



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 (321)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q1

Out of the following, please tick the products and services that have been offered by your entity during the previous calendar year

Note that "Acting or arranging others to act as director, company secretary etc." refers to "Acting as director, company secretary refers to the provisions of acting as, or arranging for another person to act as director or secretary of a company, a partner in a partnership or in a similar position in relation to other legal entities"

Choose more than one option:

- Formation of companies or other legal entities
- Provision of a registered office
- Acting or arranging others to act as director, company secretary etc.
- Acting as a mandatary in the holding of securities and/or immovable property for another person
- Acting as a Trustee or co-trustee in terms of Article 43 (1)
- Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)

Product Risk (322)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q2

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

Choose only one option:

- Yes
- No

Product Risk (323)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q3

Provide details of the de-risking.

[Answer if Q2 is Yes]

Product Risk (324)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q4

Please indicate the total number of companies or other legal entities or arrangements that your entity formed during the previous calendar year.

[Answer if Q1 is Formation of companies or other legal entities]

Product Risk (325)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q5

With respect to companies or other legal entities or arrangements formation services that your entity provided during the previous calendar year, how many of such services were provided in isolation? (i.e., no other relevant activity was provided following company formation)

[Answer if Q4 is > 0]

Product Risk (326)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q6

Please indicate the total number of customers to whom your entity provided registered office, business correspondence or administrative address services as at end of the previous calendar year.

[Answer if Q1 is Provision of a registered office]

Product Risk (327)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q7

With respect to companies or other legal entities to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year, how many of such services were provided in isolation? (i.e., no other relevant activity was provided)

[Answer if Q6 is > 0]

Product Risk (328)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q8

Please indicate the total number of customers to whom registered office, a business correspondence or administrative address and other related services was provided as at the end of the previous calendar year with whom your entity lost contact, or where the customer became unresponsive.

[Answer if Q6 is > 0]

Product Risk (329)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q9

Please indicate the total number of customers as at the end of the previous calendar year for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position .

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (330)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q10

Please list details (name, surname and I.D. Card Number) of the Company's officers or employees who have been appointed to act as company secretary or in a similar position in client entities.

[Answer if Q9 is > 0]

Product Risk (331)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q11

Please indicate the total number of directorship positions held for customers during the previous calendar year.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (332)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q12

Please indicate the total number of arrangements for another person to act as director, a partner in a partnership or in a similar position in relation to other client entities during the previous calendar year.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (333)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

In respect of director roles held or arranged for another person to hold such role, please indicate the following:

Q13 <i>Number of customers as at the end of the previous calendar year, where the director is solely or jointly vested</i>	<input type="text"/>
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<p><i>with the legal and judicial representation of the company</i></p> <p>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</p>	
<p>Q14</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is vested with the legal and judicial representation of the company, but where legal and judicial representation is vested in different directors acting individually</i></p> <p>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q15</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the company</i></p> <p>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q16</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the customer, however, he was authorised through a board resolution or power of attorney to open/manage customer's bank/payment account</i></p> <p>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q17</p> <p><i>Number of customers as at the end of the previous calendar year, for whom provision of directorship services includes having signatory right on customers' bank or payment accounts</i></p> <p>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q18</p> <p><i>Number of customers where power of attorney authorisations or board of directors resolutions have been granted to a third party to open and/or manage customers' bank/payment accounts during the previous calendar year</i></p> <p>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>

Product Risk (334)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q19

Please list details (name, surname and I.D. Card Number) of the Company's officers or employees who have been appointed to act as director in customers entities or in a similar position.

[Answer if Q11 is > 0]

Product Risk (335)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q20

Please indicate how many customers to whom directorship services was provided and who did not have their own bank/payment/crypto account as at the end of the previous calendar year but instead used your entity's clients account.

[Answer if Q11 is > 0]

Product Risk (336)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q21

Please indicate the number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, whose assets were frozen, confiscated or seized (due to ML/FT considerations).

[Answer if Q12 is > 0]

Product Risk (337)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q22

Please indicate the total number of private interest foundations that your entity formed, or assisted in forming such, during the previous calendar year.

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (338)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q23

Please indicate the total number of private interest foundations for which your entity was acting as an administrator as at the end of the previous calendar year.

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (339)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q24

Please indicate the total value of assets of the private interest foundations that your entity administered as at the end of the previous calendar year.

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (340)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q25

Please indicate the total number of private interest foundations that your entity administered as at the end of the previous calendar year where the total value of the assets of the private foundation did not exceed €999,999?

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (341)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q26

Please indicate the total number of private interest foundations that your entity administered as at the end of the previous calendar year where the total value of the assets of the foundation was between €1,000,000 and €4,999,999?

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (342)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q27

Please indicate the total number of private interest foundations that your entity administered as at the end of the previous calendar year where the total value of the assets of the foundation exceeded €5,000,000?

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (343)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q28

Please indicate for how many private interest foundations a statement of net assets supported by an audited profit and loss account which is required to be submitted to the MBR each year on the anniversary date of the foundation's birth was not submitted during the previous calendar year.

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (344)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q29

Please indicate the total value of payouts distributed from private interest foundations during the previous calendar year for which your entity acted as an administrator for.

[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]

Product Risk (345)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q30

Please indicate the total number of companies and other legal arrangements in which your entity held shares in fiduciary/mandatary capacity as at the end of the previous calendar year.

[Answer if Q1 is Acting as a mandatary in the holding of securities and/or immovable property for another person]

Product Risk (346)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q31

Please indicate the total value (€) of shares that your entity held in fiduciary/mandatary capacity as at the end of the previous calendar year.

[Answer if Q1 is Acting as a mandatary in the holding of securities and/or immovable property for another person]

Product Risk (347)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q32

Please list the type of trusts for which your entity provided trustee or co trustee services or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year:

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Choose more than one option:

- Discretionary trust
- Fixed interest trust
- Charitable trust
- Security trust
- Other

Product Risk (348)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q33

Please indicate the total value (€) of the assets held on trust as at the end of the previous calendar year where your entity provided trustee or co-trustee services or arranged by way of business, for another person to act as a trustee.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (349)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the following held on trust:

Q34 a) the total value (EUR equivalent) of funds in bank accounts held on trust [Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]	<input type="text"/>
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Q35 <i>b) the total value of balances (EUR) held in investment accounts (EUR equivalent)</i> [Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]	<input type="text"/> <input type="text"/>
Q36 <i>c) the total value of crypto assets held (EUR equivalent)</i> [Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]	<input type="text"/> <input type="text"/>
Q37 <i>d) the total value of immovable properties held on trust (EUR equivalent)</i> [Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]	<input type="text"/> <input type="text"/>
Q38 <i>e) the total value (EUR equivalent) of any other assets held on trust (such as jewellery, works of art, yachts, rights to receive income and others)</i> [Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]	<input type="text"/> <input type="text"/>

Product Risk (350)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q39

In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of trusts where, the total value of the assets settled on trust did not exceed €999,999.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (351)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q40

In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of trusts where the total value of the assets settled on trust was between €1,000,000 and €4,999,999.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (352)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q41

In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of trusts where the total value of the assets settled on trust exceeded €5,000,000.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (353)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q42

In respect of trusts for which your entity acted as a trustee or a co-trustee or arranged, by way of business, for another person to act as a trustee during the previous calendar year, please indicate the total value of additional endowments made into trusts during the previous calendar year.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (354)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q43

In respect of trusts for which your entity during the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total value (€) of the payouts distributed to beneficiaries of trusts during the previous calendar year.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (355)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q44

In respect of trusts for which your entity during the prior calendar year acted as a trustee or co-trustee, or arranged, by way of business, for another person to act as a trustee, please indicate the total number of trusts for which a power of attorney was granted to the settlor.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (356)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q45

In respect of trusts for which your entity during the prior calendar year acted as a trustee or co-trustee, or arranged, by way of business, for another person to act as a trustee, please indicate the total number of trusts for which a power of attorney was granted to a third party.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Product Risk (357)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q46

In respect of trusts for which your entity acted as a trustee or a co-trustee, or arranged, by way of business, for another person to act as a trustee, please indicate the total number of trusts for which trust accounts were not available as the end of the previous calendar year.

[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]

Customer Risk

Customer Risk (225)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q1

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

Customer Risk (226)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q2

Please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer is part of a multi-tier ownership structures (i.e. at least two additional layers of legal persons or arrangements on top of the customer)

[Answer if Q1 is > 0]

Customer Risk (227)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q3

According to your entity's policies and procedures during the previous calendar year, how many business relationships were subject to EDD?

[Answer if Q1 is > 0]

Customer Risk (228)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q4

According to your entity's policies and procedures during the previous calendar year, how many business relationships were subject to SDD?

[Answer if Q1 is > 0]

Customer Risk (229)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q5

In respect to the CSP services provided by your entity, please list the number of business relationships your entity had at the end of the previous calendar year where the customer is a company.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (230)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q6

In respect to the CSP services provided by your entity, please list the number of business relationships your entity had at the end of the previous calendar year where the customer is a commercial partnership.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (231)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q7

In respect to the CSP services provided by your entity, please list the number of business relationships your entity had at the end of the previous calendar year where the customer is a foundation or association.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (232)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q8

In respect to the CSP services provided by your entity please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer's ownership and control structure involves a trust, foundation or other similar legal arrangement (i.e. it is not the customer who is the trust, foundation or similar legal arrangement).

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (233)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q9

In respect of the CSP services provided by your entity, how many natural persons customers were PEPs (including family members and close associates) at the end of the previous calendar year?

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (234)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q10

In respect of the CSP services provided by your entity, how many legal persons customers have at least one beneficial owner who is a PEP (including family members and close associates) as at the end of the previous calendar year?

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (235)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q11

In respect of the CSP services provided by your entity, please list the number of customers during the previous calendar year, where the customer being a natural person or at least one of the beneficial owners of the legal person customer benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by Malta.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (236)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q12

In respect of the CSP services provided by your entity, please list the number of customers during the previous calendar year, where the customer being a natural person or at least one of the beneficial owners of the legal person customer benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by countries other than Malta.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (237)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q13

In respect of the CSP services provided by your entity, how many customers acted as holding companies with subsidiaries or investments in non-EU/non-EEA jurisdictions as at the end of the previous calendar year.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (238)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q14

In respect of the CSP services provided by your entity, how many customers acted as holding companies with subsidiaries or investments in non-EU/non-EEA jurisdictions as at the end of the previous calendar year.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (239)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q15

In respect of the CSP services provided by your entity, how many customers as at the end of the previous calendar year meet the definition of small companies in line with the Companies Act, that is, companies which on their balance sheet do not exceed the limits of two of the three following criteria: - balance sheet total: EUR4 million (4,000,000); - turnover: EUR8 million (8,000,000); - average number of employees during the accounting period: fifty (50)

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Customer Risk (240)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q16

According to your entity's policies and procedures, how many occasional transactions (that is, company formation services) that your entity carried out during the previous calendar year were subject to EDD?

[Answer if Q4 is > 0]

Customer Risk (241)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q17

According to your entity's policies and procedures, how many occasional transactions (that is, company formation services) that your entity carried out during the previous calendar year were subject to SDD?

[Answer if Q4 is > 0]

Customer Risk (242)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q18

For the companies or other legal entities or arrangements that your entity has formed during the previous calendar year, please select the value of the initial share capital.

