



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.

Product Risk

Product Risk (261)

(Relates to Company Service Providers)

Q1

Please indicate the type of licence authorised by the Malta Financial Services Authority that your entity holds:

Choose only one option:

- Class A CSP
- Class B CSP
- Class C CSP

Product Risk (262)

(Relates to Company Service Providers)

Q2

Out of the following, please tick the products and services that have been offered by your entity/you during the previous calendar year

Acting as director, company secretary refers to the provisions of acting as, or arranging for another person to act as director or secretary of a company, a partner in a partnership or in a similar position in relation to other legal entities

Choose more than one option:

- Formation of companies or other legal entities
- Provision of a registered office
- Acting or arranging others to act as director, company secretary etc.

Product Risk (263)

(Relates to Company Service Providers)

Q3

Were any of the products and/or services provided to your entity (as a subject person), ceased due to de-risking practices during the previous calendar year?

Choose only one option:

- Yes
- No

Product Risk (264)

(Relates to Company Service Providers)

Q4

Provide details of the de-risking.

[Answer if Q3 is Yes]

Product Risk (265)

(Relates to Company Service Providers)

Q5

Please indicate the total number of companies or other legal entities or arrangements that your entity formed during the previous calendar year.

[Answer if Q2 is Formation of companies or other legal entities]

Product Risk (266)

(Relates to Company Service Providers)

Q6

With respect to companies or other legal entities or arrangements formation services that your entity provided during the previous calendar year, how many of such services were provided in isolation? (i.e., no other relevant activity was provided following company formation)

[Answer if Q5 is > 0]

Product Risk (267)

(Relates to Company Service Providers)

Q7

Please indicate the total number of customers to whom your entity provided registered office, business correspondence or administrative address services as at end of the previous calendar year.

[Answer if Q2 is Provision of a registered office]

Product Risk (268)

(Relates to Company Service Providers)

Q8

With respect to companies or other legal entities to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year, how many of such services were provided in isolation? (i.e., no other relevant activity was provided)

[Answer if Q7 is > 0]

Product Risk (269)

(Relates to Company Service Providers)

Q9

Please indicate the total number of customers to whom registered office, a business correspondence or administrative address and other related services were provided as at the end of the previous calendar year with whom your entity lost contact, or where the customer became unresponsive.

[Answer if Q7 is > 0]

Product Risk (270)

(Relates to Company Service Providers)

Q10

Please indicate the total number of customers as at the end of the previous calendar year for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position .

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (271)

(Relates to Company Service Providers)

Q11

Please list details (name, surname and I.D. Card Number) of the Company's officers or employees who have been appointed to act as company secretary or in a similar position in client entities.

[Answer if Q10 is > 0]

Product Risk (272)

(Relates to Company Service Providers)

Q12

Please indicate the total number of directorship positions held for customers during the previous calendar year.

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (273)

(Relates to Company Service Providers)

Q13

Please indicate the total number of arrangements for another person to act as director, a partner in a partnership or in a similar position in relation to other client entities during the previous calendar year.

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (274)

(Relates to Company Service Providers)

In respect of director roles held or arranged for another person to hold such role, please indicate the following:

Q14

Number of customers as at the end of the previous calendar year, where the director is solely or jointly vested with the legal and judicial representation of the company

<p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	
<p>Q15</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is vested with the legal and judicial representation of the company, but where legal and judicial representation is vested in different directors acting individually</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input data-bbox="1045 398 1394 439" type="text"/>
<p>Q16</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the company</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input data-bbox="1045 719 1394 759" type="text"/>
<p>Q17</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the customer, however, he was authorised through a board resolution or power of attorney to open/manage customer's bank/payment account</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input data-bbox="1045 1059 1394 1099" type="text"/>
<p>Q18</p> <p><i>Number of customers as at the end of the previous calendar year, for whom provision of directorship services includes having signatory right on customers' bank or payment accounts</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input data-bbox="1045 1417 1394 1458" type="text"/>
<p>Q19</p> <p><i>Number of customers where power of attorney authorisations or board of directors resolutions have been granted to a third party to open and/or manage customers' bank/payment accounts during the previous calendar year</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input data-bbox="1045 1738 1394 1778" type="text"/>

Product Risk (275)

(Relates to Company Service Providers)

Q20

Please list details (name, surname and I.D. Card Number) of the Company's officers or employees who have been appointed to act as director in customers entities or in a similar position.

[Answer if Q12 is > 0]

Product Risk (276)

(Relates to Company Service Providers)

Q21

Please indicate how many customers to whom your entity provided directorship services or arranged for another person to act as director of a company, a partner in a partnership or in a similar position, who did not have their own bank/payment/crypto account as at the end of the previous calendar but instead used your entity's clients account.

Product Risk (278)

(Relates to Company Service Providers)

Q22

Please indicate the number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, whose assets were frozen, confiscated or seized (due to ML/FT considerations).



Customer Risk

Customer Risk (125)

(Relates to Company Service Providers)

Q1

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

Customer Risk (126)

(Relates to Company Service Providers)

Q2

Please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer is a company.

[Answer if Q1 is > 0]

Customer Risk (127)

(Relates to Company Service Providers)

Q3

Please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer is a commercial partnership.

[Answer if Q1 is > 0]

Customer Risk (128)

(Relates to Company Service Providers)

Q4

Please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer is a foundation or association.

[Answer if Q1 is > 0]

Customer Risk (129)

(Relates to Company Service Providers)

Q5

Please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer is part of a multi-tier ownership structures (i.e. at least two additional layers of legal persons or arrangements on top of the customer)

[Answer if Q1 is > 0]

Customer Risk (130)

(Relates to Company Service Providers)

Q6

Please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer's ownership and control structure involves a trust, foundation or other similar legal arrangement (i.e. it is not the customer who is the trust, foundation or similar legal arrangement).

[Answer if Q1 is > 0]

Customer Risk (131)

(Relates to Company Service Providers)

Q7

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

[Answer if Q1 is > 0]

Customer Risk (132)

(Relates to Company Service Providers)

Q8

Of the total customer base as at the end of the previous calendar year, how many legal persons (customers) have at least one beneficial owner who is a PEP (including family members and close associates)?

[Answer if Q2 is > 0]

Customer Risk (133)

(Relates to Company Service Providers)

Q9

Please list the number of customers to whom your entity was providing company services (constituting relevant activity) during the previous calendar year, where the customer, being a natural person or at least one of the beneficial owners of the legal person (customer), benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by Malta.

