



# 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.

# Customers

**Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors**

## Customers (2.1)

**(Relates to Investment Services & Securities Markets)**

### Q1

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

*Customer is defined as a natural person or a legal person and/or entity with whom the subject person has a business relationship, or for whom the subject person carried out an occasional transaction. In this context, customers refers to active customers as at the end of the prior calendar year.*

*For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.*

or choose one of:

- Not Available

## Customers (10.1)

**(Relates to Investment Services & Securities Markets)**

### Q2

Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.

*Customer is defined as natural person or a legal person / entity with whom the subject person has a business relationship or for whom the subject person carried out an occasional transaction. In this context, customers refer to customers for whom the subject person carried out an occasional transaction during the prior calendar*

*year. Where a subject person carried out more than one occasional transaction to the same customer, it should count the customer as one to avoid duplication. "Total number of customers" only includes those clients that have been provided with a relevant activity by the subject person.*

*For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.*

*or choose one of:*

- Not Available

## **Customers (29)**

### **Q3**

Do you have any customers in the following industries?

*Choose more than one option:*

- Precious metals, stones, jewelry dealers or wholesalers
- Arts or Antiques dealers
- Aviation technology, materials or Parts
- Cash intensive businesses
- Hydrocarbon trading or investing
- Arms or weapons dealers or manufacturers
- Car dealers
- Remote Gaming Operators or Land Based Casinos
- Attorneys / Lawyers
- Chemical, Oil, Gas or Petrochemicals companies
- International Transportation businesses (including by air, land or sea)
- Import or Export Agents

*or choose one of:*

- Not Available

## **Customers (Investments) (25)**

#### Q4

What is the total number (#) of customers that invest in loans

or choose one of:

- Not Available

### Customers (Investments) (26)

#### Q5

What is the total number (#) of customers that invest in precious metals

or choose one of:

- Not Available

### Customers (Investments) (41)

#### Q6

What is the total number (#) of customers that invest in other assets not referred to hereabove?

or choose one of:

- Not Available

### Customer Type (9)

#### Q7

Please list the number of customers and beneficial owners serviced during the prior calendar year, that benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes.

*Investor citizenship schemes are often referred to as CIPs ('citizenship investment programmes'), 'citizenships for sale' or 'golden passports'. They allow foreigners to be naturalised as a citizen of a country in return for an investment, provided certain criteria are fulfilled. Investor citizenship schemes differ from investor residence ('golden visa') schemes, which aim to attract investment in exchange for residence rights in the country concerned. The answer provided should include all the customers of the subject person who have benefitted or applied to benefit from CIPs, irrespective whether the application for the CIP was done by the SP.*

or choose one of:

- Not Available

## Customer Type (12)

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

**Q8**

a) Malta UCITS Scheme

or choose one of:

- Not Available

## Customer Type (13)

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

**Q9**

b) Professional Investor Fund (PIF)

or choose one of:

- Not Available

## Customer Type (14)

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

**Q10**

c) Alternative Investment Fund (AIF)

or choose one of:

- Not Available

## Customer Type (15)

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

**Q11**

d) Notified Alternative Investment Fund (NAIF)

or choose one of:

- Not Available

## Customer Type (16)

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

**Q12**

e) Private Collective Investment Schemes

*or choose one of:*

- Not Available

## **Customer Type (17)**

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

**Q13**

f) Foreign UCITS Schemes

*or choose one of:*

- Not Available

## **Customer Type (18)**

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

**Q14**

g) EU/EEA Alternative Investment Funds

*or choose one of:*

- Not Available

## Customer Type (19)

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

**Q15**

h) Other Foreign Collective Investment Schemes

or choose one of:

- Not Available

## Customer Type (31.1)

**(Relates to Investment Services & Securities Markets)**

Please specify the total number (#) of:

<p><b>Q16</b></p> <p>a) customers rated as high risk</p> <p><i>The risk rating of your customers should be as at the end of the prior calendar year. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.</i></p>	<input type="text"/>  or choose one of: <ul style="list-style-type: none"><li>• Not Available</li></ul>
<p><b>Q17</b></p> <p>b) customers rated as medium risk</p> <p><i>The risk rating of your customers should be as at the end of the prior calendar year. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.</i></p>	<input type="text"/>  or choose one of: <ul style="list-style-type: none"><li>• Not Available</li></ul>
<p><b>Q18</b></p> <p>c) customers rated as low risk</p> <p><i>The risk rating of your customers should be as at the end of the prior calendar year. The risk rating should reflect the</i></p>	<input type="text"/>  or choose one of: <ul style="list-style-type: none"><li>• Not Available</li></ul>

result of the latest customer risk assessment as carried out in line with the policies and procedures.	
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## Customer Type (36)

### Q19

Does your customer base have a risk rating outside of the 'high', 'medium' and 'low' categories?

*Choose only one option:*

- Yes
- No

## Customer Type (37)

### Q20

*Please specify the additional risk rating/s.*

**[Answer if Q19 is Yes]**

## Customer Type (39)

### Q21

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

*or choose one of:*

- Not Available

## Customers (Others) (5)

### Q22

Are customers that act as holding companies with subsidiaries or investments in non-EU/EEA jurisdictions part of the customer base?

