

# Optimising Subject Persons' Representations:

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**Guidance on Best Practices for Subject Persons when  
Submitting Representations to the FIAU**

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# Introduction

The Supervision Section of the FIAU is empowered<sup>1</sup> to undertake compliance reviews to assess subject persons' compliance with their anti-money laundering/combatting the funding of terrorism (AML/CFT) obligations. These stem from the Prevention of Money Laundering Act (PMLA), the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR), the Implementing Procedures (IPs), and any applicable binding guidance issued by the FIAU. Following a supervisory review undertaken by the FIAU (or any of its agents, such as the MFSA or the MGA), any cases where serious shortcomings are identified are referred to the FIAU's Compliance Monitoring Committee (CMC). The CMC is an internal organ set-up by the FIAU to assist in the exercise of its enforcement powers. It is tasked with the onerous responsibility of determining breaches of AML/CFT obligations and establishing the most appropriate administrative measures to be imposed in response to the breaches identified. This is in line with Article 13 of the PMLA and Regulation 21 of the PMLFTR which empower the FIAU to impose administrative penalties and other measures in respect of any breach or failure to comply with any rules, Regulations, or directives.

Where one or more potential breaches of the subject person's AML/CFT breaches are identified, a Potential Breaches Letter (or compliance report) is issued by the FIAU and sent to the SP outlining these potential failures. The subject person is then granted the opportunity to submit both written and verbal representations. The Potential Breaches Letter, the subject person's representations and all the evidence available are subsequently referred to the CMC for its consideration. While SPs are not obliged to provide representations, most tend to make use of this opportunity as the submissions are presented in front of the Committee and thoroughly discussed. Hence, representations have a significant impact on the final determinations made by the CMC, therefore emphasising their importance throughout the enforcement process. Representations permit SPs to provide updates on self-driven remedial actions which were implemented, are in progress or a commitment has been made to implement, based on the shortcomings identified during the compliance review. Furthermore, through the submission of representations, SPs are provided with the opportunity to provide further clarifications, information and/or documentation to support their arguments where they believe that certain potential breaches should not have been identified. On the rare occasion that a SP opts not to provide representations, the Committee would still examine in depth the details and evidence related to each finding. The CMC eventually determines if the identified findings are to be classified as breaches of the AML/CFT legislative provisions, and if so, the proportionate, effective and dissuasive administrative measure(s) to be imposed.

This paper therefore aims to provide details and practical insights behind the best practices SPs should adopt when submitting representations to the FIAU.

**'THE SUBJECT PERSON IS THEN GRANTED THE OPPORTUNITY TO SUBMIT BOTH WRITTEN AND VERBAL REPRESENTATIONS. THE POTENTIAL BREACHES LETTER, THE SUBJECT PERSON'S REPRESENTATIONS AND ALL THE EVIDENCE AVAILABLE ARE SUBSEQUENTLY REFERRED TO THE CMC FOR ITS CONSIDERATION.'**

