



Risk Evaluation Questionnaire 2025

A large, faint, light gray sunburst graphic is centered on the page, behind the "PREVIEW" text. It is composed of many thin, wedge-shaped segments radiating from a central point, creating a circular effect.

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.

Customer Risk

Customer Risk (100)

(Relates to Virtual Financial Assets Service Providers)

Q1

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

Customer Risk (101)

(Relates to Virtual Financial Assets Service Providers)

Q2

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

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

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

Customer Risk (102)

(Relates to Virtual Financial Assets Service Providers)

Q3

Please list the total number of customer relationships which were closed and/or terminated during the prior calendar year.

Customer Risk (103)

(Relates to Virtual Financial Assets Service Providers)

Q4

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

Customer Risk (104)

(Relates to Virtual Financial Assets Service Providers)

Q5

Please list the total number of new customers onboarded during the prior calendar year.

"Onboarding" refers to the process through which a business relationship is established or an occasional transaction is carried out. "Total number of customers" only includes those clients that have been provided with a relevant activity by the subject person.

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

Customer Risk (105)

(Relates to Virtual Financial Assets Service Providers)

Q6

Do you have any customers in the following industries?

Choose more than one option:

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

Customer Risk (108)

(Relates to Virtual Financial Assets Service Providers)

Q7

Please indicate the number (#) of customers that are legal persons

Q8

(a) How many of these are VASPs

[Answer if Q7 is > 0]

Q9

(b) How many of these are financial intermediaries

[Answer if Q7 is > 0]

Q10

(c) How many of these are non-financial intermediaries

[Answer if Q7 is > 0]

Q11

(d) How many of these are issuers

[Answer if Q7 is > 0]

Customer Risk (109)

(Relates to Virtual Financial Assets Service Providers)

Q12

Please list the number of customers serviced during the prior calendar year, where at least one of the beneficial owners benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by Malta.

Customer Risk (110)

(Relates to Virtual Financial Assets Service Providers)

Q13

Please list the number of customers who are natural persons serviced during the prior calendar year, that benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by countries other than Malta.

Customer Risk (111)

(Relates to Virtual Financial Assets Service Providers)

For customers which are legal entities, please list the number of customers which had one or more of the following characteristics:

Q14	<input type="text"/>
a) Allow the use of privacy coins	<input type="text"/>
Q15	<input type="text"/>
b) Allow the transfer of VFAs to or from non-custodian wallets	<input type="text"/>
Q16	<input type="text"/>
c) Accept the transfer of VFAs that have passed through mixers, tumblers, etc	<input type="text"/>
Q17	<input type="text"/>
d) Accept the use of unverifiable IP Addresses or other means to obscure their location	<input type="text"/>
Q18	<input type="text"/>
e) Had an AML/CFT program that was not sufficiently robust	<input type="text"/>
Q19	<input type="text"/>
f) A lack of transparency surrounding an issue, including the rights of holders and how financing will be used	<input type="text"/>
Q20	<input type="text"/>
g) Carried out VFA offerings with no capping per user or, even though capped, there are no controls in place to ensure that the capping is somehow circumvented	<input type="text"/>

Customer Risk (112)

(Relates to Virtual Financial Assets Service Providers)

Q21

How many customers were subject to AML/CFT obligations?

[Answer if Q8 is > 0]

Customer Risk (113)

(Relates to Virtual Financial Assets Service Providers)

Q22

Does the Company hold and/or control client money (FIAT), in terms of Part IV of S.L. 590 of the Laws of Malta?

Choose only one option:

- Yes
- No

Customer Risk (114)

(Relates to Virtual Financial Assets Service Providers)

Of the total number of active customers, please specify the % of:

Q23	<input type="text"/>
<i>a) customers rated as high risk</i>	<input type="text"/>
<i>[Answer if Q2 is > 0]</i>	
Q24	<input type="text"/>
<i>b) customers rated as medium risk</i>	<input type="text"/>
<i>[Answer if Q2 is > 0]</i>	
Q25	<input type="text"/>
<i>c) customers rated as low risk</i>	

[Answer if Q2 is > 0]

Customer Risk (115)

(Relates to Virtual Financial Assets Service Providers)

Q26

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

[Answer if Q2 is > 0]

Choose only one option:

- Yes
- No

Customer Risk (116)

(Relates to Virtual Financial Assets Service Providers)

Q27

Please specify the additional risk rating/s.