*Holding companies are typically entities that hold investments principally related to equity shares in other entities. Holding companies may also own other assets such as immovable property, intellectual property and other financial assets. Holding companies do not actively participate in the running of the day-to-day operations of the entities they hold an investment in.*

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

## Customers (Others) (14)

***Based on the investments carried out by your customers:***

### Q23

Please specify the total number (#) of customers that invest in financial instruments not listed on a regulated market?

or choose one of:

- Not Available

## Customers (Others) (15)

***Based on the investments carried out by your customers:***

### Q24

Please specify the total number (#) of customers that invest in immovable property?

or choose one of:

- Not Available

## Customers (Others) (16)

***Based on the investments carried out by your customers:***

### Q25

Please specify the total number (#) of customers that invest in financial instruments listed on a regulated market?

or choose one of:

- Not Available

## Customers (Others) (17)

***Based on the investments carried out by your customers:***

### Q26

Please specify the total number (#) of customers that invest in virtual financial assets?

or choose one of:

- Not Available

## PEPs (1.1)

*(Relates to Investment Services & Securities Markets)*

### Q27

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

*Regulation 2(1) of the PMLFTR defines a PEP as a natural person who is or has been entrusted with a prominent public function, other than middle ranking or more junior officials. The PMLFTR The Government Gazette no. 20,602 published on 6 April, 2021 provides an exhaustive list of public functions that are considered to be prominent public functions and would therefore render the holder thereof a PEP. Regulation 11(8) of the PMLFTR defines the term "family members" as including:(i) the spouse, or a person considered to be equivalent to a spouse;(ii) the children and their spouses, or persons considered to be equivalent to a spouse; and(iii) the parents. The list of 'family members' is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered to be similar to those under the indicative list in the PMLFTR. Regulation 11(8) also defines the term "close associates" as:(i) a natural person known to have joint beneficial ownership of a body corporate or any other form of legal arrangement, or any other close business relations, with that politically exposed person;(ii) a natural person who has sole beneficial ownership of a body corporate or any other form of legal arrangement that is known to have been established for the benefit of that politically exposed person.*

or choose one of:

- Not Applicable
- Not Available

## PEPs (2.1)

*(Relates to Investment Services & Securities Markets)*

### Q28

Of the total number of customers who are legal entities, how many of their beneficial owners were PEPs (including family members and close associates) as at the end of the prior calendar year?

or choose one of:

- Not Available

## PEPs (3)

From the number of PEPs in your customer base, kindly provide a breakdown of:

<p><b>Q29</b></p> <p>a) the total number(#) of Maltese PEPs (including beneficial owners), in the prior calendar year</p> <p><i>Regulation 2(1) of the PMLFTR defines a PEP as a natural person who is or has been entrusted with a prominent public function, other than middle ranking or more junior officials. The Government Gazette no. 20,602 published on 6 April, 2021 provides an exhaustive list of public functions that are considered to be prominent public functions and would therefore render the holder thereof a PEP.</i></p> <p><i>Regulation 11(8) of the PMLFTR defines the term "family members" as including:</i></p> <p><i>(i) the spouse, or a person considered to be equivalent to a spouse;</i></p> <p><i>(ii) the children and their spouses, or persons considered to be equivalent to a spouse; and</i></p> <p><i>(iii) the parents.</i></p> <p><i>The list of 'family members' is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered to be similar to those under the indicative list in the PMLFTR. Regulation 11(8) also defines the term "close associates" as:</i></p> <p><i>(i) a natural person known to have joint beneficial ownership of a body corporate or any other form of legal arrangement, or any other close business relations, with that politically exposed person;</i></p> <p><i>(ii) a natural person who has sole beneficial ownership of a body corporate or any other form of legal arrangement that is known to have been established for the benefit of that politically exposed person.</i></p> <p><b>Q30</b></p>	<div></div> <p>or choose one of:</p> <ul style="list-style-type: none"><li>• Not Available</li></ul> <div></div>
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<p>b) the total number (#) of PEPs (including beneficial owners) from EU/EEA jurisdictions (other than Malta), in the prior calendar year</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>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Available</li> </ul>
<p><b>Q31</b></p> <p>c) the total number (#) of PEPs (including beneficial owners) from non-EU/EEA jurisdictions, in the prior calendar year</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	<div data-bbox="1045 869 1401 913" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Available</li> </ul>
<p><b>Q32</b></p> <p>d) the total number (#) of PEPs (including beneficial owners) from countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries, in the prior calendar year</p>	<div data-bbox="1045 1305 1401 1350" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Available</li> </ul>

## PEPs (7)

### Q33

*If your answer to the above question was greater than 0, please select the respective jurisdictions.*

**[Answer if Q32 is > 0, Not Available]**

*Choose more than one option:*

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria
- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

*or choose one of:*

- Not Available

## **Additional (Customers) (2)**

### **Q34**

Please list the number of customers who are operating in high-risk industries as per your internal policies and procedures.

Subject persons are required to define their own list of high risk industries and products. For the purpose of responding to this question, subject persons should consider high risk industries to include: productions / trade in war related weapons, productions / trade in radioactive materials, mining, oil and gas, chemical and pharmaceutical industries and adult entertainment. In accordance with S.L. 365.12, dual-use items refer to any used or unused items, including software and technology, which can be used for both civil and military purposes, and including all goods which can be used for both non-explosive uses and for assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices.

or choose one of:

- Not Available

## Additional (Customers) (3)

### Q35

Please list the number of customers who are operating in dual use items.

