



Risk Evaluation Questionnaire 2025

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 (360)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q1

Were any new products offered in the previous calendar year?

Choose only one option:

- Yes
- No

Product Risk (361)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q2

Please provide a short description of the new products offered

[Answer if Q1 is Yes]

Product Risk (362)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q3

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

Choose only one option:

- Yes
- No

Product Risk (363)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q4

Provide details of the de-risking.

[Answer if Q3 is Yes]

Product Risk (388)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q5

Please indicate the total number of single or aggregate deposits in one gaming session in excess of €2,000 during the previous calendar year?

Product Risk (389)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate the total number of customers who have deposited (in single deposits or aggregate deposits) the following total amounts, in the previous calendar year:

Q6	<input type="text"/>
a) € 20,000 - € 50,000	<input type="text"/>
Q7	<input type="text"/>
b) € 50,001 - € 100,000	<input type="text"/>
Q8	<input type="text"/>

c) more than € 100,000

Product Risk (390)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate the following information covering all gaming relevant activity, during the previous calendar year:

Q9	<input type="text"/>
a) Total value (€) of customer deposits	<input type="text"/>
Q10	<input type="text"/>
<i>Out of the total value of deposits, what % was done in physical cash</i>	<input type="text"/>
[Answer if Q9 is > 0]	<input type="text"/>
Q11	<input type="text"/>
b) Total number (#) of customer deposits	<input type="text"/>
<i>Total number of customer deposits refer to the amount (count of transactions) of real money deposits made by customers.</i>	<input type="text"/>
Q12	<input type="text"/>
<i>Out of the total number, how many deposits involved physical cash</i>	<input type="text"/>
[Answer if Q11 is > 0]	<input type="text"/>
Q13	<input type="text"/>
c) Total value (€) wagered by customers	<input type="text"/>
<i>Total value wagered by customers means the total amount of money that was gambled by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions and bonus wagers. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates.</i>	<input type="text"/>
Q14	<input type="text"/>
d) Total number (#) of wagers made by customers	<input type="text"/>
Q15	<input type="text"/>

e) Total % of winnings (RTP) for customers (%)	
<i>Total percentage of winnings (RTP) refers to the % of total customer winning calculated on the total value wagered by all customers. RTP should be calculated on the real monies won by customers and should exclude bonus winnings or other winnings that are not instantly redeemable.</i>	
Q16	<input type="text"/>
f) Total value (€) of winnings (RTP) for customers	
Q17	<input type="text"/>
g) Total value (€) of customer withdrawals	
Q18	
<i>Out of the total value of withdrawals, what % was done in physical cash</i>	<input type="text"/>
[Answer if Q17 is > 0]	
Q19	<input type="text"/>
h) Total number (#) of customer withdrawals	
Q20	
<i>Of the total number of withdrawals, how many withdrawals involved physical cash</i>	<input type="text"/>
[Answer if Q19 is > 0]	
Q21	<input type="text"/>
i) Total value (€) of winning certificates issued	
Q22	<input type="text"/>
j) Total number (#) of winning certificates issued	

Product Risk (391)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q23

Out of the following, please tick the products that have been offered by your entity as a Land Based Casino:

Choose more than one option:

- Casino (including live casino)

- Fixed odds betting including live betting
- Peer to peer poker / bingo
- Any other gaming vertical which is not comprised within the above

Product Risk (392)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate for gaming vertical - casino (including live casino) the following information for such activities performed by the entity during the previous calendar year:

<p>Q24</p> <p>a) Total value (€) wagered by customers</p> <p>[Answer if Q23 is Casino (including live casino)]</p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	<input type="text"/>
<p>Q25</p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p>[Answer if Q23 is Casino (including live casino)]</p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	<input type="text"/>

Product Risk (393)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate for gaming vertical - fixed odds betting including live betting, the following information for such activities performed by the entity during the previous calendar year:

<p>Q26</p> <p>a) Total value (€) wagered by customers</p> <p>[Answer if Q23 is Fixed odds betting including live betting]</p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	<input type="text"/>
<p>Q27</p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p>[Answer if Q23 is Fixed odds betting including live betting]</p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	<input type="text"/>

