



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 (290)

(Relates to Real Estate Agents)

Q1

Please list the total number of deeds of sale of immovable property for which you acted as an agent in the prior calendar year.

Product Risk (291)

(Relates to Real Estate Agents)

Q2

Please list the total number of occasional transactions carried out during the previous calendar year and that related to deed of immovable property sale that were assessed to be 'high risk'.

Product Risk (292)

(Relates to Real Estate Agents)

Q3

Please list the total number of occasional transactions carried out during the previous calendar year and that related to deed of immovable property sale that were assessed to be 'medium risk'.

Product Risk (293)

(Relates to Real Estate Agents)

Q4

Please list the total number of occasional transactions carried out during the previous calendar year and that related to deed of immovable property sale that were assessed to be 'low risk'.

Product Risk (294)

(Relates to Real Estate Agents)

Q5

How many occasional transactions carried out during the previous calendar year and that related to deed of immovable property sale were subject to simplified due diligence?

Product Risk (295)

(Relates to Real Estate Agents)

Q6

How many occasional transactions carried out during the previous calendar year and that related to deed of immovable property sale were subject to enhanced due diligence?

Product Risk (296)

(Relates to Real Estate Agents)

Q7

Please specify the number of property letting contracts with a monthly rental transaction value of €10,000 or more, for which you acted as an agent during the prior calendar year.

Product Risk (297)

(Relates to Real Estate Agents)

Q8

How many deeds of immovable property sale were you involved in during the previous calendar year where at least 50% of the consideration was paid through the buyer's own or third party funds (i.e. not financed by a bank loan)?

Product Risk (298)

(Relates to Real Estate Agents)

Q9

How many deeds of immovable property sale were you involved in during the previous calendar year where all the consideration (excluding 10% deposit) was paid through the buyer's own or third party funds (i.e. not financed by a bank loan)?

Product Risk (299)

(Relates to Real Estate Agents)

Q10

How many deeds of immovable property sale were you involved in during the previous calendar year where the consideration (excluding 10% deposit) was financed through a loan issued through a non-EU/ non-EEA financial / credit institution?

Product Risk (300)

(Relates to Real Estate Agents)

Q11

How many deeds of immovable property sale were you involved in during the previous calendar year where the consideration (excluding 10% deposit) was financed through loans or other means of finance other than those issued by a regulated financial / credit institution?

Product Risk (301)

(Relates to Real Estate Agents)

Q12

Please state the number of deeds of immovable property sale that you were involved in during the previous calendar year, where the property had a sale value of up to €350,000?

Product Risk (302)

(Relates to Real Estate Agents)

Q13

Please state the number of deeds of immovable property sale that you were involved in during the previous calendar year, where the property had a sale value between €350,001 and €550,000?

Product Risk (303)

(Relates to Real Estate Agents)

Q14

Please state the number of deeds of immovable property sale that you were involved in during the previous calendar year, where the property had a sale value between €550,001 and €999,999?

Product Risk (304)

(Relates to Real Estate Agents)

Q15

Please state the number of deeds of immovable property sale that you were involved in during the previous calendar year, where the property had a sale value exceeding €1,000,000?

Product Risk (305)

(Relates to Real Estate Agents)

Q16

Please specify the deeds of immovable property sale that you were involved in during the prior calendar year which involved properties in Special Designated Areas.

Product Risk (306)

(Relates to Real Estate Agents)

Q17

How many deeds of immovable property sale were you involved in during the prior calendar year which involved successive transactions relating to the same property which took place within a short period of time?

Product Risk (307)

(Relates to Real Estate Agents)

Q18

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

Choose only one option:

- Yes
- No

Product Risk (308)

(Relates to Real Estate Agents)

Q19

Provide details of the de-risking.

[Answer if Q18 is Yes]



Customer Risk

Customer Risk (195)

(Relates to Real Estate Agents)

Q1

Please list the total number of deeds of immovable property sales concluded in the last calendar year where all the purchasers were natural persons.

Customer Risk (196)

(Relates to Real Estate Agents)

Q2

How many natural persons were included as purchasers in deeds of immovable property sale that you were involved in during the last calendar year?

Customer Risk (197)

(Relates to Real Estate Agents)

Q3

Please indicate the number of deeds of immovable property sale concluded in the previous calendar year exceeding the value of €1,000,000, where the purchaser(s) was / were solely natural persons.

Customer Risk (198)

(Relates to Real Estate Agents)

Q4

Please list the total number of deeds of immovable property sales concluded in the last calendar year where at least one of the purchasers were legal persons or arrangements.

Customer Risk (199)

(Relates to Real Estate Agents)

Q5

How many legal persons were included as purchasers in deeds of immovable property sale that you were involved in during the last calendar year?

Customer Risk (201)

(Relates to Real Estate Agents)

Q6

Please list the number of legal person purchasers involved in a deed of immovable property sale that you were involved in during the last calendar year having multi-tier ownership structures (i.e. at least two additional layers of legal persons on top of the legal person being the purchaser).