<sup>1</sup> through Article 16(1)(c) of the PMLA

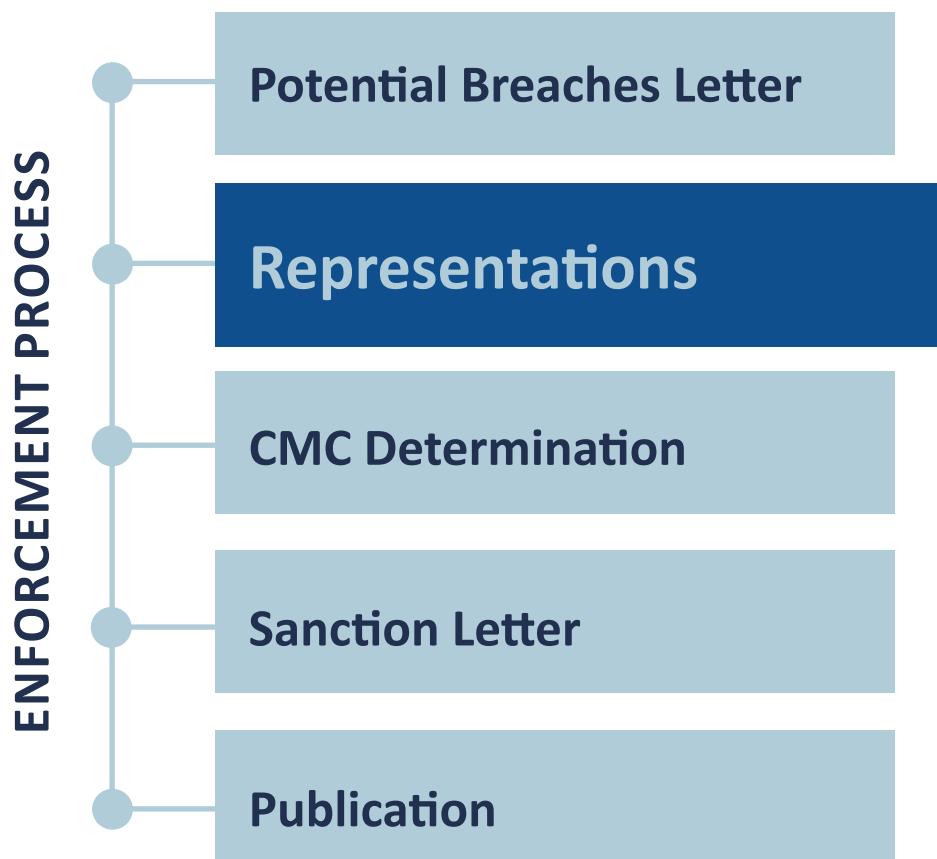
# Enforcement Process

**'AS PART OF THEIR WRITTEN REPRESENTATIONS, SPs MAY ALSO REQUEST TO SUBSTANTIATE THEIR SUBMISSIONS VERBALLY BY HOLDING A MEETING WITH THE CMC AND PRESENTING THEIR SO CALLED 'ORAL SUBMISSIONS'.'**

Compliance examinations are carried out on SPs either by the FIAU's Supervision section or through agents of the FIAU (or through any of its agents). When potential serious failures are identified, a Potential Breaches Letter is issued to the SP providing the necessary detail to understand the potential failure, the legislative provision(s) that has/ have potentially been breached, and informing them of the right to submit representations (both written and verbal).

Written representations are to be provided within a specified period as detailed in the Potential Breaches Letter. As part of their written representations, SPs may also request to substantiate their submissions verbally by holding a meeting with the CMC and presenting their so called 'oral submissions'. When verbal representations are requested, the Enforcement section of the FIAU contacts the SP with a proposed date for their representatives (including the MLRO) to meet with the CMC. During this allocated time slot, both representatives from the SP and the FIAU may ask questions in relation to the findings identified and written submissions provided. Following the oral submissions, the SP may provide additional written submissions based on the discussions undertaken during the respective meeting.

Subsequently, all the details pertaining to the case including the Potential Breaches Letter, the subject person's representations (written and verbal) and all the evidence available are referred to the CMC for its consideration and final determination. The outcome of the case is then communicated to the subject person, including any corrective action required. Administrative measures imposed by the CMC together with a summary of the facts leading to the imposition of the measure are published by the FIAU on its website.



# Representations

## I. Written Representations

When submitting written representations in relation to specific findings, SPs should either:

- Concede to the respective finding and provide updates on the self-driven remedial actions implemented, being implemented or which they have committed to implement in view of the shortcomings identified during the compliance review, or
- Provide further clarifications, information and/or documentation to support their arguments where they believe that there should not be potential breaches identified.

It is therefore vital for SPs to provide as much information, where applicable backed up by documentary evidence, to assist the Committee in understanding how the SP adhered/intends to adhere to their local AML/CFT Regulations.

