may contact AWDC via compliance@awdc.be for further information.

Finally, you will be asked whether you have any further remarks regarding your employees. In this field, you may, for example, mention that staff changed during the past year, that you are unsure about the exact number of employees to be indicated, or add other relevant remarks. If you complete the anti-money laundering report online and you have no remarks, write **“no remarks”** in the field. Only then can you proceed with the rest of the report.

2.3.7. You keep a copy of this annual anti-money laundering report? What should you answer?

If you complete your anti-money laundering report online, the system automatically stores the submitted file and you will always have a digital copy of your report. You may therefore answer **“YES”** to this question. You may also download the report and store it on your servers, or print it and archive it in your administration, if you wish.

If you complete your anti-money laundering report on paper, make sure to keep a copy of the report you submitted to the FPS Economy and retain this copy in your administration, so that you can present it, for example, in the event of a spot check by the FPS Economy.

2.3.8. Were you commercially active in the previous year? What should you answer?

Commercial activities/trading activities in diamonds mean that you purchased or sold diamonds during the past year, including consignments. If you did indeed make purchases or sales during the previous year, even if these were very limited or involved only small transactions, you must answer **“YES”** to this question.

If your company did not carry out any diamond sales or purchases during the past year, or if your company was inactive, you may answer **“NO”**. In that case, this is the last question you need to answer and you do not need to proceed with the rest of the report, as the remaining questions relate to customer relationships, etc., which you did not have during the past year.

2.4. Section III: vigilance – identification and verification of clients

2.4.1. You had (a) Belgian registered trader(s) in diamonds and/or synthetic diamonds as client(s) in the past year? What should you answer?

If you sold diamonds to diamond traders registered in Belgium, you must answer **“YES”** to this question. You can verify whether a diamond trader is indeed registered by consulting the public list of diamond traders at https://diamondsupervision.economie.fgov.be/login. All active Belgian registered diamond companies can be found on this website. If you did not have Belgian registered diamond companies as customers last year, you may answer **“NO”**.

Diamond traders are required to identify all their customers (the “KYC obligation”). You can do this by consulting the CBE (via https://economie.fgov.be) and/or consulting the UBO register (via https://financien.belgium.be) and/or consulting the consolidated articles of association (via www.notaris.be/statuten) of your customer. In addition, you must keep a copy of all documents collected during this verification.

2.4.2. You had (a) Belgian unregistered trader(s) in diamonds and/or synthetic diamonds as client(s) in the past year (e.g. private individuals, jewellers…)? What should you answer?

If you sold diamonds to Belgian persons or companies that are not registered as a diamond trader, you must answer **“YES”** to this question. This applies, for example, when you sold diamonds to a jewellery company or to a natural person (private individual). If you did not sell diamonds to Belgian private individuals, nor to Belgian companies that are not registered as a diamond trader, you may answer **“NO”**.

When you answer “YES”, you must then indicate whether you had natural persons (private individuals) as customers and, if so, whether you requested their KYC information (copy of the passport). If you did not sell to natural persons, you may answer **“NOT APPLICABLE”** to this question.

You must also indicate whether you had Belgian companies as customers that were not registered as a diamond trader and, if so, whether you requested their KYC information (the articles of association/ proof of incorporation of the company; a list of directors/managers with their name, date of birth and place of birth, and if possible also their address; a copy of the identity card or passport of the representative and proof that he/she may represent the company, e.g. a power of attorney; the names of the ultimate beneficial owners of your customer and if possible also their date of birth, place of birth and address; consultation of the UBO register). If you did not sell to Belgian companies that are not registered as a diamond trader, you may answer **“NOT APPLICABLE”**.

2.4.3. You had (a) foreign client(s) in the past year? What should you answer?

If you sold diamonds to persons or companies established abroad (outside Belgium), you must answer **“YES”** to this question. This applies when you sold diamonds to a natural person (private individual) or to a company established in another EU country or outside the EU. If you did not sell diamonds to foreign private individuals or foreign companies, you may answer **“NO”**.

When you answer “YES”, you must then indicate whether you had foreign natural persons (private individuals) as customers and, if so, whether you requested their KYC information (copy of the passport). If you did not sell to foreign private individuals, you may answer **“NOT APPLICABLE”** to this question.

You must also indicate whether you had foreign companies as customers and, if so, whether you requested their KYC information (the articles of association/proof of incorporation of the company; a list of directors/managers with their name, date of birth and place of birth, and if possible also their address; a copy of the identity card or passport of the representative and proof that he/she may represent the company, e.g. a power of attorney; the names of the ultimate beneficial owners of your customer and if possible also their date of birth, place of birth and address; in case of high risk you verify the UBOs of the customer via a shareholders' register or other sources). If you did not sell to foreign companies, you may answer **"NOT APPLICABLE"**.