Product Risk (394)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate for gaming vertical - peer to peer poker / bingo, the following information for such activities performed by the entity during the previous calendar year:

<p>Q28</p>	<input type="text"/>
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<p>a) Total value (€) wagered by customers</p> <p>[Answer if Q23 is Peer to peer poker / bingo]</p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	
<p>Q29</p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p>[Answer if Q23 is Peer to peer poker / bingo]</p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	<input data-bbox="1045 929 1396 974" type="text"/>

Product Risk (395)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate for gaming vertical - any other gaming vertical which is not comprised within the above, the following information for such activities performed by the entity during the previous calendar year:

<p>Q30</p> <p>a) Total value (€) wagered by customers</p> <p>[Answer if Q23 is Any other gaming vertical which is not comprised within the above]</p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms converted to € at the official daily exchange rate or in the absence thereof, at the</p>	<input data-bbox="1045 1635 1396 1680" type="text"/>
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<p>average monthly / annual ECB exchange rate (or other official source) for the previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	
<p>Q31</p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p>[Answer if Q23 is Any other gaming vertical which is not comprised within the above]</p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</p>	<div></div>

Product Risk (396)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q32

Please indicate the payment methods accepted by your entity, that customers can use to fund their account

Choose more than one option:

- Wire transfers (Banks / PSPs) / Debit Card / Credit Card
- Internet-based payment systems or other e-money services (as defined by FATF)
- Prepaid card / Vouchers
- Cash deposits
- Cheques
- Crypto assets
- Other payment methods

Product Risk (397)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q33

If other payment methods, please specify.

[Answer if Q32 is Other payment methods]

Product Risk (398)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q34

Please indicate the total value (€) of incoming transactions made via Wire transfers (Banks / PSPs) / Debit Card / Credit Card during the previous calendar year.

[Answer if Q32 is Wire transfers (Banks / PSPs) / Debit Card / Credit Card]

Product Risk (399)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q35

Please indicate the total value (€) of incoming transactions made via Internet-based payment systems or other e-money services (as defined by FATF) during the previous calendar year.

[Answer if Q32 is Internet-based payment systems or other e-money services (as defined by FATF)]

Product Risk (400)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q36

Please indicate the total value (€) of incoming transactions made via prepaid card / vouchers during the previous calendar year.

[Answer if Q32 is Prepaid card / Vouchers]

Product Risk (401)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q37

Please indicate the total value (€) of incoming transactions made via cash deposits during the previous calendar year.

[Answer if Q32 is Cash deposits]

Product Risk (402)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q38

Please indicate the total value (€) of incoming transactions made via cheques during the previous calendar year.

[Answer if Q32 is Cheques]

Product Risk (403)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q39

Please indicate the total value (€) of incoming transactions in crypto assets, made during the previous calendar year?

[Answer if Q32 is Crypto assets]

Product Risk (404)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q40

Please indicate the total value (€) of incoming transactions where the funds originated from crypto assets which were exchanged into fiat currency, made during the previous calendar year?

[Answer if Q32 is Crypto assets]

Product Risk (405)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q41

Please indicate the total value (€) of incoming transactions made via other payment methods during the previous calendar year.

[Answer if Q32 is Other payment methods]

Product Risk (406)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q42

What are the payment methods used for pay-out of customer winnings?

Choose more than one option:

- Wire transfers (Banks / PSPs) / Debit Card / Credit Card
- Cash payments or equivalent
- Cheques
- Other payment methods

Product Risk (407)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q43

Kindly indicate the total value (€) of customer winnings paid to customers through wire transfers (Banks / PSPs) / Debit Card / Credit Cards.

[Answer if Q42 is Wire transfers (Banks / PSPs) / Debit Card / Credit Card]

Product Risk (408)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q44

Kindly indicate the total value (€) of customer winnings paid to customers in cash or equivalent.

[Answer if Q42 is Cash payments or equivalent]

Product Risk (409)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q45

Kindly indicate the total value (€) of customer winnings paid to customers with cheques.

[Answer if Q42 is Cheques]

Product Risk (410)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q46

Kindly indicate the total value (€) of customer winnings paid to customers through other payment methods.

[Answer if Q42 is Other payment methods]

Product Risk (411)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q47

Kindly indicate if in the previous year there was any activity carried out by junket customers ?

