



Risk Evaluation Questionnaire 2025

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PREVIEW

This document contains provisional questions which will be featured in the REQ for PREVIEW for the year 2025. This document should be utilised by subject persons to initiate the gathering of the necessary information required to ensure timely and accurate submission of the 2025 REQ. Questions presented in this document may be subject to change should the FIAU deem it necessary. The 2025 REQ submission is only considered valid when submitted through the FIAU CASPAR portal and upon payment confirmation.

Customers

Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors

Customers (2.3)

(Relates to Advocates)

Q1

Please list the total number of customers with whom your entity had an active business relationship as at the end of the prior calendar year.

Customer is defined as a natural person or a legal person and/or entity with whom the subject person has a business relationship, or for whom the subject person carried out an occasional transaction. In this context, customers refers to active customers as at the end of the prior calendar year.

For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.

or choose one of:

- Not Available

Customers (10.3)

(Relates to Advocates)

Q2

Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.

Customer is defined as natural person or a legal person / entity with whom the subject person has a business relationship or for whom the subject person carried out an occasional transaction. In this context, customers refer to customers for whom the subject person carried out an occasional transaction during the prior calendar

year. Where a subject person carried out more than one occasional transaction to the same customer, it should count the customer as one to avoid duplication. "Total number of customers" only includes those clients that have been provided with a relevant activity by the subject person.

For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.

or choose one of:

- Not Available

Customers (29)

Q3

Do you have any customers in the following industries?

Choose more than one option:

- Precious metals, stones, jewelry dealers or wholesalers
- Arts or Antiques dealers
- Aviation technology, materials or Parts
- Cash intensive businesses
- Hydrocarbon trading or investing
- Arms or weapons dealers or manufacturers
- Car dealers
- Remote Gaming Operators or Land Based Casinos
- Attorneys / Lawyers
- Chemical, Oil, Gas or Petrochemicals companies
- International Transportation businesses (including by air, land or sea)
- Import or Export Agents

or choose one of:

- Not Available

Customer Type (5.3)

(Relates to Advocates)

Please state the total number (#) of customers as at end of the prior calendar year for the following

Q4	<input type="text"/>
a) Natural persons	
Q5	<input type="text"/>
b) Legal persons	

Customer Type (7.3)

(Relates to Advocates)

Q6

Please list the number of customers where the customer is part of a multi-tier ownership structure (i.e. at least two additional layers of legal persons or arrangements on top of the customer)

Customer Type (9)

Q7

Please list the number of customers and beneficial owners serviced during the prior calendar year, that benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes.

Investor citizenship schemes are often referred to as CIPs ('citizenship investment programmes'), 'citizenships for sale' or 'golden passports'. They allow foreigners to be naturalised as a citizen of a country in return for an investment, provided certain criteria are fulfilled. Investor citizenship schemes differ from investor residence ('golden visa') schemes, which aim to attract investment in exchange for residence rights in the country concerned. The answer provided should include all the customers of the subject person who have benefitted or applied to benefit from CIPs, irrespective whether the application for the CIP was done by the SP.

or choose one of:

- Not Available

Customer Type (31.3)

(Relates to Advocates)

Please specify the total number (#) of:

Q8 a) customers rated as high risk <i>The risk rating of your customers should be as at the end of the prior calendar year. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.</i>	<input type="text"/> or choose one of: <ul style="list-style-type: none">• Not Available
Q9 b) customers rated as medium risk <i>The risk rating of your customers should be as at the end of the prior calendar year. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.</i>	<input type="text"/> or choose one of: <ul style="list-style-type: none">• Not Available
Q10 c) customers rated as low risk <i>The risk rating of your customers should be as at the end of the prior calendar year. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.</i>	<input type="text"/> or choose one of: <ul style="list-style-type: none">• Not Available

Customer Type (36)

Q11

Does your customer base have a risk rating outside of the 'high', 'medium' and 'low' categories?

Choose only one option:

- Yes

- No

Customer Type (37)

Q12

Please specify the additional risk rating/s.

[Answer if Q11 is Yes]

Customer Type (39)

Q13

Please specify the total number (#) of customers to whom Simplified Due Diligence (SDD) was applied, given that their risk was classified as low.

or choose one of:

- Not Available

Customers (Others) (1)

Q14

Does your entity have customers (including beneficial owners and directors) who have been convicted of a criminal offence that could have potentially generated illicit proceeds?

Choose only one option:

- Yes
- No

Customers (Others) (2)

Q15

Are any customers funds held on trust, or in another fiduciary capacity, for customers held in the client account?

Choose only one option:

- Yes
- No

Customers (Others) (5)

Q16

Are customers that act as holding companies with subsidiaries or investments in non-EU/EEA jurisdictions part of the customer base?

Holding companies are typically entities that hold investments principally related to equity shares in other entities. Holding companies may also own other assets such as immovable property, intellectual property and other financial assets. Holding companies do not actively participate in the running of the day-to-day operations of the entities they hold an investment in.

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Customers (Others) (6)

Q17

Do shell companies form part of the customer base?

A shell company is an incorporated company with no independent operations, significant assets, ongoing business activities or employees.

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Customers (Others) (8)

Q18

Are there customers in the customer base who raised capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding?

An Initial Coin Offering (ICO) is the cryptocurrency industry's equivalent to an Initial Public Offering (IPO).

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Customers (Others) (10)

Q19

Please list the number of customers that are foundations, charities or other non-profit entities.

or choose one of:

- Not Applicable

- Not Available

Customers (Others) (13)

Q20

Please list the number of customers that held virtual financial assets, or carried out transactions (receipts or payments) through the use of virtual financial assets during the prior calendar year.

Subject persons should only select the 'Not Applicable' option in their response when they do not accept customers that held or carried out transactions through the use of virtual assets. Subject persons that are open to provide services to customer holding and / or carrying out transactions through the use of virtual assets but did not have such customers in the prior calendar year should input "0" in their reply. "Virtual financial asset" shall be construed to have the same meaning given under the Virtual Financial Assets Act, Chapter 590 of the Laws of Malta: "virtual financial asset" or "VFA" means any form of digital medium recordation that is used as a digital medium of exchange, unit of account, or store of value and that is not - (a) electronic money; (b) a financial instrument; or (c) a virtual token.

or choose one of:

- Not Available

Customers (Others) (19)

Q21

Please list the number of customers that are VFA licence holders or are in the process of obtaining a VFA licence.

Respondents are requested to report the number of customers that are VFA agents or customers who hold or are in the process of applying for a VFA licence with whom you have a business, professional, or commercial relationship or who were involved as parties in executed contracts.

or choose one of:

- Not Applicable
- Not Available

Customers (Others) (22)

Q22

Are you aware of customers within the customer base with no address or multiple addresses, without any legitimate reasons?

Choose only one option:

- Yes
- No

Customers (Others) (23)

Q23

Do any of your customers use financial intermediaries located in countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?