[Answer if Q4 is > 0]

Choose more than one option:

- Not more than Eur 10,000
- EUR 10,001 - EUR 50,000
- EUR 50,001 - EUR 100,000
- Over EUR 100,001

Customer Risk (243)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q19

Please list the number of companies or other legal entities or arrangements that your entity formed during the previous calendar year who raised their initial capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding.

[Answer if Q4 is > 0]

Customer Risk (244)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Please list the number of activities in which the companies or other legal entities or arrangements that your entity formed during the previous calendar year, intended to be involved in:

Q20	<input type="text"/>
<i>Licensed activities</i>	<input type="text"/>
[Answer if Q4 is > 0]	
Q21	<input type="text"/>
<i>Cash intensive activities</i>	<input type="text"/>
[Answer if Q4 is > 0]	
Q22	<input type="text"/>
<i>Consulting, marketing and advisory activities</i>	

[Answer if Q4 is > 0]	
Q23	
Import/export activities	<input type="text"/>
[Answer if Q4 is > 0]	
Q24	
Manufacturing activities	<input type="text"/>
[Answer if Q4 is > 0]	
Q25	
Holding entities	<input type="text"/>
[Answer if Q4 is > 0]	
Q26	
Operate in/trade dual use items	<input type="text"/>
[Answer if Q4 is > 0]	
Q27	
Other	<input type="text"/>
[Answer if Q4 is > 0]	

Customer Risk (245)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q28

Please list the number of customers to whom your entity was providing a registered office, a business correspondence or administrative address and other related services as at end of the previous calendar year, who have not met their financial statements reporting requirements with the Malta Business Registry for the last financial year for which reporting was due.

[Answer if Q6 is > 0]

Note: A private company with an accounting period ending on 31 December 2023, would need to file its accounts latest by 12 December 2024. Thus, when filling in the REQ 2025 in April 2025 in respect of the year 2024, Subject Persons are required to indicate the number of customers who did not file their financial statements for financial year 2023. Similarly for other reporting periods, i.e. any financial statements that were due to be reported at any point in 2024 and were not reported.

Customer Risk (246)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q29

Please list the total number of customers to whom your entity provided registered office, a business correspondence or administrative address and other related services as at end of the previous calendar year and who were subject to change in beneficial ownership during the previous calendar year.

[Answer if Q6 is > 0]

Customer Risk (247)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q30

Please list the total number of customers to whom your entity was providing a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year, where the customer's director was considered to be the SMO (Tier 3 in the beneficial ownership determination)?

[Answer if Q6 is > 0]

Customer Risk (248)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q31

Please list the total number of customers for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position as at the end of the previous calendar year, where a Board of Directors meeting was not held during the previous calendar year.

[Answer if Q9 is > 0]

Customer Risk (249)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q32

Please list the total number of customers for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position as at the end of the previous calendar year, where the customer's director was considered to be the SMO (Tier 3 in the beneficial ownership determination)?

[Answer if Q9 is > 0]

Customer Risk (250)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q33

Please list the total number of customers for whom your entity acted as or arranged for another person to act as secretary of a company or in a similar position as at the end of the previous calendar year and who were subject to change in beneficial ownership during the previous calendar year.

[Answer if Q9 is > 0]

Customer Risk (251)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q34

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, who raised capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Customer Risk (252)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q35

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year and who do not hold a bank/payment account in Malta.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Customer Risk (253)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q36

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, who use crypto accounts.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Customer Risk (254)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q37

Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, who had loans issued by non-financial institutions (both legal and natural persons or legal arrangements).

[Answer if Q13 is > 0]

Note: Question to be replied to only by directors who have legal and judicial representation

Customer Risk (255)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Please list the number of activities in which the companies or other legal entities for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year were involved in:

Q38	<input type="text"/>
<i>Licensed activities</i>	

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	
Q39	
Cash intensive activities	<input type="text"/>
[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	
Q40	
Consulting, marketing and advisory activities	<input type="text"/>
[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	
Q41	
Import/export activities	<input type="text"/>
[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	
Q42	
Manufacturing activities	<input type="text"/>
[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	
Q43	
Holding entities	<input type="text"/>
[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	
Q44	
Operate in/trade dual use items	<input type="text"/>
[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	
Q45	
Other	<input type="text"/>
[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]	

Customer Risk (256)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q46

Please list the total number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year and who were subject to change in beneficial ownership during the previous calendar year.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Customer Risk (257)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q47

Please list the total number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, where the customer's director was considered to be the SMO (Tier 3 in the beneficial ownership determination)?

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Customer Risk (258)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q48

Please list the total number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year who had an increase in share capital during the previous calendar year?

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Customer Risk (259)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q49

Please list the number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, where a Board of Directors meeting was not held during the previous calendar year.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Customer Risk (260)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q50

Please list the number of customers for whom your entity acted as a director or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at end of the previous calendar year, who have not met their financial statements reporting requirements with the Malta Business Registry for the last financial year for which reporting was due.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Note: A private company with an accounting period ending on 31 December 2023, would need to file its accounts latest by 12 December 2024. Thus, when filling in the REQ 2025 in April 2025 in respect of the year 2024, Subject Persons are required to indicate the number of customers who did not file their financial statements for financial year 2023. Similarly for other reporting periods, i.e. any financial statements that were due to be reported at any point in 2024 and were not reported

Customer Risk (261)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q51

In respect of private interest foundations for which your entity was appointed as an administrator as at the end of the previous calendar year, please indicate the total number of beneficial owners (that is, the founder, members of the supervisory council and the beneficiaries) who were PEPs (including family members and close associates).

[Answer if Q23 is > 0]

Customer Risk (262)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q52

Please indicate the total number of private interest foundations for which your entity was appointed as an administrator as at the end of the previous calendar year, who had loans issued by non-financial institutions (both legal and natural persons or legal arrangements).

[Answer if Q23 is > 0]

Customer Risk (263)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q53

Please indicate the total number of customers (private interest foundations) that your entity acts as an administrator for who as at the end of the previous calendar year did not have their own bank/payment/crypto account and instead used your entity's clients' account.

[Answer if Q23 is > 0]

Customer Risk (265)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q54

Please indicate the total number of customers (trusts) who as at the end of the previous calendar year did not have their own bank/payment/crypto account and instead used your entity's clients' account.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (266)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q55

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who have been convicted of a criminal offence that could have potentially generated illicit proceeds.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (267)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q56

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of beneficiaries who have been convicted of a criminal offence that could have potentially generated illicit proceeds.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (268)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q57

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who, as at the end of the previous calendar year, were PEPs.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (269)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q58

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of beneficiaries who, as at the end of the previous calendar year, were PEPs.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (270)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q59

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by Malta.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (271)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q60

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by countries other than Malta.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (272)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q61

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the number of beneficiaries who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by Malta.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (273)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q62

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of beneficiaries who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by countries other than Malta.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (274)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q63

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of trusts in which settlor was legal person other than a natural person.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (275)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q64

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the number of trusts where the settlor indicated on the trust instrument that s/he is acting as mandator for another person (the 'Economic Settlor' or 'Mandator')

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (276)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q65

In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the number of trusts in which settlor was also a beneficiary.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (277)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q66

Please indicate the total number of trusts that your entity took over from other trust service providers during the previous calendar year.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (278)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q67

Please indicate the total number of customers for whom, as at the end of the previous calendar year, your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, who had loans issued by non-financial institutions (both legal and natural persons or legal arrangements).

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Customer Risk (264)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q68

Please indicate the total number of customers (natural persons) or beneficial owners of customers (legal person) for whom your entity provided fiduciary services/acted as mandatary as at the end of the previous calendar year, who were PEPs.

[Answer if Q30 is > 0]



Jurisdiction Risk

Jurisdiction Risk (159)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q1

In respect to CSP services provided by your entity, please indicate the respective jurisdiction in which the natural persons (customers or beneficial owners of legal persons) are considered to be PEPs.

[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (160)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q2

Please indicate the jurisdiction in which the companies or other legal entities that your entity formed during the previous calendar year were incorporated.

[Answer if Q4 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (161)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

How many customers (natural persons) to whom your entity provided company formation services during the previous calendar year resided in the following jurisdictions:

Q3 Malta [Answer if Q4 is > 0]	<input type="text"/>
Q4 EU/EEA country (apart from Malta) [Answer if Q4 is > 0] Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q5 Non EU/non-EEA country [Answer if Q4 is > 0] Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q6	<input type="text"/>

<p><i>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q4 is > 0]</p>	
<p>Q7</p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q6 is > 0]</p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu

	<ul style="list-style-type: none"> • Venezuela • Vietnam • Yemen
Q8 Afghanistan [Answer if Q7 is Afghanistan]	<input type="text"/> <input type="text"/>
Q9 Algeria [Answer if Q7 is Algeria]	<input type="text"/> <input type="text"/>
Q10 Angola [Answer if Q7 is Angola]	<input type="text"/> <input type="text"/>
Q11 Barbados [Answer if Q7 is Barbados]	<input type="text"/> <input type="text"/>
Q12 Bulgaria [Answer if Q7 is Bulgaria]	<input type="text"/> <input type="text"/>
Q13 Burkina Faso [Answer if Q7 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q14 Cameroon [Answer if Q7 is Cameroon]	<input type="text"/> <input type="text"/>
Q15 Congo, the Democratic Republic of the [Answer if Q7 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q16 Cote D'Ivoire [Answer if Q7 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q17	<input type="text"/>

Croatia	
[Answer if Q7 is Croatia]	
Q18	
Gibraltar	<input type="text"/>
[Answer if Q7 is Gibraltar]	
Q19	
Haiti	<input type="text"/>
[Answer if Q7 is Haiti]	
Q20	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q7 is Iran, Islamic Republic of]	
Q21	
Jamaica	<input type="text"/>
[Answer if Q7 is Jamaica]	
Q22	
Kenya	<input type="text"/>
[Answer if Q7 is Kenya]	
Q23	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q7 is Korea, Democratic People's Republic of]	
Q24	
Lebanon	<input type="text"/>
[Answer if Q7 is Lebanon]	
Q25	
Mali	<input type="text"/>
[Answer if Q7 is Mali]	
Q26	
Monaco	<input type="text"/>
[Answer if Q7 is Monaco]	
Q27	<input type="text"/>
Mozambique	

[Answer if Q7 is Mozambique]	
Q28	
Myanmar	<input type="text"/>
[Answer if Q7 is Myanmar]	
Q29	
Namibia	<input type="text"/>
[Answer if Q7 is Namibia]	
Q30	
Nigeria	<input type="text"/>
[Answer if Q7 is Nigeria]	
Q31	
Panama	<input type="text"/>
[Answer if Q7 is Panama]	
Q32	
Philippines	<input type="text"/>
[Answer if Q7 is Philippines]	
Q33	
Senegal	<input type="text"/>
[Answer if Q7 is Senegal]	
Q34	
South Africa	<input type="text"/>
[Answer if Q7 is South Africa]	
Q35	
South Sudan	<input type="text"/>
[Answer if Q7 is South Sudan]	
Q36	
Syrian Arab Republic	<input type="text"/>
[Answer if Q7 is Syrian Arab Republic]	
Q37	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q7 is Tanzania, United Republic of]	
Q38	<input type="text"/>

Trinidad and Tobago	
[Answer if Q7 is Trinidad and Tobago]	
Q39	
Uganda	<input type="text"/>
[Answer if Q7 is Uganda]	
Q40	
United Arab Emirates	<input type="text"/>
[Answer if Q7 is United Arab Emirates]	
Q41	
Vanuatu	<input type="text"/>
[Answer if Q7 is Vanuatu]	
Q42	
Venezuela	<input type="text"/>
[Answer if Q7 is Venezuela]	
Q43	
Vietnam	<input type="text"/>
[Answer if Q7 is Vietnam]	
Q44	
Yemen	<input type="text"/>
[Answer if Q7 is Yemen]	