[Answer if Q26 is Yes]

Customer Risk (117)

(Relates to Virtual Financial Assets Service Providers)

Q28

What % of the customer base had Simplified Due Diligence applied, given that their risk was classified as low?

[Answer if Q25 is > 0]

Customer Risk (118)

(Relates to Virtual Financial Assets Service Providers)

Q29

Does your entity have customers (including beneficial owners and directors) who have been convicted of a criminal offence that could have potentially generated illicit proceeds?

[Answer if Q2 is > 0]

Choose only one option:

- Yes
- No

Customer Risk (119)

(Relates to Virtual Financial Assets Service Providers)

Q30

Do shell companies form part of the customer base?

[Answer if Q2 is > 0]

Choose only one option:

- Yes
- No

Customer Risk (120)

(Relates to Virtual Financial Assets Service Providers)

Q31

Are there customers in the customer base who raised capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding?

[Answer if Q2 is > 0]

Choose only one option:

- Yes
- No

Customer Risk (121)

(Relates to Virtual Financial Assets Service Providers)

Q32

Please list the number of customers that are foundations, charities or other non-profit entities.

[Answer if Q2 is > 0]

Customer Risk (122)

(Relates to Virtual Financial Assets Service Providers)

Q33

Of the total customer base, how many customers have at least one beneficial owner who is a PEP (including family members and close associates), as at the end of the prior calendar year?

Customer Risk (123)

(Relates to Virtual Financial Assets Service Providers)

Q34

Please indicate the respective jurisdiction in which the natural persons or beneficial owners are considered to be a PEP. Kindly list the relevant jurisdictions and the number of PEPs per jurisdiction.

[Answer if Q33 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Customer Risk (124)

(Relates to Virtual Financial Assets Service Providers)

Q35

Please list the number of business relationships with customers who are operating in dual use items as at end of the previous calendar year.

Products and Services

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

Products and Services (1)

(Relates to Virtual Financial Assets Service Providers)

Q1

Please indicate the aggregate amount of clients' money holding in €

Products and Services (2)

(Relates to Virtual Financial Assets Service Providers)

Q2

How does the Company accept VFA deposits?

Choose more than one option:

- From custodial wallets
- From self-custodial wallets
- Both
- Other

Products and Services (3)

(Relates to Virtual Financial Assets Service Providers)

Q3

If 'Other', please provide further details.

[Answer if Q2 is Other]

Products and Services (4)

(Relates to Virtual Financial Assets Service Providers)

Q4

Does the Company accept VFA transfers to and/or from unidentified wallets?

Choose only one option:

- Yes
- No

Products and Services (5)

(Relates to Virtual Financial Assets Service Providers)

Q5

Please provide value (€) of VFAs transferred to unidentified hosted wallets

[Answer if Q4 is Yes]

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

Products and Services (6)

(Relates to Virtual Financial Assets Service Providers)

Q6

Please provide value (€) of VFAs transferred from unidentified hosted wallets;

[Answer if Q4 is Yes]

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

Products and Services (7)

(Relates to Virtual Financial Assets Service Providers)

Q7

Please provide value (€) of VFAs transferred to unidentified unhosted wallets;

[Answer if Q4 is Yes]

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

Products and Services (8)

(Relates to Virtual Financial Assets Service Providers)

Q8

Please provide value (€) of VFAs transferred from unidentified unhosted wallets;

[Answer if Q4 is Yes]

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

Products and Services (9)

(Relates to Virtual Financial Assets Service Providers)

Q9

Does the Company accept VFA transfers from third party wallets of which the client is not the beneficial owner?

Choose only one option:

- Yes
- No

Products and Services (10)

(Relates to Virtual Financial Assets Service Providers)

Q10

Please provide the value (€) of VFAs received from third party wallets (of which the client is not the beneficial owner)

[Answer if Q9 is Yes]

Products and Services (11)

(Relates to Virtual Financial Assets Service Providers)

Q11

Does the Company facilitate VFA transfers to third party wallets, of which the client is not the beneficial owner?