A financial intermediary is an institution or individual that serves as a middleman among diverse parties in order to facilitate financial transactions. Examples of financial intermediaries include commercial banks, investment banks, stockbrokers, pooled investment funds and stock exchanges. Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

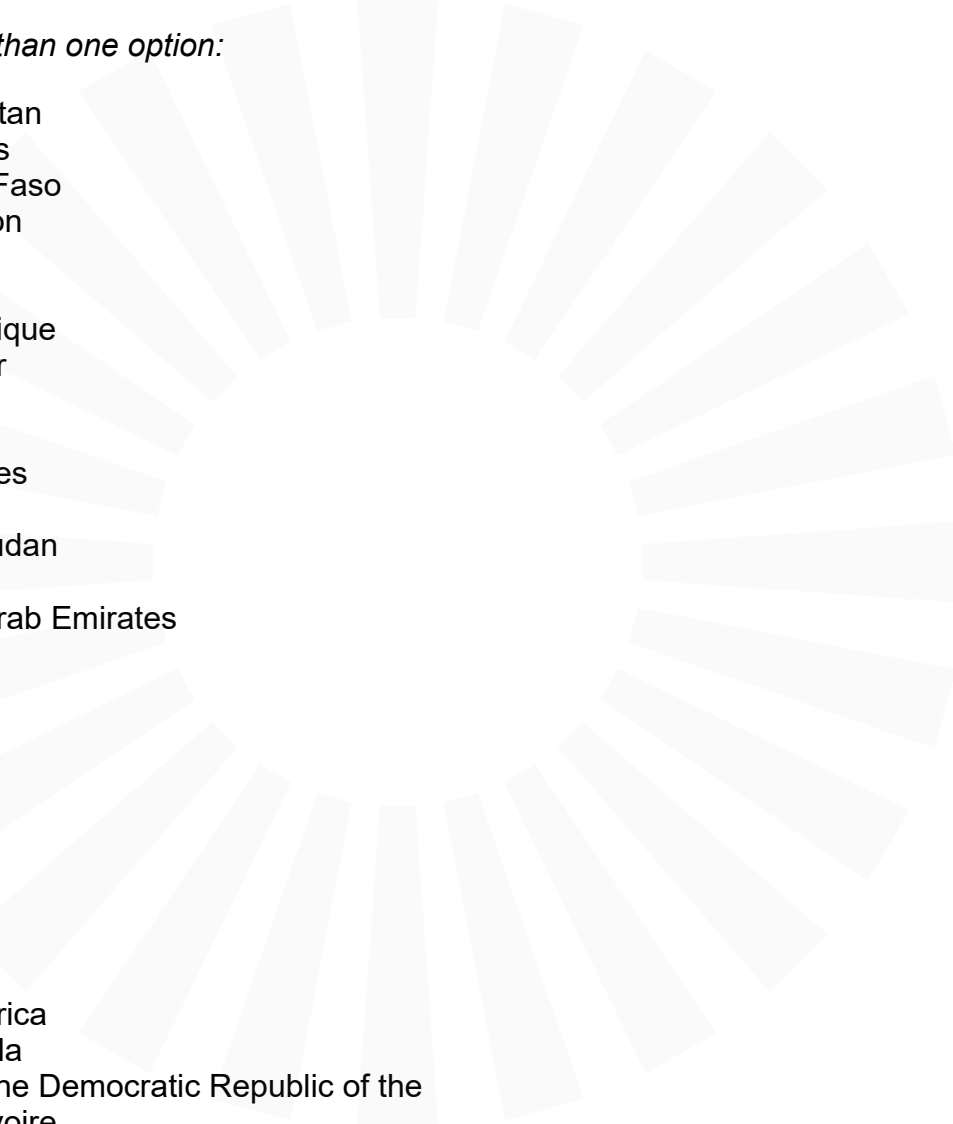
Customers (Others) (24)

Q24

Please select the respective jurisdictions.

[Answer if Q23 is Yes]

Choose more than one option:

- 
- Afghanistan
 - Barbados
 - Burkina Faso
 - Cameroon
 - Gibraltar
 - Mali
 - Mozambique
 - Myanmar
 - Nigeria
 - Panama
 - Philippines
 - Senegal
 - South Sudan
 - Uganda
 - United Arab Emirates
 - Vanuatu
 - Vietnam
 - Yemen
 - Algeria
 - Angola
 - Bulgaria
 - Croatia
 - Haiti
 - Jamaica
 - Kenya
 - South Africa
 - Venezuela
 - Congo, the Democratic Republic of the
 - Cote D'Ivoire
 - Iran, Islamic Republic of
 - Korea, Democratic People's Republic of
 - Lebanon
 - Monaco
 - Namibia
 - Syrian Arab Republic
 - Tanzania, United Republic of
 - Trinidad and Tobago

or choose one of:

- Not Available

Customers (Others) (25)

Q25

Please list the number of customers who have not filed the financial statements of the year preceding the prior calendar year with the Malta Business Registry.

or choose one of:

- Not Applicable
- Not Available

Customers (Others) (26)

Q26

Please list the number of customers whereby the independent audit opinion, expressed in the last financial statements, is either a qualified opinion, an adverse opinion or a disclaimer of opinion.

There are four types of independent audit opinions expressed on a customer's financial statements. These are an unqualified opinion, a qualified opinion, an adverse opinion and a disclaimer of opinion. Subject persons are requested to report on the % of their customers that received any of the latter three audit opinions. A qualified opinion indicates any limitations on the scope of the audit and may describe certain information that could not be verified by the auditor. An adverse opinion indicates gross misstatement in customer's financial statements. An auditor may issue a disclaimer of opinion report where he is unable to express a definite opinion on the financial statements being audited

or choose one of:

- Not Applicable
- Not Available

PEPs (1.3)

(Relates to Advocates)

Q27

Of the total customer base, how many natural persons were PEPs (including family members and close associates), as at the end of the prior calendar year?

Regulation 2(1) of the PMLFTR defines a PEP as a natural person who is or has been entrusted with a prominent public function, other than middle ranking or more junior officials. The PMLFTR The Government Gazette no. 20,602 published on 6 April, 2021 provides an exhaustive list of public functions that are considered to be prominent public functions and would therefore render the holder thereof a PEP. Regulation 11(8) of the PMLFTR defines the term "family members" as including:(i) the spouse, or a person considered to be equivalent to a spouse;(ii) the children and their spouses, or persons considered to be equivalent to a spouse; and(iii) the parents. The list of 'family members' is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered to be similar to those under the indicative list in the PMLFTR. Regulation 11(8) also defines the term "close associates" as:(i) a natural person known to have joint beneficial ownership of a body corporate or any other form of legal arrangement, or any other close business relations, with that politically exposed person;(ii) a natural person who has sole beneficial ownership of a body corporate or any other form of legal arrangement that is known to have been established for the benefit of that politically exposed person.

or choose one of:

- Not Applicable
- Not Available

PEPs (2.3)

(Relates to Advocates)

Q28

Of the total number of customers who are legal entities, how many of their beneficial owners were PEPs (including family members and close associates) as at the end of the prior calendar year?

or choose one of:

- Not Available

PEPs (3)

From the number of PEPs in your customer base, kindly provide a breakdown of:

<p>Q29</p> <p>a) the total number(#) of Maltese PEPs (including beneficial owners), in the prior calendar year</p> <p><i>Regulation 2(1) of the PMLFTR defines a PEP as a natural person who is or has been entrusted with a prominent public function, other than middle ranking or more junior officials. The Government Gazette no. 20,602 published on 6 April, 2021 provides an exhaustive list of public functions that are considered to be prominent public functions and would therefore render the holder thereof a PEP.</i></p> <p><i>Regulation 11(8) of the PMLFTR defines the term "family members" as including:</i></p> <p><i>(i) the spouse, or a person considered to be equivalent to a spouse;</i></p> <p><i>(ii) the children and their spouses, or persons considered to be equivalent to a spouse; and</i></p> <p><i>(iii) the parents.</i></p> <p><i>The list of 'family members' is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered to be similar to those under the indicative list in the PMLFTR. Regulation 11(8) also defines the term "close associates" as:</i></p> <p><i>(i) a natural person known to have joint beneficial ownership of a body corporate or any other form of legal arrangement, or any other close business relations, with that politically exposed person;</i></p> <p><i>(ii) a natural person who has sole beneficial ownership of a body corporate or any other form of legal arrangement that is known to have been established for the benefit of that politically exposed person.</i></p>	<div></div> <p>or choose one of:</p> <ul style="list-style-type: none">• Not Available
<p>Q30</p>	<div></div>

<p>b) the total number (#) of PEPs (including beneficial owners) from EU/EEA jurisdictions (other than Malta), in the prior calendar year</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	<p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available
<p>Q31</p> <p>c) the total number (#) of PEPs (including beneficial owners) from non-EU/EEA jurisdictions, in the prior calendar year</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	<div data-bbox="1045 869 1401 913" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available
<p>Q32</p> <p>d) the total number (#) of PEPs (including beneficial owners) from countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries, in the prior calendar year</p>	<div data-bbox="1045 1305 1401 1350" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available

PEPs (7)

Q33

If your answer to the above question was greater than 0, please select the respective jurisdictions.

[Answer if Q32 is > 0, Not Available]

Choose more than one option:

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria
- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

or choose one of:

- Not Available

Additional (Customers) (2)

Q34

Please list the number of customers who are operating in high-risk industries as per your internal policies and procedures.

Subject persons are required to define their own list of high risk industries and products. For the purpose of responding to this question, subject persons should consider high risk industries to include: productions / trade in war related weapons, productions / trade in radioactive materials, mining, oil and gas, chemical and pharmaceutical industries and adult entertainment. In accordance with S.L. 365.12, dual-use items refer to any used or unused items, including software and technology, which can be used for both civil and military purposes, and including all goods which can be used for both non-explosive uses and for assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices.

or choose one of:

- Not Available

Additional (Customers) (3)

Q35

Please list the number of customers who are operating in dual use items.

In accordance with SL 365.12, dual-use items refers to any used or unused items, including software and technology, which can be used for both civil and military purposes, and including all goods which can be used for both non-explosive uses and for assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices. Dual-use items are to be considered as those designated by the Company's policies and procedures or through the SL 365.12.

or choose one of:

- Not Available

Additional (Customers) (5)

Q36

Please list the number of customers who operate cash intensive businesses.

Cash intensive businesses are businesses which through their operations receive or depend largely on cash- based transactions such as restaurants, petrol stations,

retail stores, parking garages etc.

or choose one of:

- Not Available

Additional (Customers) (12)

Q37

Did your entity have any customers that were re-domiciled or whose economic activity was transferred to a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Additional (Customers) (13)

Q38

Please select the respective jurisdictions.

[Answer if Q37 is Yes]

Choose more than one option:

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar

- 
- Nigeria
 - Panama
 - Philippines
 - Senegal
 - South Sudan
 - Uganda
 - United Arab Emirates
 - Vanuatu
 - Vietnam
 - Yemen
 - Algeria
 - Angola
 - Bulgaria
 - Croatia
 - Haiti
 - Jamaica
 - Kenya
 - South Africa
 - Venezuela
 - Congo, the Democratic Republic of the
 - Cote D'Ivoire
 - Iran, Islamic Republic of
 - Korea, Democratic People's Republic of
 - Lebanon
 - Monaco
 - Namibia
 - Syrian Arab Republic
 - Tanzania, United Republic of
 - Trinidad and Tobago

or choose one of:

- Not Available

Products and Services

Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors or VFA Service Providers

Products and Services (DNFBPs) (1) (Tax Advice.Firms)

Q1

Please specify the number of times your entity provided tax support or planning during the prior calendar year

Products and Services (DNFBPs) (2) (Tax Advice.Firms)

With regards to the number of tax advice services provided during the prior calendar year, specify how many were related to:

Q2 <i>Assistance in relation to succession and estate planning</i> [Answer if Q1 is > 0]	<input type="text"/> or choose one of: <ul style="list-style-type: none">• Not Available
Q3 <i>Advice on corporate reorganisations</i> [Answer if Q1 is > 0] <i>Tax advice shall include but not be limited the advice on the following:</i> <i>(a) advice on corporate reorganisations;</i> <i>(b) advice on transfer/sales of on-going concerns;</i> <i>(c) advice on redomiciliation of entities; and</i> <i>(d) advice on repatriation of assets.</i> <i>The definition of tax advice shall include other form of advice aimed at tax minimisation or tax planning but shall</i>	<input type="text"/> or choose one of: <ul style="list-style-type: none">• Not Available

however exclude the completion of tax returns where no advice is actually provided	
<p>Q4</p> <p>Advice on transfer / sales of on-going concerns</p> <p>[Answer if Q1 is > 0]</p> <p>Tax advice shall include but not be limited the advice on the following:</p> <p>(a) advice on corporate reorganisations;</p> <p>(b) advice on transfer/sales of on-going concerns;</p> <p>(c) advice on redomiciliation of entities; and</p> <p>(d) advice on repatriation of assets.</p> <p>The definition of tax advice shall include other form of advice aimed at tax minimisation or tax planning but shall however exclude the completion of tax returns where no advice is actually provided.</p>	<div></div> <p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available
<p>Q5</p> <p>Advice on redomiciliation of entities</p> <p>[Answer if Q1 is > 0]</p> <p>Tax advice shall include but not be limited the advice on the following:</p> <p>(a) advice on corporate reorganisations;</p> <p>(b) advice on transfer/sales of on-going concerns;</p> <p>(c) advice on redomiciliation of entities; and</p> <p>(d) advice on repatriation of assets.</p> <p>The definition of tax advice shall include other form of advice aimed at tax minimisation or tax planning but shall however exclude the completion of tax returns where no advice is actually provided. Shelf Company: An incorporated company with inactive shareholders, directors, and secretary, which has been left dormant for a longer period.</p>	<div></div> <p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available
<p>Q6</p> <p>Advice on repatriation of assets</p> <p>[Answer if Q1 is > 0]</p>	<div></div> <p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available

<p><i>Tax advice shall include but not be limited the advice on the following:</i></p> <p><i>(a) advice on corporate reorganisations;</i></p> <p><i>(b) advice on transfer/sales of on-going concerns;</i></p> <p><i>(c) advice on redomiciliation of entities; and</i></p> <p><i>(d) advice on repatriation of assets.</i></p> <p><i>The definition of tax advice shall include other form of advice aimed at tax minimisation or tax planning but shall however exclude the completion of tax returns where no advice is actually provided. Shell Company: a company that at the time of incorporation has no significant assets or operations.</i></p>	
<p>Q7</p> <p><i>Tax advice relative to the planning or carrying out of transactions for clients concerning the organisation of contributions necessary for the creation, operation or management of companies</i></p> <p>[Answer if Q1 is > 0]</p>	<input type="text"/>
<p>Q8</p> <p><i>Assisting in the planning or carrying out of transactions for clients concerning the creation, operation or management of companies, trusts, foundations or similar structures, or when acting as a trust or company service provider</i></p> <p>[Answer if Q1 is > 0]</p>	<input type="text"/>

Products and Services (DNFBPs) (5)

From the total number of tax advisory services provided, please specify how many involved:

<p>Q9</p> <p><i>The use of complex structures or the setting up of a complex structure</i></p> <p>[Answer if Q1 is > 0]</p>	<input type="text"/>
<p>Q10</p> <p><i>More than one jurisdiction</i></p> <p>[Answer if Q1 is > 0]</p>	<input type="text"/>

Products and Services (DNFBPs) (11)

Please answer the following questions in relation to the activities performed during the prior calendar year.