Overall, SPs are to keep in mind that representations are of benefit for the Committee to make an informed decision as to whether there are breaches of the applicable laws, as well as to determine the level of seriousness and materiality of any determined breaches. Without the SP's representations, the Committee will still decide on the case presented before it, however basing its decision only on what was provided by the SP during the supervisory review.

The following are some recommended best practices for SP's when submitting representations to the FIAU.

**Representations need to be sufficient and relevant.**

SPs should aim to address each, and every shortcoming highlighted in the Potential Breaches Letter issued by the FIAU and clearly outline the measures taken/planned to be taken to comply with the respective AML/CFT Regulation. Potential breaches identified during a compliance examination can either be in relation to procedural deficiencies, file specific issues or a combination of both.

**Procedural shortcomings** are not tied to specific customer files, but may reflect systematic issues within the SP's AML/CFT framework. These may include, amongst others, inadequate business risk assessment carried out by the SP, lacking customer risk assessment procedures, deficiencies in the SP's written policies and procedures, etc. In these circumstances, SPs should aim to provide explanations (and if applicable supporting documentation) which illustrate the remedial action taken/planned to remediate their position. This should include any updates implemented to the respective procedures together with documentary evidence to substantiate the listed enhancements.

**File-specific shortcomings**, on the other hand, refer to weaknesses identified within individual customer files during the examination process. These may include, amongst others, failure to identify/verify a customer, failure to collect information pertaining to the customer's source of wealth and/or source of funds, etc. Here SPs should aim to provide any additional information and where applicable documentation pertaining to the specific file which was not provided during the Compliance examination. Therefore, if findings are identified in seven out of ten reviewed files, the SP should aim to provide detailed representation on each of the seven files.

When in disagreement with a particular finding, rather than solely stating disagreement, SPs should put forward tangible arguments, detail, and evidence to justify their reasoning. Similarly, when a finding is not contested, SPs should provide detail on the remediation undertaken or planned.

Representations should be backed up with evidence.

SPs should aim to ensure that any information submitted as part of their written representations is thoroughly substantiated with supporting evidence. In instances where deficiencies are related to missing documentation, it is recommended to provide these documents as clearly referenced annexes, furnishing detailed explanations regarding the reasons for their initial omission during the compliance examination. Additionally, SPs are urged to supply an audit trail confirming the date when these documents were acquired.

If the aforementioned documents were provided by the SP during the compliance examination, reference to this should be made in the representations. This referencing facilitates the Committee's review of the pertinent documents, as well as provides it with all information/documentation to make an informed decision on each finding identified within the Potential Breaches Letter.

However, SPs **are not** to present the same information/documentation in the representations if this was already provided during the supervisory review.

Self-initiated remedial actions implemented, being implemented or committed to implement.

SPs may have proactively rectified or would have started a process to rectify the identified shortcomings. This pro-active approach, including details and evidence of actions taken or of any adopted plans should be clearly communicated to the Committee. Importantly, evidence of any actions already implemented, or of any internal/external audits carried out following implementation of enhanced controls, should form an integral part of the representations. Additional actions taken beyond the findings observed during the supervisory review should also be provided. Self-initiated remedial actions permit the Committee to assess the regard the SP has towards complying with the AML/CFT laws. Furthermore, the Committee can better gauge the extent of implemented (or planned to be implemented) controls that support the effective management of ML/FT risks the SP may be exposed to.

The Committee, through the Enforcement Section of the FIAU, always assesses the extent of the effectiveness of the remedial action taken (or planned) and provides timely support and guidance, both on matters linked with the remedial action, and more broadly in relation to the AML/CFT compliance requirements and the implementation of effective controls.

