

Art 68 Wtt 2018 Enquiry related to Exchange of Information

Strictly confidential and only limited to the use by the requesting trust office.

The enquiry relates to (possible) integrity risks arising after 1/1/2019.

WTT 2018 Art 1(1) integrity risk

- a. risk of inadequate compliance with the provisions laid down by or pursuant to any statutory regulation;
- b. risk of the trust office or its staff members being involved in acts which are incompatible in such a way with what is appropriate in social and economic life under unwritten law, that confidence in the trust office or in the financial markets may be damaged.

Details trust office:		
Date:		
Client company name:		
Client name(s):		
Address:		
KVK number:		
<i>Integrity risks</i>		
	Are there any materialised integrity risks with regards to the client or client company?	
	Are there (ongoing) criminal investigations and if so, which (suspected) criminal offences do they relate to?	
	Is there negative publicity that may result in reputational damage to either the Dutch financial system or the trust office or the trust sector? If so, on which facts and/or circumstances is it based?	
	Did the trust office face either lack of or contradictory information in respect of part client acceptance/ review/ transactions?	
	Has the client terminated the business relation due to questions/requests of the trust office and do these remained unsolved?	
	Is/did the trust office terminate services (due to the above) reasons of compliance/ integrity risks?	
<i>Other questions (optional)</i>		
	What are the reasons for which the provision of services was terminated?	
	Were the services terminated as a result of changing risk appetite/risk profile of the trust office?	
	Is there any other relevant information to share?	

- Notes:
- Prior to providing its services, the trust office, pursuant to Section 68 of the Wtt 2018, is obliged to examine whether another trust office is providing or has provided services to the client or the client company. This relates to the integrity risks as per 1 January 2019 to date.
- The trust office remains cautious of the fact that the other trust office is not informed of the fact that a report to the FIU has been made or is being considered (tipping-off prohibition).
- A trust office shall examine whether another trust office provides or has provided services to the client or the client company. Therefore, in case a trust office is aware that another company of a client in the same structure is serviced by another trust office an enquiry related to exchange of information is to be made. See Section 68, subsection 1 and 2 Wtt 2018.,
- When the client has been serviced by multiple trust offices in a short preceding period of time, additional trust offices can be contacted.