



Risk Evaluation Questionnaire 2025

A large, faint, light-gray sunburst graphic is centered on the page, behind the "PREVIEW" text. It is composed of many thin, radial lines of varying lengths, similar in style to the FIAU logo but much larger and lighter in color.

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 (17.Undertakings)

Q1

Please list the total number of customers (as at the end of the prior calendar year) making use of long-term insurance products with whom your entity had an active business relationship.

Long-term insurance products as defined in the Second Schedule of the Insurance Business Act. 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 refers to active customers as at the end of the prior calendar year. Customer in terms of insurance is defined as the "policyholder" and / or "insured". "Insured" is defined as the party to whom, or on whose account, or to whose beneficiaries, a sum of money or other consideration is payable under a contract of insurance on the happening of a specified event; "policyholder" is defined as the person who is the legal holder of the policy for securing the contract with the insurer. In their response to questions, respondents should only take into consideration relevant financial business, that is customers relating to long term insurance business. Where a subject person offers more than one service to the same customer, it should count the customer as one to avoid duplication

or choose one of:

- Not Available

Customers (18.Undertakings)

Q2

Please list the total number of new customers making use of long-term insurance products onboarded during the prior calendar year.

Long-term insurance products as defined in the Second Schedule of the Insurance Business Act.

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

Customers (Insurance) (1.Undertakings+Intermediaries)

Q4

What number of long-term business insurance customers have an ownership structure that includes offshore vehicles, trusts, and/or other legal arrangements including bearer shares, fiduciary deposits and foundations?

The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency. You are kindly requested to refer to the EU list of Non-Cooperative Jurisdictions. The list can be found in the following link: <https://cfr.gov.mt/en/inlandrevenue/tcu/Pages/EU-List-of-non-cooperative-jurisdictions.aspx>

or choose one of:

- Not Available

Customers (Insurance) (2.Undertakings+Intermediaries)

Please list the total number of long-term business insurance customers rated as:

Q5

a) "High Risk"

The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.

or choose one of:

- Not Available

Customers (Insurance) (3.Undertakings+Intermediaries)

Please list the total number of long-term business insurance customers rated as:

Q6

b) "Medium Risk"

The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.

or choose one of:

- Not Available

Customers (Insurance) (6.Undertakings+Intermediaries)

Please list the total number of long-term business insurance customers rated as:

Q7

c) "Low Risk"

The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.

or choose one of:

- Not Available

Customers (Insurance) (7.Undertakings+Intermediaries)

Q8

Are there long-term business insurance customers that have a risk rating outside of the "high", "medium" and "low" categories?

Choose only one option:

- Yes
- No

Customers (Insurance) (8.Undertakings+Intermediaries)

Q9

If yes, please specify the additional risk rating.

[Answer if Q8 is Yes]

or choose one of:

- Not Available

Customers (Insurance) (9.Undertakings+Intermediaries)

Q10

Please specify the number of long-term insurance business customers in the additional risk category specified in the prior question.

[Answer if Q8 is Yes]

or choose one of:

- Not Available

Customers (Insurance) (12)

Q11

Are any of the customers represented by an agent or third party?

Agent means a person or entity who has an agreement with a subject person in order to provide services or products to the subject person's customers. These may include portfolio management companies which use the entity's services to trade on behalf of their customers

Choose only one option:

- Yes
- No

Customer Type (5.5)

(Relates to Insurance)

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

Q12	<input type="text"/>
a) Natural persons	<input type="text"/>
Q13	<input type="text"/>
b) Legal persons	<input type="text"/>

Customer Type (9.Undertakings+Intermediaries)

Long-term insurance products' is defined in the Second Schedule of the Business Insurance Act.

Q14

Please list the number of customers making use of long-term insurance products (natural persons) and/or beneficial owners that have benefited from residence or citizenship by investment schemes, or are applicants/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.

or choose one of:

- Not Available

Customer Type (39)

Q15

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

PEPs (2.5)

(Relates to Insurance)

Q16

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 (20)

Q17

Please specify the total number (#) of long-term business customers that were PEPs in the prior calendar year?

or choose one of:

- Not Applicable
- Not Available

PEPs (21)

Q18

Please specify the total number (#) of long-term business customers (or, if applicable their beneficial owners) that were local PEPs in the prior calendar year?

or choose one of:

- Not Applicable
- Not Available

PEPs (22)

Q19

Please specify the total number (#) of long term business customers (or, if applicable their beneficial owners) that were PEPs from an EU or EEA jurisdiction, in the prior calendar year?

or choose one of:

- Not Applicable
- Not Available

PEPs (23)

Q20

Please specify the total number (#) of long term business customers (or, if applicable their beneficial owners) that were PEPs 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.

The FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' may be accessed from the following link:
<https://fiaumalta.org/country-statements/>

or choose one of:

- Not Applicable
- Not Available

PEPs (24)

Q21

If your answer to the above question was yes, please select the respective jurisdictions.

[Answer if Q20 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
- Haiti
- Jamaica
- Algeria
- Angola
- Bulgaria
- Croatia
- 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 Applicable
- Not Available

Additional (Customers) (2.Undertakings + Intermediaries)

Long-term insurance products as defined in the Second Schedule of the Insurance Business

Q22

Please list the number of customers making use of long-term insurance products, who are operating in high-risk industries.

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.

or choose one of:

- Not Available

Additional (Customers) (3)

Q23

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)

Q24

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

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 (Insurance and Pensions) (1.Undertakings)

For long-term business activity undertaken by your entity during the prior calendar year, please indicate:

Q1

a) The total gross premium / contribution (€) from long-term business policies

The long-term business activity includes all the classes as listed in Schedule 2 of the Insurance Business Act. Gross premium should be construed to refer to the total premium paid by the policy owner. The gross premium is the total premium of an insurance contract before brokerage or discounts have been deducted. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (2.Undertakings)

For long-term business activity undertaken by your entity during the prior calendar year, please indicate:

Q2

b) the total number (#) of long-term business policies

The long-term business activity includes all the classes as listed in Schedule 2 of the Insurance Business Act. Gross premium should be construed to refer to the total premium paid by the policy owner. The gross premium is the total premium of an insurance contract before brokerage or discounts have been deducted.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (3.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for life and annuity insurance contracts (individuals):

Q3

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, 'Life and Annuity product' is defined as 'Contracts of insurance on human life or contracts to pay annuities on human life, but excluding (in each case) contracts within Classes II and III of this Schedule'.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (4.Undertakings)

Q4

b) total gross premium (€) for active policies

[Answer if Q3 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (5.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for life and annuity insurance contracts (groups):

Q5

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, 'Life and Annuity product' is defined as 'Contracts of insurance on human life or contracts to pay annuities on human life, but excluding (in each case) contracts within Classes II and III of this Schedule'.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (6.Undertakings)

Q6

b) total gross premium (€) for active policies

[Answer if Q5 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (11.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for marriage and birth contracts:

Q7

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, Marriage and birth product is defined as 'contracts of insurance to provide a sum on marriage or on the birth of a child, being contracts expressed to be in effect for a period of more than one year'.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (12.Undertakings)

Q8

b) total gross premium (€) for active policies

[Answer if Q7 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (13.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for linked long term contracts:

Q9

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, Marriage and birth product is defined as 'contracts of insurance to provide a sum on marriage or on the birth of a child, being contracts expressed to be in effect for a period of more than one year'.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (14.Undertakings)

Q10

b) total gross premium (€) for active policies

[Answer if Q9 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (15.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for permanent health contracts:

Q11

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, Permanent health product is defined as 'Contracts of insurance providing specified benefits against risks of persons becoming incapacitated in consequence of sustaining injury as a result of an accident, or of an accident of a specified class, or of sickness or infirmity, being contracts that: (a) are expressed to be in effect for a period of not less than five years, or until the normal retirement age for the persons concerned, or without limit of time, and (b) either are not expressed to be terminable by the insurer, or are

expressed to be so terminable only in special circumstances mentioned in the contract'.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (16.Undertakings)

Q12

b) total gross premium (€) for active policies

[Answer if Q11 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (17.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for tontines contracts:

Q13

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, Tontines product is defined as 'Contracts of insurance providing for operations whereby associations of subscribers are to be set up with a view to capitalising their contributions jointly and subsequently distributing the assets thus accumulated among the survivors or among the beneficiaries of the deceased'.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (18.Undertakings)

Q14

b) total gross premium (€) for active policies

[Answer if Q13 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (19.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for capital redemption contracts:

Q15

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, Capital redemption product is defined as 'Contracts of insurance providing for capital redemption operations based on actuarial calculation whereby, in return for single or periodic payments agreed in advance, commitments of specified duration and amount are undertaken.'

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (20.Undertakings)

Q16

b) total gross premium (€) for active policies

[Answer if Q15 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (21.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for pension fund management contracts:

Q17

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, Pension fund management product is defined as '(a) Contracts to manage the investments of pension funds, and in particular the assets representing the reserves of bodies that effect payments on death or survival or in the event of discontinuance or curtailment of activity; or (b) Contracts or the kind mentioned in paragraph (a) above that are combined with contracts of insurance covering either conservation of capital or payment of a minimum interest.