2.4.4. You make use of KYCP or similar information sources to verify the information provided by your client and to screen your client? What should you answer?

AWDC provides all Belgian diamond traders free access to the KYCP database. This database provides diamond traders with a central platform where, among other things, identification data can be stored digitally via a personal dashboard, company information can be downloaded from the Orbis database and can be stored in your personal dashboard. Your customer data are also automatically screened for risks relevant to the diamond sector and you are automatically notified when customer information needs to be updated. You can invite customers to complete their KYC data and upload missing documents. This tool helps diamond traders to verify the information they receive from their customers and also provides better insight into the possible risks associated with transactions and/or business relationships. In this way, it supports both the verification phase of the KYC process and the performance of a risk analysis. It is particularly recommended to use this tool for screening your foreign customers (both natural persons and companies), but it may also be useful to check your Belgian customers (for example, to see whether the database detects possible risks linked to the company).

If you used the KYCP tool during the past year, you may answer **"YES"** to this question. If you did not use it, you must answer **"NO"**. If you have not yet used the database but would like to obtain access, you may contact AWDC via compliance@awdc.be to request access.

2.4.5. You identify your client and verify the identification details before concluding the business relationship or executing the occasional transaction? What should you answer?

Anti-money laundering legislation requires diamond traders to identify their customers and verify their identification data before the business relationship is entered into or before the occasional transaction is carried out. In other words: before you close the deal, you must know with whom you are trading.

If, during the past year, you requested the KYC information and screened your customers before concluding the transactions, you may answer **"YES"** to this question. If you did not obtain the KYC information before concluding the transaction, you must answer **"NO"**.

2.4.6. You paid diamond transactions in cash to suppliers last year or received cash payments from clients (or payments through other means than through bank transfers)? What should you answer?

In Belgium, cash payments are limited to a maximum of 3,000 euros. Be aware of the risks of cash payments. Trading in cash above this amount is considered a criminal offence and the fines for unlawful use of cash are very high in Belgium.

If the transaction was carried out abroad, the cash limits of the country where the transaction took place apply. When, for example, you make a sale in Hong Kong, the cash limits of Hong Kong apply, which may differ from the Belgian limit. However, legislation assumes that the transaction took place on Belgian territory when a Belgian party is involved, unless the contrary is proven. This means that you must be able to demonstrate that the transaction was actually carried out in another jurisdiction where another cash limit applied. Therefore, make sure to keep all supporting documents proving that the transaction was carried out abroad (transport documents, proof of participation in a foreign fair, etc.).

Attention: amounts above 10,000 euros in cash must be declared to customs when you enter the EU.

If you paid or received certain transactions in cash last year, you must answer **"YES"** to this question. If you did not pay or receive anything in cash, you may answer **"NO"**.

When you answer "YES", you must indicate whether you paid or received cash (select "paid" or "received"). Then you must indicate whether you respected the cash limit of 3,000 EUR ("YES"/"NO"). As explained above, it is possible that you were abroad and that a higher cash limit applied there, so that you paid or received more than 3,000 EUR in cash. If you indicate that you did not respect the limit of 3,000 EUR, you must indicate the reason in the next question. You can then choose between:

- you were in a country where a different cash limit applied, of
- another reason.

2.4.7. You experienced difficulties to identify your clients, their representatives or their ultimate beneficiaries during the last year (e.g. clients who do not want to provide you of their identification details)? What should you answer?

Sometimes certain customers do not want to provide their identification data to their suppliers. Belgian diamond traders who sell diamonds are, however, legally obliged to obtain and check the identification data of their customers.

If, during the past year, you experienced difficulties in obtaining or retrieving the KYC data of your customers, you may answer **"YES"** to this question. If you had no difficulties and you always received the information without problems when you asked for it, you may answer **"NO"**.

2.4.8. You make use of a third party intermediary (a person outside of your company, e.g. your accountant or your bank) who does the identification and verification of your client for you? What should you answer?

It is possible that diamond companies do not carry out the KYC obligations for their customers themselves, but outsource this work to another person or company. For example, they can ask their accountant, their bank or another company to collect the KYC information of their customers. This is allowed, but bear in mind that the diamond company itself always remains responsible for compliance with the legal obligation to obtain this information from its customers.

If you have another entity than your own company perform the KYC work for you, you may answer **"YES"** to this question. If you carry out all KYC work yourself within your company, you may answer **"NO"**. When you use a third party, you must indicate in the next question who this third party is (fill in the name of the company that performs this work for you).