**'HOWEVER, ONE MUST NOT PERCEIVE THIS TO MEAN THAT NO ADMINISTRATIVE MEASURE WILL BE IMPOSED BY THE COMMITTEE WHEN IT OBSERVES THAT REMEDIAL ACTION HAS BEEN UNDERTAKEN OR IS BEING IMPLEMENTED.'**

## II. Oral Representations

The Committee extends to SPs the right to supplement their written representations with oral submissions. SPs who intend to avail themselves of this right, are requested to clearly communicate this as part of their written representations. When communicating the date for the oral submission, the Enforcement Section of the FIAU guides the SP on which parts of the Potential Breaches Letter they should focus the oral submissions. SPs are required to indicate who will be present during the meeting. It is imperative to note that oral submissions are intended to complement written representations, and no oral representations can be made, if no written representations were submitted by the SP within the timeframes stipulated. During oral submissions, SPs may present additional evidence on the potential breaches identified following the compliance review, as well as provide any further explanations deemed appropriate by them. Similarly, Enforcement officials in charge of the case, as well as Committee members may ask case specific questions, as well as request clarifications on any policies or processes implemented by the SP.

After the oral representations meeting, the SP is allowed to provide additional written explanations, as required, based on the discussions with the Committee. Any additional clarifications, and evidence provided in writing will be included with the SP's initial representations for the Committee's considerations and deliberations.

**'IT IS IMPERATIVE TO NOTE THAT ORAL SUBMISSIONS ARE INTENDED TO COMPLEMENT WRITTEN REPRESENTATIONS, AND NO ORAL REPRESENTATIONS CAN BE MADE, IF NO WRITTEN REPRESENTATIONS WERE SUBMITTED BY THE SP WITHIN THE TIMEFRAMES STIPULATED.'**



# Other Key Takeaways

Annexed to this paper are specific details SPs are to keep in mind when submitting representations following shortcomings identified during a compliance examination in relation to specific AML/CFT obligations (e.g. when findings are noted in relation to Business Risk Assessment, Customer Risk Assessment, Purpose & Intended Nature, etc). Below are the general highlights extracted from the Annex aimed at offering SPs additional guidance to consider when submitting representations:

- SPs usually obtain a great deal of information and documentation on their customers throughout their business relationships with them. During the supervisory review, SPs are to provide all the information and documentation required to prove compliance with their AML/CFT obligations. Similarly, as part of the representations, SPs are to provide the Committee any explanation, information, and documentation they deem pertinent to defend their position. While the Committee welcomes anything the SP may wish it to be aware of, **labelling the evidence** provided and **linking it to the relevant part of the written representations they relate to** ensures that the Committee is clearly understanding why the SP has provided the documentary evidence. While oral submissions permit these clarifications, clearly linking the written representations with the evidence provided allows the Committee to be more aligned with the arguments the SP wants to convey through their representations. This applies in a similar manner to the SP's internal policies, procedures, and processes. Since SPs may structure this documentation in a manner they deem more appropriate, clear referencing in the representations will facilitate better understanding by the Committee.
- While providing an explanation of the customer and the activities undertaken by them is important, SPs should not only rely on this explanation when providing representations. Any **evidence** at hand that may corroborate their statement, **on a risk sensitive basis, should be equally provided** as part of the representations.
- SPs may naturally be exposed to a multitude of transactions linked to the same activity the customer has undertaken. Although not all transactions will form part of the sample selected for review, SPs may have additional evidence to account for the activity undertaken through the other transactions. In these circumstances, **SPs are to explain the circumstance in detail, as well as how the SP is linking the additional transactions with those selected during the review and to provide all the evidence available**. By way of example, the SP may be privy to ongoing business between its customer and another party. While the SP did not obtain documentary evidence to substantiate the transactions sampled during the review, it may have obtained evidence to corroborate other similar transactions. This should be provided to the Committee so it may assess the extent of the SP's knowledge of the relationship between the parties and the transactions the customer has undertaken.
- Oral representations enable SPs to explain their written representations as well as serve to provide anything that may help the Committee understand more clearly the circumstances of the case. Therefore, **SPs are to be well prepared to discuss the findings and to utilise the time afforded to them in the most efficient manner**.