Choose only one option:

- Yes
- No

Products and Services (12)

(Relates to Virtual Financial Assets Service Providers)

Q12

Please indicate the value (€) of VFAs transferred to third party wallets (of which the client is not the beneficial owner)

[Answer if Q11 is Yes]

Products and Services (13)

(Relates to Virtual Financial Assets Service Providers)

Q13

Please indicate the total number (#) of reception and transmission of orders.

Products and Services (14)

(Relates to Virtual Financial Assets Service Providers)

Q14

Please indicate the total value (€) of reception and transmission of orders.

[Answer if Q13 is > 0]

Products and Services (15)

(Relates to Virtual Financial Assets Service Providers)

Q15

Please indicate the total number (#) of orders executed on behalf of other persons.

Products and Services (16)

(Relates to Virtual Financial Assets Service Providers)

Q16

Please indicate the total value (€) of orders executed on behalf of other persons.

[Answer if Q15 is > 0]

Products and Services (17)

(Relates to Virtual Financial Assets Service Providers)

Q17

Please indicate the total number (#) of dealing on own account.

Products and Services (18)

(Relates to Virtual Financial Assets Service Providers)

Q18

Please indicate the total value (€) of dealing on own account.

[Answer if Q17 is > 0]

Products and Services (19)

(Relates to Virtual Financial Assets Service Providers)

Q19

Please indicate the total number (#) of portfolio management.

Products and Services (20)

(Relates to Virtual Financial Assets Service Providers)

Q20

Please indicate the total value (€) of portfolio management.

[Answer if Q19 is > 0]

Products and Services (21)

(Relates to Virtual Financial Assets Service Providers)

Q21

Please indicate the total number (#) of custodian or nominee services.

Products and Services (22)

(Relates to Virtual Financial Assets Service Providers)

Q22

Please indicate the total value (€) of custodian or nominee services.

[Answer if Q21 is > 0]

Products and Services (23)

(Relates to Virtual Financial Assets Service Providers)

Q23

Please indicate the total number (#) of investment advice.

Products and Services (24)

(Relates to Virtual Financial Assets Service Providers)

Q24

Please indicate the total value (€) of investment advice.

[Answer if Q23 is > 0]

Products and Services (25)

(Relates to Virtual Financial Assets Service Providers)

Q25

Please indicate the total number (#) of placing of virtual financial assets.

Products and Services (26)

(Relates to Virtual Financial Assets Service Providers)

Q26

Please indicate the total value (€) of placing of virtual financial assets.

[Answer if Q25 is > 0]

Products and Services (27)

(Relates to Virtual Financial Assets Service Providers)

Q27

Please indicate the total number (#) of the operation of a VFA exchange.

Products and Services (28)

(Relates to Virtual Financial Assets Service Providers)

Q28

Please indicate the total value (€) of the operation of a VFA exchange.

[Answer if Q27 is > 0]

Products and Services (29)

(Relates to Virtual Financial Assets Service Providers)

Q29

Please indicate the total number (#) of transfer of virtual financial assets.

Products and Services (30)

(Relates to Virtual Financial Assets Service Providers)

Q30

Please indicate the total value (€) of transfer of virtual financial assets.

[Answer if Q29 is > 0]

Products and Services (31)

(Relates to Virtual Financial Assets Service Providers)

Q31

Please indicate the number of VFAs transferred during the reporting period

Products and Services (34)

(Relates to Virtual Financial Assets Service Providers)

Q32

Please indicate the top 3 deposited VFAs:

Products and Services (35)

(Relates to Virtual Financial Assets Service Providers)

Q33

Please indicate the top 3 withdrawn VFAs:

Products and Services (36)

(Relates to Virtual Financial Assets Service Providers)

Q34

Please indicate the value (€) of VFAs held on own account for trading purposes as at end of reporting period

Products and Services (37)

(Relates to Virtual Financial Assets Service Providers)

Q35

Does the entity deal on own account or operate VFA exchange?