[Answer if Q1 is > 0]

Customer Risk (134)

(Relates to Company Service Providers)

Q10

Please list the number of customers to whom your entity provided company services (constituting relevant activity) during the previous calendar year, where the customer being a natural person or at least one of the beneficial owners of the legal person (customer), benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by countries other than Malta.

[Answer if Q1 is > 0]

Customer Risk (135)

(Relates to Company Service Providers)

Q11

According to your entity's policies and procedures during the previous calendar year, how many business relationships were subject to EDD?

[Answer if Q1 is > 0]

Customer Risk (136)

(Relates to Company Service Providers)

Q12

According to your entity's policies and procedures during the previous calendar year, how many business relationships were subject to SDD?

[Answer if Q1 is > 0]

Customer Risk (137)

(Relates to Company Service Providers)

Q13

Of the total customer base as at the end of the previous calendar year, how many customers acted as holding companies with subsidiaries or investments in non-EU/EEA jurisdictions.

[Answer if Q1 is > 0]

Customer Risk (138)

(Relates to Company Service Providers)

Q14

How many of the customers to whom your entity was providing company services (constituting relevant activity) as at the end of the previous calendar year meet the definition of small companies in line with the Companies Act, that is, companies which on their balance sheet do not exceed the limits of two of the three following criteria: - balance sheet total: EUR4 million (4,000,000); - turnover: EUR8 million (8,000,000); - average number of employees during the accounting period: fifty (50)

[Answer if Q1 is > 0]

Customer Risk (139)

(Relates to Company Service Providers)

Q15

According to your entity's policies and procedures, how many occasional transactions (that is, company formation services) that your entity carried out during the previous calendar year were subject to EDD?

[Answer if Q5 is > 0]

Customer Risk (140)

(Relates to Company Service Providers)

Q16

According to your entity's policies and procedures, how many occasional transactions (that is, company formation services) that your entity carried out during the previous calendar year were subject to SDD?

[Answer if Q5 is > 0]

Customer Risk (141)

(Relates to Company Service Providers)

Q17

For the companies or other legal entities or arrangements that your entity has formed during the previous calendar year, please select the value of the initial share capital.

[Answer if Q5 is > 0]

Choose more than one option:

- Not more than Eur 10,000
- EUR 10,001 - EUR 50,000
- EUR 50,001 - EUR 100,000
- Over EUR 100,001

Customer Risk (142)

(Relates to Company Service Providers)

Q18

Please list the number of companies or other legal entities or arrangements that your entity formed during the previous calendar year who raised their initial capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding.

[Answer if Q5 is > 0]

Customer Risk (143)

(Relates to Company Service Providers)

Please list the number of activities in which the companies or other legal entities or arrangements that your entity formed during the previous calendar year, intended to be involved in:

Q19	
<i>Licensed activities</i>	<input type="text"/>
[Answer if Q5 is > 0]	
Q20	
<i>Cash intensive activities</i>	<input type="text"/>
[Answer if Q5 is > 0]	
Q21	
<i>Consulting, marketing and advisory activities</i>	<input type="text"/>
[Answer if Q5 is > 0]	
Q22	
<i>Import/export activities</i>	<input type="text"/>
[Answer if Q5 is > 0]	
Q23	<input type="text"/>
<i>Manufacturing activities</i>	

[Answer if Q5 is > 0]	
Q24	
Holding entities	<input type="text"/>
[Answer if Q5 is > 0]	
Q25	
Operate in/trade dual use items	<input type="text"/>
[Answer if Q5 is > 0]	
Q26	
Other	<input type="text"/>
[Answer if Q5 is > 0]	

Customer Risk (144)

(Relates to Company Service Providers)

Q27

Please list the number of customers to whom your entity was providing a registered office, a business correspondence or administrative address and other related services as at end of the previous calendar year, who have not met their financial statements reporting requirements with the Malta Business Registry for the last financial year for which reporting was due.

[Answer if Q7 is > 0]

Note: A private company with an accounting period ending on 31 December 2023, would need to file its accounts latest by 12 December 2024. Thus, when filling in the REQ 2025 in April 2025 in respect of the year 2024, Subject Persons are required to indicate the number of customers who did not file their financial statements for financial year 2023. Similarly for other reporting periods, i.e. any financial statements that were due to be reported at any point in 2024 and were not reported.

Customer Risk (145)

(Relates to Company Service Providers)

Q28

Please list the total number of customers to whom your entity provided registered office, a business correspondence or administrative address and other related services as at end of the previous calendar year and who were subject to change in beneficial ownership during the previous calendar year.

[Answer if Q7 is > 0]

Customer Risk (146)

(Relates to Company Service Providers)

Q29

Please list the total number of customers to whom your entity was providing a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year, where the customer's director was considered to be the SMO (Tier 3 in the beneficial ownership determination)?

[Answer if Q7 is > 0]

Customer Risk (147)

(Relates to Company Service Providers)

Q30

Please list the total number of customers for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position as at the end of the previous calendar year, where a Board of Directors meeting was not held during the previous calendar year.

[Answer if Q10 is > 0]

Customer Risk (148)

(Relates to Company Service Providers)

Q31

Please list the total number of customers for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position as at the end of the previous calendar year, where the customer's director was considered to be the SMO (Tier 3 in the beneficial ownership determination)?

[Answer if Q10 is > 0]

Customer Risk (149)

(Relates to Company Service Providers)

Q32

Please list the total number of customers for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position as at the end of the previous calendar year and who were subject to change in beneficial ownership during the previous calendar year.

[Answer if Q10 is > 0]

Customer Risk (150)

(Relates to Company Service Providers)

Q33

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, who raised capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding.

[Answer if Q12 is > 0]

Customer Risk (151)

(Relates to Company Service Providers)

Q34

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year and who do not hold a bank/payment account in Malta.

[Answer if Q12 is > 0]

Customer Risk (152)

(Relates to Company Service Providers)

Q35

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, who use crypto accounts.

[Answer if Q12 is > 0]

Customer Risk (153)

(Relates to Company Service Providers)

Q36

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a

similar position as at the end of the previous calendar year, who had loans issued by non-financial institutions (both legal and natural persons or legal arrangements).