Jurisdiction Risk (162)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

How many customers (persons other than natural persons) to whom your entity provided company formation services during the previous calendar year were registered in the following jurisdictions:

Q45	
Malta	<input type="text"/>
[Answer if Q4 is > 0]	
Q46	<input type="text"/>

<p>EU/EEA country (apart from Malta)</p> <p>[Answer if Q4 is > 0]</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>Q47</p> <p>Non-EU/non-EEA country</p> <p>[Answer if Q4 is > 0]</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>	<input type="text"/>
<p>Q48</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q4 is > 0]</p>	<input type="text"/>
<p>Q49</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q48 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire

	<ul style="list-style-type: none"> • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q50 Afghanistan [Answer if Q49 is Afghanistan]	<input type="text"/> <input type="text"/>
Q51 Algeria [Answer if Q49 is Algeria]	<input type="text"/> <input type="text"/>
Q52 Angola [Answer if Q49 is Angola]	<input type="text"/> <input type="text"/>
Q53	

Barbados	<input type="text"/>
[Answer if Q49 is Barbados]	
Q54	
Bulgaria	<input type="text"/>
[Answer if Q49 is Bulgaria]	
Q55	
Burkina Faso	<input type="text"/>
[Answer if Q49 is Burkina Faso]	
Q56	
Cameroon	<input type="text"/>
[Answer if Q49 is Cameroon]	
Q57	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q49 is Congo, the Democratic Republic of the]	
Q58	
Cote D'Ivoire	<input type="text"/>
[Answer if Q49 is Cote D'Ivoire]	
Q59	
Croatia	<input type="text"/>
[Answer if Q49 is Croatia]	
Q60	
Gibraltar	<input type="text"/>
[Answer if Q49 is Gibraltar]	
Q61	
Haiti	<input type="text"/>
[Answer if Q49 is Haiti]	
Q62	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q49 is Iran, Islamic Republic of]	
Q63	<input type="text"/>
Jamaica	

[Answer if Q49 is Jamaica]	
Q64	
Kenya	<input type="text"/>
[Answer if Q49 is Kenya]	
Q65	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q49 is Korea, Democratic People's Republic of]	
Q66	
Lebanon	<input type="text"/>
[Answer if Q49 is Lebanon]	
Q67	
Mali	<input type="text"/>
[Answer if Q49 is Mali]	
Q68	
Monaco	<input type="text"/>
[Answer if Q49 is Monaco]	
Q69	
Mozambique	<input type="text"/>
[Answer if Q49 is Mozambique]	
Q70	
Myanmar	<input type="text"/>
[Answer if Q49 is Myanmar]	
Q71	
Namibia	<input type="text"/>
[Answer if Q49 is Namibia]	
Q72	
Nigeria	<input type="text"/>
[Answer if Q49 is Nigeria]	
Q73	
Panama	<input type="text"/>
[Answer if Q49 is Panama]	

Q74	<input type="text"/>
<i>Philippines</i>	
[Answer if Q49 is Philippines]	
Q75	<input type="text"/>
<i>Senegal</i>	
[Answer if Q49 is Senegal]	
Q76	<input type="text"/>
<i>South Africa</i>	
[Answer if Q49 is South Africa]	
Q77	<input type="text"/>
<i>South Sudan</i>	
[Answer if Q49 is South Sudan]	
Q78	<input type="text"/>
<i>Syrian Arab Republic</i>	
[Answer if Q49 is Syrian Arab Republic]	
Q79	<input type="text"/>
<i>Tanzania, United Republic of</i>	
[Answer if Q49 is Tanzania, United Republic of]	
Q80	<input type="text"/>
<i>Trinidad and Tobago</i>	
[Answer if Q49 is Trinidad and Tobago]	
Q81	<input type="text"/>
<i>Uganda</i>	
[Answer if Q49 is Uganda]	
Q82	<input type="text"/>
<i>United Arab Emirates</i>	
[Answer if Q49 is United Arab Emirates]	
Q83	<input type="text"/>
<i>Vanuatu</i>	
[Answer if Q49 is Vanuatu]	
Q84	<input type="text"/>

Venezuela	
[Answer if Q49 is Venezuela]	
Q85	
Vietnam	<input type="text"/>
[Answer if Q49 is Vietnam]	
Q86	
Yemen	<input type="text"/>
[Answer if Q49 is Yemen]	

Jurisdiction Risk (163)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q87

Please indicate the number of companies or other legal entities that your entity formed during the previous calendar year where all beneficial owners were non-Maltese residents.

[Answer if Q4 is > 0]

Jurisdiction Risk (164)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q88

Please indicate the number of companies or other legal entities that your entity formed during the previous calendar year where all beneficial owners were Maltese residents.

[Answer if Q4 is > 0]

Jurisdiction Risk (165)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q89

Please indicate the number of companies or other legal entities that your entity formed during the previous calendar year where at least one of the beneficial owners was non-Maltese resident.

[Answer if Q4 is > 0]

Jurisdiction Risk (166)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q90

Please indicate the number of companies or other legal entities to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year where all beneficial owners were Maltese residents.

[Answer if Q6 is > 0]

Jurisdiction Risk (167)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q91

Please indicate the number of companies or other legal entities to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at end of the previous calendar year where at least one of the beneficial owners was non-Maltese resident.

[Answer if Q6 is > 0]

Jurisdiction Risk (168)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

How many beneficial owners of the customers to whom your entity provided a registered office, a business correspondence or administrative address and other related services as at the end of the previous calendar year resided in the following jurisdictions:

Q92 Malta [Answer if Q6 is > 0]	<input type="text"/>
Q93 EU/EEA country (excluding Malta) [Answer if Q6 is > 0] Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q94 Non-EU/non-EEA country [Answer if Q6 is > 0] Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased	<input type="text"/>

<p><i>Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	
<p>Q95</p> <p><i>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries with strategic deficiencies.</i></p> <p>[Answer if Q6 is > 0]</p>	<div data-bbox="1045 416 1394 459" style="border: 1px solid black; height: 19px;"></div>
<p>Q96</p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q95 is > 0]</p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic

	<ul style="list-style-type: none"> • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q97 Afghanistan [Answer if Q96 is Afghanistan]	<input type="text"/> <input type="text"/>
Q98 Algeria [Answer if Q96 is Algeria]	<input type="text"/> <input type="text"/>
Q99 Angola [Answer if Q96 is Angola]	<input type="text"/> <input type="text"/>
Q100 Barbados [Answer if Q96 is Barbados]	<input type="text"/> <input type="text"/>
Q101 Bulgaria [Answer if Q96 is Bulgaria]	<input type="text"/> <input type="text"/>
Q102 Burkina Faso [Answer if Q96 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q103 Cameroon [Answer if Q96 is Cameroon]	<input type="text"/> <input type="text"/>
Q104 Congo, the Democratic Republic of the	<input type="text"/> <input type="text"/>

[Answer if Q96 is Congo, the Democratic Republic of the]	
Q105	
Cote D'Ivoire	<input type="text"/>
[Answer if Q96 is Cote D'Ivoire]	
Q106	
Croatia	<input type="text"/>
[Answer if Q96 is Croatia]	
Q107	
Gibraltar	<input type="text"/>
[Answer if Q96 is Gibraltar]	
Q108	
Haiti	<input type="text"/>
[Answer if Q96 is Haiti]	
Q109	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q96 is Iran, Islamic Republic of]	
Q110	
Jamaica	<input type="text"/>
[Answer if Q96 is Jamaica]	
Q111	
Kenya	<input type="text"/>
[Answer if Q96 is Kenya]	
Q112	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q96 is Korea, Democratic People's Republic of]	
Q113	
Lebanon	<input type="text"/>
[Answer if Q96 is Lebanon]	
Q114	<input type="text"/>
Mali	

[Answer if Q96 is Mali]	
Q115	
Monaco	<input type="text"/>
[Answer if Q96 is Monaco]	
Q116	
Mozambique	<input type="text"/>
[Answer if Q96 is Mozambique]	
Q117	
Myanmar	<input type="text"/>
[Answer if Q96 is Myanmar]	
Q118	
Namibia	<input type="text"/>
[Answer if Q96 is Namibia]	
Q119	
Nigeria	<input type="text"/>
[Answer if Q96 is Nigeria]	
Q120	
Panama	<input type="text"/>
[Answer if Q96 is Panama]	
Q121	
Philippines	<input type="text"/>
[Answer if Q96 is Philippines]	
Q122	
Senegal	<input type="text"/>
[Answer if Q96 is Senegal]	
Q123	
South Africa	<input type="text"/>
[Answer if Q96 is South Africa]	
Q124	
South Sudan	<input type="text"/>
[Answer if Q96 is South Sudan]	
Q125	<input type="text"/>

Syrian Arab Republic	
[Answer if Q96 is Syrian Arab Republic]	
Q126	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q96 is Tanzania, United Republic of]	
Q127	
Trinidad and Tobago	<input type="text"/>
[Answer if Q96 is Trinidad and Tobago]	
Q128	
Uganda	<input type="text"/>
[Answer if Q96 is Uganda]	
Q129	
United Arab Emirates	<input type="text"/>
[Answer if Q96 is United Arab Emirates]	
Q130	
Vanuatu	<input type="text"/>
[Answer if Q96 is Vanuatu]	
Q131	
Venezuela	<input type="text"/>
[Answer if Q96 is Venezuela]	
Q132	
Vietnam	<input type="text"/>
[Answer if Q96 is Vietnam]	
Q133	
Yemen	<input type="text"/>
[Answer if Q96 is Yemen]	

Jurisdiction Risk (169)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

How many beneficial owners of the customers to whom your entity provided company secretary services as at the end of the previous calendar year resided in the following jurisdictions:

<p>Q134</p> <p>Malta</p> <p>[Answer if Q9 is > 0]</p>	<input type="text"/>
<p>Q135</p> <p>EU/EEA country (excluding Malta)</p> <p>[Answer if Q9 is > 0]</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>	<input type="text"/>
<p>Q136</p> <p>Non-EU/non-EEA country</p> <p>[Answer if Q9 is > 0]</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>	<input type="text"/>
<p>Q137</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 with strategic deficiencies.</p> <p>[Answer if Q9 is > 0]</p>	<input type="text"/>
<p>Q138</p>	<p>Choose more than one option:</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.