*In accordance with SL 365.12, dual-use items refers to any used or unused items, including software and technology, which can be used for both civil and military purposes, and including all goods which can be used for both non-explosive uses and for assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices. Dual-use items are to be considered as those designated by the Company's policies and procedures or through the SL 365.12.*

or choose one of:

- Not Available

## Additional (Customers) (12)

### Q36

Did your entity have any customers that were re-domiciled or whose economic activity was transferred to a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Available

## **Additional (Customers) (13)**

### **Q37**

*Please select the respective jurisdictions.*

**[Answer if Q36 is Yes]**

*Choose more than one option:*

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria
- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire

- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

*or choose one of:*

- Not Available



## Products and Services

*Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors or VFA Service Providers*

### Products and Services (Securities and Markets) (53)

*Please indicate the following for funds processed as subscription received through transfer agency services offered, in the prior calendar year:*

**Q1**

a) The volume (#)

*The funds processed relate to subscriptions coming in for the funds serviced by the entity*

### Products and Services (Securities and Markets) (54)

**Q2**

b) The value (€)

**[Answer if Q1 is > 0]**

*The funds processed relate to subscriptions coming in for the funds serviced by the entity. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.*

or choose one of:

- Not Available

### Products and Services (Securities and Markets) (55)

***Please indicate the following for funds processed as redemptions through transfer agency services offered, in the prior calendar year:***

**Q3**

a)The volume (#)

*The funds processed relate to redemptions for the funds serviced by the entity*

## **Products and Services (Securities and Markets) (56)**

**Q4**

b)The value (€)

***[Answer if Q3 is > 0]***

*The funds processed relate to redemptions for the funds serviced by the entity. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.*

or choose one of:

- Not Available

# De-Risking Risks

**Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors or VFA Service Providers**

## De-Risking Risks (1)

### Q1

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

*"De-risking" refers to a process being carried out by a Subject Person, which includes terminating or restricting business relationships, to avoid, rather than manage risk.*

Choose only one option:

- Yes
- No

## De-Risking Risks (2)

### Q2

*Provide details of the de-risking*

**[Answer if Q1 is Yes]**

*Such reasons should explain whether business relationship was entirely terminated or restricted to limited services.*

## Jurisdiction Risk.

**Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors**

### Residence of Customers + BOs (1)

As at the end of the prior calendar year, what is the total number (#) of customers that are resident, or otherwise, incorporated or have their principal place of business in:

<b>Q1</b>	<input type="text"/>
a) Malta?	
<b>Q2</b>	
b) an EU/EEA jurisdiction, excluding Malta?	
<i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i>	<input type="text"/>
<b>Q3</b>	
c) an non-EU/EEA jurisdiction?	
<i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i>	<input type="text"/>
<b>Q4</b>	
d) a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?	<input type="text"/>
<b>Q5</b>	Choose more than one

Please choose the applicable countries identified under the option:  
 FATF 'High Risk Jurisdictions Subject to a Call for Action'  
 and 'Jurisdictions Under Increased Monitoring' and the EU  
 Commission Delegated Acts on High Risk Third Countries.

[Answer if Q4 is > 0]

- Afghanistan
- Algeria
- Angola
- Barbados
- Bulgaria
- Burkina Faso
- Cameroon
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Croatia
- Gibraltar
- Haiti
- Iran, Islamic Republic of
- Jamaica
- Kenya
- Korea, Democratic People's Republic of
- Lebanon
- Mali
- Monaco
- Mozambique
- Myanmar
- Namibia
- Nigeria
- Panama
- Philippines
- Senegal
- South Africa
- South Sudan
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago
- Uganda
- United Arab Emirates
- Vanuatu
- Venezuela
- Vietnam
- Yemen

Q6

Afghanistan

<b>[Answer if Q5 is Afghanistan]</b>	
<b>Q7</b>	
Algeria	<input type="text"/>
<b>[Answer if Q5 is Algeria]</b>	
<b>Q8</b>	
Angola	<input type="text"/>
<b>[Answer if Q5 is Angola]</b>	
<b>Q9</b>	
Barbados	<input type="text"/>
<b>[Answer if Q5 is Barbados]</b>	
<b>Q10</b>	
Bulgaria	<input type="text"/>
<b>[Answer if Q5 is Bulgaria]</b>	
<b>Q11</b>	
Burkina Faso	<input type="text"/>
<b>[Answer if Q5 is Burkina Faso]</b>	
<b>Q12</b>	
Cameroon	<input type="text"/>
<b>[Answer if Q5 is Cameroon]</b>	
<b>Q13</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q5 is Congo, the Democratic Republic of the]</b>	
<b>Q14</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q5 is Cote D'Ivoire]</b>	
<b>Q15</b>	
Croatia	<input type="text"/>
<b>[Answer if Q5 is Croatia]</b>	
<b>Q16</b>	
Gibraltar	<input type="text"/>
<b>[Answer if Q5 is Gibraltar]</b>	

<b>Q17</b> <i>Haiti</i> <b>[Answer if Q5 is Haiti]</b>	<input type="text"/> <input type="text"/>
<b>Q18</b> <i>Iran, Islamic Republic of</i> <b>[Answer if Q5 is Iran, Islamic Republic of]</b>	<input type="text"/> <input type="text"/>
<b>Q19</b> <i>Jamaica</i> <b>[Answer if Q5 is Jamaica]</b>	<input type="text"/> <input type="text"/>
<b>Q20</b> <i>Kenya</i> <b>[Answer if Q5 is Kenya]</b>	<input type="text"/> <input type="text"/>
<b>Q21</b> <i>Korea, Democratic People's Republic of</i> <b>[Answer if Q5 is Korea, Democratic People's Republic of]</b>	<input type="text"/> <input type="text"/>
<b>Q22</b> <i>Lebanon</i> <b>[Answer if Q5 is Lebanon]</b>	<input type="text"/> <input type="text"/>
<b>Q23</b> <i>Mali</i> <b>[Answer if Q5 is Mali]</b>	<input type="text"/> <input type="text"/>
<b>Q24</b> <i>Monaco</i> <b>[Answer if Q5 is Monaco]</b>	<input type="text"/> <input type="text"/>
<b>Q25</b> <i>Mozambique</i> <b>[Answer if Q5 is Mozambique]</b>	<input type="text"/> <input type="text"/>
<b>Q26</b> <i>Myanmar</i> <b>[Answer if Q5 is Myanmar]</b>	<input type="text"/> <input type="text"/>
<b>Q27</b>	<input type="text"/>