[Answer if Q14 is > 0]

Note: Question to be replied to only by directors who have legal and judicial representation

Customer Risk (154)

(Relates to Company Service Providers)

Please list the number of activities in which the companies or other legal entities for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year were involved in:

Q37	
<i>Licensed activities</i>	<input type="text"/>
[Answer if Q12 is > 0]	
Q38	
<i>Cash intensive activities</i>	<input type="text"/>
[Answer if Q12 is > 0]	
Q39	
<i>Consulting, marketing and advisory activities</i>	<input type="text"/>
[Answer if Q12 is > 0]	
Q40	
<i>Import/export activities</i>	<input type="text"/>
[Answer if Q12 is > 0]	
Q41	
<i>Manufacturing activities</i>	<input type="text"/>
[Answer if Q12 is > 0]	
Q42	<input type="text"/>
<i>Holding entities</i>	

[Answer if Q12 is > 0]	
Q43	
Operate in/trade dual use items	<input type="text"/>
[Answer if Q12 is > 0]	
Q44	
Other	<input type="text"/>
[Answer if Q12 is > 0]	

Customer Risk (155)

(Relates to Company Service Providers)

Q45

Please list the total number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year and who were subject to change in beneficial ownership during the previous calendar year.

[Answer if Q12 is > 0]

Customer Risk (156)

(Relates to Company Service Providers)

Q46

Please list the total number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, where the customer's director was considered to be the SMO (Tier 3 in the beneficial ownership determination)?

[Answer if Q12 is > 0]

Customer Risk (157)

(Relates to Company Service Providers)

Q47

Please list the total number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year who had an increase in share capital during the previous calendar year?

[Answer if Q12 is > 0]

Customer Risk (158)

(Relates to Company Service Providers)

Q48

Please list the number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, where a Board of Directors meeting was not held during the previous calendar year.

[Answer if Q12 is > 0]

Customer Risk (159)

(Relates to Company Service Providers)

Q49

Please list the number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at end of the previous calendar year, who have not met their financial statements reporting requirements with the Malta Business Registry for the last financial year for which reporting was due.

[Answer if Q12 is > 0]

Note: A private company with an accounting period ending on 31 December 2023, would need to file its accounts latest by 12 December 2024. Thus, when filling in the REQ 2025 in April 2025 in respect of the year 2024, Subject Persons are required to indicate the number of customers who did not file their financial statements for financial year 2023. Similarly for other reporting periods, i.e. any financial statements that were due to be reported at any point in 2024 and were not reported



Jurisdiction Risk

Jurisdiction Risk (93)

(Relates to Company Service Providers)

Q1

Please indicate the respective jurisdiction in which the natural persons (customers or beneficial owners of legal persons) are considered to be PEPs.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (94)

(Relates to Company Service Providers)

Q2

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 (95)

(Relates to Company Service Providers)

Q3

Please provide the number of subsidiaries per jurisdiction

[Answer if Q2 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 (96)

(Relates to Company Service Providers)

Q4

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 (97)

(Relates to Company Service Providers)

Q5

Please provide the number of branches per jurisdiction

[Answer if Q4 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 (98)

(Relates to Company Service Providers)

Q6

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 (99)

(Relates to Company Service Providers)

Q7

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

[Answer if Q6 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]

Jurisdiction Risk (100)

(Relates to Company Service Providers)

Q8

Please indicate the jurisdiction in which the companies or other legal entities that your entity formed during the previous calendar year were incorporated.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (101)

(Relates to Company Service Providers)

How many customers (natural persons) to whom your entity provided company formation services during the previous calendar year resided in the following jurisdictions:

<div>Q9</div> <div>Malta</div> <div>[Answer if Q5 is > 0]</div>	<div></div> <div></div>
<div>Q10</div> <div>EU/EEA country (apart from Malta)</div> <div>[Answer if Q5 is > 0]</div> <div>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.</div>	<div></div> <div></div>

<p>Q11</p> <p><i>Non EU/EEA country</i></p> <p>[Answer if Q5 is > 0]</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></div>
<p>Q12</p> <p><i>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 Q5 is > 0]</p>	<div></div>
<p>Q13</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 Q12 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

	<ul style="list-style-type: none"> • 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
Q14 <i>Afghanistan</i> [Answer if Q13 is Afghanistan]	<input type="text"/> <input type="text"/>
Q15 <i>Algeria</i> [Answer if Q13 is Algeria]	<input type="text"/> <input type="text"/>
Q16 <i>Angola</i> [Answer if Q13 is Angola]	<input type="text"/> <input type="text"/>
Q17 <i>Barbados</i> [Answer if Q13 is Barbados]	<input type="text"/> <input type="text"/>
Q18 <i>Bulgaria</i> [Answer if Q13 is Bulgaria]	<input type="text"/> <input type="text"/>
Q19 <i>Burkina Faso</i> [Answer if Q13 is Burkina Faso]	<input type="text"/> <input type="text"/>

Q20 Cameroon [Answer if Q13 is Cameroon]	<input type="text"/> <input type="text"/>
Q21 Congo, the Democratic Republic of the [Answer if Q13 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q22 Cote D'Ivoire [Answer if Q13 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q23 Croatia [Answer if Q13 is Croatia]	<input type="text"/> <input type="text"/>
Q24 Gibraltar [Answer if Q13 is Gibraltar]	<input type="text"/> <input type="text"/>
Q25 Haiti [Answer if Q13 is Haiti]	<input type="text"/> <input type="text"/>
Q26 Iran, Islamic Republic of [Answer if Q13 is Iran, Islamic Republic of]	<input type="text"/> <input type="text"/>
Q27 Jamaica [Answer if Q13 is Jamaica]	<input type="text"/> <input type="text"/>
Q28 Kenya [Answer if Q13 is Kenya]	<input type="text"/> <input type="text"/>
Q29 Korea, Democratic People's Republic of [Answer if Q13 is Korea, Democratic People's Republic of]	<input type="text"/> <input type="text"/>

Q30	<input type="text"/>
Lebanon	
[Answer if Q13 is Lebanon]	
Q31	<input type="text"/>
Mali	
[Answer if Q13 is Mali]	
Q32	<input type="text"/>
Monaco	
[Answer if Q13 is Monaco]	
Q33	<input type="text"/>
Mozambique	
[Answer if Q13 is Mozambique]	
Q34	<input type="text"/>
Myanmar	
[Answer if Q13 is Myanmar]	
Q35	<input type="text"/>
Namibia	
[Answer if Q13 is Namibia]	
Q36	<input type="text"/>
Nigeria	
[Answer if Q13 is Nigeria]	
Q37	<input type="text"/>
Panama	
[Answer if Q13 is Panama]	
Q38	<input type="text"/>
Philippines	
[Answer if Q13 is Philippines]	
Q39	<input type="text"/>
Senegal	
[Answer if Q13 is Senegal]	
Q40	<input type="text"/>