Choose only one option:

- Yes
- No

Product Risk (412)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please provide the following on activity carried out by junket customers in the previous calendar year:

<p>Q48</p> <p>a) Total value (€) deposits transactions</p> <p>[Answer if Q47 is Yes]</p> <p><i>Junket means an arrangement the purpose of which is to induce any person resident outside Malta, selected or approved for participation therein, to come to a gaming premises in possession of a concession issued by Government for the purpose of playing licensable games and pursuant to which, and as a consideration for which, any or all of the costs of transportation, food, lodging, and entertainment for the said person is directly or indirectly paid by the authorised person operating the gaming premises.</i></p>	<input type="text"/>
<p>Q49</p> <p>b) Total value (€) wagered</p> <p>[Answer if Q47 is Yes]</p> <p><i>Total value wagered by customers means the total amount of money that was gambled by the customer expressed in monetary terms 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 previous calendar year. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</i></p>	<input type="text"/>
<p>Q50</p> <p>c) Total value (€) of customer winnings</p> <p>[Answer if Q47 is Yes]</p> <p><i>Total value of customer winnings (RTP) refers to the amount of total customer winning calculated 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 previous calendar year. RTP should be calculated on the real monies won by customers and should exclude bonus winnings or other winnings that are not instantly redeemable. Average exchange rates may be accessed through the following link: https://www.centralbankmalta.org/average-exchange-rates</i></p>	<input type="text"/>
<p>Q51</p> <p>d) Total value (€) withdrawals transactions</p>	<input type="text"/>

[Answer if Q47 is Yes]



Customer Risk

Customer Risk (284)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q1

Please specify the total number (#) of customers that are classified as VIPs, as defined by the policies and procedures.

Customer Risk (285)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate the jurisdictions in which customers that are classified as VIP reside.

Q2 Malta [Answer if Q1 is > 0]	Choose only one option: <ul style="list-style-type: none">• Yes• No
Q3 EU/EEA (Excluding Malta) [Answer if Q1 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 High Risk Third Countries". This list is as at 31 December 2024.	Choose only one option: <ul style="list-style-type: none">• Yes• No
Q4 Non-EU/Non-EEA [Answer if Q1 is > 0]	Choose only one option: <ul style="list-style-type: none">• Yes• No

<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>Q5</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 > 0]</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q6</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 Q5 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

	<ul style="list-style-type: none"> • 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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Customer Risk (288)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please specify the total number (#) of:

Q7	<input type="text"/>
a) customers rated as high risk	<input type="text"/>
Q8	<input type="text"/>
b) customers rated as medium risk	<input type="text"/>
Q9	<input type="text"/>
c) customers rated as low risk	<input type="text"/>

Customer Risk (289)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q10

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

calendar year.

Answer should not include customers who have not reached the threshold of € 2,000 in deposits

Customer Risk (290)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q11

Please specify the total number (#) of customers to whom Enhanced Due Diligence (EDD) was applied, given that their risk was classified as high, during the previous calendar year.

Customer Risk (292)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q12

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

Customer Risk (294)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q13

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

Customer Risk (295)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q14

Please indicate the total number of active customers who carried out transactions that amounted to or exceeded two thousand (€2,000), whether carried out within the context of a business relationship or otherwise, in the previous calendar year?

The term 'transactions' refers to: (a) acquires against payment chips or tokens for the amount of or exceeding €2,000; (b) exchanges chips or tokens for an amount of or exceeding €2,000, after playing a game or games.

Customer Risk (296)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q15

Please list the total number of the customers with whom your entity has an active business relationship and have transacted at least two thousand (€2,000) in the last six months of the previous calendar year?

Customer Risk (297)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q16

Please indicate the total number of customers who carried out transactions that amounted to or exceeded two thousand (€2,000), and have been suspended / terminated during the previous calendar year

Customer Risk (298)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q17

During the previous calendar year, what was the total number (#) of habitual customers?

Habitual customers as defined by the Subject Person's internal policies (eg. a customer who carries out gaming activity in the casino at least three times in one year)

Customer Risk (299)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q18

During the previous calendar year, what was the total number (#) of non-habitual customers?

Non-habitual customers as defined by the Subject Person's internal policies

Customer Risk (300)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q19

During the previous calendar year, what was the total number (#) of junket customers?