Customer Risk (203)

(Relates to Real Estate Agents)

Q7

Please list the number of purchasers (a legal person) involved in a deed of immovable property sale that you were involved in during the previous calendar year who are voluntary organisations (including charities, foundations and Non-Profit entities).

Customer Risk (205)

(Relates to Real Estate Agents)

Q8

Please list the number of purchasers (including beneficial owners) for whom you concluded a deed of immovable property sale during the previous calendar year, that benefited from residency or citizenship schemes, or are applicants or prospective applicants for such schemes.

Customer Risk (207)

(Relates to Real Estate Agents)

Q9

Please list the number of purchasers in deeds of immovable property sale that you were involved in during the previous calendar year that are involved in cash intensive businesses.

Customer Risk (209)

(Relates to Real Estate Agents)

Q10

From the total deeds of immovable property sale that you were involved in during the previous calendar year, how many natural persons or beneficial owners who were listed as purchasers in the deed were PEPs (including family members and close associates)?

Customer Risk (211)

(Relates to Real Estate Agents)

Q11

From the total deeds of immovable property sale that you were involved in during the last calendar year, how many natural persons or beneficial owners who were listed as vendors in the deed were PEPs (including family members and close associates)?

Customer Risk (213)

(Relates to Real Estate Agents)

Q12

Please list the total number of deeds of immovable property sale that you were involved in during the last calendar year where at least one of the purchasers operated in dual use items.

Customer Risk (215)

(Relates to Real Estate Agents)

Q13

Please list the total number of deeds of immovable property sale that you were involved in during the last calendar year where at least one of the vendors operated in dual use items.

Customer Risk (217)

(Relates to Real Estate Agents)

Q14

How many customers do you have who appeared as buyers in more than three deeds of immovable property sale during the last 2 calendar years?

Customer Risk (219)

(Relates to Real Estate Agents)

Q15

How many customers do you have who appeared as vendors in more than three deeds of immovable property sale during the last 2 calendar years?

Customer Risk (221)

(Relates to Real Estate Agents)

Q16

In the case of property letting contracts with a monthly rental transaction value of €10,000 or more, and for which you acted as an agent during the prior calendar year, how many natural persons were lessees?

Customer Risk (223)

(Relates to Real Estate Agents)

Q17

In the case of property letting contracts with a monthly rental transaction value of €10,000 or more, and for which you acted as an agent during the prior calendar year, how many legal persons were lessees?

Jurisdiction Risk

Jurisdiction Risk (130)

(Relates to Real Estate Agents)

Q1

Please specify the total number of natural person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year who were resident in Malta.

Jurisdiction Risk (131)

(Relates to Real Estate Agents)

Q2

In the case of natural person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year and who were not resident in Malta, please specify the jurisdictions where they reside.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (132)

(Relates to Real Estate Agents)

Q3

Please specify the total number of natural person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year

who were Maltese national.

Jurisdiction Risk (133)

(Relates to Real Estate Agents)

Q4

In the case of natural person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year and who were not Maltese national, please specify the nationality jurisdiction.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (134)

(Relates to Real Estate Agents)

Q5

Please specify the total number of legal person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year who were registered in Malta.

Jurisdiction Risk (135)

(Relates to Real Estate Agents)

Q6

In the case of legal person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year and who were not registered in Malta, please specify the jurisdictions where they are registered.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (136)

(Relates to Real Estate Agents)

Q7

Please specify the total number of beneficial owners of legal person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year who were resident in Malta.

Jurisdiction Risk (137)

(Relates to Real Estate Agents)

Q8

In the case of beneficial owners of legal person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year and who were not resident in Malta, please specify the jurisdictions where they are resident.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (138)

(Relates to Real Estate Agents)

Q9

Please specify the total number of beneficial owners of legal person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year who were Maltese national.

Jurisdiction Risk (139)

(Relates to Real Estate Agents)

Q10

In the case of beneficial owners of legal person purchasers involved in deeds of immovable property sale that you were involved in during the previous calendar year and who were not Maltese national, please specify the nationality jurisdiction.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (140)

(Relates to Real Estate Agents)

Q11

If a natural person or a beneficial owner were a party to a deed of immovable property sale carried out in the previous calendar year, kindly indicate the total PEPs per jurisdiction in which these persons were considered to be a PEP.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (141)

(Relates to Real Estate Agents)

Q12

In the case of property letting contracts with a monthly rental transaction value of €10,000 or more, and for which you acted as an agent during the prior calendar year, how many natural persons lessees were Maltese national?

Jurisdiction Risk (142)

(Relates to Real Estate Agents)

Q13

In the case of property letting contracts with a monthly rental transaction value of €10,000 or more, and for which you acted as an agent during the prior calendar year, how many natural persons lessees were not Maltese national?

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (143)

(Relates to Real Estate Agents)

Q14

In the case of property letting contracts with a monthly rental transaction value of €10,000 or more, and for which you acted as an agent during the prior calendar year, how many legal persons lessees were registered in Malta?