Namibia	
<b>[Answer if Q5 is Namibia]</b>	
Q28	
Nigeria	<input type="text"/>
<b>[Answer if Q5 is Nigeria]</b>	
Q29	
Panama	<input type="text"/>
<b>[Answer if Q5 is Panama]</b>	
Q30	
Philippines	<input type="text"/>
<b>[Answer if Q5 is Philippines]</b>	
Q31	
Senegal	<input type="text"/>
<b>[Answer if Q5 is Senegal]</b>	
Q32	
South Africa	<input type="text"/>
<b>[Answer if Q5 is South Africa]</b>	
Q33	
South Sudan	<input type="text"/>
<b>[Answer if Q5 is South Sudan]</b>	
Q34	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q5 is Syrian Arab Republic]</b>	
Q35	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q5 is Tanzania, United Republic of]</b>	
Q36	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q5 is Trinidad and Tobago]</b>	
Q37	<input type="text"/>
Uganda	

<b>[Answer if Q5 is Uganda]</b>	
<b>Q38</b>	
United Arab Emirates	<input type="text"/>
<b>[Answer if Q5 is United Arab Emirates]</b>	
<b>Q39</b>	
Vanuatu	<input type="text"/>
<b>[Answer if Q5 is Vanuatu]</b>	
<b>Q40</b>	
Venezuela	<input type="text"/>
<b>[Answer if Q5 is Venezuela]</b>	
<b>Q41</b>	
Vietnam	<input type="text"/>
<b>[Answer if Q5 is Vietnam]</b>	
<b>Q42</b>	
Yemen	<input type="text"/>
<b>[Answer if Q5 is Yemen]</b>	

## Residence of Customers + BOs (2)

Please specify the total number of customers' BOs that are resident in:

<b>Q43</b>	<input type="text"/>
a) Malta?	or choose one of: <ul style="list-style-type: none"> <li>• Not Available</li> </ul>
<b>Q44</b>	<input type="text"/>
b) an EU/EEA jurisdiction, excluding Malta?  <i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on</i>	or choose one of: <ul style="list-style-type: none"> <li>• Not Available</li> </ul>

<p><i>High Risk Third Countries". This list is as at 31 December 2024.</i></p>	
<p><b>Q45</b></p> <p>c) an non-EU/EEA jurisdiction?</p> <p><i>Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.</i></p> <p><i>Principal place of business refers to the place where key management and commercial decisions that are necessary for the conduct of the business of an entity are made.</i></p>	<div data-bbox="1045 344 1394 389" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Available</li> </ul>
<p><b>Q46</b></p> <p>d) a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?</p>	<div data-bbox="1045 651 1394 696" style="border: 1px solid black; height: 20px; margin-bottom: 10px;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Available</li> </ul>
<p><b>Q47</b></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><b>[Answer if Q46 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></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> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nigeria</li> <li>• Panama</li> </ul>

	<ul style="list-style-type: none"> <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>
<b>Q48</b> Afghanistan <b>[Answer if Q47 is Afghanistan]</b>	<input type="text"/> <input type="text"/>
<b>Q49</b> Algeria <b>[Answer if Q47 is Algeria]</b>	<input type="text"/> <input type="text"/>
<b>Q50</b> Angola <b>[Answer if Q47 is Angola]</b>	<input type="text"/> <input type="text"/>
<b>Q51</b> Barbados <b>[Answer if Q47 is Barbados]</b>	<input type="text"/> <input type="text"/>
<b>Q52</b> Bulgaria <b>[Answer if Q47 is Bulgaria]</b>	<input type="text"/> <input type="text"/>
<b>Q53</b> Burkina Faso <b>[Answer if Q47 is Burkina Faso]</b>	<input type="text"/> <input type="text"/>
<b>Q54</b> Cameroon	<input type="text"/> <input type="text"/>

<b>[Answer if Q47 is Cameroon]</b>	
<b>Q55</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q47 is Congo, the Democratic Republic of the]</b>	
<b>Q56</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q47 is Cote D'Ivoire]</b>	
<b>Q57</b>	
Croatia	<input type="text"/>
<b>[Answer if Q47 is Croatia]</b>	
<b>Q58</b>	
Gibraltar	<input type="text"/>
<b>[Answer if Q47 is Gibraltar]</b>	
<b>Q59</b>	
Haiti	<input type="text"/>
<b>[Answer if Q47 is Haiti]</b>	
<b>Q60</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q47 is Iran, Islamic Republic of]</b>	
<b>Q61</b>	
Jamaica	<input type="text"/>
<b>[Answer if Q47 is Jamaica]</b>	
<b>Q62</b>	
Kenya	<input type="text"/>
<b>[Answer if Q47 is Kenya]</b>	
<b>Q63</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q47 is Korea, Democratic People's Republic of]</b>	
<b>Q64</b>	<input type="text"/>
Lebanon	