[Answer if Q137 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

Q139

Afghanistan

[Answer if Q138 is Afghanistan]

Q140 <i>Algeria</i> [Answer if Q138 is Algeria]	<input type="text"/> <input type="text"/>
Q141 <i>Angola</i> [Answer if Q138 is Angola]	<input type="text"/> <input type="text"/>
Q142 <i>Barbados</i> [Answer if Q138 is Barbados]	<input type="text"/> <input type="text"/>
Q143 <i>Bulgaria</i> [Answer if Q138 is Bulgaria]	<input type="text"/> <input type="text"/>
Q144 <i>Burkina Faso</i> [Answer if Q138 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q145 <i>Cameroon</i> [Answer if Q138 is Cameroon]	<input type="text"/> <input type="text"/>
Q146 <i>Congo, the Democratic Republic of the</i> [Answer if Q138 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q147 <i>Cote D'Ivoire</i> [Answer if Q138 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q148 <i>Croatia</i> [Answer if Q138 is Croatia]	<input type="text"/> <input type="text"/>
Q149 <i>Gibraltar</i> [Answer if Q138 is Gibraltar]	<input type="text"/> <input type="text"/>
Q150	<input type="text"/>

Haiti	
[Answer if Q138 is Haiti]	
Q151	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q138 is Iran, Islamic Republic of]	
Q152	
Jamaica	<input type="text"/>
[Answer if Q138 is Jamaica]	
Q153	
Kenya	<input type="text"/>
[Answer if Q138 is Kenya]	
Q154	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q138 is Korea, Democratic People's Republic of]	
Q155	
Lebanon	<input type="text"/>
[Answer if Q138 is Lebanon]	
Q156	
Mali	<input type="text"/>
[Answer if Q138 is Mali]	
Q157	
Monaco	<input type="text"/>
[Answer if Q138 is Monaco]	
Q158	
Mozambique	<input type="text"/>
[Answer if Q138 is Mozambique]	
Q159	
Myanmar	<input type="text"/>
[Answer if Q138 is Myanmar]	
Q160	<input type="text"/>
Namibia	

[Answer if Q138 is Namibia]	
Q161	
Nigeria	<input type="text"/>
[Answer if Q138 is Nigeria]	
Q162	
Panama	<input type="text"/>
[Answer if Q138 is Panama]	
Q163	
Philippines	<input type="text"/>
[Answer if Q138 is Philippines]	
Q164	
Senegal	<input type="text"/>
[Answer if Q138 is Senegal]	
Q165	
South Africa	<input type="text"/>
[Answer if Q138 is South Africa]	
Q166	
South Sudan	<input type="text"/>
[Answer if Q138 is South Sudan]	
Q167	
Syrian Arab Republic	<input type="text"/>
[Answer if Q138 is Syrian Arab Republic]	
Q168	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q138 is Tanzania, United Republic of]	
Q169	
Trinidad and Tobago	<input type="text"/>
[Answer if Q138 is Trinidad and Tobago]	
Q170	
Uganda	<input type="text"/>
[Answer if Q138 is Uganda]	
Q171	<input type="text"/>

United Arab Emirates	
[Answer if Q138 is United Arab Emirates]	
Q172	
Vanuatu	<input type="text"/>
[Answer if Q138 is Vanuatu]	
Q173	
Venezuela	<input type="text"/>
[Answer if Q138 is Venezuela]	
Q174	
Vietnam	<input type="text"/>
[Answer if Q138 is Vietnam]	
Q175	
Yemen	<input type="text"/>
[Answer if Q138 is Yemen]	

Jurisdiction Risk (170)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q176

Please indicate the jurisdictions in which customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year were registered.

[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (171)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

How many beneficial owners of customers to whom your entity provided directorship services at the end of the previous calendar year resided in the following jurisdictions:

Q177 Malta [Answer if Q11 is > 0]	<input type="text"/>
Q178 EU/EEA country (excluding Malta) [Answer if Q11 is > 0] Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q179 non-EU/non-EEA country [Answer if Q11 is > 0] Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q180 Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under	<input type="text"/>

<p><i>Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q11 is > 0]</p>	
<p>Q181</p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q180 is > 0]</p> 	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela

	<ul style="list-style-type: none"> • Vietnam • Yemen
Q182	
<i>Afghanistan</i>	<input type="text"/>
[Answer if Q181 is Afghanistan]	
Q183	
<i>Algeria</i>	<input type="text"/>
[Answer if Q181 is Algeria]	
Q184	
<i>Angola</i>	<input type="text"/>
[Answer if Q181 is Angola]	
Q185	
<i>Barbados</i>	<input type="text"/>
[Answer if Q181 is Barbados]	
Q186	
<i>Bulgaria</i>	<input type="text"/>
[Answer if Q181 is Bulgaria]	
Q187	
<i>Burkina Faso</i>	<input type="text"/>
[Answer if Q181 is Burkina Faso]	
Q188	
<i>Cameroon</i>	<input type="text"/>
[Answer if Q181 is Cameroon]	
Q189	
<i>Congo, the Democratic Republic of the</i>	<input type="text"/>
[Answer if Q181 is Congo, the Democratic Republic of the]	
Q190	
<i>Cote D'Ivoire</i>	<input type="text"/>
[Answer if Q181 is Cote D'Ivoire]	
Q191	<input type="text"/>
<i>Croatia</i>	

[Answer if Q181 is Croatia]	
Q192	
Gibraltar	<input type="text"/>
[Answer if Q181 is Gibraltar]	
Q193	
Haiti	<input type="text"/>
[Answer if Q181 is Haiti]	
Q194	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q181 is Iran, Islamic Republic of]	
Q195	
Jamaica	<input type="text"/>
[Answer if Q181 is Jamaica]	
Q196	
Kenya	<input type="text"/>
[Answer if Q181 is Kenya]	
Q197	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q181 is Korea, Democratic People's Republic of]	
Q198	
Lebanon	<input type="text"/>
[Answer if Q181 is Lebanon]	
Q199	
Mali	<input type="text"/>
[Answer if Q181 is Mali]	
Q200	
Monaco	<input type="text"/>
[Answer if Q181 is Monaco]	
Q201	
Mozambique	<input type="text"/>
[Answer if Q181 is Mozambique]	

Q202	<input type="text"/>
<i>Myanmar</i>	
[Answer if Q181 is Myanmar]	
Q203	<input type="text"/>
<i>Namibia</i>	
[Answer if Q181 is Namibia]	
Q204	<input type="text"/>
<i>Nigeria</i>	
[Answer if Q181 is Nigeria]	
Q205	<input type="text"/>
<i>Panama</i>	
[Answer if Q181 is Panama]	
Q206	<input type="text"/>
<i>Philippines</i>	
[Answer if Q181 is Philippines]	
Q207	<input type="text"/>
<i>Senegal</i>	
[Answer if Q181 is Senegal]	
Q208	<input type="text"/>
<i>South Africa</i>	
[Answer if Q181 is South Africa]	
Q209	<input type="text"/>
<i>South Sudan</i>	
[Answer if Q181 is South Sudan]	
Q210	<input type="text"/>
<i>Syrian Arab Republic</i>	
[Answer if Q181 is Syrian Arab Republic]	
Q211	<input type="text"/>
<i>Tanzania, United Republic of</i>	
[Answer if Q181 is Tanzania, United Republic of]	
Q212	<input type="text"/>

Trinidad and Tobago	
[Answer if Q181 is Trinidad and Tobago]	
Q213	
Uganda	<input type="text"/>
[Answer if Q181 is Uganda]	
Q214	
United Arab Emirates	<input type="text"/>
[Answer if Q181 is United Arab Emirates]	
Q215	
Vanuatu	<input type="text"/>
[Answer if Q181 is Vanuatu]	
Q216	
Venezuela	<input type="text"/>
[Answer if Q181 is Venezuela]	
Q217	
Vietnam	<input type="text"/>
[Answer if Q181 is Vietnam]	
Q218	
Yemen	<input type="text"/>
[Answer if Q181 is Yemen]	

Jurisdiction Risk (172)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q219

Please indicate the jurisdictions in which customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year held their bank/payments/crypto account.

[Answer if Q13 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (173)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q220

With respect to customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at the end of the previous calendar year, please indicate jurisdictions from which loans issued by non-financial institutions (both legal and natural persons or legal arrangements) originated.

[Answer if Q13 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (174)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Please indicate how many private interest foundations were set up by your entity in the previous calendar year in the following jurisdictions:

Q221	
<i>Malta</i>	<input type="text"/>
<i>[Answer if Q22 is > 0]</i>	
Q222	<input type="text"/>

<p>EU/EEA jurisdiction (apart from Malta)</p> <p>[Answer if Q22 is > 0]</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>Q223</p> <p>Non-EU/non-EEA</p> <p>[Answer if Q22 is > 0]</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>	<input type="text"/>
<p>Q224</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q22 is > 0]</p>	<input type="text"/>
<p>Q225</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q224 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire

	<ul style="list-style-type: none"> • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q226 Afghanistan <i>[Answer if Q225 is Afghanistan]</i>	<input data-bbox="1045 1525 1396 1565" type="text"/>
Q227 Algeria <i>[Answer if Q225 is Algeria]</i>	<input data-bbox="1045 1704 1396 1744" type="text"/>
Q228 Angola <i>[Answer if Q225 is Angola]</i>	<input data-bbox="1045 1883 1396 1924" type="text"/>
Q229	

Barbados	<input type="text"/>
[Answer if Q225 is Barbados]	
Q230	
Bulgaria	<input type="text"/>
[Answer if Q225 is Bulgaria]	
Q231	
Burkina Faso	<input type="text"/>
[Answer if Q225 is Burkina Faso]	
Q232	
Cameroon	<input type="text"/>
[Answer if Q225 is Cameroon]	
Q233	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q225 is Congo, the Democratic Republic of the]	
Q234	
Cote D'Ivoire	<input type="text"/>
[Answer if Q225 is Cote D'Ivoire]	
Q235	
Croatia	<input type="text"/>
[Answer if Q225 is Croatia]	
Q236	
Gibraltar	<input type="text"/>
[Answer if Q225 is Gibraltar]	
Q237	
Haiti	<input type="text"/>
[Answer if Q225 is Haiti]	
Q238	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q225 is Iran, Islamic Republic of]	
Q239	<input type="text"/>
Jamaica	

[Answer if Q225 is Jamaica]	
Q240	
Kenya	<input type="text"/>
[Answer if Q225 is Kenya]	
Q241	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q225 is Korea, Democratic People's Republic of]	
Q242	
Lebanon	<input type="text"/>
[Answer if Q225 is Lebanon]	
Q243	
Mali	<input type="text"/>
[Answer if Q225 is Mali]	
Q244	
Monaco	<input type="text"/>
[Answer if Q225 is Monaco]	
Q245	
Mozambique	<input type="text"/>
[Answer if Q225 is Mozambique]	
Q246	
Myanmar	<input type="text"/>
[Answer if Q225 is Myanmar]	
Q247	
Namibia	<input type="text"/>
[Answer if Q225 is Namibia]	
Q248	
Nigeria	<input type="text"/>
[Answer if Q225 is Nigeria]	
Q249	
Panama	<input type="text"/>
[Answer if Q225 is Panama]	

Q250	<input type="text"/>
<i>Philippines</i>	
[Answer if Q225 is Philippines]	
Q251	<input type="text"/>
<i>Senegal</i>	
[Answer if Q225 is Senegal]	
Q252	<input type="text"/>
<i>South Africa</i>	
[Answer if Q225 is South Africa]	
Q253	<input type="text"/>
<i>South Sudan</i>	
[Answer if Q225 is South Sudan]	
Q254	<input type="text"/>
<i>Syrian Arab Republic</i>	
[Answer if Q225 is Syrian Arab Republic]	
Q255	<input type="text"/>
<i>Tanzania, United Republic of</i>	
[Answer if Q225 is Tanzania, United Republic of]	
Q256	<input type="text"/>
<i>Trinidad and Tobago</i>	
[Answer if Q225 is Trinidad and Tobago]	
Q257	<input type="text"/>
<i>Uganda</i>	
[Answer if Q225 is Uganda]	
Q258	<input type="text"/>
<i>United Arab Emirates</i>	
[Answer if Q225 is United Arab Emirates]	
Q259	<input type="text"/>
<i>Vanuatu</i>	
[Answer if Q225 is Vanuatu]	
Q260	<input type="text"/>