Q11

Liquidation of companies, including assisting liquidators in insolvency or winding up proceedings, whether appointed to do so by a court or otherwise

"Assisting liquidators" refers to any AML/CFT relevant activity carried out within the scope of "liquidating a company". For example, if a professional is assisting a liquidator with the sale and purchase of real property, this service should be classified in the REQ as "liquidation of company" as this person is providing the service within the contest of the liquidation of the company. This would fall under the scope of "assisting liquidators in insolvency or winding up proceedings, whether appointed to do so by a court or otherwise".

or choose one of:

- Not Available

Products and Services (DNFBPs) (12)

Please answer the following questions in relation to the activities performed during the prior calendar year.

Q12

Acting on behalf of or assisting in the planning or carrying out of transactions for clients concerning the managing of client money, securities or other assets.

or choose one of:

- Not Available

Products and Services (DNFBPs) (13)

Please answer the following questions in relation to the activities performed during the prior calendar year.

Q13

Acting on behalf of or assisting in the planning or carrying out of transactions for clients concerning the opening or management of bank, savings or securities accounts

or choose one of:

- Not Available

Products and Services (DNFBPs) (14)

Please answer the following questions in relation to the activities performed during the prior calendar year.

Q14

Acting on behalf of or assisting in the planning or carrying out of transactions for clients concerning the organisation of contributions necessary for the creation, operation or management of companies

or choose one of:

- Not Available

Products and Services (DNFBPs) (15)

Please answer the following questions in relation to the activities performed during the prior calendar year.

Q15

Acting on behalf of or assisting in the planning or carrying out of transactions for clients concerning the creation, operation or management of companies, trusts, foundations or similar structures

or choose one of:

- Not Available

Products and Services (DNFBPs) (18)

Please answer the following questions in relation to the activities performed during the prior calendar year.

Q16

Acting on behalf of or assisting in the planning or carrying out of transactions for clients concerning the buying or selling of real estate property or business entities

or choose one of:

- Not Available

Products and Services (DNFBPs) (50)

Q17

Have you been engaged to act on behalf of, or represent a customer during the prior calendar year?

Representations includes through power of attorney and /or power of representation

Choose only one option:

- Yes
- No

De-Risking Risks

Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors or VFA Service Providers

De-Risking Risks (1)

Q1

Were any of the products and/or services provided to you as a subject person, ceased due to de-risking practices during the prior calendar year?

"De-risking" refers to a process being carried out by a Subject Person, which includes terminating or restricting business relationships, to avoid, rather than manage risk.

Choose only one option:

- Yes
- No

De-Risking Risks (2)

Q2

Provide details of the de-risking

[Answer if Q1 is Yes]

Such reasons should explain whether business relationship was entirely terminated or restricted to limited services.

Jurisdiction Risk.

Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors

Residence of Customers + BOs (1)

As at the end of the prior calendar year, what is the total number (#) of customers that are resident, or otherwise, incorporated or have their principal place of business in:

Q1	<input type="text"/>
a) Malta?	
Q2	
b) an EU/EEA jurisdiction, excluding Malta?	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q3	
c) an non-EU/EEA jurisdiction?	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q4	
d) a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?	<input type="text"/>
Q5	Choose more than one

Please choose the applicable countries identified under the option:
 FATF 'High Risk Jurisdictions Subject to a Call for Action'
 and 'Jurisdictions Under Increased Monitoring' and the EU
 Commission Delegated Acts on High Risk Third Countries.

[Answer if Q4 is > 0]

- Afghanistan
- Algeria
- Angola
- Barbados
- Bulgaria
- Burkina Faso
- Cameroon
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Croatia
- Gibraltar
- Haiti
- Iran, Islamic Republic of
- Jamaica
- Kenya
- Korea, Democratic People's Republic of
- Lebanon
- Mali
- Monaco
- Mozambique
- Myanmar
- Namibia
- Nigeria
- Panama
- Philippines
- Senegal
- South Africa
- South Sudan
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago
- Uganda
- United Arab Emirates
- Vanuatu
- Venezuela
- Vietnam
- Yemen

Q6

Afghanistan

[Answer if Q5 is Afghanistan]	
Q7	
Algeria	<input type="text"/>
[Answer if Q5 is Algeria]	
Q8	
Angola	<input type="text"/>
[Answer if Q5 is Angola]	
Q9	
Barbados	<input type="text"/>
[Answer if Q5 is Barbados]	
Q10	
Bulgaria	<input type="text"/>
[Answer if Q5 is Bulgaria]	
Q11	
Burkina Faso	<input type="text"/>
[Answer if Q5 is Burkina Faso]	
Q12	
Cameroon	<input type="text"/>
[Answer if Q5 is Cameroon]	
Q13	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q5 is Congo, the Democratic Republic of the]	
Q14	
Cote D'Ivoire	<input type="text"/>
[Answer if Q5 is Cote D'Ivoire]	
Q15	
Croatia	<input type="text"/>
[Answer if Q5 is Croatia]	
Q16	
Gibraltar	<input type="text"/>
[Answer if Q5 is Gibraltar]	

Q17 <i>Haiti</i> [Answer if Q5 is Haiti]	<input type="text"/> <input type="text"/>
Q18 <i>Iran, Islamic Republic of</i> [Answer if Q5 is Iran, Islamic Republic of]	<input type="text"/> <input type="text"/>
Q19 <i>Jamaica</i> [Answer if Q5 is Jamaica]	<input type="text"/> <input type="text"/>
Q20 <i>Kenya</i> [Answer if Q5 is Kenya]	<input type="text"/> <input type="text"/>
Q21 <i>Korea, Democratic People's Republic of</i> [Answer if Q5 is Korea, Democratic People's Republic of]	<input type="text"/> <input type="text"/>
Q22 <i>Lebanon</i> [Answer if Q5 is Lebanon]	<input type="text"/> <input type="text"/>
Q23 <i>Mali</i> [Answer if Q5 is Mali]	<input type="text"/> <input type="text"/>
Q24 <i>Monaco</i> [Answer if Q5 is Monaco]	<input type="text"/> <input type="text"/>
Q25 <i>Mozambique</i> [Answer if Q5 is Mozambique]	<input type="text"/> <input type="text"/>
Q26 <i>Myanmar</i> [Answer if Q5 is Myanmar]	<input type="text"/> <input type="text"/>
Q27	<input type="text"/>

Namibia	
[Answer if Q5 is Namibia]	
Q28	
Nigeria	<input type="text"/>
[Answer if Q5 is Nigeria]	
Q29	
Panama	<input type="text"/>
[Answer if Q5 is Panama]	
Q30	
Philippines	<input type="text"/>
[Answer if Q5 is Philippines]	
Q31	
Senegal	<input type="text"/>
[Answer if Q5 is Senegal]	
Q32	
South Africa	<input type="text"/>
[Answer if Q5 is South Africa]	
Q33	
South Sudan	<input type="text"/>
[Answer if Q5 is South Sudan]	
Q34	
Syrian Arab Republic	<input type="text"/>
[Answer if Q5 is Syrian Arab Republic]	
Q35	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q5 is Tanzania, United Republic of]	
Q36	
Trinidad and Tobago	<input type="text"/>
[Answer if Q5 is Trinidad and Tobago]	
Q37	<input type="text"/>
Uganda	