<b>[Answer if Q47 is Lebanon]</b>	
<b>Q65</b>	
Mali	<input type="text"/>
<b>[Answer if Q47 is Mali]</b>	
<b>Q66</b>	
Monaco	<input type="text"/>
<b>[Answer if Q47 is Monaco]</b>	
<b>Q67</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q47 is Mozambique]</b>	
<b>Q68</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q47 is Myanmar]</b>	
<b>Q69</b>	
Namibia	<input type="text"/>
<b>[Answer if Q47 is Namibia]</b>	
<b>Q70</b>	
Nigeria	<input type="text"/>
<b>[Answer if Q47 is Nigeria]</b>	
<b>Q71</b>	
Panama	<input type="text"/>
<b>[Answer if Q47 is Panama]</b>	
<b>Q72</b>	
Philippines	<input type="text"/>
<b>[Answer if Q47 is Philippines]</b>	
<b>Q73</b>	
Senegal	<input type="text"/>
<b>[Answer if Q47 is Senegal]</b>	
<b>Q74</b>	
South Africa	<input type="text"/>
<b>[Answer if Q47 is South Africa]</b>	
<b>Q75</b>	<input type="text"/>

South Sudan	
<b>[Answer if Q47 is South Sudan]</b>	
Q76	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q47 is Syrian Arab Republic]</b>	
Q77	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q47 is Tanzania, United Republic of]</b>	
Q78	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q47 is Trinidad and Tobago]</b>	
Q79	
Uganda	<input type="text"/>
<b>[Answer if Q47 is Uganda]</b>	
Q80	
United Arab Emirates	<input type="text"/>
<b>[Answer if Q47 is United Arab Emirates]</b>	
Q81	
Vanuatu	<input type="text"/>
<b>[Answer if Q47 is Vanuatu]</b>	
Q82	
Venezuela	<input type="text"/>
<b>[Answer if Q47 is Venezuela]</b>	
Q83	
Vietnam	<input type="text"/>
<b>[Answer if Q47 is Vietnam]</b>	
Q84	
Yemen	<input type="text"/>
<b>[Answer if Q47 is Yemen]</b>	

## Residence of Customers + BOs (5)

**Q85**

*Please select the respective jurisdictions.*

**[Answer if Q46 is > 0, Not Available]**

*Choose more than one option:*

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria
- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

*or choose one of:*

- Not Available

## Residence of Customers + BOs (6)

**Q86**

Do any of the customers making part of the customer base provide goods and/or services (main markets) in, or to, a country identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries?

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Available

## Residence of Customers + BOs (7)

**Q87**

*Please select the respective jurisdictions.*

**[Answer if Q86 is Yes]**

*Choose more than one option:*

- Afghanistan
- Barbados
- Burkina Faso
- Cameroon
- Gibraltar
- Mali
- Mozambique
- Myanmar
- Nigeria
- Panama
- Philippines
- Senegal
- South Sudan
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Algeria

- Angola
- Bulgaria
- Croatia
- Haiti
- Jamaica
- Kenya
- South Africa
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lebanon
- Monaco
- Namibia
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago

or choose one of:

- Not Available

## Transactions / Payments (Investments) (1)

***Please indicate the following for domestically-held investment accounts, during the prior calendar year:***

**Q88**

a) Volume (#) of investments

*Client-held investment accounts refers to bank or other accounts from which the customer remitted funds for subscriptions, or to which dividends / pay-outs / redemption proceeds are remitted.*

## Transactions / Payments (Investments) (2)

**Q89**

b) Value (€) of investments

**[Answer if Q88 is > 0]**

*Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.*

## **Transactions / Payments (Investments) (3)**

***Please indicate the following for investments made by clients who hold accounts in EU/EEA jurisdictions excluding Malta, during the prior calendar year:***

**Q90**

a) Volume (#) of investments

*Client-held investment accounts refers to bank or other accounts from which the customer remitted funds for subscriptions, or to which dividends / pay-outs / redemption proceeds are remitted.*

## **Transactions / Payments (Investments) (4)**

**Q91**

b) Value (€) of investments

**[Answer if Q90 is > 0]**

*Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.*

## **Transactions / Payments (Investments) (5)**

**Please indicate the following for investments made by clients who hold accounts in non-EU/EEA jurisdictions, during the prior calendar year:**

**Q92**

a) Volume (#) of investments

*Client-held investment accounts refers to bank or other accounts from which the customer remitted funds for subscriptions, or to which dividends / pay-outs / redemption proceeds are remitted.*

**Transactions / Payments (Investments) (6)**

**Q93**

b) Value (€) of investments

**[Answer if Q92 is > 0]**

*Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.*

**Transactions / Payments (Investments) (9)**

**Please indicate the following for investments made by clients who hold accounts in multiple jurisdictions, during the prior calendar year:**

**Q94**

a) Volume (#) of investments

*Client held accounts refers to bank or other accounts from which the customer remitted funds for subscriptions, or to which dividends / pay-outs / redemption proceeds are remitted. Multiple should refer to 4 or more client held accounts. The Company should specify the total number and value of investments which were made through 4 or more accounts held by the same client and which were located in 4 or more different jurisdictions.*

## Transactions / Payments (Investments) (10)

**Q95**

*b) Value (€) of investments*

**[Answer if Q94 is > 0]**

*Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.*

## Location of fund (1)

***Please indicate the number (#) of customers that targeted the following during the prior calendar year:***

**Q96**

a) Domestic investors

*or choose one of:*

- Not Available

## Location of fund (2)

**Q97**

b) Foreign investors - EU/EEA

or choose one of:

- Not Available

## Location of fund (3)

**Q98**

c) Foreign investors - Non-EU/EEA

or choose one of:

- Not Available

## Location of fund (4)

**Q99**

d) Foreign investors - jurisdictions listed in countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.