South Africa	
[Answer if Q13 is South Africa]	
Q41	
South Sudan	<input type="text"/>
[Answer if Q13 is South Sudan]	
Q42	
Syrian Arab Republic	<input type="text"/>
[Answer if Q13 is Syrian Arab Republic]	
Q43	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q13 is Tanzania, United Republic of]	
Q44	
Trinidad and Tobago	<input type="text"/>
[Answer if Q13 is Trinidad and Tobago]	
Q45	
Uganda	<input type="text"/>
[Answer if Q13 is Uganda]	
Q46	
United Arab Emirates	<input type="text"/>
[Answer if Q13 is United Arab Emirates]	
Q47	
Vanuatu	<input type="text"/>
[Answer if Q13 is Vanuatu]	
Q48	
Venezuela	<input type="text"/>
[Answer if Q13 is Venezuela]	
Q49	
Vietnam	<input type="text"/>
[Answer if Q13 is Vietnam]	
Q50	<input type="text"/>
Yemen	

[Answer if Q13 is Yemen]

Jurisdiction Risk (102)

(Relates to Company Service Providers)

How many customers (persons other than natural persons) to whom your entity provided company formation services during the previous calendar year were registered in the following jurisdictions::

Q51 <i>Malta</i> [Answer if Q5 is > 0]	<input type="text"/>
Q52 <i>EU/EEA country (apart from Malta)</i> [Answer if Q5 is > 0] <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>	<input type="text"/>
Q53 <i>Non EU/EEA country</i> [Answer if Q5 is > 0] <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>	<input type="text"/>
Q54	<input type="text"/>

<p><i>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 Q5 is > 0]</p> <p>Q55</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 Q54 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 • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu

	<ul style="list-style-type: none"> • Venezuela • Vietnam • Yemen
Q56 Afghanistan [Answer if Q55 is Afghanistan]	<input type="text"/> <input type="text"/>
Q57 Algeria [Answer if Q55 is Algeria]	<input type="text"/> <input type="text"/>
Q58 Angola [Answer if Q55 is Angola]	<input type="text"/> <input type="text"/>
Q59 Barbados [Answer if Q55 is Barbados]	<input type="text"/> <input type="text"/>
Q60 Bulgaria [Answer if Q55 is Bulgaria]	<input type="text"/> <input type="text"/>
Q61 Burkina Faso [Answer if Q55 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q62 Cameroon [Answer if Q55 is Cameroon]	<input type="text"/> <input type="text"/>
Q63 Congo, the Democratic Republic of the [Answer if Q55 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q64 Cote D'Ivoire [Answer if Q55 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q65	<input type="text"/>

Croatia	
[Answer if Q55 is Croatia]	
Q66	
Gibraltar	<input type="text"/>
[Answer if Q55 is Gibraltar]	
Q67	
Haiti	<input type="text"/>
[Answer if Q55 is Haiti]	
Q68	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q55 is Iran, Islamic Republic of]	
Q69	
Jamaica	<input type="text"/>
[Answer if Q55 is Jamaica]	
Q70	
Kenya	<input type="text"/>
[Answer if Q55 is Kenya]	
Q71	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q55 is Korea, Democratic People's Republic of]	
Q72	
Lebanon	<input type="text"/>
[Answer if Q55 is Lebanon]	
Q73	
Mali	<input type="text"/>
[Answer if Q55 is Mali]	
Q74	
Monaco	<input type="text"/>
[Answer if Q55 is Monaco]	
Q75	<input type="text"/>
Mozambique	

[Answer if Q55 is Mozambique]	
Q76	
Myanmar	<input type="text"/>
[Answer if Q55 is Myanmar]	
Q77	
Namibia	<input type="text"/>
[Answer if Q55 is Namibia]	
Q78	
Nigeria	<input type="text"/>
[Answer if Q55 is Nigeria]	
Q79	
Panama	<input type="text"/>
[Answer if Q55 is Panama]	
Q80	
Philippines	<input type="text"/>
[Answer if Q55 is Philippines]	
Q81	
Senegal	<input type="text"/>
[Answer if Q55 is Senegal]	
Q82	
South Africa	<input type="text"/>
[Answer if Q55 is South Africa]	
Q83	
South Sudan	<input type="text"/>
[Answer if Q55 is South Sudan]	
Q84	
Syrian Arab Republic	<input type="text"/>
[Answer if Q55 is Syrian Arab Republic]	
Q85	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q55 is Tanzania, United Republic of]	
Q86	<input type="text"/>

Trinidad and Tobago	
[Answer if Q55 is Trinidad and Tobago]	
Q87	
Uganda	<input type="text"/>
[Answer if Q55 is Uganda]	
Q88	
United Arab Emirates	<input type="text"/>
[Answer if Q55 is United Arab Emirates]	
Q89	
Vanuatu	<input type="text"/>
[Answer if Q55 is Vanuatu]	
Q90	
Venezuela	<input type="text"/>
[Answer if Q55 is Venezuela]	
Q91	
Vietnam	<input type="text"/>
[Answer if Q55 is Vietnam]	
Q92	
Yemen	<input type="text"/>
[Answer if Q55 is Yemen]	

Jurisdiction Risk (103)

(Relates to Company Service Providers)

Q93

Please indicate the number of companies or other legal entities that your entity formed during the previous calendar year where all beneficial owners were non-Maltese residents.

[Answer if Q5 is > 0]

Jurisdiction Risk (104)

(Relates to Company Service Providers)

Q94

Please indicate the number of companies or other legal entities that your entity formed during the previous calendar year where all beneficial owners were Maltese residents.

[Answer if Q5 is > 0]

Jurisdiction Risk (105)

(Relates to Company Service Providers)

Q95

Please indicate the number of companies or other legal entities that your entity formed during the previous calendar year where at least one of the beneficial owners was non-Maltese resident.

[Answer if Q5 is > 0]

Jurisdiction Risk (106)

(Relates to Company Service Providers)

Q96

Please indicate the number of companies or other legal entities to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year where all beneficial owners were non-Maltese residents.

[Answer if Q7 is > 0]

Jurisdiction Risk (107)

(Relates to Company Service Providers)

Q97

Please indicate the number of companies or other legal entities to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year where all beneficial owners were Maltese residents.