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (22.Undertakings)

Q18

b) total gross premium (€) for active policies

[Answer if Q17 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (23.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for collective insurance product contracts:

Q19

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, 'Collective insurance product' is defined as 'Contracts of a kind referred to in Article 2(3)(b)(v) of the Solvency II Directive.'

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (24.Undertakings)

Q20

b) total gross premium (€) for active policies

[Answer if Q19 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (25.Undertakings)

For long-term business activity undertaken by your entity as at the end of prior calendar year, please indicate for social insurance product contracts:

Q21

a) the total volume (#) of active policies

As per Schedule 2 of the Insurance Business Act, 'Social insurance product' is defined as 'Contracts of a kind referred to in Article 2(3)(c) of the Solvency II Directive.'

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (26.Undertakings)

Q22

b) total gross premium (€) for active policies

[Answer if Q21 is > 0, Not Available]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (27.Undertakings+Intermediaries)

Q23

During the prior calendar year, were specific long-term business products (as described in the Second Schedule of the Insurance Business Act) ceased to be offered due to exposure to higher ML/FT risk?

Respondents that are insurance managers should select the 'Not Applicable' option in their response.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable
- Not Available

Products and Services (Insurance and Pensions) (28.Undertakings)

Q24

Do any of the long-term business insurance products offered by your entity, allow for easy access to funds?

Easy access to funds' include partial withdrawal or early surrender at any time with limited charges or fees.

Choose only one option:

- Yes
- No

Products and Services (Insurance and Pensions) (29.Undertakings)

Do any of the long-term business insurance products offered by your entity, allow for:

Q25 a) high-value premium / contribution payments	Choose only one option: <ul style="list-style-type: none"> • Yes • No or choose one of: <ul style="list-style-type: none"> • Not Available
Q26 b) overpayments	Choose only one option: <ul style="list-style-type: none"> • Yes • No or choose one of: <ul style="list-style-type: none"> • Not Available
Q27 c) large volumes of lower value premium payments	Choose only one option: <ul style="list-style-type: none"> • Yes • No or choose one of: <ul style="list-style-type: none"> • Not Available

Products and Services (Insurance and Pensions) (31.Undertakings)

Q28

Do the long-term business insurance products offered by your entity, impose a restriction and/or limit on the total policy value of the product?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Products and Services (Insurance and Pensions) (32.Undertakings)

Q29

Do the long-term business insurance products offered by your entity, impose a restriction on the term when the policy can be surrendered?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Products and Services (Insurance and Pensions) (32.5.Undertakings)

Q30

If yes, please specify the minimum time period

[Answer if Q29 is Yes]

or choose one of:

- Not Available

Products and Services (Insurance and Pensions) (34.Undertakings)

Q31

Do any of the long-term business insurance products offered by your entity allow for the transferability of the policy?

Choose only one option:

- Yes
- No

Products and Services (Insurance and Pensions) (35.Undertakings)

Q32

Does your entity offer long-term business tailor-made products, where the customer may dictate the underlying investment or portfolio composition?

Choose only one option:

- Yes
- No

Products and Services (Insurance and Pensions) (36.Undertakings)

Q33

Does your entity offer long-term business insurance products that are funded in part or in whole by an employer through employer contributions and/or deductions made from employee salaries?

Choose only one option:

- Yes
- No

Products and Services (Insurance and Pensions) (37.Undertakings)

Q34

Does your entity offer long term insurance products with a short-term maturity period?

A short term maturity period should be construed to be a period of up to 3 years.

Choose only one option:

- Yes
- No

Funding Methods (33.Undertakings)

Please indicate the following details for premium payments and/or contributions made through bank transfers in EU/EEA (or equivalent safeguards), in the prior calendar year:

Q35

Volume (#)

or choose one of:

- Not Available

Funding Methods (34.Undertakings)

Please indicate the following details for premium payments and/or contributions made through bank transfers in EU/EEA (or equivalent safeguards), in the prior calendar year:

Q36

Value (€)

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Available

Funding Methods (35.Undertakings)

Please indicate the following details for premium payments and/or contributions made through bank transfers in non-EU/EEA (or equivalent safeguards), in the prior calendar year:

Q37

Volume (#)

or choose one of:

- Not Applicable
- Not Available

Funding Methods (36.Undertakings)

Please indicate the following details for premium payments and/or contributions made through bank transfers in non-EU/EEA (or equivalent safeguards), in the prior calendar year:

Q38

Value (€)

Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Applicable
- Not Available

Funding Methods (37.Undertakings)

Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:

Q39

Volume (#)

or choose one of:

- Not Available

Funding Methods (38.Undertakings)

Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:

Q40

Value (€)

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Available

Funding Methods (39.Undertakings)

Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by non-EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:

Q41

Volume (#)

or choose one of:

- Not Available

Funding Methods (40.Undertakings)

Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by non-EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:

Q42

Value (€)

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Available

Funding Methods (41.Undertakings)

Please indicate the following details for premium payments and/or contributions made through prepaid cards and/or vouchers:

Q43

Volume (#)

or choose one of:

- Not Available

Funding Methods (42.Undertakings)

Please indicate the following details for premium payments and/or contributions made through prepaid cards and/or vouchers:

Q44

Value (€)

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Available

Funding Methods (43.Undertakings)

Please indicate the following details for premium payments and/or contributions made through cash:

Q45

Volume (#)

or choose one of:

- Not Available

Funding Methods (44.Undertakings)

Please indicate the following details for premium payments and/or contributions made through cash:

Q46

Value (€)

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Available



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?	
<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"/>
Q3	
c) an non-EU/EEA jurisdiction?	
<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"/>
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 347 1394 387" style="border: 1px solid black; height: 18px; 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 692" style="border: 1px solid black; height: 18px; 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

Transactions / Payments (1.Undertakings+Intermediaries)

Please indicate the following details for long-term insurance policy premium and/or contribution payments originated from domestic payees and/or insured persons in the prior calendar year:

Q88

a) Volume (#)

For Insurance Intermediaries: This should be only applicable to those brokers that are handling premia.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (2.Undertakings+Intermediaries)

Q89

b) Value (€)

[Answer if Q88 is > 0, Not Available]

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (3.Undertakings+Intermediaries)

Please indicate the following details for long-term insurance policies paid out to domestic-based insured-persons in the prior calendar year:

Q90

a) Volume (#)

For Insurance Intermediaries: This should be only applicable to those brokers that are handling premia.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (4.Undertakings+Intermediaries)

Q91

b) Value (€)

[Answer if Q90 is > 0, Not Available]

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (5.Undertakings+Intermediaries)

Please indicate the following details for long-term insurance policies paid out to cross border insured-persons or beneficiaries in the prior calendar year:

Q92

a) Volume (#)

For Insurance Intermediaries: This should be only applicable to those brokers that are handling premia.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (6.Undertakings+Intermediaries)

Q93

b) Value (€)

[Answer if Q92 is > 0, Not Available]

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (7&8.Undertakings+Intermediaries)

Please indicate the following details for long-term insurance policy premium and/or contribution payments originated from foreign payees and/or insured persons in the prior calendar year

Q94 Volume (number of transactions)	<input type="text"/> or choose one of: <ul style="list-style-type: none">• Not Applicable• Not Available
Q95 Value (€) [Answer if Q94 is > 0, Not Available] <i>Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year.</i>	<input type="text"/> or choose one of: <ul style="list-style-type: none">• Not Applicable• Not Available

Jurisdiction Risk (207)

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

Q96

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)

Q97

Please provide the number of subsidiaries per jurisdiction

[Answer if Q96 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)

Q98

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)

Q99

Please provide the number of branches per jurisdiction

[Answer if Q98 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)

Q100

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)

Q101

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

[Answer if Q100 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 (14.Undertakings+Intermediaries)

Q1

Please state the total number (#) of the customers relating to long-term insurance business which were onboarded on a non-face-to-face basis

Non- face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Examples include online postal or telephone sales.

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (15.Undertakings+Intermediaries)

Q2

Please state the total number (#) of long-term business insurance customers onboarded on a non-face-to-face basis that were introduced by an EU/EEA, or otherwise by a regulated broker/agent/introducer

Non- face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Examples include online postal or telephone sales.

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (16.Undertakings+Intermediaries)

Q3

Please state the total number (#) of long-term business insurance customers onboarded on a non-face-to-face basis that were introduced by a non-EU/EEA, or otherwise by a broker/agent/introducer

Non- face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Examples include online postal or telephone sales.

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (18.Undertakings+Intermediaries)

Q4

Please state the total number (#) of long-term business insurance customers where the Customer Due Diligence was conducted by the agent/broker/introducer/TII

Customer Due Diligence obtained by the broker and passed to the undertaking and double checked by the undertaking it is sill to be included in this question.

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (21)

Q5

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)

Q6

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

[Answer if Q5 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)

Q7

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)

Q8

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

[Answer if Q7 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 <i>a) Low risk customers</i> [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 <i>b) Medium risk customers</i> [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 <i>c) High risk customers</i>	<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]

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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

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- | | |
|--|---|
| | <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]	<i>Choose only one option:</i> <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]	<i>Choose only one option:</i> <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?