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

or choose one of:

- Not Available

## Jurisdiction Risk (207)

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

## Q100

Does your entity have establishments by means of subsidiaries in EU or non-EU jurisdictions offering relevant financial business and/or relevant activity in terms of Regulation 2 of the PMLFTR?

*Choose only one option:*

- No
- Yes Relevant Financial Business
- Yes Relevant Activity
- Yes both

## Jurisdiction Risk (208)

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

### Q101

*Please provide the number of subsidiaries per jurisdiction*

***[Answer if Q100 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Jurisdiction Risk (209)

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

### Q102

Does your entity have establishments by means of branches in EU or non-EU jurisdictions offering relevant financial business and/or relevant activity in terms of Regulation 2 of the PMLFTR?

*Choose only one option:*

- No
- Yes Relevant Financial Business
- Yes Relevant Activity
- Yes both

## **Jurisdiction Risk (210)**

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

### **Q103**

*Please provide the number of branches per jurisdiction*

***[Answer if Q102 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## **Jurisdiction Risk (211)**

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

### **Q104**

Is there any other entity (apart from subsidiaries or branches) within the group of companies in which your entity forms part, which carries out Relevant Financial Business and/or Relevant Activity in terms of Regulation 2 of the PMLFTR?

*Choose only one option:*

- No
- Yes Relevant Financial Business

- Yes Relevant Activity
- Yes both

## Jurisdiction Risk (212)

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

### Q105

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

***[Answer if Q104 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Interface / Distribution Channels

**Questions in this page relate to Subject Persons having categories Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocacy or Tax Advisors or VFA Service Providers**

### Interface / Distribution Channels (9)

Please list the total number (#) of customers that were onboarded:

<b>Q1</b> a) face-to-face during the prior calendar year?  <i>Onboarded on a face-to-face basis refers to the cases when the customer is physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group, but not by the subject person, the relationship is to be considered as non-face-to-face - since the subject person did not meet the client (or its agent) for verification purposes.</i>	<input type="text"/>
<b>Q2</b> b) on a non-face-to-face basis, during the prior calendar year?  <i>Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group but not by the subject person, the relationship is to be considered as non-face-to-face - since the subject person did not meet the client (or its agent) for verification purposes.</i>	<input type="text"/>

# MLRO, Monitoring Function and Employees

## MLRO, Monitoring Function and Employees (1)

### Q1

How many years of experience does the MLRO have in AML/CFT?

*Choose only one option:*

- 1 month - 1 year
- 1 - 2 years
- 2 - 3 years
- 3 - 5 years
- 5 - 7 years
- 8 - 10 years
- over 10 years

## MLRO, Monitoring Function and Employees (2)

### Q2

How many hours do you dedicate to the MLRO function on a weekly basis?

*Choose only one option:*

- 0 - 10 hours
- 11 - 20 hours
- 21 - 30 hours
- 31 - 40 hours

## MLRO, Monitoring Function and Employees (3)

### Q3

Is the MLRO responsible for other areas other than AML/CFT within the entity?

*Choose only one option:*

- Yes
- No

## MLRO, Monitoring Function and Employees (4)

**Q4**

*Please provide a description of the other areas of responsibility.*

**[Answer if Q3 is Yes]**

## MLRO, Monitoring Function and Employees (8)

**Q5**

Does the MLRO have a direct reporting line to the Board of Directors?

*Choose only one option:*

- Yes
- No

## MLRO, Monitoring Function and Employees (9)

**Q6**

Has the entity appointed an officer at management level to monitor the day-to-day implementation of the AML/CFT measures, policies, controls and procedures adopted by the entity?

*Choose only one option:*

- No
- Yes - The function is carried out by the MLRO
- Yes - The function is carried out by a person who is not also acting as the entity's MLRO

## MLRO, Monitoring Function and Employees (10)

Q7

On average, how many years of experience in the industry does the director(s) and/or senior management of your entity have?

## MLRO, Monitoring Function and Employees (11)

Q8

How many staff members expressed in full time equivalent (FTE) are part of the AML/CFT team (if one exists)?

*Employment in full-time equivalent ("FTE") is a conversion method used to measure the number of employees according to the number of hours worked. When using FTE, a full-time employee working a 40 hour week is equivalent to 1, whereas a person who works 20 hours per week is equivalent to 0.5. Self employed should be included in the FTEs calculation.*

## MLRO, Monitoring Function and Employees (12)

Q9

How many staff members in the AML/CFT team expressed in full time equivalent (FTE) are also responsible for other roles and responsibilities not attributable to AML/CFT (e.g. front office / back office etc.)?

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

*Employment in full-time equivalent ("FTE") is a conversion method used to measure the number of employees according to the number of hours worked. When using FTE, a full-time employee working a 40 hour week is equivalent to 1, whereas a person who works 20 hours per week is equivalent to 0.5. Self employed should be included in the FTEs calculation.*

## MLRO, Monitoring Function and Employees (24)

### Q10

How often does your entity assess the conduct and integrity of employees (including partners or directors) handling relevant financial business and/or relevant activity?

*Choose only one option:*

- At onboarding only
- At onboarding and at least yearly
- Not assessed

## MLRO, Monitoring Function and Employees (14)

### Q11

In the past five (5) years, were any employees (including directors and partners) disciplined for non-compliance with the AML/CFT policies and procedures?

*Choose only one option:*

- Yes
- No

### Q12

*If 'Yes', please explain.*

**[Answer if Q11 is Yes]**

# Business Risk Assessment

## Business Risk Assessment (11)

### Q1

What is your entity's most recent inherent risk scoring or rating for ML/FT in the Business Risk Assessment (BRA)?