[Answer if Q47 is Yes]

Customer Risk (301)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Kindly indicate the number of customers introduced by junket operators from every jurisdiction as at the end of the previous calendar year.

Q20 <i>Malta</i> [Answer if Q19 is > 0]	<input type="text"/>
Q21 <i>EU/EEA (Excluding Malta)</i> [Answer if Q19 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"/>
Q22 <i>Non-EU/Non-EEA</i> [Answer if Q19 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</i>	<input type="text"/>

<p><i>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>Q23</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 Q19 is > 0]</p>	<div data-bbox="1045 472 1394 510" style="border: 1px solid black; height: 17px; width: 219px;"></div>
<p>Q24</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 Q23 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

	<ul style="list-style-type: none"> • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q25 Afghanistan [Answer if Q24 is Afghanistan]	<input type="text"/> <input type="text"/>
Q26 Algeria [Answer if Q24 is Algeria]	<input type="text"/> <input type="text"/>
Q27 Angola [Answer if Q24 is Angola]	<input type="text"/> <input type="text"/>
Q28 Barbados [Answer if Q24 is Barbados]	<input type="text"/> <input type="text"/>
Q29 Bulgaria [Answer if Q24 is Bulgaria]	<input type="text"/> <input type="text"/>
Q30 Burkina Faso [Answer if Q24 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q31 Cameroon [Answer if Q24 is Cameroon]	<input type="text"/> <input type="text"/>
Q32 Congo, the Democratic Republic of the	<input type="text"/> <input type="text"/>

[Answer if Q24 is Congo, the Democratic Republic of the]	
Q33	
Cote D'Ivoire	<input type="text"/>
[Answer if Q24 is Cote D'Ivoire]	
Q34	
Croatia	<input type="text"/>
[Answer if Q24 is Croatia]	
Q35	
Gibraltar	<input type="text"/>
[Answer if Q24 is Gibraltar]	
Q36	
Haiti	<input type="text"/>
[Answer if Q24 is Haiti]	
Q37	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q24 is Iran, Islamic Republic of]	
Q38	
Jamaica	<input type="text"/>
[Answer if Q24 is Jamaica]	
Q39	
Kenya	<input type="text"/>
[Answer if Q24 is Kenya]	
Q40	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q24 is Korea, Democratic People's Republic of]	
Q41	
Lebanon	<input type="text"/>
[Answer if Q24 is Lebanon]	
Q42	<input type="text"/>
Mali	

[Answer if Q24 is Mali]	
Q43	
Monaco	<input type="text"/>
[Answer if Q24 is Monaco]	
Q44	
Mozambique	<input type="text"/>
[Answer if Q24 is Mozambique]	
Q45	
Myanmar	<input type="text"/>
[Answer if Q24 is Myanmar]	
Q46	
Namibia	<input type="text"/>
[Answer if Q24 is Namibia]	
Q47	
Nigeria	<input type="text"/>
[Answer if Q24 is Nigeria]	
Q48	
Panama	<input type="text"/>
[Answer if Q24 is Panama]	
Q49	
Philippines	<input type="text"/>
[Answer if Q24 is Philippines]	
Q50	
Senegal	<input type="text"/>
[Answer if Q24 is Senegal]	
Q51	
South Africa	<input type="text"/>
[Answer if Q24 is South Africa]	
Q52	
South Sudan	<input type="text"/>
[Answer if Q24 is South Sudan]	
Q53	<input type="text"/>

Syrian Arab Republic	
[Answer if Q24 is Syrian Arab Republic]	
Q54	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q24 is Tanzania, United Republic of]	
Q55	
Trinidad and Tobago	<input type="text"/>
[Answer if Q24 is Trinidad and Tobago]	
Q56	
Uganda	<input type="text"/>
[Answer if Q24 is Uganda]	
Q57	
United Arab Emirates	<input type="text"/>
[Answer if Q24 is United Arab Emirates]	
Q58	
Vanuatu	<input type="text"/>
[Answer if Q24 is Vanuatu]	
Q59	
Venezuela	<input type="text"/>
[Answer if Q24 is Venezuela]	
Q60	
Vietnam	<input type="text"/>
[Answer if Q24 is Vietnam]	
Q61	
Yemen	<input type="text"/>
[Answer if Q24 is Yemen]	