[Answer if Q7 is > 0]

Jurisdiction Risk (108)

(Relates to Company Service Providers)

Q98

Please indicate the number of companies or other legal entities to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at end of the previous calendar year where at least one of the beneficial owners was non-Maltese resident.

[Answer if Q7 is > 0]

Jurisdiction Risk (109)

(Relates to Company Service Providers)

How many beneficial owners of the customers to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year resided in the following jurisdictions:

--	--

<p>Q99</p> <p>Malta</p> <p>[Answer if Q7 is > 0]</p>	<input type="text"/>
<p>Q100</p> <p>EU/EEA country (apart from Malta)</p> <p>[Answer if Q7 is > 0]</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>	<input type="text"/>
<p>Q101</p> <p>Non EU/EEA country</p> <p>[Answer if Q7 is > 0]</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>	<input type="text"/>
<p>Q102</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>[Answer if Q7 is > 0]</p>	<input type="text"/>
<p>Q103</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>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados

[Answer if Q102 is > 0]

- 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

Q104

Afghanistan

[Answer if Q103 is Afghanistan]

Q105

Algeria

[Answer if Q103 is Algeria]	
Q106	
Angola	<input type="text"/>
[Answer if Q103 is Angola]	
Q107	
Barbados	<input type="text"/>
[Answer if Q103 is Barbados]	
Q108	
Bulgaria	<input type="text"/>
[Answer if Q103 is Bulgaria]	
Q109	
Burkina Faso	<input type="text"/>
[Answer if Q103 is Burkina Faso]	
Q110	
Cameroon	<input type="text"/>
[Answer if Q103 is Cameroon]	
Q111	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q103 is Congo, the Democratic Republic of the]	
Q112	
Cote D'Ivoire	<input type="text"/>
[Answer if Q103 is Cote D'Ivoire]	
Q113	
Croatia	<input type="text"/>
[Answer if Q103 is Croatia]	
Q114	
Gibraltar	<input type="text"/>
[Answer if Q103 is Gibraltar]	
Q115	
Haiti	<input type="text"/>
[Answer if Q103 is Haiti]	

Q116	<input type="text"/>
<i>Iran, Islamic Republic of</i>	
[Answer if Q103 is Iran, Islamic Republic of]	
Q117	<input type="text"/>
<i>Jamaica</i>	
[Answer if Q103 is Jamaica]	
Q118	<input type="text"/>
<i>Kenya</i>	
[Answer if Q103 is Kenya]	
Q119	<input type="text"/>
<i>Korea, Democratic People's Republic of</i>	
[Answer if Q103 is Korea, Democratic People's Republic of]	
Q120	<input type="text"/>
<i>Lebanon</i>	
[Answer if Q103 is Lebanon]	
Q121	<input type="text"/>
<i>Mali</i>	
[Answer if Q103 is Mali]	
Q122	<input type="text"/>
<i>Monaco</i>	
[Answer if Q103 is Monaco]	
Q123	<input type="text"/>
<i>Mozambique</i>	
[Answer if Q103 is Mozambique]	
Q124	<input type="text"/>
<i>Myanmar</i>	
[Answer if Q103 is Myanmar]	
Q125	<input type="text"/>
<i>Namibia</i>	
[Answer if Q103 is Namibia]	
Q126	<input type="text"/>

Nigeria	
[Answer if Q103 is Nigeria]	
Q127	
Panama	<input type="text"/>
[Answer if Q103 is Panama]	
Q128	
Philippines	<input type="text"/>
[Answer if Q103 is Philippines]	
Q129	
Senegal	<input type="text"/>
[Answer if Q103 is Senegal]	
Q130	
South Africa	<input type="text"/>
[Answer if Q103 is South Africa]	
Q131	
South Sudan	<input type="text"/>
[Answer if Q103 is South Sudan]	
Q132	
Syrian Arab Republic	<input type="text"/>
[Answer if Q103 is Syrian Arab Republic]	
Q133	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q103 is Tanzania, United Republic of]	
Q134	
Trinidad and Tobago	<input type="text"/>
[Answer if Q103 is Trinidad and Tobago]	
Q135	
Uganda	<input type="text"/>
[Answer if Q103 is Uganda]	
Q136	<input type="text"/>
United Arab Emirates	

[Answer if Q103 is United Arab Emirates]	
Q137	
Vanuatu	<input type="text"/>
[Answer if Q103 is Vanuatu]	
Q138	
Venezuela	<input type="text"/>
[Answer if Q103 is Venezuela]	
Q139	
Vietnam	<input type="text"/>
[Answer if Q103 is Vietnam]	
Q140	
Yemen	<input type="text"/>
[Answer if Q103 is Yemen]	

Jurisdiction Risk (110)

(Relates to Company Service Providers)

How many beneficial owners of the customers to whom your entity provided company secretary services as at the end of the previous calendar year resided in the following jurisdictions:

Q141	
Malta	<input type="text"/>
[Answer if Q10 is > 0]	
Q142	<input type="text"/>
EU/EEA country (apart from Malta)	
[Answer if Q10 is > 0]	
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	

<p>High Risk Third Countries". This list is as at 31 December 2024.</p>	
<p>Q143</p> <p>Non EU/EEA country</p> <p>[Answer if Q10 is > 0]</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>	<div data-bbox="1045 504 1394 544" style="border: 1px solid black; height: 18px; width: 100%;"></div>
<p>Q144</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>[Answer if Q10 is > 0]</p>	<div data-bbox="1045 929 1394 969" style="border: 1px solid black; height: 18px; width: 100%;"></div>
<p>Q145</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 Q144 is > 0]</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

	<ul style="list-style-type: none"> • 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
Q146 Afghanistan [Answer if Q145 is Afghanistan]	<input type="text"/> <input type="text"/>
Q147 Algeria [Answer if Q145 is Algeria]	<input type="text"/> <input type="text"/>
Q148 Angola [Answer if Q145 is Angola]	<input type="text"/> <input type="text"/>
Q149 Barbados [Answer if Q145 is Barbados]	<input type="text"/> <input type="text"/>
Q150 Bulgaria [Answer if Q145 is Bulgaria]	<input type="text"/> <input type="text"/>
Q151 Burkina Faso	<input type="text"/>