Venezuela	
[Answer if Q225 is Venezuela]	
Q261	
Vietnam	<input type="text"/>
[Answer if Q225 is Vietnam]	
Q262	
Yemen	<input type="text"/>
[Answer if Q225 is Yemen]	

Jurisdiction Risk (175)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Please indicate how many private interest foundations that your entity administered as at the end of the previous calendar year were registered in the following jurisdictions:

Q263	
Malta	<input type="text"/>
[Answer if Q23 is > 0]	
Q264	
EU/EEA country (apart from Malta)	
[Answer if Q23 is > 0]	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.	<input type="text"/>
Q265	<input type="text"/>
Non-EU/non-EEA country	
[Answer if Q23 is > 0]	

<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>Q266</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q23 is > 0]</p>	<div data-bbox="1046 651 1401 692" style="border: 1px solid black; height: 18px; width: 100%;"></div>
<p>Q267</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q266 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines

	<ul style="list-style-type: none"> • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q268 Afghanistan [Answer if Q267 is Afghanistan]	<input type="text"/> <input type="text"/>
Q269 Algeria [Answer if Q267 is Algeria]	<input type="text"/> <input type="text"/>
Q270 Angola [Answer if Q267 is Angola]	<input type="text"/> <input type="text"/>
Q271 Barbados [Answer if Q267 is Barbados]	<input type="text"/> <input type="text"/>
Q272 Bulgaria [Answer if Q267 is Bulgaria]	<input type="text"/> <input type="text"/>
Q273 Burkina Faso [Answer if Q267 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q274 Cameroon [Answer if Q267 is Cameroon]	<input type="text"/> <input type="text"/>

Q275 Congo, the Democratic Republic of the [Answer if Q267 is Congo, the Democratic Republic of the]	<input type="text"/>
Q276 Cote D'Ivoire [Answer if Q267 is Cote D'Ivoire]	<input type="text"/>
Q277 Croatia [Answer if Q267 is Croatia]	<input type="text"/>
Q278 Gibraltar [Answer if Q267 is Gibraltar]	<input type="text"/>
Q279 Haiti [Answer if Q267 is Haiti]	<input type="text"/>
Q280 Iran, Islamic Republic of [Answer if Q267 is Iran, Islamic Republic of]	<input type="text"/>
Q281 Jamaica [Answer if Q267 is Jamaica]	<input type="text"/>
Q282 Kenya [Answer if Q267 is Kenya]	<input type="text"/>
Q283 Korea, Democratic People's Republic of [Answer if Q267 is Korea, Democratic People's Republic of]	<input type="text"/>
Q284 Lebanon [Answer if Q267 is Lebanon]	<input type="text"/>

Q285	<input type="text"/>
<i>Mali</i>	
[Answer if Q267 is Mali]	
Q286	<input type="text"/>
<i>Monaco</i>	
[Answer if Q267 is Monaco]	
Q287	<input type="text"/>
<i>Mozambique</i>	
[Answer if Q267 is Mozambique]	
Q288	<input type="text"/>
<i>Myanmar</i>	
[Answer if Q267 is Myanmar]	
Q289	<input type="text"/>
<i>Namibia</i>	
[Answer if Q267 is Namibia]	
Q290	<input type="text"/>
<i>Nigeria</i>	
[Answer if Q267 is Nigeria]	
Q291	<input type="text"/>
<i>Panama</i>	
[Answer if Q267 is Panama]	
Q292	<input type="text"/>
<i>Philippines</i>	
[Answer if Q267 is Philippines]	
Q293	<input type="text"/>
<i>Senegal</i>	
[Answer if Q267 is Senegal]	
Q294	<input type="text"/>
<i>South Africa</i>	
[Answer if Q267 is South Africa]	
Q295	<input type="text"/>

South Sudan	
[Answer if Q267 is South Sudan]	
Q296	
Syrian Arab Republic	
[Answer if Q267 is Syrian Arab Republic]	
Q297	
Tanzania, United Republic of	
[Answer if Q267 is Tanzania, United Republic of]	
Q298	
Trinidad and Tobago	
[Answer if Q267 is Trinidad and Tobago]	
Q299	
Uganda	
[Answer if Q267 is Uganda]	
Q300	
United Arab Emirates	
[Answer if Q267 is United Arab Emirates]	
Q301	
Vanuatu	
[Answer if Q267 is Vanuatu]	
Q302	
Venezuela	
[Answer if Q267 is Venezuela]	
Q303	
Vietnam	
[Answer if Q267 is Vietnam]	
Q304	
Yemen	
[Answer if Q267 is Yemen]	

Jurisdiction Risk (176)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Please indicate how many founders of the private interest foundations that your entity administered as at the end of the previous calendar year resided in the following jurisdictions:

<p>Q305</p> <p>Malta</p> <p>[Answer if Q23 is > 0]</p>	<input type="text"/>
<p>Q306</p> <p>EU/EEA country (apart from Malta)</p> <p>[Answer if Q23 is > 0]</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>	<input type="text"/>
<p>Q307</p> <p>Non-EU/non-EEA country</p> <p>[Answer if Q23 is > 0]</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>	<input type="text"/>
<p>Q308</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q23 is > 0]</p>	<input type="text"/>

Q309

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.

[Answer if Q308 is > 0]

Choose more than one option:

- 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

Q310

Afghanistan	
[Answer if Q309 is Afghanistan]	
Q311	
Algeria	
[Answer if Q309 is Algeria]	
Q312	
Angola	
[Answer if Q309 is Angola]	
Q313	
Barbados	
[Answer if Q309 is Barbados]	
Q314	
Bulgaria	
[Answer if Q309 is Bulgaria]	
Q315	
Burkina Faso	
[Answer if Q309 is Burkina Faso]	
Q316	
Cameroon	
[Answer if Q309 is Cameroon]	
Q317	
Congo, the Democratic Republic of the	
[Answer if Q309 is Congo, the Democratic Republic of the]	
Q318	
Cote D'Ivoire	
[Answer if Q309 is Cote D'Ivoire]	
Q319	
Croatia	
[Answer if Q309 is Croatia]	
Q320	
Gibraltar	

[Answer if Q309 is Gibraltar]	
Q321	
Haiti	<input type="text"/>
[Answer if Q309 is Haiti]	
Q322	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q309 is Iran, Islamic Republic of]	
Q323	
Jamaica	<input type="text"/>
[Answer if Q309 is Jamaica]	
Q324	
Kenya	<input type="text"/>
[Answer if Q309 is Kenya]	
Q325	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q309 is Korea, Democratic People's Republic of]	
Q326	
Lebanon	<input type="text"/>
[Answer if Q309 is Lebanon]	
Q327	
Mali	<input type="text"/>
[Answer if Q309 is Mali]	
Q328	
Monaco	<input type="text"/>
[Answer if Q309 is Monaco]	
Q329	
Mozambique	<input type="text"/>
[Answer if Q309 is Mozambique]	
Q330	
Myanmar	<input type="text"/>
[Answer if Q309 is Myanmar]	

Q331	<input type="text"/>
Namibia	
[Answer if Q309 is Namibia]	
Q332	<input type="text"/>
Nigeria	
[Answer if Q309 is Nigeria]	
Q333	<input type="text"/>
Panama	
[Answer if Q309 is Panama]	
Q334	<input type="text"/>
Philippines	
[Answer if Q309 is Philippines]	
Q335	<input type="text"/>
Senegal	
[Answer if Q309 is Senegal]	
Q336	<input type="text"/>
South Africa	
[Answer if Q309 is South Africa]	
Q337	<input type="text"/>
South Sudan	
[Answer if Q309 is South Sudan]	
Q338	<input type="text"/>
Syrian Arab Republic	
[Answer if Q309 is Syrian Arab Republic]	
Q339	<input type="text"/>
Tanzania, United Republic of	
[Answer if Q309 is Tanzania, United Republic of]	
Q340	<input type="text"/>
Trinidad and Tobago	
[Answer if Q309 is Trinidad and Tobago]	
Q341	<input type="text"/>

Uganda	
[Answer if Q309 is Uganda]	
Q342	
United Arab Emirates	
[Answer if Q309 is United Arab Emirates]	
Q343	
Vanuatu	
[Answer if Q309 is Vanuatu]	
Q344	
Venezuela	
[Answer if Q309 is Venezuela]	
Q345	
Vietnam	
[Answer if Q309 is Vietnam]	
Q346	
Yemen	
[Answer if Q309 is Yemen]	

Jurisdiction Risk (177)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Please indicate how many beneficiaries of the private interest foundations that your entity administered as at the end of the previous calendar year resided in the following jurisdictions:

Q347	
Malta	
[Answer if Q23 is > 0]	
Q348	
EU/EEA country (apart from Malta)	
[Answer if Q23 is > 0]	

<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>Q349</p> <p>Non-EU/non-EEA country</p> <p>[Answer if Q23 is > 0]</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>	<input type="text"/>
<p>Q350</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q23 is > 0]</p>	<input type="text"/>
<p>Q351</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q350 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti

	<ul style="list-style-type: none"> • 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
Q352 Afghanistan [Answer if Q351 is Afghanistan]	<input type="text"/> <input type="text"/>
Q353 Algeria [Answer if Q351 is Algeria]	<input type="text"/> <input type="text"/>
Q354 Angola [Answer if Q351 is Angola]	<input type="text"/> <input type="text"/>
Q355 Barbados	<input type="text"/> <input type="text"/>

[Answer if Q351 is Barbados]	
Q356	
Bulgaria	<input type="text"/>
[Answer if Q351 is Bulgaria]	
Q357	
Burkina Faso	<input type="text"/>
[Answer if Q351 is Burkina Faso]	
Q358	
Cameroon	<input type="text"/>
[Answer if Q351 is Cameroon]	
Q359	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q351 is Congo, the Democratic Republic of the]	
Q360	
Cote D'Ivoire	<input type="text"/>
[Answer if Q351 is Cote D'Ivoire]	
Q361	
Croatia	<input type="text"/>
[Answer if Q351 is Croatia]	
Q362	
Gibraltar	<input type="text"/>
[Answer if Q351 is Gibraltar]	
Q363	
Haiti	<input type="text"/>
[Answer if Q351 is Haiti]	
Q364	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q351 is Iran, Islamic Republic of]	
Q365	
Jamaica	<input type="text"/>
[Answer if Q351 is Jamaica]	

Q366	<input type="text"/>
Kenya	
[Answer if Q351 is Kenya]	
Q367	<input type="text"/>
Korea, Democratic People's Republic of	
[Answer if Q351 is Korea, Democratic People's Republic of]	
Q368	<input type="text"/>
Lebanon	
[Answer if Q351 is Lebanon]	
Q369	<input type="text"/>
Mali	
[Answer if Q351 is Mali]	
Q370	<input type="text"/>
Monaco	
[Answer if Q351 is Monaco]	
Q371	<input type="text"/>
Mozambique	
[Answer if Q351 is Mozambique]	
Q372	<input type="text"/>
Myanmar	
[Answer if Q351 is Myanmar]	
Q373	<input type="text"/>
Namibia	
[Answer if Q351 is Namibia]	
Q374	<input type="text"/>
Nigeria	
[Answer if Q351 is Nigeria]	
Q375	<input type="text"/>
Panama	
[Answer if Q351 is Panama]	
Q376	<input type="text"/>

<i>Philippines</i>	
[Answer if Q351 is Philippines]	
Q377	
<i>Senegal</i>	<input type="text"/>
[Answer if Q351 is Senegal]	
Q378	
<i>South Africa</i>	<input type="text"/>
[Answer if Q351 is South Africa]	
Q379	
<i>South Sudan</i>	<input type="text"/>
[Answer if Q351 is South Sudan]	
Q380	
<i>Syrian Arab Republic</i>	<input type="text"/>
[Answer if Q351 is Syrian Arab Republic]	
Q381	
<i>Tanzania, United Republic of</i>	<input type="text"/>
[Answer if Q351 is Tanzania, United Republic of]	
Q382	
<i>Trinidad and Tobago</i>	<input type="text"/>
[Answer if Q351 is Trinidad and Tobago]	
Q383	
<i>Uganda</i>	<input type="text"/>
[Answer if Q351 is Uganda]	
Q384	
<i>United Arab Emirates</i>	<input type="text"/>
[Answer if Q351 is United Arab Emirates]	
Q385	
<i>Vanuatu</i>	<input type="text"/>
[Answer if Q351 is Vanuatu]	
Q386	<input type="text"/>
<i>Venezuela</i>	

[Answer if Q351 is Venezuela]	
Q387	
Vietnam	<input type="text"/>
[Answer if Q351 is Vietnam]	
Q388	
Yemen	<input type="text"/>
[Answer if Q351 is Yemen]	

Jurisdiction Risk (178)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q389

With respect to private interest foundations for which your entity was appointed as an administrator, Please indicate the jurisdictions in which the customers' beneficial owners (that is, the founder, members of the supervisory council and the beneficiaries) were considered as PEPs (including family members and close associates) as at the end of the previous calendar year.

