



# 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 (291)

*(Relates to Real Estate Agents)*

**Q1**

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)*

**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 'medium risk'.

## Product Risk (293)

*(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 'low risk'.

## Product Risk (294)

*(Relates to Real Estate Agents)*

**Q4**

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)*

**Q5**

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 (307)

*(Relates to Real Estate Agents)*

**Q6**

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)*

**Q7**

*Provide details of the de-risking.*

**[Answer if Q6 is Yes]**

## Product Risk (309)

*(Relates to Real Estate Agents)*

**Q8**

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

## Product Risk (310)

*(Relates to Real Estate Agents)*

**Q9**

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

## Product Risk (311)

***(Relates to Real Estate Agents)***

**Q10**

How many deeds of immovable property sale was the agency 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 (312)**

***(Relates to Real Estate Agents)***

**Q11**

How many deeds of immovable property sale was the agency 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 (313)**

***(Relates to Real Estate Agents)***

**Q12**

How many deeds of immovable property sale was the agency 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 (314)**

***(Relates to Real Estate Agents)***

**Q13**

How many deeds of immovable property sale was the agency 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 (315)**

***(Relates to Real Estate Agents)***

**Q14**

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

**Product Risk (316)**

***(Relates to Real Estate Agents)***

**Q15**

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

**Product Risk (317)**

***(Relates to Real Estate Agents)***

**Q16**

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

**Product Risk (318)**

***(Relates to Real Estate Agents)***

**Q17**

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

**Product Risk (319)**

***(Relates to Real Estate Agents)***

**Q18**

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

**Product Risk (320)**

***(Relates to Real Estate Agents)***

**Q19**

How many deeds of immovable property sale was the agency 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?



# 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 (200)

*(Relates to Real Estate Agents)*

**Q5**

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

## Customer Risk (202)

*(Relates to Real Estate Agents)*

**Q6**

Please list the number of legal person purchasers involved in a deed of immovable property sale that the agency was 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 (204)

***(Relates to Real Estate Agents)***

**Q7**

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

## **Customer Risk (206)**

***(Relates to Real Estate Agents)***

**Q8**

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

## **Customer Risk (208)**

***(Relates to Real Estate Agents)***

**Q9**

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

## **Customer Risk (210)**

***(Relates to Real Estate Agents)***

**Q10**

From the total deeds of immovable property sale that the agency was involved in during the last 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 (212)**

***(Relates to Real Estate Agents)***

**Q11**

From the total deeds of immovable property sale that the agency was 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 (214)**

***(Relates to Real Estate Agents)***

**Q12**

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

**Customer Risk (216)**

***(Relates to Real Estate Agents)***

**Q13**

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

## **Customer Risk (218)**

***(Relates to Real Estate Agents)***

**Q14**

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

## **Customer Risk (220)**

***(Relates to Real Estate Agents)***

**Q15**

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

## **Customer Risk (222)**

***(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 the agency acted as an agent during the prior calendar year, how many natural persons were lessees?

## Customer Risk (224)

*(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 your agency acted as an agent during the prior calendar year, how many legal persons were lessees?

## Jurisdiction Risk

### Jurisdiction Risk (140)

*(Relates to Real Estate Agents)*

#### Q1

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 (145)

*(Relates to Real Estate Agents)*

#### Q2

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

### Jurisdiction Risk (146)

*(Relates to Real Estate Agents)*

#### Q3

In the case of natural person purchasers involved in deeds of immovable property sale that the agency was 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 (147)**

***(Relates to Real Estate Agents)***

### **Q4**

Please specify the total number of natural person purchasers involved in deeds of immovable property sale that the agency was involved in during the previous calendar year who were Maltese national.

## **Jurisdiction Risk (148)**

***(Relates to Real Estate Agents)***

### **Q5**

In the case of natural person purchasers involved in deeds of immovable property sale that the agency was 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 (149)

*(Relates to Real Estate Agents)*

**Q6**

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

## Jurisdiction Risk (150)

*(Relates to Real Estate Agents)*

**Q7**

In the case of legal person purchasers involved in deeds of immovable property sale that the agency was 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 (151)

*(Relates to Real Estate Agents)*

**Q8**

Please specify the total number of beneficial owners of legal person purchasers involved in deeds of immovable property sale that the agency was involved in during

in the previous calendar year who were resident in Malta.