[Answer if Q145 is Burkina Faso]	
Q152	
Cameroon	<input type="text"/>
[Answer if Q145 is Cameroon]	
Q153	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q145 is Congo, the Democratic Republic of the]	
Q154	
Cote D'Ivoire	<input type="text"/>
[Answer if Q145 is Cote D'Ivoire]	
Q155	
Croatia	<input type="text"/>
[Answer if Q145 is Croatia]	
Q156	
Gibraltar	<input type="text"/>
[Answer if Q145 is Gibraltar]	
Q157	
Haiti	<input type="text"/>
[Answer if Q145 is Haiti]	
Q158	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q145 is Iran, Islamic Republic of]	
Q159	
Jamaica	<input type="text"/>
[Answer if Q145 is Jamaica]	
Q160	
Kenya	<input type="text"/>
[Answer if Q145 is Kenya]	
Q161	<input type="text"/>
Korea, Democratic People's Republic of	

[Answer if Q145 is Korea, Democratic People's Republic of]	
Q162	
Lebanon	<input type="text"/>
[Answer if Q145 is Lebanon]	
Q163	
Mali	<input type="text"/>
[Answer if Q145 is Mali]	
Q164	
Monaco	<input type="text"/>
[Answer if Q145 is Monaco]	
Q165	
Mozambique	<input type="text"/>
[Answer if Q145 is Mozambique]	
Q166	
Myanmar	<input type="text"/>
[Answer if Q145 is Myanmar]	
Q167	
Namibia	<input type="text"/>
[Answer if Q145 is Namibia]	
Q168	
Nigeria	<input type="text"/>
[Answer if Q145 is Nigeria]	
Q169	
Panama	<input type="text"/>
[Answer if Q145 is Panama]	
Q170	
Philippines	<input type="text"/>
[Answer if Q145 is Philippines]	
Q171	
Senegal	<input type="text"/>
[Answer if Q145 is Senegal]	

Q172	<input type="text"/>
<i>South Africa</i>	
[Answer if Q145 is South Africa]	
Q173	<input type="text"/>
<i>South Sudan</i>	
[Answer if Q145 is South Sudan]	
Q174	<input type="text"/>
<i>Syrian Arab Republic</i>	
[Answer if Q145 is Syrian Arab Republic]	
Q175	<input type="text"/>
<i>Tanzania, United Republic of</i>	
[Answer if Q145 is Tanzania, United Republic of]	
Q176	<input type="text"/>
<i>Trinidad and Tobago</i>	
[Answer if Q145 is Trinidad and Tobago]	
Q177	<input type="text"/>
<i>Uganda</i>	
[Answer if Q145 is Uganda]	
Q178	<input type="text"/>
<i>United Arab Emirates</i>	
[Answer if Q145 is United Arab Emirates]	
Q179	<input type="text"/>
<i>Vanuatu</i>	
[Answer if Q145 is Vanuatu]	
Q180	<input type="text"/>
<i>Venezuela</i>	
[Answer if Q145 is Venezuela]	
Q181	<input type="text"/>
<i>Vietnam</i>	
[Answer if Q145 is Vietnam]	
Q182	<input type="text"/>

Yemen	
[Answer if Q145 is Yemen]	

Jurisdiction Risk (111)

(Relates to Company Service Providers)

Q183

Please indicate the jurisdictions in which customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year were registered.

[Answer if Q12 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (112)

(Relates to Company Service Providers)

How many beneficial owners of customers to whom your entity provided directorship services at the end of the previous calendar year resided in the following jurisdictions::

Q184	
Malta	<input type="text"/>
[Answer if Q12 is > 0]	
Q185	<input type="text"/>
EU/EEA country (apart from Malta)	
[Answer if Q12 is > 0]	

<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>Q186</p> <p>Non EU/EEA country</p> <p>[Answer if Q12 is > 0]</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>	<input type="text"/>
<p>Q187</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>[Answer if Q12 is > 0]</p>	<input type="text"/>
<p>Q188</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 Q187 is > 0]</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

	<ul style="list-style-type: none"> • 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
Q189 <i>Afghanistan</i> [Answer if Q188 is Afghanistan]	<input type="text"/> <input type="text"/>
Q190 <i>Algeria</i> [Answer if Q188 is Algeria]	<input type="text"/> <input type="text"/>
Q191 <i>Angola</i> [Answer if Q188 is Angola]	<input type="text"/> <input type="text"/>
Q192 <i>Barbados</i>	<input type="text"/> <input type="text"/>

[Answer if Q188 is Barbados]	
Q193	
Bulgaria	<input type="text"/>
[Answer if Q188 is Bulgaria]	
Q194	
Burkina Faso	<input type="text"/>
[Answer if Q188 is Burkina Faso]	
Q195	
Cameroon	<input type="text"/>
[Answer if Q188 is Cameroon]	
Q196	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q188 is Congo, the Democratic Republic of the]	
Q197	
Cote D'Ivoire	<input type="text"/>
[Answer if Q188 is Cote D'Ivoire]	
Q198	
Croatia	<input type="text"/>
[Answer if Q188 is Croatia]	
Q199	
Gibraltar	<input type="text"/>
[Answer if Q188 is Gibraltar]	
Q200	
Haiti	<input type="text"/>
[Answer if Q188 is Haiti]	
Q201	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q188 is Iran, Islamic Republic of]	
Q202	
Jamaica	<input type="text"/>
[Answer if Q188 is Jamaica]	

Q203	<input type="text"/>
<i>Kenya</i>	
[Answer if Q188 is Kenya]	
Q204	<input type="text"/>
<i>Korea, Democratic People's Republic of</i>	
[Answer if Q188 is Korea, Democratic People's Republic of]	
Q205	<input type="text"/>
<i>Lebanon</i>	
[Answer if Q188 is Lebanon]	
Q206	<input type="text"/>
<i>Mali</i>	
[Answer if Q188 is Mali]	
Q207	<input type="text"/>
<i>Monaco</i>	
[Answer if Q188 is Monaco]	
Q208	<input type="text"/>
<i>Mozambique</i>	
[Answer if Q188 is Mozambique]	
Q209	<input type="text"/>
<i>Myanmar</i>	
[Answer if Q188 is Myanmar]	
Q210	<input type="text"/>
<i>Namibia</i>	
[Answer if Q188 is Namibia]	
Q211	<input type="text"/>
<i>Nigeria</i>	
[Answer if Q188 is Nigeria]	
Q212	<input type="text"/>
<i>Panama</i>	
[Answer if Q188 is Panama]	
Q213	<input type="text"/>