# Conclusion

Written and oral representations give the opportunity to SPs to communicate with the Compliance Monitoring Committee. Furthermore, SPs can furnish all the necessary information and documentation to allow the Committee to determine whether there is a breach of the legal obligations, and which administrative measures to impose if a breach is determined. Therefore, representations should be well thought out, detailed but concise, adequately linked, and be substantiated with all the evidence available. Self-initiated remedial actions or plans in the process of being implemented should also form an integral part of the SP's representations. This allows the Committee to assess future levels of compliance and the extent to which ML/FT risks are being or shall be effectively managed. The aim of the Committee is to ensure compliance with AML/CFT Regulations and it is the Committee's prerogative to ensure this happens by imposing the necessary administrative measures (when required) in a just manner and by always ensuring that they are proportionate, effective, and dissuasive.



# Annex

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This Annex contains details about the representations which should be submitted by SPs following shortcomings identified during a compliance examination in relation to specific AML/CFT obligations (e.g. when findings are noted in relation to Business Risk Assessment, Customer Risk Assessment, Purpose & Intended Nature, etc.). This is required to assist the CMC in determining whether there is a breach of the SP's obligations at law, and which administrative measure to impose if breaches are confirmed.

## I. Business Risk Assessment (BRA)

When BRA shortcomings are highlighted in the Potential Breaches Letter, the SP should bring forward any remedial action taken, such as the updating of the BRA. If the findings are linked with the methodology implemented by the SP, the representations should explain this and furnish any evidence linked with the explanation. This may be done, by providing quantitative elements considered or how these considerations are impacting the overall risk. Additionally, SPs may wish to highlight their understanding of the business risks, both by explaining in their written representations and as part of their oral submissions. When the Potential Breaches Letter highlights that there was no BRA in place, or that other serious deficiencies were highlighted, representations should also focus on the actions taken by the SP to enhance their risk understanding and in documenting same. Furthermore, the SP should provide a copy of the BRA together with explanations of the methodology adopted and quantitative data utilised.

Where potential breaches relate to the SP's obligation to consider the risks and reputability of jurisdictions, it is essential for the SP to explain the sources consulted during the jurisdiction assessment and how the details outlined from these sources align with the risk score for each jurisdiction. Evidence of when each assessment was carried out, is also necessary.

## II. Customer Risk Assessment (CRA)

Shortcomings related to the CRA generally fall into two main categories: procedural or file specific. In the latter circumstance, SPs are to provide the Committee with evidence of the CRAs undertaken, each indicating the date of the assessment. Any changes in circumstances and the ensuing change in risk should also be highlighted together with an explanation of the new risks identified. For the former, SPs are to provide an explanation of the CRA methodology utilised to assess its customers, together with any supporting evidence. This may be indications of how the risk factors and risk criteria chosen influenced the risk score and how this is deemed to be effective for understanding the customers' risks.

## III. Identification & Verification of the customer and beneficial owner

If during the supervisory examination, potential breaches are identified due to, incomplete, inadequate, or missing identification and verification measures, SPs are to submit any documents that are available to account for the shortcomings identified. This may include submitting documentation collected at onboarding stage together with any additional updates provided during the course of the relationship. Evidence of when the documentation was collected is crucial so the Committee may take this into consideration. This applies both in the context of servicing natural persons as well as corporate customers. In the latter circumstance, if the findings are related to the verification of the corporate structure and the BO(s), the SP should furnish all checks it undertook to establish the BO of the customer, from onboarding to date. Corporate structure charts, M&As and registry searches are a few examples. Here again, evidence of when these documents were collected is to be provided. Specifically for BOs, where there is no one person that satisfies the criteria of a BO, SPs should furnish all evidence available to substantiate that the senior managing officials of the customer are to be considered as BOs.

## IV. Purpose & Intended Nature

Shortcomings in relation to the Purpose and Intended Nature include instances where the SP did not collect sufficient information or failed to collect any information about customers' employment, anticipated level of activity, and expected sources of wealth and funds.