[Answer if Q5 is Uganda]	
Q38	
United Arab Emirates	<input type="text"/>
[Answer if Q5 is United Arab Emirates]	
Q39	
Vanuatu	<input type="text"/>
[Answer if Q5 is Vanuatu]	
Q40	
Venezuela	<input type="text"/>
[Answer if Q5 is Venezuela]	
Q41	
Vietnam	<input type="text"/>
[Answer if Q5 is Vietnam]	
Q42	
Yemen	<input type="text"/>
[Answer if Q5 is Yemen]	

Residence of Customers + BOs (2)

Please specify the total number of customers' BOs that are resident in:

Q43	<input type="text"/>
a) Malta?	or choose one of: <ul style="list-style-type: none"> • Not Available
Q44	<input type="text"/>
b) an EU/EEA jurisdiction, excluding Malta? <i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on</i>	or choose one of: <ul style="list-style-type: none"> • Not Available

<p><i>High Risk Third Countries". This list is as at 31 December 2024.</i></p>	
<p>Q45</p> <p>c) an non-EU/EEA jurisdiction?</p> <p><i>Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.</i></p> <p><i>Principal place of business refers to the place where key management and commercial decisions that are necessary for the conduct of the business of an entity are made.</i></p>	<div data-bbox="1045 344 1394 389" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available
<p>Q46</p> <p>d) a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?</p>	<div data-bbox="1045 651 1394 696" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> • Not Available
<p>Q47</p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q46 is > 0]</p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama

	<ul style="list-style-type: none"> • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q48 <i>Afghanistan</i> [Answer if Q47 is Afghanistan]	<input type="text"/> <input type="text"/>
Q49 <i>Algeria</i> [Answer if Q47 is Algeria]	<input type="text"/> <input type="text"/>
Q50 <i>Angola</i> [Answer if Q47 is Angola]	<input type="text"/> <input type="text"/>
Q51 <i>Barbados</i> [Answer if Q47 is Barbados]	<input type="text"/> <input type="text"/>
Q52 <i>Bulgaria</i> [Answer if Q47 is Bulgaria]	<input type="text"/> <input type="text"/>
Q53 <i>Burkina Faso</i> [Answer if Q47 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q54 <i>Cameroon</i>	<input type="text"/> <input type="text"/>

[Answer if Q47 is Cameroon]	
Q55	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q47 is Congo, the Democratic Republic of the]	
Q56	
Cote D'Ivoire	<input type="text"/>
[Answer if Q47 is Cote D'Ivoire]	
Q57	
Croatia	<input type="text"/>
[Answer if Q47 is Croatia]	
Q58	
Gibraltar	<input type="text"/>
[Answer if Q47 is Gibraltar]	
Q59	
Haiti	<input type="text"/>
[Answer if Q47 is Haiti]	
Q60	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q47 is Iran, Islamic Republic of]	
Q61	
Jamaica	<input type="text"/>
[Answer if Q47 is Jamaica]	
Q62	
Kenya	<input type="text"/>
[Answer if Q47 is Kenya]	
Q63	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q47 is Korea, Democratic People's Republic of]	
Q64	<input type="text"/>
Lebanon	

[Answer if Q47 is Lebanon]	
Q65	
Mali	<input type="text"/>
[Answer if Q47 is Mali]	
Q66	
Monaco	<input type="text"/>
[Answer if Q47 is Monaco]	
Q67	
Mozambique	<input type="text"/>
[Answer if Q47 is Mozambique]	
Q68	
Myanmar	<input type="text"/>
[Answer if Q47 is Myanmar]	
Q69	
Namibia	<input type="text"/>
[Answer if Q47 is Namibia]	
Q70	
Nigeria	<input type="text"/>
[Answer if Q47 is Nigeria]	
Q71	
Panama	<input type="text"/>
[Answer if Q47 is Panama]	
Q72	
Philippines	<input type="text"/>
[Answer if Q47 is Philippines]	
Q73	
Senegal	<input type="text"/>
[Answer if Q47 is Senegal]	
Q74	
South Africa	<input type="text"/>
[Answer if Q47 is South Africa]	
Q75	<input type="text"/>

South Sudan	
[Answer if Q47 is South Sudan]	
Q76	
Syrian Arab Republic	<input type="text"/>
[Answer if Q47 is Syrian Arab Republic]	
Q77	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q47 is Tanzania, United Republic of]	
Q78	
Trinidad and Tobago	<input type="text"/>
[Answer if Q47 is Trinidad and Tobago]	
Q79	
Uganda	<input type="text"/>
[Answer if Q47 is Uganda]	
Q80	
United Arab Emirates	<input type="text"/>
[Answer if Q47 is United Arab Emirates]	
Q81	
Vanuatu	<input type="text"/>
[Answer if Q47 is Vanuatu]	
Q82	
Venezuela	<input type="text"/>
[Answer if Q47 is Venezuela]	
Q83	
Vietnam	<input type="text"/>
[Answer if Q47 is Vietnam]	
Q84	
Yemen	<input type="text"/>
[Answer if Q47 is Yemen]	

Residence of Customers + BOs (5)

Q85

Please select the respective jurisdictions.

[Answer if Q46 is > 0, Not Available]

Choose more than one option:

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria
- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

or choose one of:

- Not Available

Residence of Customers + BOs (6)

Q86

Do any of the customers making part of the customer base provide goods and/or services (main markets) in, or to, a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Residence of Customers + BOs (7)

Q87

Please select the respective jurisdictions.

[Answer if Q86 is Yes]

Choose more than one option:

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria

- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

or choose one of:

- Not Available

Jurisdiction Risk (207)

(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)

Q88

Does your entity have establishments by means of subsidiaries in EU or non-EU jurisdictions offering relevant financial business and/or relevant activity in terms of Regulation 2 of the PMLFTR?

Choose only one option:

- No
- Yes Relevant Financial Business
- Yes Relevant Activity
- Yes both

Jurisdiction Risk (208)

(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)

Q89

Please provide the number of subsidiaries per jurisdiction

[Answer if Q88 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (209)

(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)

Q90

Does your entity have establishments by means of branches in EU or non-EU jurisdictions offering relevant financial business and/or relevant activity in terms of Regulation 2 of the PMLFTR?

Choose only one option:

- No
- Yes Relevant Financial Business
- Yes Relevant Activity
- Yes both

Jurisdiction Risk (210)

(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)

Q91

Please provide the number of branches per jurisdiction

[Answer if Q90 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (211)

(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)

Q92

Is there any other entity (apart from subsidiaries or branches) within the group of companies in which your entity forms part, which carries out Relevant Financial Business and/or Relevant Activity in terms of Regulation 2 of the PMLFTR?