## Jurisdiction Risk (152)

*(Relates to Real Estate Agents)*

### Q9

In the case of beneficial owners of legal person purchasers involved in deeds of immovable property sale that the agency was 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 (153)

*(Relates to Real Estate Agents)*

### Q10

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

## Jurisdiction Risk (154)

***(Relates to Real Estate Agents)***

**Q11**

In the case of beneficial owners of legal person purchasers involved in deeds of immovable property sale that the agency was 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 (155)**

***(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 the agency acted as an agent during the prior calendar year, how many natural persons lessees were Maltese national?

**Jurisdiction Risk (156)**

***(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 the agency 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 (157)**

*(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 the agency acted as an agent during the prior calendar year, how many legal persons lessees were registered in Malta?

## **Jurisdiction Risk (158)**

*(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 the agency 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 (35)

*(Relates to Real Estate Agents)*

**Q1**

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

### Interface Risk (36)

*(Relates to Real Estate Agents)*

**Q2**

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

### Interface Risk (37)

*(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 the agency 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 (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]**

## MLRO, Monitoring Function and Employees (28)

### Q13

How many real estate agents licensed by the Real Estate Licensing Unit are employed with your firm? (i.e. there is a contract of employment between the firm and the real estate agent)

## MLRO, Monitoring Function and Employees (29)

### Q14

How many real estate agents licensed by the Real Estate Licensing Unit are engaged with your firm? (i.e. real estate agents are allowed to sell properties marketed by the agency but there is no contract of employment between the firm and the real estate agents)

# 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 (19)

Q7

*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

## Business Risk Assessment (32)

Q8

*Please indicate the jurisdictions which the entity considers as high risk (excluding non-reputable jurisdictions)*

***[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 (34)

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 (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 (103)

**Q8**

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

## Customer Acceptance and Risk Assessment (104)

**Q9**

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

**[Answer if Q8 is > 0]**

## Customer Acceptance and Risk Assessment (116)

**Q10**

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 (122)

### Q11

How many deeds of immovable property sale that the entity carried out last year, has CDD not been completed?



# 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 (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

## Policies and Procedures (75)

**Q9**

*If others, explain*

**[Answer if Q8 is Others]**



# Outsourcing

## Outsourcing (19)

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 (20)

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 (21)

Q3

*Please specify the obligations that are being outsourced.*

***[Answer if Q1 is Yes Outsourcing Within the Group,, Yes Outsourcing Outside the group]***

*Choose more than one option:*

- Drafting of BRA
- CRA
- CDD - PMLFTR Reg 7(1)(a) and 7(1)(b)
- EDD measures
- Record-keeping
- Drafting of policies and procedures

## Outsourcing (22)

Q4

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

**[Answer if Q1 is Yes Outsourcing Outside the group]**

Choose only one option:


- No assessments are carried out
- On a monthly basis
- On a quarterly basis
- Half yearly
- Yearly
- Every 2 years
- Over 2 years

## Outsourcing (23)

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

<p><b>Q5</b></p> <p>Malta</p> <p><b>[Answer if Q1 is Yes Outsourcing Within the Group,, Yes Outsourcing Outside the group]</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>
<p><b>Q6</b></p> <p>EU/EEA</p> <p><b>[Answer if Q1 is Yes Outsourcing Within the Group,, Yes Outsourcing Outside the group]</b></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"><li>• Yes</li><li>• No</li></ul>

<p><b>Q7</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q1 is Yes Outsourcing Within the Group,, Yes Outsourcing Outside the group]</b></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"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q8</b></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><b>[Answer if Q1 is Yes Outsourcing Within the Group,, Yes Outsourcing Outside the group]</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q9</b></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><b>[Answer if Q8 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Barbados</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Croatia</li> <li>• Gibraltar</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Jamaica</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> </ul>



	<ul style="list-style-type: none"><li>• Lebanon</li><li>• Mali</li><li>• Monaco</li><li>• Mozambique</li><li>• Myanmar</li><li>• Namibia</li><li>• Nigeria</li><li>• Panama</li><li>• Philippines</li><li>• Senegal</li><li>• South Africa</li><li>• South Sudan</li><li>• Syrian Arab Republic</li><li>• Tanzania, United Republic of</li><li>• Trinidad and Tobago</li><li>• Uganda</li><li>• United Arab Emirates</li><li>• Vanuatu</li><li>• Venezuela</li><li>• Vietnam</li><li>• Yemen</li></ul>
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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 (3)

### Q1

*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 (12)

### Q2

Please provide the % of real estate agents that completed AML/CFT training throughout the prior calendar year.

# 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?