[Answer if Q23 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (179)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q390

With respect to private interest foundations for which your entity was appointed as an administrator as at the end of the previous calendar year, please indicate the value

per jurisdictions from which loans issued by non-financial institutions (both legal and natural persons or legal arrangements) originated.

[Answer if Q23 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (180)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q391

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 (181)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q392

Please provide the number of subsidiaries per jurisdiction

[Answer if Q391 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 (182)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q393

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 (186)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

With respect to customers (natural persons) to whom your entity provided fiduciary services/acted as mandatory as at the end of the previous calendar year, please indicate how many customers resided in the following jurisdictions:

Q394	
Malta	<input type="text"/>
[Answer if Q30 is > 0]	
Q395	<input type="text"/>
EU/EEA country (apart from Malta)	

<p>[Answer if Q30 is > 0]</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>Q396</p> <p>Non-EU/non-EEA country</p> <p>[Answer if Q30 is > 0]</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>	<input type="text"/>
<p>Q397</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q30 is > 0]</p>	<input type="text"/>
<p>Q398</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q397 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar

	<ul style="list-style-type: none"> • 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
Q399 Afghanistan [Answer if Q398 is Afghanistan]	<input type="text"/> <input type="text"/>
Q400 Algeria [Answer if Q398 is Algeria]	<input type="text"/> <input type="text"/>
Q401 Angola [Answer if Q398 is Angola]	<input type="text"/> <input type="text"/>
Q402 Barbados	<input type="text"/> <input type="text"/>

[Answer if Q398 is Barbados]	
Q403	
Bulgaria	<input type="text"/>
[Answer if Q398 is Bulgaria]	
Q404	
Burkina Faso	<input type="text"/>
[Answer if Q398 is Burkina Faso]	
Q405	
Cameroon	<input type="text"/>
[Answer if Q398 is Cameroon]	
Q406	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q398 is Congo, the Democratic Republic of the]	
Q407	
Cote D'Ivoire	<input type="text"/>
[Answer if Q398 is Cote D'Ivoire]	
Q408	
Croatia	<input type="text"/>
[Answer if Q398 is Croatia]	
Q409	
Gibraltar	<input type="text"/>
[Answer if Q398 is Gibraltar]	
Q410	
Haiti	<input type="text"/>
[Answer if Q398 is Haiti]	
Q411	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q398 is Iran, Islamic Republic of]	
Q412	
Jamaica	<input type="text"/>
[Answer if Q398 is Jamaica]	

Q413	<input type="text"/>
<i>Kenya</i>	
[Answer if Q398 is Kenya]	
Q414	<input type="text"/>
<i>Korea, Democratic People's Republic of</i>	
[Answer if Q398 is Korea, Democratic People's Republic of]	
Q415	<input type="text"/>
<i>Lebanon</i>	
[Answer if Q398 is Lebanon]	
Q416	<input type="text"/>
<i>Mali</i>	
[Answer if Q398 is Mali]	
Q417	<input type="text"/>
<i>Monaco</i>	
[Answer if Q398 is Monaco]	
Q418	<input type="text"/>
<i>Mozambique</i>	
[Answer if Q398 is Mozambique]	
Q419	<input type="text"/>
<i>Myanmar</i>	
[Answer if Q398 is Myanmar]	
Q420	<input type="text"/>
<i>Namibia</i>	
[Answer if Q398 is Namibia]	
Q421	<input type="text"/>
<i>Nigeria</i>	
[Answer if Q398 is Nigeria]	
Q422	<input type="text"/>
<i>Panama</i>	
[Answer if Q398 is Panama]	
Q423	<input type="text"/>

<i>Philippines</i>	
[Answer if Q398 is Philippines]	
Q424	
<i>Senegal</i>	<input type="text"/>
[Answer if Q398 is Senegal]	
Q425	
<i>South Africa</i>	<input type="text"/>
[Answer if Q398 is South Africa]	
Q426	
<i>South Sudan</i>	<input type="text"/>
[Answer if Q398 is South Sudan]	
Q427	
<i>Syrian Arab Republic</i>	<input type="text"/>
[Answer if Q398 is Syrian Arab Republic]	
Q428	
<i>Tanzania, United Republic of</i>	<input type="text"/>
[Answer if Q398 is Tanzania, United Republic of]	
Q429	
<i>Trinidad and Tobago</i>	<input type="text"/>
[Answer if Q398 is Trinidad and Tobago]	
Q430	
<i>Uganda</i>	<input type="text"/>
[Answer if Q398 is Uganda]	
Q431	
<i>United Arab Emirates</i>	<input type="text"/>
[Answer if Q398 is United Arab Emirates]	
Q432	
<i>Vanuatu</i>	<input type="text"/>
[Answer if Q398 is Vanuatu]	
Q433	<input type="text"/>
<i>Venezuela</i>	

[Answer if Q398 is Venezuela]	
Q434	
Vietnam	<input type="text"/>
[Answer if Q398 is Vietnam]	
Q435	
Yemen	<input type="text"/>
[Answer if Q398 is Yemen]	

Jurisdiction Risk (187)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

With respect to customers (legal persons or legal arrangements) to whom your entity provided fiduciary services/acted as mandatary as at the end of the previous calendar year, please indicate how many customers were incorporated or registered in the following jurisdictions:

Q436	
Malta	<input type="text"/>
[Answer if Q30 is > 0]	
Q437	
EU/EEA country (apart from Malta)	
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.	<input type="text"/>
Q438	
Non-EU/non-EEA country	
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	

<p><i>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>Q439</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>	<div></div>
<p>Q440</p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q393 is > 0]</p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic

	<ul style="list-style-type: none"> • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q441	
<i>Afghanistan</i>	<input type="text"/>
[Answer if Q440 is Afghanistan]	
Q442	
<i>Algeria</i>	<input type="text"/>
[Answer if Q440 is Algeria]	
Q443	
<i>Angola</i>	<input type="text"/>
[Answer if Q440 is Angola]	
Q444	
<i>Barbados</i>	<input type="text"/>
[Answer if Q440 is Barbados]	
Q445	
<i>Bulgaria</i>	<input type="text"/>
[Answer if Q440 is Bulgaria]	
Q446	
<i>Burkina Faso</i>	<input type="text"/>
[Answer if Q440 is Burkina Faso]	
Q447	
<i>Cameroon</i>	<input type="text"/>
[Answer if Q440 is Cameroon]	
Q448	<input type="text"/>
<i>Congo, the Democratic Republic of the</i>	

[Answer if Q440 is Congo, the Democratic Republic of the]	
Q449	
Cote D'Ivoire	<input type="text"/>
[Answer if Q440 is Cote D'Ivoire]	
Q450	
Croatia	<input type="text"/>
[Answer if Q440 is Croatia]	
Q451	
Gibraltar	<input type="text"/>
[Answer if Q440 is Gibraltar]	
Q452	
Haiti	<input type="text"/>
[Answer if Q440 is Haiti]	
Q453	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q440 is Iran, Islamic Republic of]	
Q454	
Jamaica	<input type="text"/>
[Answer if Q440 is Jamaica]	
Q455	
Kenya	<input type="text"/>
[Answer if Q440 is Kenya]	
Q456	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q440 is Korea, Democratic People's Republic of]	
Q457	
Lebanon	<input type="text"/>
[Answer if Q440 is Lebanon]	
Q458	<input type="text"/>
Mali	

[Answer if Q440 is Mali]	
Q459	
Monaco	<input type="text"/>
[Answer if Q440 is Monaco]	
Q460	
Mozambique	<input type="text"/>
[Answer if Q440 is Mozambique]	
Q461	
Myanmar	<input type="text"/>
[Answer if Q440 is Myanmar]	
Q462	
Namibia	<input type="text"/>
[Answer if Q440 is Namibia]	
Q463	
Nigeria	<input type="text"/>
[Answer if Q440 is Nigeria]	
Q464	
Panama	<input type="text"/>
[Answer if Q440 is Panama]	
Q465	
Philippines	<input type="text"/>
[Answer if Q440 is Philippines]	
Q466	
Senegal	<input type="text"/>
[Answer if Q440 is Senegal]	
Q467	
South Africa	<input type="text"/>
[Answer if Q440 is South Africa]	
Q468	
South Sudan	<input type="text"/>
[Answer if Q440 is South Sudan]	
Q469	<input type="text"/>

Syrian Arab Republic	
[Answer if Q440 is Syrian Arab Republic]	
Q470	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q440 is Tanzania, United Republic of]	
Q471	
Trinidad and Tobago	<input type="text"/>
[Answer if Q440 is Trinidad and Tobago]	
Q472	
Uganda	<input type="text"/>
[Answer if Q440 is Uganda]	
Q473	
United Arab Emirates	<input type="text"/>
[Answer if Q440 is United Arab Emirates]	
Q474	
Vanuatu	<input type="text"/>
[Answer if Q440 is Vanuatu]	
Q475	
Venezuela	<input type="text"/>
[Answer if Q440 is Venezuela]	
Q476	
Vietnam	<input type="text"/>
[Answer if Q440 is Vietnam]	
Q477	
Yemen	<input type="text"/>
[Answer if Q440 is Yemen]	

Jurisdiction Risk (188)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Please indicate how many companies and other legal arrangements in which your entity held shares in fiduciary/mandatary capacity as at the end of the previous calendar year were incorporated or registered in the following jurisdictions:

Q478 Malta	<input type="text"/>
Q479 EU/EEA country (apart from 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"/>
Q480 Non-EU/non-EEA country [Answer if Q30 is > 0] <i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i>	<input type="text"/>
Q481 <i>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i> [Answer if Q30 is > 0]	<input type="text"/>
Q482 <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>	Choose more than one option: <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados

[Answer if Q481 is > 0]

- 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

Q483

Afghanistan

[Answer if Q482 is Afghanistan]