Customer Risk (302)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please provide the total number of customers to which the following product was offered during the previous calendar year

Q62 <i>casino (including live casino)</i> [Answer if Q23 is Casino (including live casino)]	<input type="text"/> <input type="text"/>
Q63 <i>fixed odds betting including live betting</i> [Answer if Q23 is Fixed odds betting including live betting]	<input type="text"/> <input type="text"/>
Q64 <i>peer to peer poker / bingo</i> [Answer if Q23 is Peer to peer poker / bingo]	<input type="text"/> <input type="text"/>
Q65 <i>other gaming vertical</i> [Answer if Q23 is Any other gaming vertical which is not comprised within the above]	<input type="text"/> <input type="text"/>

Customer Risk (303)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q66

Does the entity allow its customers to hold multiple accounts within its approved premises?

Choose only one option:

- Yes
- No

Customer Risk (304)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q67

Does the entity allow its customers access to its multiple approved premises?

Choose only one option:

- Yes
- No

Customer Risk (305)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q68

Please list the total number of customers who during the previous calendar year, deposited and withdrew funds from their account without gameplay ?

Jurisdiction Risk

Jurisdiction Risk (206)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Please indicate the number of customers residing in every category of jurisdictions, as at the end of the previous calendar year.

Q1 Malta	<input type="text"/>
Q2 EU/EEA (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 Non-EU/Non-EEA <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 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	<input type="text"/>
Q5 <i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action'</i>	<i>Choose more than one option:</i> <ul style="list-style-type: none">• Afghanistan

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

[Answer if Q4 is > 0]

- 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 [Answer if Q5 is Algeria]	<input type="text"/> <input type="text"/>
Q8 Angola [Answer if Q5 is Angola]	<input type="text"/> <input type="text"/>
Q9 Barbados [Answer if Q5 is Barbados]	<input type="text"/> <input type="text"/>
Q10 Bulgaria [Answer if Q5 is Bulgaria]	<input type="text"/> <input type="text"/>
Q11 Burkina Faso [Answer if Q5 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q12 Cameroon [Answer if Q5 is Cameroon]	<input type="text"/> <input type="text"/>
Q13 Congo, the Democratic Republic of the [Answer if Q5 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q14 Cote D'Ivoire [Answer if Q5 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q15 Croatia [Answer if Q5 is Croatia]	<input type="text"/> <input type="text"/>
Q16 Gibraltar [Answer if Q5 is Gibraltar]	<input type="text"/> <input type="text"/>
Q17	<input type="text"/>

Haiti	
[Answer if Q5 is Haiti]	
Q18	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q5 is Iran, Islamic Republic of]	
Q19	
Jamaica	<input type="text"/>
[Answer if Q5 is Jamaica]	
Q20	
Kenya	<input type="text"/>
[Answer if Q5 is Kenya]	
Q21	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q5 is Korea, Democratic People's Republic of]	
Q22	
Lebanon	<input type="text"/>
[Answer if Q5 is Lebanon]	
Q23	
Mali	<input type="text"/>
[Answer if Q5 is Mali]	
Q24	
Monaco	<input type="text"/>
[Answer if Q5 is Monaco]	
Q25	
Mozambique	<input type="text"/>
[Answer if Q5 is Mozambique]	
Q26	
Myanmar	<input type="text"/>
[Answer if Q5 is Myanmar]	
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	
Uganda	<input type="text"/>
[Answer if Q5 is Uganda]	
Q38	<input type="text"/>

United Arab Emirates	
[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]	

Jurisdiction Risk (225)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q43

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

or choose one of:

- Not Applicable

Jurisdiction Risk (226)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q44

Please provide the number of subsidiaries per jurisdiction

[Answer if Q43 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 (227)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q45

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

or choose one of:

- Not Applicable

Jurisdiction Risk (228)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q46

Please provide the number of branches per jurisdiction

[Answer if Q45 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 (229)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q47

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

or choose one of:

- Not Applicable

Jurisdiction Risk (230)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q48

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

[Answer if Q47 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 Risk

Interface Risk (50)

(Relates to Remote Gaming Operators or Land-Based Casinos)

Q1

What % of customers had Customer Due Diligence carried out by a third party, with whom a reliance arrangement was in place?