<i>Philippines</i>	
[Answer if Q188 is Philippines]	
Q214	
<i>Senegal</i>	<input type="text"/>
[Answer if Q188 is Senegal]	
Q215	
<i>South Africa</i>	<input type="text"/>
[Answer if Q188 is South Africa]	
Q216	
<i>South Sudan</i>	<input type="text"/>
[Answer if Q188 is South Sudan]	
Q217	
<i>Syrian Arab Republic</i>	<input type="text"/>
[Answer if Q188 is Syrian Arab Republic]	
Q218	
<i>Tanzania, United Republic of</i>	<input type="text"/>
[Answer if Q188 is Tanzania, United Republic of]	
Q219	
<i>Trinidad and Tobago</i>	<input type="text"/>
[Answer if Q188 is Trinidad and Tobago]	
Q220	
<i>Uganda</i>	<input type="text"/>
[Answer if Q188 is Uganda]	
Q221	
<i>United Arab Emirates</i>	<input type="text"/>
[Answer if Q188 is United Arab Emirates]	
Q222	
<i>Vanuatu</i>	<input type="text"/>
[Answer if Q188 is Vanuatu]	
Q223	<input type="text"/>
<i>Venezuela</i>	

[Answer if Q188 is Venezuela]	
Q224	
Vietnam	<input type="text"/>
[Answer if Q188 is Vietnam]	
Q225	
Yemen	<input type="text"/>
[Answer if Q188 is Yemen]	

Jurisdiction Risk (113)

(Relates to Company Service Providers)

Q226

Please indicate the jurisdictions in which customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year held their bank/payments/crypto account.

[Answer if Q14 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (114)

(Relates to Company Service Providers)

Q227

With respect to customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, please indicate jurisdictions from which loans issued by non-financial institutions (both legal and natural persons or legal arrangements) originated.

[Answer if Q14 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable



Interface Risk

Interface Risk (27)

(Relates to Company Service Providers)

From the total number of customers, what % was onboarded:

Q1 a) on a face-to-face basis during the previous calendar year?	<input type="text"/>
Q2 b) on a non-face-to-face basis, during the previous calendar year?	<input type="text"/>

Interface Risk (28)

(Relates to Company Service Providers)

Q3

How many agents/ introducers/ intermediaries did you/your entity have at the end of the previous calendar year?

Interface Risk (29)

(Relates to Company Service Providers)

Q4

What is the % of customers that were introduced by either an agent, introducer or an intermediary?

Interface Risk (30)

(Relates to Company Service Providers)

Q5

Please indicate the jurisdictions in which agents, intermediaries or introducers operate.

[Answer if Q4 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Interface Risk (31)

(Relates to Company Service Providers)

Q6

What is the % of customers whose CDD in terms of Regulation 7(1)(a), 7(1)(b) and 7(1)(c) has been carried out by another subject person/third party, on the basis of a reliance agreement between you/your entity and the other subject person/third party?

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 (40)

Q2

Does your entity have internal whistleblowing procedures?

Choose only one option:

- Yes
- No
- Not applicable

Q3

If not applicable, please explain why.

[Answer if Q2 is Not applicable]

Policies and Procedures (41)

Q4

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)

Q5

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

[Answer if Q4 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)

Q6

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

[Answer if Q4 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)

Q7

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

[Answer if Q6 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)

Q8

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 Q6 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]

Policies and Procedures (46)

Q9

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 Q6 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]

Policies and Procedures (47)

Q10

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

[Answer if Q6 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)

Q11

If others, explain

[Answer if Q10 is Others]

Policies and Procedures (65)

Q12

How is it being determined whether customers and, where applicable their beneficial owners, are politically exposed persons (PEPs) or PEPs' family members or close associates, prior to the commencement of service?

Choose more than one option:

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

Policies and Procedures (66)

Q13

How is it being determined 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 (67)

Q14

In respect of intermediaries, does your entity have policies and procedures in place to assess their AML/CFT compliance framework (in line with Section 2.1.2 of the IPs Part II applicable to CSPs)?

Choose only one option:

- Yes
- No

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 (5)

Q4

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.

Q5 <i>Malta</i> <i>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</i>	<i>Choose only one option:</i> <ul style="list-style-type: none"> • Yes • No
Q6 <i>EU/EEA (Excluding Malta)</i> <i>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</i> <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</i>	<i>Choose only one option:</i> <ul style="list-style-type: none"> • Yes • No

<p><i>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>Q7</p> <p>Non-EU/Non-EEA</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</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>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q8</p> <p><i>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 Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</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>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q9</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 Q8 is Yes]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon

	<ul style="list-style-type: none"> • 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
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Outsourcing (16)

Please indicate the jurisdictions where the service providers to whom your entity had outsourced AML/CFT obligations are located.

<p>Q10</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>Q11</p> <p>EU/EEA (Excluding Malta)</p> <p>[Answer if Q1 is Yes, outsourcing outside the group, Yes, outsourcing within 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>Q12</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>Q13</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>[Answer if Q1 is Yes, outsourcing outside the group, Yes, outsourcing within the group]</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q14</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria

'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.

[Answer if Q13 is Yes]