*When the risk classification in the BRA does not align with the risk classification listed in the options provided, please convert the risk category accordingly and select the option which most closely reflect the risk classification in the BRA.*

Choose only one option:

- Low
- Lower Medium
- Higher Medium
- High
- Very High
- BRA not carried out

## Business Risk Assessment (30)

### Q2

What is your entity's most recent BRA controls effectiveness rating?

**[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]**

*When the risk classification in the BRA does not align with the risk classification listed in the options provided, please convert the risk category accordingly and select the option which most closely reflect the risk classification in the BRA.*

Choose only one option:

- Low
- Lower medium
- Higher medium
- High
- Very high
- Control Effectiveness not rated

## Business Risk Assessment (13)

Q3

*What is your entity's most recent residual risk scoring or rating for ML/FT in the BRA?*

***[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]***

*When the risk classification in the BRA does not align with the risk classification listed in the options provided, please convert the risk category accordingly and select the option which most closely reflect the risk classification in the BRA.*

*Choose only one option:*

- Low
- Lower Medium
- Higher Medium
- High
- Very High
- Residual risk not rated

## Business Risk Assessment (14)

Q4

*What are the 3 highest customer risk factors resulting from the BRA?*

***[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]***

## Business Risk Assessment (15)

Q5

*What are the 3 highest product/service/transaction risk factors resulting from the BRA?*

***[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]***

## Business Risk Assessment (16)

Q6

*What are the 3 highest geographical risk factors resulting from the BRA?*

***[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]***

## Business Risk Assessment (31)

Q7

*Please indicate the jurisdictions which your entity considers as high risk*

***[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]***

*Exclude jurisdictions considered as Non-Reputable in terms of Chapter 8 of the Implementing Procedures as at the end of the prior calendar year.*

## Business Risk Assessment (18)

Q8

*What are the 3 highest interface risk factors resulting from the BRA?*

***[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]***

## Business Risk Assessment (19)

**Q9**

*Did your entity review and/or update the BRA in the prior calendar year?*

***[Answer if Q1 is Low, Lower Medium, Higher Medium, High, Very High]***

*Choose only one option:*

- Yes
- No



# Customer Acceptance and Risk Assessment

## Customer Acceptance and Risk Assessment (94)

### Q1

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

*Choose only one option:*

- Yes
- No
- CAP Not Available

## Customer Acceptance and Risk Assessment (95)

### Q2

*Did this review result in major changes?*

**[Answer if Q1 is Yes]**

*Choose only one option:*

- Yes
- No

## Customer Acceptance and Risk Assessment (96)

### Q3

*Please explain these changes.*

**[Answer if Q2 is Yes]**

## Customer Acceptance and Risk Assessment (123)

#### Q4

*According to your entity's CAP, which customers are likely to pose a higher than average risk of ML/FT?*

**[Answer if Q1 is Yes, No]**

*Choose "Not Available" if information cannot be provided.*

*or choose one of:*

- Not Available

### Customer Acceptance and Risk Assessment (98)

#### Q5

*As at end of the last calendar year, how many customers fell outside the CAP but were provided with services, (including those that were subject to management approval)?*

**[Answer if Q1 is Yes, No]**

### Customer Acceptance and Risk Assessment (99)

#### Q6

Is there a documented Customer Risk Assessment (CRA) methodology?

*Choose only one option:*

- Yes
- No
- CRA Methodology Not Available

## Customer Acceptance and Risk Assessment (100)

**Q7**

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

*[Answer if Q6 is Yes]*

## Customer Acceptance and Risk Assessment (101)

**Q8**

In the case where an introducer, intermediary, broker or agent, was used to onboard customers during the previous calendar year, was Customer Due Diligence (CDD) performed on such?

*Choose only one option:*

- Yes
- Yes - most of the times
- Yes - sometimes
- No
- N/A (no intermediaries, etc, are used)

## Customer Acceptance and Risk Assessment (102)

**Q9**

How many customers are included in the entity's customer portfolio, where CDD has not been completed, but activity has begun or is completed?

## Customer Acceptance and Risk Assessment (103)

**Q10**

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

## Customer Acceptance and Risk Assessment (104)

Q11

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

[Answer if Q10 is > 0]

## Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

<b>Q12</b> a) Low risk customers [Answer if Q6 is Yes]	<i>Choose only one option:</i> <ul style="list-style-type: none"><li>• Trigger event based</li><li>• At least annually</li><li>• Every 13 - 23 months</li><li>• Every 2 - 3 years</li><li>• More than every 3 years</li><li>• Never</li><li>• Not applicable</li></ul>
<b>Q13</b> b) Medium risk customers [Answer if Q6 is Yes]	<i>Choose only one option:</i> <ul style="list-style-type: none"><li>• Trigger event based</li><li>• At least annually</li><li>• Every 13 - 23 months</li><li>• Every 2 - 3 years</li><li>• More than every 3 years</li><li>• Never</li><li>• Not applicable</li></ul>
<b>Q14</b> c) High risk customers	<i>Choose only one option:</i> <ul style="list-style-type: none"><li>• Trigger event based</li></ul>

[Answer if Q6 is Yes]	<ul style="list-style-type: none"> <li>• At least annually</li> <li>• Every 13 - 23 months</li> <li>• Every 2 - 3 years</li> <li>• More than every 3 years</li> <li>• Never</li> <li>• Not applicable</li> </ul>
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## Customer Acceptance and Risk Assessment (106)

### Q15

How many clients and/or business relationships were terminated during the last calendar year due to de-risking practices?