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 (124)

Q9

How many customers are included in the entity's customer portfolio, where customer due diligence has not been completed once the customers have reached the € two thousand (€2,000) threshold in deposits?

or choose one of:

- Not Applicable

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 (125)

Q12

When does your entity carry out the first CRA?

Choose only one option:

- At onboarding
- At first transaction
- When the two thousand (€2,000) threshold in deposits is reached
- CRA not carried out
- Other

Q13

Kindly provide details if "other".

[Answer if Q12 is Other]

Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

Q14 <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
Q15 <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
Q16 <i>c) High 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

Customer Acceptance and Risk Assessment (106)

Q17

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)

Q18

What was the reason for the de-risking exercise?

[Answer if Q17 is > 0]

Customer Acceptance and Risk Assessment (108)

Q19

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 (77)

Q14

If others, explain

[Answer if Q13 is Others]



Outsourcing

Outsourcing (1)

Q1

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

Choose only one option:

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

Outsourcing (2)

Q2

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

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

Outsourcing (13)

Q3

If your entity outsourced the carrying out of any applicable AML/CFT obligations outside the group, 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 (14)

Q4

If your entity outsourced the carrying out of any applicable AML/CFT obligations within the group, 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 (15)

Q5

If your entity outsources AML/CFT obligations to a service provider/s, whether within or outside the group, 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 (24)

Please indicate the jurisdictions where the service providers 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>Choose only one option:</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>	<ul style="list-style-type: none"> • Yes • No
<p>Q10</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 Q9 is Yes]</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

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



Record-keeping

Record-keeping (1)

Q1

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

Choose only one option:

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



Training

Training (1)

Q1

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

Training (2)

Q2

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

Training (3)

Q3

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

[Answer if Q8 is > 0]

or choose one of:

- Not Applicable

Training (10)

Q4

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

or choose one of:

- Not Applicable

Training (5)

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

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

Training (14)

Q7

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

Choose only one option:

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

Reporting

Reporting (15)

Q1

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

Reporting (16)

Q2

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

[Answer if Q1 is > 0]

Reporting (17)

Q3

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

[Answer if Q1 is > 0]

Reporting (18)

Q4

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

Reporting (19)

Q5

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



Ongoing monitoring (data, documents and information)

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

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

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

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

Q4

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

Choose more than one option:

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

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

Q5

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

Ongoing monitoring (Transaction Scrutiny)

Ongoing monitoring (Transaction Scrutiny) (5)

Q1

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

Choose only one option:

- Yes
- No

Ongoing monitoring (Transaction Scrutiny) (42)

Q2

In case of a business relationship, are processes and/or systems for monitoring transactions 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) (43)

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) (44)

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-event
- Post-event
- Combination of all
- Combination of pre-event and post-event

or choose one of:

- Not Applicable

Ongoing monitoring (Transaction Scrutiny) (45)

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) (46)

Q6

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

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

or choose one of:

- Not Applicable

Ongoing monitoring (Transaction Scrutiny) (47)

Q7

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, Combination of all, Combination of pre-event and post-event]

Ongoing monitoring (Transaction Scrutiny) (48)

Q8

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, Combination of all, Combination of pre-event and post-event]

or choose one of:

- Not Available

Ongoing monitoring (Transaction Scrutiny) (50)

Q9

Does your entity implement a closed-loop policy with regards to withdrawals?

Choose only one option:

- Yes
- No
- Not always

Ongoing monitoring (Transaction Scrutiny) (51)

Q10

Kindly provide details if "not always".

[Answer if Q9 is Not always]

Ongoing monitoring (Transaction Scrutiny) (52)

Q11

Does your entity have controls in place to detect the opening of multiple accounts by the same customer?

Choose only one option:

- Yes
- No
- Not Applicable

Ongoing monitoring (Transaction Scrutiny) (53)

Q12

Does your entity have measures in place to be able to detect collusion between customers?

Choose only one option:

- Yes
- No
- Not Applicable

Ongoing monitoring (Transaction Scrutiny) (25)

Q13

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

Ongoing monitoring (Transaction Scrutiny) (27)

Q14

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

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