- 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

Record-keeping

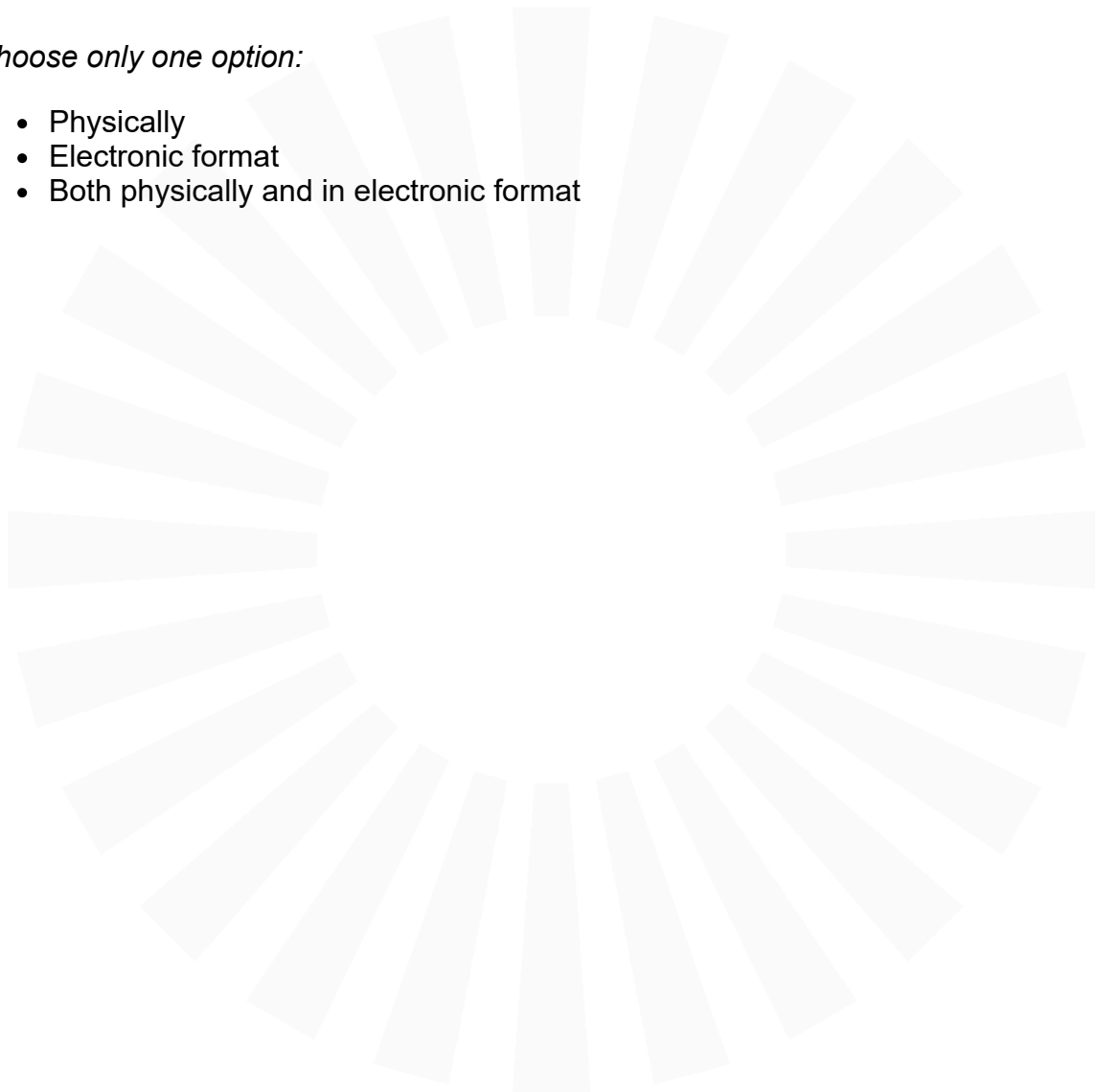
Record-keeping (1)

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

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 (Data, documents and information) (4)

Q6

Do your entity's policies and procedures contain specific provisions relevant to risk based approach to ongoing monitoring depending on the corporate services being provided to customers (in line with Section 2.4.4 of the of the IPs Part II applicable to CSPs)?

Choose only one option:

- Yes
- No

Ongoing monitoring (Data, documents and information) (5)

Q7

How is it ensured that customers' and/or beneficial owners' information remains up to date and documentation valid?

Choose only one option:

- Automated system identifies a document that is soon to expire
- Yearly questionnaire is distributed to customers for confirmation and updates
- Checks are conducted during reviews per policy, based on the customer's risk profile.
- A combination of all above
- System identifies document to be expired and through periodic reviews
- Subject person's procedures do not require for such checks to be undertaken



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) (15)

(Relates to Company Service Providers)

Q2

In respect of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position, please indicate whether transaction monitoring processes and/or systems for monitoring transactions is/are fully automated, partially automated or manual?

Choose only one option:

- N/A - No transaction monitoring is carried out
- Fully automated
- Partially automated
- Manual

Ongoing monitoring (Transaction Scrutiny) (16)

(Relates to Company Service Providers)

Q3

How often are the criteria and rules utilised by the monitoring system reviewed and updated?

[Answer if Q2 is Fully automated, Partially automated, Manual]

Choose only one option:

- No reviews and updates are carried out
- Monthly basis
- Quarterly basis
- Half yearly
- Yearly
- Every 2 years
- Over 2 years

Ongoing monitoring (Transaction Scrutiny) (17)

(Relates to Company Service Providers)

Q4

Are customers' transactions monitored in real-time, pre-event, post-event, a combination of all, or a combination of pre-event and post-event?

[Answer if Q2 is Fully automated, Partially automated, Manual]

Choose only one option:

- Real-time
- Pre-time
- Post-event
- Combination of all
- Combination of pre-event and post-event

Ongoing monitoring (Transaction Scrutiny) (18)

(Relates to Company Service Providers)

Q5

Please explain which transactions are subject to real-time monitoring?

[Answer if Q4 is Real-time, Combination of all, Combination of pre-event and post-event]

Ongoing monitoring (Transaction Scrutiny) (24)

Q6

Please explain which transactions are subject to pre-event monitoring.

Ongoing monitoring (Transaction Scrutiny) (25)

Q7

Please explain which transactions are subject to post-event monitoring.

Ongoing monitoring (Transaction Scrutiny) (26)

Q8

Please explain which transactions are subject to pre-event and post-event monitoring.

Ongoing monitoring (Transaction Scrutiny) (27)

Q9

Please explain measures that your entity applies in respect of transactions flagged for scrutiny.

Ongoing monitoring (Transaction Scrutiny) (19)

(Relates to Company Service Providers)

Q10

What is the average time allowed (in days) to clear any transaction monitoring alerts?

[Answer if Q4 is Real-time, Post-event, Combination of all, Combination of pre-event and post-event]

Ongoing monitoring (Transaction Scrutiny) (20)

(Relates to Company Service Providers)

Q11

Please list the number of ML/FT related alerts generated as part of transaction monitoring during the prior calendar year.

[Answer if Q4 is Real-time, Post-event, Combination of all, Combination of pre-event and post-event]

Ongoing monitoring (Transaction Scrutiny) (21)

(Relates to Company Service Providers)

Q12

How many transaction monitoring alerts were triggered last calendar year, but not yet closed by end of January of this calendar year?

[Answer if Q4 is Real-time, Post-event, Combination of all, Combination of pre-event and post-event]

Ongoing monitoring (Transaction Scrutiny) (22)

Q13

Please explain transaction monitoring process in instances where your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position does and did not have access to customer's bank/payment accounts.

Ongoing monitoring (Transaction Scrutiny) (23)

(Relates to Company Service Providers)

Q14

Please explain transaction monitoring process in instances where your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position does and had access to customer's bank/payment accounts.

Ongoing monitoring (Transaction Scrutiny) (49)

Q15

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