Jurisdiction Risk (144)

(Relates to Real Estate Agents)

Q15

In the case of property letting contracts with a monthly rental transaction value of €10,000 or more, and for which you acted as an agent during the prior calendar year, how many legal persons lessees were not registered in Malta?

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Interface Risk

Interface Risk (32)

(Relates to Real Estate Agents)

Q1

From the deeds of immovable property sale that you were involved in during the prior calendar year, how many purchasers (natural person) were represented by another person through a power of attorney?

Interface Risk (33)

(Relates to Real Estate Agents)

Q2

From the deeds of immovable property sale that you were involved in during the prior calendar year, how many sellers (natural person) were represented by another person through a power of attorney?

Interface Risk (34)

(Relates to Real Estate Agents)

Q3

What is the % of purchasers/vendors whose customer due diligence had been carried out by another subject person/third party, on the basis of a reliance agreement between you and the other subject person/third party in terms of Regulation 12 of the PMLFTR?



MLRO, Monitoring Function and Employees

MLRO, Monitoring Function and Employees (27)

Q1

For how many years have you been acting as a real estate agent?

Choose only one option:

- Not more than 5 years
- 6-10 years
- Over 10 years



Business Risk Assessment

Business Risk Assessment (10)

Q1

What is your 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 reflects 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 (12)

Q2

What is your 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 reflects 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 (22)

Q3

What is your 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 reflects 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 (26)

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 (27)

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 (28)

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 (23)

Q7

Did you 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

Business Risk Assessment (33)

Q8

Please indicate the jurisdictions which you consider 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 (35)

Q9

What are the 2 highest interface risk factors resulting from the BRA?

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



Customer Acceptance and Risk Assessment

Customer Acceptance and Risk Assessment (109)

Q1

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

Choose only one option:

- Yes
- No
- CAP Not Available

Customer Acceptance and Risk Assessment (112)

Q2

Did this review result in major changes?

[Answer if Q1 is Yes]

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (113)

Q3

Please explain these changes.

[Answer if Q2 is Yes]

Customer Acceptance and Risk Assessment (117)

Q4

According to your 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 (99)

Q5

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)

Q6

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

[Answer if Q5 is Yes]

Customer Acceptance and Risk Assessment (103)

Q7

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

Customer Acceptance and Risk Assessment (104)

Q8

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

[Answer if Q7 is > 0]

Customer Acceptance and Risk Assessment (116)

Q9

In what cases do you collect documentation on the buyer's source of wealth and source of funds when carrying out a deed of immovable property sale?

Customer Acceptance and Risk Assessment (120)

Q10

During the last calendar year, how many customers fell outside the CAP but were provided with services?

[Answer if Q1 is Yes, No]

Customer Acceptance and Risk Assessment (121)

Q11

How many deeds of immovable property sale carried out by you in the prior calendar year had incomplete CDD?



Policies & Procedures

Policies and Procedures (53)

Q1

How frequently do you review and / or update your AML/CFT written policies and procedures?

Choose only one option:

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

Policies and Procedures (65)

Q2

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

Choose more than one option:

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

Policies and Procedures (66)

Q3

How is it being determined whether individuals/entities are sanctioned?

Choose more than one option:

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

Policies and Procedures (70)

Q4

Has the entity/you ever engaged an independent third party to carry out an independent audit to assess compliance with AML/CFT obligations?

Choose only one option:

- Yes - During the past 2 years
- Yes - Over 2 years ago
- No

Policies and Procedures (71)

Q5

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

[Answer if Q4 is Yes - During the past 2 years, Yes - Over 2 years ago]

Choose only one option:

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

Policies and Procedures (72)

Q6

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 Q4 is Yes - During the past 2 years, Yes - Over 2 years ago]

Policies and Procedures (73)

Q7

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 Q4 is Yes - During the past 2 years, Yes - Over 2 years ago]

Policies and Procedures (74)

Q8

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

[Answer if Q4 is Yes - During the past 2 years, Yes - Over 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
- AML/CFT Governance
- Others

Outsourcing

Outsourcing (7)

Q1

Have you outsourced the carrying out of any applicable AML/CFT obligations during the previous calendar year?

Choose only one option:

- Yes
- No

Outsourcing (8)

Q2

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

[Answer if Q1 is Yes]

Outsourcing (9)

Q3

Please specify the obligations that are being outsourced.

[Answer if Q1 is Yes]

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
- MLRO function

- Drafting of policies and procedures

Outsourcing (10)

Q4

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

[Answer if Q1 is Yes]

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 (11)

Please indicate the jurisdictions where the service provider/s to whom you have outsourced the carrying out of any applicable AML/CFT obligations, are located..

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

<p><i>'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	
<p>Q7</p> <p>Non-EU/Non-EEA</p> <p>[Answer if Q1 is Yes]</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q8</p> <p><i>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q1 is Yes]</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q9</p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q8 is Yes]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire

	<ul style="list-style-type: none"> • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
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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 (9)

Q1

Please provide the number of AML/CFT training hours that you received in the previous calendar year?

or choose one of:

- Not Applicable



Reporting

Reporting (18)

Q1

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

Reporting (19)

Q2

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