Q484

Algeria

[Answer if Q482 is Algeria]	
Q485	
Angola	<input type="text"/>
[Answer if Q482 is Angola]	
Q486	
Barbados	<input type="text"/>
[Answer if Q482 is Barbados]	
Q487	
Bulgaria	<input type="text"/>
[Answer if Q482 is Bulgaria]	
Q488	
Burkina Faso	<input type="text"/>
[Answer if Q482 is Burkina Faso]	
Q489	
Cameroon	<input type="text"/>
[Answer if Q482 is Cameroon]	
Q490	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q482 is Congo, the Democratic Republic of the]	
Q491	
Cote D'Ivoire	<input type="text"/>
[Answer if Q482 is Cote D'Ivoire]	
Q492	
Croatia	<input type="text"/>
[Answer if Q482 is Croatia]	
Q493	
Gibraltar	<input type="text"/>
[Answer if Q482 is Gibraltar]	
Q494	
Haiti	<input type="text"/>
[Answer if Q482 is Haiti]	

Q495 <i>Iran, Islamic Republic of</i> [Answer if Q482 is Iran, Islamic Republic of]	<input type="text"/> <input type="text"/>
Q496 <i>Jamaica</i> [Answer if Q482 is Jamaica]	<input type="text"/> <input type="text"/>
Q497 <i>Kenya</i> [Answer if Q482 is Kenya]	<input type="text"/> <input type="text"/>
Q498 <i>Korea, Democratic People's Republic of</i> [Answer if Q482 is Korea, Democratic People's Republic of]	<input type="text"/> <input type="text"/>
Q499 <i>Lebanon</i> [Answer if Q482 is Lebanon]	<input type="text"/> <input type="text"/>
Q500 <i>Mali</i> [Answer if Q482 is Mali]	<input type="text"/> <input type="text"/>
Q501 <i>Monaco</i> [Answer if Q482 is Monaco]	<input type="text"/> <input type="text"/>
Q502 <i>Mozambique</i> [Answer if Q482 is Mozambique]	<input type="text"/> <input type="text"/>
Q503 <i>Myanmar</i> [Answer if Q482 is Myanmar]	<input type="text"/> <input type="text"/>
Q504 <i>Namibia</i> [Answer if Q482 is Namibia]	<input type="text"/> <input type="text"/>
Q505	<input type="text"/>

<i>Nigeria</i>	
[Answer if Q482 is Nigeria]	
Q506	
<i>Panama</i>	
[Answer if Q482 is Panama]	
Q507	
<i>Philippines</i>	
[Answer if Q482 is Philippines]	
Q508	
<i>Senegal</i>	
[Answer if Q482 is Senegal]	
Q509	
<i>South Africa</i>	
[Answer if Q482 is South Africa]	
Q510	
<i>South Sudan</i>	
[Answer if Q482 is South Sudan]	
Q511	
<i>Syrian Arab Republic</i>	
[Answer if Q482 is Syrian Arab Republic]	
Q512	
<i>Tanzania, United Republic of</i>	
[Answer if Q482 is Tanzania, United Republic of]	
Q513	
<i>Trinidad and Tobago</i>	
[Answer if Q482 is Trinidad and Tobago]	
Q514	
<i>Uganda</i>	
[Answer if Q482 is Uganda]	
Q515	
<i>United Arab Emirates</i>	

[Answer if Q482 is United Arab Emirates]	
Q516	
Vanuatu	<input type="text"/>
[Answer if Q482 is Vanuatu]	
Q517	
Venezuela	<input type="text"/>
[Answer if Q482 is Venezuela]	
Q518	
Vietnam	<input type="text"/>
[Answer if Q482 is Vietnam]	
Q519	
Yemen	<input type="text"/>
[Answer if Q482 is Yemen]	

Jurisdiction Risk (191)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q520

Please indicate the total number of trusts that your entity created (under domestic law) during previous calendar year.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Jurisdiction Risk (192)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q521

Please indicate the total number of trusts that your entity created (under foreign law) during previous calendar year.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Jurisdiction Risk (193)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate how many settlors of trusts resided in the following jurisdictions:

Q522 Malta [Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]	<input type="text"/>
Q523 EU/EEA country (apart from Malta) [Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other] 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.	<input type="text"/>
Q524 Non-EU/non-EEA country [Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]	<input type="text"/>

<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>Q525</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</p>	<div data-bbox="1046 667 1394 707" style="border: 1px solid black; height: 18px; width: 100%;"></div>
<p>Q526</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q525 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama

	<ul style="list-style-type: none"> • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q527 Afghanistan [Answer if Q526 is Afghanistan]	<input type="text"/> <input type="text"/>
Q528 Algeria [Answer if Q526 is Algeria]	<input type="text"/> <input type="text"/>
Q529 Angola [Answer if Q526 is Angola]	<input type="text"/> <input type="text"/>
Q530 Barbados [Answer if Q526 is Barbados]	<input type="text"/> <input type="text"/>
Q531 Bulgaria [Answer if Q526 is Bulgaria]	<input type="text"/> <input type="text"/>
Q532 Burkina Faso [Answer if Q526 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q533 Cameroon	<input type="text"/> <input type="text"/>

[Answer if Q526 is Cameroon]	
Q534	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q526 is Congo, the Democratic Republic of the]	
Q535	
Cote D'Ivoire	<input type="text"/>
[Answer if Q526 is Cote D'Ivoire]	
Q536	
Croatia	<input type="text"/>
[Answer if Q526 is Croatia]	
Q537	
Gibraltar	<input type="text"/>
[Answer if Q526 is Gibraltar]	
Q538	
Haiti	<input type="text"/>
[Answer if Q526 is Haiti]	
Q539	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q526 is Iran, Islamic Republic of]	
Q540	
Jamaica	<input type="text"/>
[Answer if Q526 is Jamaica]	
Q541	
Kenya	<input type="text"/>
[Answer if Q526 is Kenya]	
Q542	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q526 is Korea, Democratic People's Republic of]	
Q543	<input type="text"/>
Lebanon	

[Answer if Q526 is Lebanon]	
Q544	
Mali	<input type="text"/>
[Answer if Q526 is Mali]	
Q545	
Monaco	<input type="text"/>
[Answer if Q526 is Monaco]	
Q546	
Mozambique	<input type="text"/>
[Answer if Q526 is Mozambique]	
Q547	
Myanmar	<input type="text"/>
[Answer if Q526 is Myanmar]	
Q548	
Namibia	<input type="text"/>
[Answer if Q526 is Namibia]	
Q549	
Nigeria	<input type="text"/>
[Answer if Q526 is Nigeria]	
Q550	
Panama	<input type="text"/>
[Answer if Q526 is Panama]	
Q551	
Philippines	<input type="text"/>
[Answer if Q526 is Philippines]	
Q552	
Senegal	<input type="text"/>
[Answer if Q526 is Senegal]	
Q553	
South Africa	<input type="text"/>
[Answer if Q526 is South Africa]	
Q554	<input type="text"/>

South Sudan	
[Answer if Q526 is South Sudan]	
Q555	
Syrian Arab Republic	
[Answer if Q526 is Syrian Arab Republic]	
Q556	
Tanzania, United Republic of	
[Answer if Q526 is Tanzania, United Republic of]	
Q557	
Trinidad and Tobago	
[Answer if Q526 is Trinidad and Tobago]	
Q558	
Uganda	
[Answer if Q526 is Uganda]	
Q559	
United Arab Emirates	
[Answer if Q526 is United Arab Emirates]	
Q560	
Vanuatu	
[Answer if Q526 is Vanuatu]	
Q561	
Venezuela	
[Answer if Q526 is Venezuela]	
Q562	
Vietnam	
[Answer if Q526 is Vietnam]	
Q563	
Yemen	
[Answer if Q526 is Yemen]	

Jurisdiction Risk (194)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate how many beneficiaries of trusts resided in the following jurisdictions:

<p>Q564</p> <p>Malta</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</p>	<input type="text"/>
<p>Q565</p> <p>EU/EEA country (apart from Malta)</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>	<input type="text"/>
<p>Q566</p> <p>Non-EU/non-EEA country</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>	<input type="text"/>
<p>Q567</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under</p>	<input type="text"/>

<p><i>Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p><i>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</i></p>	
<p>Q568</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><i>[Answer if Q567 is > 0]</i></p> 	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu

	<ul style="list-style-type: none"> • Venezuela • Vietnam • Yemen
Q569 Afghanistan [Answer if Q568 is Afghanistan]	<input type="text"/> <input type="text"/>
Q570 Algeria [Answer if Q568 is Algeria]	<input type="text"/> <input type="text"/>
Q571 Angola [Answer if Q568 is Angola]	<input type="text"/> <input type="text"/>
Q572 Barbados [Answer if Q568 is Barbados]	<input type="text"/> <input type="text"/>
Q573 Bulgaria [Answer if Q568 is Bulgaria]	<input type="text"/> <input type="text"/>
Q574 Burkina Faso [Answer if Q568 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q575 Cameroon [Answer if Q568 is Cameroon]	<input type="text"/> <input type="text"/>
Q576 Congo, the Democratic Republic of the [Answer if Q568 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q577 Cote D'Ivoire [Answer if Q568 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q578	<input type="text"/>

Croatia	
[Answer if Q568 is Croatia]	
Q579	
Gibraltar	<input type="text"/>
[Answer if Q568 is Gibraltar]	
Q580	
Haiti	<input type="text"/>
[Answer if Q568 is Haiti]	
Q581	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q568 is Iran, Islamic Republic of]	
Q582	
Jamaica	<input type="text"/>
[Answer if Q568 is Jamaica]	
Q583	
Kenya	<input type="text"/>
[Answer if Q568 is Kenya]	
Q584	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q568 is Korea, Democratic People's Republic of]	
Q585	
Lebanon	<input type="text"/>
[Answer if Q568 is Lebanon]	
Q586	
Mali	<input type="text"/>
[Answer if Q568 is Mali]	
Q587	
Monaco	<input type="text"/>
[Answer if Q568 is Monaco]	
Q588	<input type="text"/>
Mozambique	

[Answer if Q568 is Mozambique]	
Q589	
Myanmar	<input type="text"/>
[Answer if Q568 is Myanmar]	
Q590	
Namibia	<input type="text"/>
[Answer if Q568 is Namibia]	
Q591	
Nigeria	<input type="text"/>
[Answer if Q568 is Nigeria]	
Q592	
Panama	<input type="text"/>
[Answer if Q568 is Panama]	
Q593	
Philippines	<input type="text"/>
[Answer if Q568 is Philippines]	
Q594	
Senegal	<input type="text"/>
[Answer if Q568 is Senegal]	
Q595	
South Africa	<input type="text"/>
[Answer if Q568 is South Africa]	
Q596	
South Sudan	<input type="text"/>
[Answer if Q568 is South Sudan]	
Q597	
Syrian Arab Republic	<input type="text"/>
[Answer if Q568 is Syrian Arab Republic]	
Q598	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q568 is Tanzania, United Republic of]	
Q599	<input type="text"/>

Trinidad and Tobago	
[Answer if Q568 is Trinidad and Tobago]	
Q600	
Uganda	<input type="text"/>
[Answer if Q568 is Uganda]	
Q601	
United Arab Emirates	<input type="text"/>
[Answer if Q568 is United Arab Emirates]	
Q602	
Vanuatu	<input type="text"/>
[Answer if Q568 is Vanuatu]	
Q603	
Venezuela	<input type="text"/>
[Answer if Q568 is Venezuela]	
Q604	
Vietnam	<input type="text"/>
[Answer if Q568 is Vietnam]	
Q605	
Yemen	<input type="text"/>
[Answer if Q568 is Yemen]	

Jurisdiction Risk (195)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q606

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate jurisdictions in which bank/investment/crypto accounts that were held on trust were located.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (196)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q607

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee as at the end of the previous calendar year, please indicate jurisdictions in which the immovable properties settled on trust were located.