In the case of potential breaches related to Purpose and Intended Nature, it is recommended that the SP provides details about the customer and their activities. Substantiating this with evidence of what documentation was obtained at onboarding is also required. Explaining the customer's circumstances and activities during the representations stage is essential for the Committee to understand the extent of the SP's knowledge of its customers. Any documentary evidence available, such as financial statements, contractual agreements, business projections, and searches of the customer's websites, aimed at corroborating the information obtained is also to be provided.

## V. Ongoing Monitoring - Transaction Monitoring

Shortcomings in relation to Transaction Monitoring typically fall into two primary categories. The first category pertains to transactions that deviate from a customer's normal behaviour, prompting the SP to examine the reasons behind the transactions. This may involve communication with the customer to seek further explanations, requesting supporting documentation, such as invoices and receipts, and seeking clarification on whether the behaviour is anticipated to continue. Providing this information and documentation is beneficial for the Committee to understand the extent of the checks carried out by the SP. Evidence of when the information/documentation was requested and obtained is also required for the Committee to know when action was taken by the SP to understand the transaction/s in question. Additional measures taken, such as the updating of the customer profile and CRA should also be highlighted.<sup>2</sup> Explaining the circumstances of the transactions in question and the customer's activities during the representations stage is also encouraged.

The second category of shortcomings relate to the effectiveness of the SP's transaction monitoring system and the ensuing actions once the system triggers alerts<sup>3</sup>. SPs are to explain how the parameters set within their transaction monitoring system are aligned with their business operations and the identified risks at both business and customer levels. While an automated transaction monitoring system is not always necessary, when it does not exist, the SP should also demonstrate how manual monitoring still enables for the effective monitoring of the activities undertaken. Any enhancements carried out to the SP's implemented system should also be explained as well as evidence of any testing carried out confirming the effectiveness of the implemented system.

## VI. Ongoing Monitoring - Updating of information/ Documentation

Potential breaches may come either because of trigger events linked to specific customers, or else because the SP is not abiding with their own policy concerning the updating of customer information/documentation. In instances of potential breaches related to the updating of the customers' information/documentation due to trigger events, representations should include details about any information/documentation collected following the event that triggered the customer for review. This should encompass the date of when the updated information/documentation was obtained as well as any subsequent actions taken either when this was furnished to the SP or else when the customer was not forthcoming in acceding to the SP's request.

SPs are to have established policies and procedures outlining their periodic review process and its frequency. As part of their representations, SPs are to either evidence that they have indeed adhered to their own policies or else provide a plan of action for updating the customer information/documentation in line with the SP's policies. However, policies may have been overly ambitious and therefore SPs should also assess the extent to which this is truly risk based. Therefore, the representations may also include updated policies that are truly risk based together with actions aimed at ensuring that the updated policies are adhered to.

<sup>2</sup> Reference is also made to the 'Other Key Takeaways' Section of this paper in relation to evidence obtained corroborating similar transactions or activity.

<sup>3</sup> <https://fiaumalta.org/app/uploads/2023/05/Guidance-Note-A-Look-Through-the-Obligation-of-Transaction-Monitoring.pdf>

## VII. Enhanced Due Diligence (EDD)

First, the SP would need to explain to the Committee the circumstances that led them to classify the customer as high risk. Therefore, providing a comprehensive customer profile would be beneficial. Any specific circumstance that leads to the customer's classification as posing a high risk during the business relationship should also be explained. Secondly, the SP should furnish an explanation of the steps taken to mitigate the heightened risk identified. However, this should not merely be the customer due diligence one is required to undertake. It is crucial to ensure that additional measures are taken to mitigate the heightened risks identified. For example, obtaining additional verification documents is a good measure aimed at ensuring that the customer is who he purports to be, but are futile if the risk is deriving from the activity the customer undertakes. In the latter case, obtaining documentary evidence confirming the activity of the customer, more thorough monitoring of their activities, as well as lower thresholds for monitoring the transactions undertaken, would in reality manage the risks identified better.