*Answer should NOT include customers who were transferred or sold to another gaming company or shifted onto another licence held by the Company.*

## Customer Acceptance and Risk Assessment (107)

### Q16

*What was the reason for the de-risking exercise?*

**[Answer if Q15 is > 0]**

## Customer Acceptance and Risk Assessment (108)

### Q17

How many business relationships were terminated, blocked, suspended or were otherwise, provided limited services for ML/FT related reasons (apart from de-risking reasons), during the prior calendar year?

*The answer should include all customers (not only the ones who had reached the two thousand (€2,000) threshold in deposits.*



# Policies & Procedures

## Policies and Procedures (36)

### Q1

How frequently does your entity review and/or update the entity's AML/CFT written policies and procedures?

*Choose only one option:*

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

## Policies and Procedures (37)

### Q2

How do you determine whether customers and, where applicable their beneficial owners, are politically exposed persons (PEPs) or PEPs' family members or close associates?

*Choose more than one option:*

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

## Policies and Procedures (38)

### Q3

How do you determine whether individuals/entities are sanctioned?

*Choose more than one option:*

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

## **Policies and Procedures (39)**

### **Q4**

If there is use of intermediaries, brokers, agents, distributors, and/or introducers, does your entity have policies and procedures in place to assess their AML/CFT compliance framework?

*Choose only one option:*

- Yes
- No
- Not applicable (no intermediaries, etc, are used)

## **Policies and Procedures (40)**

### **Q5**

Does your entity have internal whistleblowing procedures?

*Choose only one option:*

- Yes
- No
- Not applicable

### **Q6**

*If not applicable, please explain why.*

***[Answer if Q5 is Not applicable]***

## Policies and Procedures (41)

**Q7**

Does your entity have an independent audit function to test the AML/CFT internal measures, policies, controls and procedures?

*Choose only one option:*

- No
- Yes - The function is carried out in-house
- Yes - The function is outsourced

## Policies and Procedures (42)

**Q8**

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

***[Answer if Q7 is Yes - The function is carried out in-house, Yes - The function is outsourced]***

*Choose only one option:*

- Monthly
- Quarterly
- Half yearly
- Yearly
- Every 2 years
- Over 2 years
- Never

## Policies and Procedures (43)

**Q9**

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

***[Answer if Q7 is Yes - The function is carried out in-house, Yes - The function is outsourced]***

*Choose only one option:*

- 1 month ago
- 2 - 3 months ago
- 4 - 6 months ago
- 7 - 12 months ago
- 1 - 2 years ago
- Over 2 years ago
- Internal audit not yet performed

## **Policies and Procedures (44)**

**Q10**

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

***[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago, Over 2 years ago]***

*Choose only one option:*

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

## **Policies and Procedures (45)**

**Q11**

*List the 3 main "high risk" audit issues that were identified in the AML/CFT independent audit reports issued in the past 2 calendar years.*

***[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]***

## Policies and Procedures (46)

Q12

*List the 3 main "medium risk" audit issues that were identified in the AML/CFT independent audit reports issued in the past 2 calendar years.*

**[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]**

## Policies and Procedures (47)

Q13

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

**[Answer if Q9 is 1 month ago, 2 - 3 months ago, 4 - 6 months ago, 7 - 12 months ago, 1 - 2 years ago]**

*Choose more than one option:*

- Business risk assessment
- Customer risk assessment procedures
- Customer and beneficial ownership identification and verification
- Purpose and intended nature of business relationship
- Ongoing monitoring
- AML/CFT Governance
- Others

## Policies and Procedures (48)

Q14

*If others, explain*

**[Answer if Q13 is Others]**



# Outsourcing

## Outsourcing (1)

### Q1

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

*Choose only one option:*

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

## Outsourcing (2)

### Q2

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

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

## Outsourcing (3)

### Q3

*Please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

- Drafting of BRA
- CRA
- CDD - PMLFTR Reg 7(1)(a) and 7(1)(b)
- CDD - PMLFTR Reg 7(1)(c)
- CDD - PMLFTR Reg 7(2)(a)
- CDD - PMLFTR Reg 7(2)(b)
- Record-Keeping

- Drafting of policies and procedures
- MLRO function

## Outsourcing (4)

### Q4

*Please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

- Drafting of BRA
- CRA
- CDD - PMLFTR Reg 7(1)(a) and 7(1)(b)
- CDD - PMLFTR Reg 7(1)(c)
- CDD - PMLFTR Reg 7(2)(a)
- CDD - PMLFTR Reg 7(2)(b)
- Record-Keeping
- Drafting of policies and procedures
- MLRO function

## Outsourcing (5)

### Q5

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

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

*Choose only one option:*

- No assessments are carried out
- Approximately on a daily basis
- Weekly or bi-weekly basis
- Monthly basis
- Quarterly basis
- Half yearly
- Yearly
- Every 2 years
- Over 2 years

## Outsourcing (6)

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

<p><b>Q6</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>Q7</b></p> <p>EU/EEA (Excluding Malta)</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>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>Q9</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>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

<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><b>Q10</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 Q9 is Yes]</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> <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> </ul>

- 
- |  |   |
|--|---|
|  | <ul style="list-style-type: none"><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> |
|--|---|

# 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:

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

## Training (7)

### Q7

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

Choose only one option:

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

# Reporting

## Reporting (15)

### Q1

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

## Reporting (16)

### Q2

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

**[Answer if Q1 is > 0]**

## Reporting (17)

### Q3

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

**[Answer if Q1 is > 0]**

## Reporting (18)

### Q4

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

## Reporting (19)

### Q5

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



## Ongoing monitoring (data, documents and information)

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

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

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

### 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) (49)

**Q9**

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