Choose only one option:

- No
- Yes Relevant Financial Business
- Yes Relevant Activity
- Yes both

Jurisdiction Risk (212)

(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)

Q93

Please provide the number of other entities (apart from subsidiaries or branches) per jurisdiction

[Answer if Q92 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable



Interface / Distribution Channels

Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors or VFA Service Providers

Interface / Distribution Channels (9)

Please list the total number (#) of customers that were onboarded:

Q1 a) face-to-face during the prior calendar year? <i>Onboarded on a face-to-face basis refers to the cases when the customer is physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group, but not by the subject person, the relationship is to be considered as non-face-to-face - since the subject person did not meet the client (or its agent) for verification purposes.</i>	<input type="text"/>
Q2 b) on a non-face-to-face basis, during the prior calendar year? <i>Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group but not by the subject person, the relationship is to be considered as non-face-to-face - since the subject person did not meet the client (or its agent) for verification purposes.</i>	<input type="text"/>

Interface / Distribution Channels (5)

Q3

Of those customers who are legal persons, and who were onboarded and/or serviced on a non-face-to-face basis in the prior calendar year, indicate whether the majority are incorporated in Malta, within EU/EEA or outside EU/EEA jurisdictions?

Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes.

Choose only one option:

- Majority of non-face-to-face customers are incorporated in Malta
- Majority of non-face-to-face customers are incorporated within the EU or EEA
- Majority of non-face-to-face customers are incorporated outside the EU or EEA

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (6)

Q4

Of those customers who are natural persons and who were onboarded / serviced on a non-face-to-face basis in the prior calendar year, indicate whether the majority of customers are resident in Malta, within EU/EEA or outside EU/EEA?

Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes.

Choose only one option:

- Majority of non-face-to-face customers are residents in Malta
- Majority of non-face-to-face customers are residents within the EU or EEA
- Majority of non-face-to-face customers are residents outside the EU or EEA

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (8)

Q5

Please state the total number (#) of customers onboarded during the prior calendar year, where a reliance arrangement was in place in terms of Regulation 12 of the PMLFTR

Third parties may be used by a subject person during the onboarding process of its customers. Some examples of how third parties may be used include: a) reliance on the CDD measures of another subject person or third party; b) use of third party software to carry out some aspects of identity verification; c) outsourcing any part of identity verification to a third party. A third party refers to a natural person that is not in the direct employment of the entity or to a legal person that is not connected to the

subject person either as part of the same group or through common beneficial owners

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (21)

Q6

What is the % of customers that were introduced by either an agent, broker, and/or introducer from a jurisdiction listed in countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?

Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.

Interface / Distribution Channels (23)

Q7

If the answer to the above question is greater than 0, please select the respective jurisdictions.

[Answer if Q6 is > 0]

Choose more than one option:

- Afghanistan
- Barbados
- Burkina Faso

- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria
- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

Customer Acceptance and Risk Assessment (39)

Q8

Were new clients acquired through an introducer/s in the prior calendar year?

The term introducer refers to an individual / entity that introduces a customer/s to a subject person. The introducer does not represent or act on behalf of the customer. The relationship between an introducer and the subject person may or may not be governed by an agreement. The subject person may remunerate (e.g. commission/finders fee) for their service. An official or an employee of the subject person is not an introducer. Furthermore, group entities that introduce customers to other entities within the same group are not to be considered as introducers.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (43)

Q9

If yes, please indicate the number of introducers used during the prior calendar year.

[Answer if Q8 is Yes]

The term introducer refers to an individual / entity that introduces a customer/s to a subject person. The introducer does not represent or act on behalf of the customer. The relationship between an introducer and the subject person may or may not be governed by an agreement. The subject person may remunerate (e.g. commission/finders fee) for their service. An official or an employee of the subject person is not an introducer. Furthermore, group entities that introduce customers to other entities within the same group are not to be considered as introducers.

or choose one of:

- Not Applicable
- Not Available

MLRO, Monitoring Function and Employees

MLRO, Monitoring Function and Employees (1)

Q1

How many years of experience does the MLRO have in AML/CFT?

Choose only one option:

- 1 month - 1 year
- 1 - 2 years
- 2 - 3 years
- 3 - 5 years
- 5 - 7 years
- 8 - 10 years
- over 10 years

MLRO, Monitoring Function and Employees (2)

Q2

How many hours do you dedicate to the MLRO function on a weekly basis?

Choose only one option:

- 0 - 10 hours
- 11 - 20 hours
- 21 - 30 hours
- 31 - 40 hours

MLRO, Monitoring Function and Employees (3)

Q3

Is the MLRO responsible for other areas other than AML/CFT within the entity?

Choose only one option:

- Yes
- No

MLRO, Monitoring Function and Employees (4)

Q4

Please provide a description of the other areas of responsibility.

[Answer if Q3 is Yes]

MLRO, Monitoring Function and Employees (8)

Q5

Does the MLRO have a direct reporting line to the Board of Directors?

Choose only one option:

- Yes
- No

MLRO, Monitoring Function and Employees (9)

Q6

Has the entity appointed an officer at management level to monitor the day-to-day implementation of the AML/CFT measures, policies, controls and procedures adopted by the entity?

Choose only one option:

- No
- Yes - The function is carried out by the MLRO
- Yes - The function is carried out by a person who is not also acting as the entity's MLRO

MLRO, Monitoring Function and Employees (10)

Q7

On average, how many years of experience in the industry does the director(s) and/or senior management of your entity have?

MLRO, Monitoring Function and Employees (11)

Q8

How many staff members expressed in full time equivalent (FTE) are part of the AML/CFT team (if one exists)?

Employment in full-time equivalent ("FTE") is a conversion method used to measure the number of employees according to the number of hours worked. When using FTE, a full-time employee working a 40 hour week is equivalent to 1, whereas a person who works 20 hours per week is equivalent to 0.5. Self employed should be included in the FTEs calculation.

MLRO, Monitoring Function and Employees (12)

Q9

How many staff members in the AML/CFT team expressed in full time equivalent (FTE) are also responsible for other roles and responsibilities not attributable to AML/CFT (e.g. front office / back office etc.)?

[Answer if Q8 is > 0]

Employment in full-time equivalent ("FTE") is a conversion method used to measure the number of employees according to the number of hours worked. When using FTE, a full-time employee working a 40 hour week is equivalent to 1, whereas a person who works 20 hours per week is equivalent to 0.5. Self employed should be included in the FTEs calculation.

MLRO, Monitoring Function and Employees (24)

Q10

How often does your entity assess the conduct and integrity of employees (including partners or directors) handling relevant financial business and/or relevant activity?

Choose only one option:

- At onboarding only
- At onboarding and at least yearly
- Not assessed

MLRO, Monitoring Function and Employees (14)

Q11

In the past five (5) years, were any employees (including directors and partners) disciplined for non-compliance with the AML/CFT policies and procedures?

Choose only one option:

- Yes
- No

Q12

If 'Yes', please explain.

[Answer if Q11 is Yes]

Business Risk Assessment

Business Risk Assessment (11)

Q1

What is your entity's most recent inherent risk scoring or rating for ML/FT in the Business Risk Assessment (BRA)?

When the risk classification in the BRA does not align with the risk classification listed in the options provided, please convert the risk category accordingly and select the option which most closely reflect the risk classification in the BRA.

Choose only one option:

- Low
- Lower Medium
- Higher Medium
- High
- Very High
- BRA not carried out

Business Risk Assessment (30)

Q2

What is your entity's most recent BRA controls effectiveness rating?

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

When the risk classification in the BRA does not align with the risk classification listed in the options provided, please convert the risk category accordingly and select the option which most closely reflect the risk classification in the BRA.