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (197)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q608

With respect to trusts for whom your entity acted as trustee or co-trustee as at the end of the previous calendar year, please indicate jurisdictions in which settlors were considered as PEPs (including family members and close associates).

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (198)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q609

With respect to trusts for whom your entity acted as trustee or co-trustee as at the end of the previous calendar year, please indicate jurisdictions in which beneficiaries were considered as PEPs (including family members and close associates)

[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (199)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate how many trusts were established in the following jurisdictions:

<p>Q610</p> <p>Malta</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</p>	<input type="text"/>
<p>Q611</p> <p>EU/EEA country (apart from Malta)</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>	<input type="text"/>
<p>Q612</p> <p>Non-EU/non-EEA country</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>	<input type="text"/>
<p>Q613</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</p>	<input type="text"/>
<p>Q614</p>	<p>Choose more than one option:</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.

[Answer if Q613 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

Q615

Afghanistan

[Answer if Q614 is Afghanistan]

Q616 Algeria [Answer if Q614 is Algeria]	<input type="text"/> <input type="text"/>
Q617 Angola [Answer if Q614 is Angola]	<input type="text"/> <input type="text"/>
Q618 Barbados [Answer if Q614 is Barbados]	<input type="text"/> <input type="text"/>
Q619 Bulgaria [Answer if Q614 is Bulgaria]	<input type="text"/> <input type="text"/>
Q620 Burkina Faso [Answer if Q614 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q621 Cameroon [Answer if Q614 is Cameroon]	<input type="text"/> <input type="text"/>
Q622 Congo, the Democratic Republic of the [Answer if Q614 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q623 Cote D'Ivoire [Answer if Q614 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q624 Croatia [Answer if Q614 is Croatia]	<input type="text"/> <input type="text"/>
Q625 Gibraltar [Answer if Q614 is Gibraltar]	<input type="text"/> <input type="text"/>
Q626	<input type="text"/>

Haiti	
[Answer if Q614 is Haiti]	
Q627	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q614 is Iran, Islamic Republic of]	
Q628	
Jamaica	<input type="text"/>
[Answer if Q614 is Jamaica]	
Q629	
Kenya	<input type="text"/>
[Answer if Q614 is Kenya]	
Q630	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q614 is Korea, Democratic People's Republic of]	
Q631	
Lebanon	<input type="text"/>
[Answer if Q614 is Lebanon]	
Q632	
Mali	<input type="text"/>
[Answer if Q614 is Mali]	
Q633	
Monaco	<input type="text"/>
[Answer if Q614 is Monaco]	
Q634	
Mozambique	<input type="text"/>
[Answer if Q614 is Mozambique]	
Q635	
Myanmar	<input type="text"/>
[Answer if Q614 is Myanmar]	
Q636	<input type="text"/>
Namibia	

[Answer if Q614 is Namibia]	
Q637	
Nigeria	<input type="text"/>
[Answer if Q614 is Nigeria]	
Q638	
Panama	<input type="text"/>
[Answer if Q614 is Panama]	
Q639	
Philippines	<input type="text"/>
[Answer if Q614 is Philippines]	
Q640	
Senegal	<input type="text"/>
[Answer if Q614 is Senegal]	
Q641	
South Africa	<input type="text"/>
[Answer if Q614 is South Africa]	
Q642	
South Sudan	<input type="text"/>
[Answer if Q614 is South Sudan]	
Q643	
Syrian Arab Republic	<input type="text"/>
[Answer if Q614 is Syrian Arab Republic]	
Q644	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q614 is Tanzania, United Republic of]	
Q645	
Trinidad and Tobago	<input type="text"/>
[Answer if Q614 is Trinidad and Tobago]	
Q646	
Uganda	<input type="text"/>
[Answer if Q614 is Uganda]	
Q647	<input type="text"/>

United Arab Emirates	
[Answer if Q614 is United Arab Emirates]	
Q648	
Vanuatu	<input type="text"/>
[Answer if Q614 is Vanuatu]	
Q649	
Venezuela	<input type="text"/>
[Answer if Q614 is Venezuela]	
Q650	
Vietnam	<input type="text"/>
[Answer if Q614 is Vietnam]	
Q651	
Yemen	<input type="text"/>
[Answer if Q614 is Yemen]	

Jurisdiction Risk (183)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q652

Please provide the number of branches per jurisdiction

[Answer if Q393 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 (184)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q653

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 (185)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q654

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

[Answer if Q653 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Interface Risk

Interface Risk (38)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

From the total number of customers, what % was onboarded:

Q1 a) on a face-to-face basis during the previous calendar year?	<input type="text"/>
Q2 b) on a non-face-to-face basis, during the previous calendar year?	<input type="text"/>

Interface Risk (39)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q3

How many agents/ introducers/ intermediaries did your entity have at the end of the previous calendar year?

Interface Risk (40)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q4

What is the % of customers that were introduced by either an agent, introducer or an intermediary?

Interface Risk (41)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q5

Please indicate the jurisdictions in which agents, intermediaries or introducers operate.

[Answer if Q4 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Interface Risk (42)

(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)

Q6

What is the % of customers whose CDD in terms of Regulation 7(1)(a), 7(1)(b) and 7(1)(c) has been carried out by another subject person/third party, on the basis of a reliance agreement between your entity and the other subject person/third party?

MLRO, Monitoring Function and Employees

MLRO, Monitoring Function and Employees (1)

Q1

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

Choose only one option:

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

MLRO, Monitoring Function and Employees (2)

Q2

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

Choose only one option:

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

MLRO, Monitoring Function and Employees (3)

Q3

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

Choose only one option:

- Yes
- No

MLRO, Monitoring Function and Employees (4)

Q4

Please provide a description of the other areas of responsibility.

[Answer if Q3 is Yes]

MLRO, Monitoring Function and Employees (8)

Q5

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

Choose only one option:

- Yes
- No

MLRO, Monitoring Function and Employees (9)

Q6

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

Choose only one option:

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

MLRO, Monitoring Function and Employees (10)

Q7

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

MLRO, Monitoring Function and Employees (11)

Q8

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

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

MLRO, Monitoring Function and Employees (12)

Q9

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

[Answer if Q8 is > 0]

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

MLRO, Monitoring Function and Employees (24)

Q10

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

Choose only one option:

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

MLRO, Monitoring Function and Employees (14)

Q11

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

Choose only one option:

- Yes
- No

Q12

If 'Yes', please explain.

[Answer if Q11 is Yes]

Business Risk Assessment

Business Risk Assessment (11)

Q1

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

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

Choose only one option:

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

Business Risk Assessment (30)

Q2

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

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

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

Choose only one option:

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

Business Risk Assessment (13)

Q3

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

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

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

Choose only one option:

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

Business Risk Assessment (14)

Q4

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

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

Business Risk Assessment (15)

Q5

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

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

Business Risk Assessment (16)

Q6

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

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

Business Risk Assessment (31)

Q7

Please indicate the jurisdictions which your entity considers as high risk

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

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

Business Risk Assessment (18)

Q8

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

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

Business Risk Assessment (19)

Q9

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

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

Choose only one option:

- Yes
- No



Customer Acceptance and Risk Assessment

Customer Acceptance and Risk Assessment (94)

Q1

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

Choose only one option:

- Yes
- No
- CAP Not Available

Customer Acceptance and Risk Assessment (95)

Q2

Did this review result in major changes?

[Answer if Q1 is Yes]

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (96)

Q3

Please explain these changes.

[Answer if Q2 is Yes]

Customer Acceptance and Risk Assessment (123)

Q4

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

[Answer if Q1 is Yes, No]

Choose "Not Available" if information cannot be provided.

or choose one of:

- Not Available

Customer Acceptance and Risk Assessment (98)

Q5

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

[Answer if Q1 is Yes, No]

Customer Acceptance and Risk Assessment (99)

Q6

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

Choose only one option:

- Yes
- No
- CRA Methodology Not Available

Customer Acceptance and Risk Assessment (100)

Q7

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

[Answer if Q6 is Yes]

Customer Acceptance and Risk Assessment (101)

Q8

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

Choose only one option:

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

Customer Acceptance and Risk Assessment (102)

Q9

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

Customer Acceptance and Risk Assessment (103)

Q10

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

Customer Acceptance and Risk Assessment (104)

Q11

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

[Answer if Q10 is > 0]

Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

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

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

Q15

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

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

Customer Acceptance and Risk Assessment (107)

Q16

What was the reason for the de-risking exercise?

[Answer if Q15 is > 0]

Customer Acceptance and Risk Assessment (108)

Q17

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

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



Policies & Procedures

Policies and Procedures (36)

Q1

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

Choose only one option:

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

Policies and Procedures (37)

Q2

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

Choose more than one option:

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

Policies and Procedures (38)

Q3

How do you determine whether individuals/entities are sanctioned?

Choose more than one option:

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

Policies and Procedures (76)

Q4

In respect of intermediaries, does your entity have policies and procedures in place to assess their AML/CFT compliance framework?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

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 (79)

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 (5)

Q4

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.

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

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

	<ul style="list-style-type: none"> • 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
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Outsourcing (16)

Please indicate the jurisdictions where the service providers to whom your entity had outsourced AML/CFT obligations are located.

<p>Q10</p> <p>Malta</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q11</p> <p>EU/EEA (Excluding Malta)</p> <p>[Answer if Q1 is Yes, outsourcing outside the group, Yes, outsourcing within the group]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q12</p> <p>Non-EU/Non-EEA</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q13</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries</p> <p>[Answer if Q1 is Yes, outsourcing outside the group, Yes, outsourcing within the group]</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q14</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria

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

[Answer if Q13 is Yes]



- 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

Record-keeping

Record-keeping (1)

Q1

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

Choose only one option:

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



Training

Training (1)

Q1

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

Training (2)

Q2

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

Training (3)

Q3

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

[Answer if Q8 is > 0]

or choose one of:

- Not Applicable

Training (10)

Q4

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

or choose one of:

- Not Applicable

Training (5)

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

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

Reporting

Reporting (15)

Q1

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

Reporting (16)

Q2

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

[Answer if Q1 is > 0]

Reporting (17)

Q3

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

[Answer if Q1 is > 0]

Reporting (18)

Q4

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

Reporting (19)

Q5

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



Ongoing monitoring (data, documents and information)

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

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

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

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

Q4

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

Choose more than one option:

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

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

Q5

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

Ongoing monitoring (Data, documents and information) **(7)**

Q6

How is it ensured that customers (including settlors and protectors, where applicable) and/or beneficial owner's information remains up to date and documentation valid?

Choose only one option:

- Automated system identifies a document that is soon to expire
- Yearly questionnaire is distributed to customers for confirmation and updates
- Checks are conducted during reviews per policy, based on the customer's risk profile.
- A combination of all above
- System identifies document to be expired and through periodic reviews
- Subject person's procedures do not require for such checks to be undertaken

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) (24)

Q9

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

Ongoing monitoring (Transaction Scrutiny) (25)

Q10

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

Ongoing monitoring (Transaction Scrutiny) (26)

Q11

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

Ongoing monitoring (Transaction Scrutiny) (27)

Q12

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

Ongoing monitoring (Transaction Scrutiny) (49)

Q13

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