## VIII. Simplified Due Diligence (SDD)

Examples of shortcomings pertaining to SDD may arise when the SP does not assess the low ML/FT risk nature of the customer before applying SDD or because they failed to consider that the customer's higher risk circumstances were not suited for the application of SDD, neither at on-boarding nor during the relationship. In these cases, SPs are required to provide details of the assessment carried out to verify that SDD could be employed, together with periodic assessments to ensure that no material changes in circumstances occurred.

## IX. Outsourcing

Findings linked to outsourcing may arise in view of a lack of agreement between the parties delineating the extent of the outsourcing arrangement. They may also occur due to a lack of checks undertaken by the SP prior to the outsourcing arrangement becoming effective. The SP must ensure that the party they are outsourcing to, can meet their legal obligations. If they do not periodically check whether the outsourced party is performing well, they risk failing to fulfil their responsibilities. In the first scenario, the Committee should be provided with both the agreement and evidence of when it took place. For the second scenario, the Committee should be provided with information about any checks, and with evidence of when these were carried out. The Committee should be provided with evidence of tests undertaken, how often and actions taken in case of anomalies identified and when these were undertaken.<sup>4</sup>

## X. Internal and External Reporting

In most circumstances, SPs argue that external reporting is subjective in nature. While reporting always has some subjective considerations, there are always objective criteria that enable an understanding of whether there is suspicion that merits reporting. In these circumstances, SPs are required to assess the red flags highlighted in the Potential Breaches Letter and provide representations addressing the red flags. Moreover, SPs are to provide all the evidence available substantiating their arguments.

In cases where an SP flags an activity, transaction or behaviour potentially warranting an external report, but opts against it after internal reporting and scrutiny, it is recommended that the SP meticulously documents the rationale behind this decision. This approach guarantees that the SP has diligently undertaken steps not only to detect suspicious activity but also to thoroughly weigh all pertinent factors influencing their judgment.

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<sup>4</sup> A similar circumstance could be identified in case reliance is placed on another SP or equivalent in a reputable jurisdiction. The same guidelines for the provision of representations on such findings apply.

## XI. Policies & Procedures

To the extent that the potential breaches and representations required have not already been covered above, the review may have identified findings linked to the details included in the SP's policies and procedures together with their implementation. SPs are to provide evidence that the law was effectively implemented, even if their policies and procedures were lacking in detail. Furthermore, SPs are to provide updated policies and procedures to remedy the finding.

## XII. Record Keeping

Findings related to the SP's record keeping obligations may arise when there is evidence suggesting that the SP had obtained the required documentation but failed to retain it. Another reason may be because the SP does not have the necessary measures to ensure that documentation is adequately retained and easily retrieved. Any documentation that the SP retrieves should be provided as part of the representation, along with evidence of when it was originally collected. SPs should also explain how they intend to ensure that documentation is retained in an adequate manner and is easily retrieved.

## XIII. MLRO

Findings related to the MLRO usually involve situations where MLROs are found to have either a potential conflict of interest, lack competence, skills, or time to carry out their role diligently. Otherwise, they are not given resources, timely access to information/documentation or they are not given the ability to influence the SP's management of ML/FT risks. In the event of potential breaches related to the MLRO's competence and suitability for the role, the Committee expects SPs to provide details on the MLRO's qualifications in combatting ML/FT. This includes providing information on any relevant training attended by the MLRO throughout their employment or otherwise, specifically focusing on AML/CFT. Additionally, the SP should provide evidence of how the MLRO has contributed to the SP's AML/CFT processes and controls. Furthermore, the level of business risk understanding of the MLRO needs to be supported. This may be substantiated during the oral representations.

If the potential breach concerns the MLRO's potential conflict of interest, SPs are required to present copies of their policies and procedures addressing the MLRO's role, particularly regarding conflict of interest. Additionally, the SP should provide a comprehensive list of all positions held by the MLRO. This information aims to clarify whether conflicts exist between roles or if the number of roles impede the MLRO's ability to carry out their duties effectively and efficiently.

Potential breaches linked with the MLRO's time afforded for the role are to be substantiated with an assessment of the extent of time they are focused on this role, as opposed to other roles they have within the SP or externally.

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