2.5. Section III: vigilance - assessment of the specifics of the client, nature and goal of the business relationship/transaction

2.5.1. You have gathered sufficient information about your client to be able to assess who your client is and the reasons why he wants to do business with you? What should you answer?

Anti-money laundering legislation requires you to identify your customers and verify their identity, so that you know who your counterparty is and so that you can make a risk assessment. When another diamond company or a jewellery company buys your diamonds, it is usually quite clear why they want to do business with you, since it is their core activity to trade in diamonds or work with them. However, when you have a very unusual customer (for example, a company active in a completely different sector, or a private individual placing an unusual order), it is important that you try to understand why they want to do business with you. In this way, you can rule out that they are trying to launder money or finance terrorism via diamond transactions with you. You must therefore always ensure that you understand who your counterparty is and why they want to do business with you.

If, during the past year, you were able to collect sufficient information about your customers to understand who they are and why they want to do business with you, you may answer **"YES"** to this question. If you had customers of whom you did not really know who they were or if you did not understand why they wanted to do business with you, you must answer **"NO"**.

2.5.2. You make use of the client acceptance policy to make an assessment of the risk level of your client and how you should respond to that? What should you answer?

A customer acceptance policy is a written policy document in which you explain which customers you identify, how you identify them, which documents you request, which information you check, and so on. It also contains a description of the various risk factors you consider within your customer relationships. There may be indicators of low risk, but also of increased risk. When there is increased risk, you may need to take additional measures to mitigate that risk (for example, carry out more thorough screening, request additional documents, monitor the transaction more closely, etc.).

AWDC has included a customer acceptance policy in its model anti-money laundering policy. If you have adopted the AWDC model anti-money laundering policy or your own anti-money laundering policy in your company and you apply the parameters to be able to make a risk assessment of your counterparty, you may answer **"YES"** to this question. If you do not have a customer acceptance policy/anti-money laundering policy or if you do not apply the instructions to make a risk assessment of your counterparties, you must answer **"NO"**.

2.6. Section III: vigilance – constant vigilance

2.6.1. During the business relationship or when executing occasional transactions, you remain vigilant for possible risk indicators related to the client or to the transaction? What should you answer?

Anti-money laundering legislation requires you to exercise ongoing vigilance in relation to your business relationships, in proportion to the established risk level of the customer. Even when you already have a business relationship with a particular customer, you remain continuously obliged to stay alert to indications that may point to money laundering or terrorist financing. For example, it may occur that you have had a business relationship with a particular customer for a long time, but that this customer suddenly makes payments from another bank account established in a tax haven. This constitutes a clear risk indicator that you can only detect by also remaining continuously vigilant during existing business relationships.

If, during the past year, you have remained alert to possible risk indicators regarding your customers or their transactions, you may answer this question with **"YES"**. If, during the past year, you have not remained vigilant while you were already in a business relationship with a customer or were about to carry out a transaction, you must answer this question with **"NO".**

2.6.2. You notified suspicions of money laundering or of financing of terrorism, atypical transactions and/or problematic situations to the CFI (Belgian Financial Intelligence Unit), during the past year? What should you answer?

All entities falling under anti-money laundering legislation, including diamond traders, have the obligation to inform the CFI when they have a suspicion of money laundering or terrorist financing, or when they identify atypical transactions or problematic situations in this context. The CFI processes such reports and decides whether certain reports should or should not be further investigated. They may forward this report to the Public Prosecutor's Office, so that it can conduct further investigation and, where appropriate, initiate judicial proceedings against a particular person or entity for suspicions of money laundering or terrorist financing.

If you made such a report to the CFI during the past year, you may answer this question with **"YES"**. If you did not make such a report, you may answer this question with **"NO"**

2.6.3. You copy and save all identification details during 10 years after the termination of the business relationship and keep them available to the competent authorities? What should you answer?

You are obliged to keep all identification data collected in the context of anti-money laundering legislation for a period of ten years from the end of the business relationship or from the date of an occasional transaction. After the expiry of this period, the Belgian Act of 30 July 2018 on the protection of natural persons with regard to the processing of personal data requires you to delete these personal data.

If you have complied with the obligation to keep the personal data collected in the context of customer due diligence for ten years, you may answer this question with **"YES"**. If you have not kept these personal data for ten years, you must answer this question with **"NO"**.

2.6.4. You update all identification details, the timing of which depends on the risk level of the business relationship with your client? What should you answer?

Anti-money laundering legislation requires diamond traders, in the context of their ongoing vigilance, to keep the identification data of their customers up to date as long as the business relationship continues. The law does not impose a fixed time interval for updating these personal data. The vigilance measures must be applied in proportion to the identified risk level. For customers with a low risk profile, more time may pass between updates of personal data, whereas for customers with a medium or high risk profile these data must be updated more frequently. You only need to update the personal data insofar as there is an ongoing business relationship with the customer concerned. If the business relationship has ended and no further transactions take place, there is no obligation to continue updating these data.