Choose only one option:

- Low
- Lower medium
- Higher medium
- High
- Very high
- Control Effectiveness not rated

Business Risk Assessment (13)

Q3

What is your entity's most recent residual risk scoring or rating for ML/FT in the BRA?

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

When the risk classification in the BRA does not align with the risk classification listed in the options provided, please convert the risk category accordingly and select the option which most closely reflect the risk classification in the BRA.

Choose only one option:

- Low
- Lower Medium
- Higher Medium
- High
- Very High
- Residual risk not rated

Business Risk Assessment (14)

Q4

What are the 3 highest customer risk factors resulting from the BRA?

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

Business Risk Assessment (15)

Q5

What are the 3 highest product/service/transaction risk factors resulting from the BRA?

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

Business Risk Assessment (16)

Q6

What are the 3 highest geographical risk factors resulting from the BRA?

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

Business Risk Assessment (31)

Q7

Please indicate the jurisdictions which your entity considers as high risk

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

Exclude jurisdictions considered as Non-Reputable in terms of Chapter 8 of the Implementing Procedures as at the end of the prior calendar year.

Business Risk Assessment (18)

Q8

What are the 3 highest interface risk factors resulting from the BRA?

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

Business Risk Assessment (19)

Q9

Did your entity review and/or update the BRA in the prior calendar year?

[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]

Choose only one option:

- Yes
- No



Customer Acceptance and Risk Assessment

Customer Acceptance and Risk Assessment (94)

Q1

Has there been a review of your entity's Customer Acceptance Policy (CAP) in the prior calendar year?

Choose only one option:

- Yes
- No
- CAP Not Available

Customer Acceptance and Risk Assessment (95)

Q2

Did this review result in major changes?

[Answer if Q1 is Yes]

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (96)

Q3

Please explain these changes.

[Answer if Q2 is Yes]

Customer Acceptance and Risk Assessment (123)

Q4

According to your entity's CAP, which customers are likely to pose a higher than average risk of ML/FT?

[Answer if Q1 is Yes, No]

Choose "Not Available" if information cannot be provided.

or choose one of:

- Not Available

Customer Acceptance and Risk Assessment (98)

Q5

As at end of the last calendar year, how many customers fell outside the CAP but were provided with services, (including those that were subject to management approval)?

[Answer if Q1 is Yes, No]

Customer Acceptance and Risk Assessment (99)

Q6

Is there a documented Customer Risk Assessment (CRA) methodology?

Choose only one option:

- Yes
- No
- CRA Methodology Not Available

Customer Acceptance and Risk Assessment (100)

Q7

List the 5 risk factors that have the highest risk weighting when carrying out the CRA.

[Answer if Q6 is Yes]

Customer Acceptance and Risk Assessment (101)

Q8

In the case where an introducer, intermediary, broker or agent, was used to onboard customers during the previous calendar year, was Customer Due Diligence (CDD) performed on such?

Choose only one option:

- Yes
- Yes - most of the times
- Yes - sometimes
- No
- N/A (no intermediaries, etc, are used)

Customer Acceptance and Risk Assessment (102)

Q9

How many customers are included in the entity's customer portfolio, where CDD has not been completed, but activity has begun or is completed?

Customer Acceptance and Risk Assessment (103)

Q10

How many potential customers were refused onboarding for ML/FT reasons during the prior calendar year?

Customer Acceptance and Risk Assessment (104)

Q11

What were the main reasons why potential customers were refused onboarding for ML/FT reasons?

[Answer if Q10 is > 0]

Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

Q12 a) Low risk customers [Answer if Q6 is Yes]	<i>Choose only one option:</i> <ul style="list-style-type: none">• Trigger event based• At least annually• Every 13 - 23 months• Every 2 - 3 years• More than every 3 years• Never• Not applicable
Q13 b) Medium risk customers [Answer if Q6 is Yes]	<i>Choose only one option:</i> <ul style="list-style-type: none">• Trigger event based• At least annually• Every 13 - 23 months• Every 2 - 3 years• More than every 3 years• Never• Not applicable
Q14 c) High risk customers	<i>Choose only one option:</i> <ul style="list-style-type: none">• Trigger event based

[Answer if Q6 is Yes]	<ul style="list-style-type: none"> • At least annually • Every 13 - 23 months • Every 2 - 3 years • More than every 3 years • Never • Not applicable
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Customer Acceptance and Risk Assessment (106)

Q15

How many clients and/or business relationships were terminated during the last calendar year due to de-risking practices?

Answer should NOT include customers who were transferred or sold to another gaming company or shifted onto another licence held by the Company.

Customer Acceptance and Risk Assessment (107)

Q16

What was the reason for the de-risking exercise?

[Answer if Q15 is > 0]

Customer Acceptance and Risk Assessment (108)

Q17

How many business relationships were terminated, blocked, suspended or were otherwise, provided limited services for ML/FT related reasons (apart from de-risking reasons), during the prior calendar year?

The answer should include all customers (not only the ones who had reached the two thousand (€2,000) threshold in deposits.



Policies & Procedures

Policies and Procedures (36)

Q1

How frequently does your entity review and/or update the entity's AML/CFT written policies and procedures?

Choose only one option:

- No written AML/CFT policies and procedures
- No reviews and updates are carried out
- Monthly basis
- Quarterly basis
- Half yearly
- Yearly
- Every 2 years
- Over 2 years

Policies and Procedures (37)

Q2

How do you determine whether customers and, where applicable their beneficial owners, are politically exposed persons (PEPs) or PEPs' family members or close associates?

Choose more than one option:

- No checks carried out
- Declaration by customer
- Automated tools
- Public searches
- Checks are outsourced

Policies and Procedures (38)

Q3

How do you determine whether individuals/entities are sanctioned?

Choose more than one option:

- No checks carried out
- Declaration by customer
- Automated tools
- Public searches
- Checks are outsourced

Policies and Procedures (39)

Q4

If there is use of intermediaries, brokers, agents, distributors, and/or introducers, does your entity have policies and procedures in place to assess their AML/CFT compliance framework?

Choose only one option:

- Yes
- No
- Not applicable (no intermediaries, etc, are used)

Policies and Procedures (40)

Q5

Does your entity have internal whistleblowing procedures?

Choose only one option:

- Yes
- No
- Not applicable

Q6

If not applicable, please explain why.

[Answer if Q5 is Not applicable]

Policies and Procedures (41)

Q7

Does your entity have an independent audit function to test the AML/CFT internal measures, policies, controls and procedures?

Choose only one option:

- No
- Yes - The function is carried out in-house
- Yes - The function is outsourced

Policies and Procedures (42)

Q8

What is the frequency of audits carried out by the independent audit function to assess compliance with the AML/CFT regulations ?

[Answer if Q7 is Yes - The function is carried out in-house, Yes - The function is outsourced]

Choose only one option:

- Monthly
- Quarterly
- Half yearly
- Yearly
- Every 2 years
- Over 2 years
- Never

Policies and Procedures (43)

Q9

When was the last independent audit performed, in regards to compliance with the AML/CFT regulations?

[Answer if Q7 is Yes - The function is carried out in-house, Yes - The function is outsourced]

Choose only one option:

- 1 month ago
- 2 - 3 months ago
- 4 - 6 months ago
- 7 - 12 months ago
- 1 - 2 years ago
- Over 2 years ago
- Internal audit not yet performed

Policies and Procedures (44)

Q10

What was the overall result of the last AML/CFT independent audit carried out?

[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago, Over 2 years ago]

Choose only one option:

- Satisfactory
- Satisfactory but minor improvements required
- Satisfactory but material improvements required
- Unsatisfactory

Policies and Procedures (45)

Q11

List the 3 main "high risk" audit issues that were identified in the AML/CFT independent audit reports issued in the past 2 calendar years.

[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]

Policies and Procedures (46)

Q12

List the 3 main "medium risk" audit issues that were identified in the AML/CFT independent audit reports issued in the past 2 calendar years.

[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]

Policies and Procedures (47)

Q13

What topics were subject to an AML/CFT independent audit in the past 2 calendar years?

[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]

Choose more than one option:

- Business risk assessment
- Customer risk assessment procedures
- Customer and beneficial ownership identification and verification
- Purpose and intended nature of business relationship
- Ongoing monitoring
- AML/CFT Governance
- Others

Policies and Procedures (48)

Q14

If others, explain

[Answer if Q13 is Others]



Outsourcing

Outsourcing (1)

Q1

Has your entity outsourced the carrying out of any applicable AML/CFT obligations?

Choose only one option:

- Yes, outsourcing within the group
- Yes, outsourcing outside the group
- No outsourcing being carried out

Outsourcing (2)

Q2

List the service provider/s to whom AML/CFT obligations have been outsourced.

[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]

Outsourcing (3)

Q3

Please specify the obligations that are being outsourced.

[Answer if Q1 is Yes, outsourcing outside the group]

Choose more than one option:

- Drafting of BRA
- CRA
- CDD - PMLFTR Reg 7(1)(a) and 7(1)(b)
- CDD - PMLFTR Reg 7(1)(c)
- CDD - PMLFTR Reg 7(2)(a)
- CDD - PMLFTR Reg 7(2)(b)
- Record-Keeping

- Drafting of policies and procedures
- MLRO function

Outsourcing (4)

Q4

Please specify the obligations that are being outsourced.

[Answer if Q1 is Yes, outsourcing within the group]

Choose more than one option:

- Drafting of BRA
- CRA
- CDD - PMLFTR Reg 7(1)(a) and 7(1)(b)
- CDD - PMLFTR Reg 7(1)(c)
- CDD - PMLFTR Reg 7(2)(a)
- CDD - PMLFTR Reg 7(2)(b)
- Record-Keeping
- Drafting of policies and procedures
- MLRO function

Outsourcing (5)

Q5

What is the frequency of assessing the quality of the services provided?

[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]

Choose only one option:

- No assessments are carried out
- Approximately on a daily basis
- Weekly or bi-weekly basis
- Monthly basis
- Quarterly basis
- Half yearly
- Yearly
- Every 2 years
- Over 2 years

Outsourcing (6)

Please indicate the jurisdictions where the service provider/s to whom you have outsourced are located.

<p>Q6</p> <p>Malta</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q7</p> <p>EU/EEA (Excluding Malta)</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q8</p> <p>Non-EU/Non-EEA</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q9</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No

<p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</p>	
<p>Q10</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q9 is Yes]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan

- 
- | | |
|--|---|
| | <ul style="list-style-type: none">• Syrian Arab Republic• Tanzania, United Republic of• Trinidad and Tobago• Uganda• United Arab Emirates• Vanuatu• Venezuela• Vietnam• Yemen |
|--|---|

Record-keeping

Record-keeping (1)

Q1

Are records relating to CDD measures applied on customers retained physically or in electronic format?

Choose only one option:

- Physically
- Electronic format
- Both physically and in electronic format



Training

Training (1)

Q1

Please provide the % of board members that completed AML/CFT training throughout the prior calendar year.

Training (2)

Q2

Please provide the % of senior management members that completed AML/CFT training throughout the prior calendar year.

Training (3)

Q3

Please provide the % of staff within the AML/CFT compliance team that completed AML/CFT training throughout the prior calendar year.

[Answer if Q8 is > 0]

or choose one of:

- Not Applicable

Training (10)

Q4

Please provide the % of members of staff involved in the activities that fall within the definition of 'relevant financial business' and/or 'relevant activity' that completed AML/CFT training throughout the prior calendar year.

or choose one of:

- Not Applicable

Training (5)

Where AML/CFT operational tasks are being outsourced, have the service provider's staff, received training during the previous calendar year in relation to:

Q5 <i>Specific Maltese AML/CFT regulations (PMLA, PMLFTR, IPs)</i> [Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]	Choose only one option: <ul style="list-style-type: none">• Yes• No
Q6 <i>AML/CFT policies and procedures relating to the subject person</i> [Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]	Choose only one option: <ul style="list-style-type: none">• Yes• No

Training (7)

Q7

Does your entity provide AML/CFT training to brokers, agents and/or intermediaries, to ensure that they have an adequate understanding of relevant ML/FT risks, and on the AML/CFT policies and procedures mandated by your entity?

Choose only one option:

- Yes
- No
- N/A (no intermediaries, etc, are used)

Reporting

Reporting (15)

Q1

How many internal suspicious activity/transactions reports (SARs/STRs) were raised during the previous calendar year?

Reporting (16)

Q2

From the internal SARs/STRs raised in the previous calendar year, how many cases were still open as at end of January of the current calendar year?

[Answer if Q1 is > 0]

Reporting (17)

Q3

How many internal SARs/STRs drawn up during the prior calendar year were closed off without submitting a SAR/STR to the FIAU?

[Answer if Q1 is > 0]

Reporting (18)

Q4

How many customers were subject to a request for information from Maltese authorities during the prior calendar year?

Reporting (19)

Q5

How many customers were subject to a request for information from foreign authorities during the prior calendar year?



Ongoing monitoring (data, documents and information)

Ongoing monitoring (Data, documents and information) (1)

Where a business relationship is established, how frequently are the customers and/or related parties subject to a review and update of information?

Q1 a) High Risk Customers	<i>Choose only one option:</i> <ul style="list-style-type: none">• Trigger event based• At least annually• Every 13 - 23 months• Every 2 - 3 years• More than every 3 years• Never
Q2 b) Medium Risk Customers	<i>Choose only one option:</i> <ul style="list-style-type: none">• Trigger event based• At least annually• Every 13 - 23 months• Every 2 - 3 years• More than every 3 years• Never
Q3 c) Low Risk Customers	<i>Choose only one option:</i> <ul style="list-style-type: none">• Trigger event based• At least annually• Every 13 - 23 months• Every 2 - 3 years• More than every 3 years• Never

Ongoing monitoring (Data, documents and information) (2)

Q4

Through what means are customers and/or beneficial owners subject to periodic adverse media screening?

Choose more than one option:

- a) No checks carried out
- b) Automated tools
- c) Public searches
- d) Checks are outsourced

Ongoing monitoring (Data, documents and information) **(3)**

Q5

How many business relationships were due for review during the previous calendar year, but are still pending review as at end of January of this calendar year?

Ongoing monitoring (Transaction Scrutiny)

Ongoing monitoring (Transaction Scrutiny) (5)

Q1

Does your entity have a documented methodology for transaction monitoring, where a business relationship is present?

Choose only one option:

- Yes
- No

Ongoing monitoring (Transaction Scrutiny) (49)

Q2

Please provide the total number of customers who had and/or have assets frozen, confiscated or seized (due to AML/CFT considerations)?

or choose one of:

- Not Applicable