You may answer this question with **“YES”** if you update your customers’ identification data regularly and in proportion to their risk level. If you requested the identification data only once and did not update them afterwards, while you continued to do business with these customers for a longer period, you must answer this question with **“NO”.**

2.6.5. You keep a report of all atypical transactions and problem cases? What should you answer?

When you identify an atypical transaction, you are obliged under anti-money laundering legislation to perform a specific analysis and draw up a written report thereof. When this analysis leads to a suspicion of money laundering or terrorist financing, you are furthermore obliged to report this to the CFI.

If you drew up written reports of identified atypical transactions during the past year, you may answer this question with **“YES”**. If you should have drawn up such reports during the past year but did not do so, you must answer this question with **“NO”**. If you did not identify any atypical transactions during the past year, you may answer this question with **“NOT APPLICABLE”**.

2.7. Section III: vigilance - enhanced vigilance

2.7.1. During the past year, you traded with a politically prominent person? What should you answer?

Politically prominent persons or persons known as close associates of politically prominent persons are subject under anti-money laundering legislation to enhanced vigilance measures. Entering into a business relationship or carrying out a transaction with a politically prominent person is not prohibited, but requires the application of additional measures such as:

- obtaining approval from senior management to enter into or continue the business relationship;
- taking appropriate measures to establish the origin of the assets and of the funds used;
- enhanced monitoring of the business relationship.

If, during the past year, you entered into a business relationship with, or carried out a transaction for, a politically prominent person, regardless of whether that person holds or has held a prominent public function in Belgium or abroad, you may answer this question with **"YES"**. If, during the past year, you did not enter into a business relationship with, nor carry out a transaction for, a politically prominent person, you may answer this question with **"NO"**.

2.7.2. You traded with clients located in a high-risk third country? What should you answer?

High-risk third countries for the European Commission are countries outside the European Union with strategic deficiencies in their systems for combating money laundering and terrorist financing. The European Commission has drawn up a list of countries it considers to be "high-risk third countries". This list can be consulted on the website of the FPS Finance (https://financien.belgium.be/en/high-risk-countries). When you have entered into a business relationship with, or carried out transactions for, a customer established in a high-risk third country, you must apply enhanced vigilance measures.

If you entered into such business relationships or carried out such transactions, you may answer this question with **"YES"**. If you did not have business relationships or transactions linked to a high-risk third country, you may answer this question with **"NO"**.

2.7.3. You traded with clients located in a country without taxes or with a low taxation level (tax havens)? What should you answer?

Anti-money laundering legislation refers to states with no or low taxation that are included in the list established by royal decree in accordance with Article 307, § 1, seventh paragraph, of the Income Tax Code 1992. When transactions are linked to such a state, or when a business relationship relates to natural persons, legal persons or legal arrangements established in such a state, you are legally obliged to apply enhanced vigilance measures.

If you entered into a business relationship with, or carried out transactions for, a customer established in a state with no or low taxation, you may answer this question with **"YES"**. If this is not the case, you may answer this question with **"NO"**.

2.8. Section IV: best practices and sanctions compliance

2.8.1. You understand and comply with the recommendations in the AWDC best practice guide? What should you answer?

You can find the AWDC best practices guide on the AWDC website via this link: https://www.awdc.be/best-practices. This guide with good practices for trading in the Belgian diamond sector contains specific guidelines that contribute to a transparent and modern diamond trade. If you have read this document and know and follow its contents, you may answer **"YES"** to this question. If you do not know this document, you must answer **"NO"** to this question.

2.8.2. You understand and comply with the recommendations in the AWDC sanctions guide? What should you answer?

You can find the AWDC sanctions guide on the AWDC website via this link: https://www.awdc.be/sanctions-and-embargoes. This guide gives you an overview of the way in which the diamond trade can be affected by trade sanctions. If you have read this document and know and follow its contents, you may answer **"YES"** to this question. If you do not know this document, you must answer **"NO"** to this question.

2.9. Remarks

2.9.1. Do you have any remarks? What should you answer?

In this field you may add any additional information you want to share with the FPS Economy. If you wish to clarify certain answers to the questions in the report, you can do so here. If you complete the report online, make sure to complete this field, even when you have no remarks. In the latter case, you may, for example, mention **"NO REMARKS"**, **"N/A"** or something similar in the field.

Only when this field has been completed can you click the **"SUBMIT AML"** button to submit your anti-money laundering report online.