Choose only one option:

- Yes
- No

Products and Services (38)

(Relates to Virtual Financial Assets Service Providers)

Q36

Please indicate the number of active clients placing orders during the reporting period

[Answer if Q35 is Yes]

Products and Services (39)

(Relates to Virtual Financial Assets Service Providers)

Q37

Please indicate the average daily trading value (€) for the reporting period

[Answer if Q35 is Yes]

Products and Services (42)

(Relates to Virtual Financial Assets Service Providers)

Q38

Please indicate the orders matched during the reporting period

Products and Services (43)

(Relates to Virtual Financial Assets Service Providers)

Q39

Please indicate the number of newly-listed VFAs (If applicable)

Products and Services (44)

(Relates to Virtual Financial Assets Service Providers)

Q40

Please indicate the number of VFAs already in issue but not admitted to trading on DLT, being marketed to specified persons, which does not involve an offer to the public or to existing holders of the issuer's VFA (If applicable)

Funding Methods (74)

(Relates to Virtual Financial Assets Service Providers)

For Wire (Bank) transfers during the previous calendar year, please specify:

Q41	<input type="text"/>
Number (#) of incoming transactions	
Q42	<input type="text"/>
Value (€) of incoming transactions	
[Answer if Q41 is > 0]	
Q43	<input type="text"/>
Number (#) of outgoing transactions	
Q44	<input type="text"/>

Value (€) of outgoing transactions [Answer if Q43 is > 0]	
--	--

Funding Methods (75)

(Relates to Virtual Financial Assets Service Providers)

For cash deposits during the previous calendar year, please specify:

Q45	
Number (#) of incoming transactions	
Q46	
Value (€) of incoming transactions [Answer if Q45 is > 0]	

Funding Methods (76)

(Relates to Virtual Financial Assets Service Providers)

For Cheque deposits during the previous calendar year, please specify:

Q47	
Number (#) of incoming transactions	
Q48	
Value (€) of incoming transactions [Answer if Q47 is > 0]	

Funding Methods (77)

(Relates to Virtual Financial Assets Service Providers)

For credit cards or debit card deposits made during the previous calendar year, please specify:

Q49	
------------	--

Number (#) of incoming transactions	
<i>Reference to Credit Cards and Debit Cards should exclude crypto-backed cards.</i>	
Q50	
Value (€) of incoming transactions	<input type="text"/>
[Answer if Q49 is > 0]	
<i>Reference to Credit Cards and Debit Cards should exclude crypto-backed cards.</i>	

Funding Methods (78)

(Relates to Virtual Financial Assets Service Providers)

For Crypto-backed credit or debit card deposits made during the previous calendar year, please specify:

Q51	<input type="text"/>
Number (#) of incoming transactions	
Q52	<input type="text"/>
Value (€) of incoming transactions	
[Answer if Q51 is > 0]	

Funding Methods (79)

(Relates to Virtual Financial Assets Service Providers)

For Prepaid card deposits made during the previous calendar year, please specify:

Q53	<input type="text"/>
Number (#) of incoming transactions	
Q54	<input type="text"/>
Value (€) of incoming transactions	
[Answer if Q53 is > 0]	

Funding Methods (80)

(Relates to Virtual Financial Assets Service Providers)

For deposits made via Internet-based payment systems or other e-money services (as defined by FATF) during the previous calendar year, please specify:

Q55	<input type="text"/>
Number (#) of incoming transactions	
Q56	<input type="text"/>
Value (€) of incoming transactions	
<i>[Answer if Q55 is > 0]</i>	

Funding Methods (81)

(Relates to Virtual Financial Assets Service Providers)

For deposits made via Virtual Financial Assets during the previous calendar year, please specify:

Q57	<input type="text"/>
Number (#) of incoming transactions	
Q58	<input type="text"/>
Value (€) of incoming transactions	
<i>[Answer if Q57 is > 0]</i>	

De-Risking Risks

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

De-Risking Risks (3)

(Relates to Virtual Financial Assets Service Providers)

Q1

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

Choose only one option:

- Yes
- No

De-Risking Risks (4)

(Relates to Virtual Financial Assets Service Providers)

Q2

Provide details of the de-risking

[Answer if Q1 is Yes]

Jurisdiction Risk

Jurisdiction Risk (88)

(Relates to Virtual Financial Assets Service Providers)

As at end of the previous calendar year, please indicate how many customers who are natural persons resided in the following jurisdictions:

Q1 Malta	<input type="text"/>
Q2 EU/EEA (Excluding Malta) <i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i>	<input type="text"/>
Q3 Non-EU/Non-EEA	<input type="text"/>
Q4 Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.	<input type="text"/>
Q5 <i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i> [Answer if Q4 is > 0]	<i>Choose more than one option:</i> <ul style="list-style-type: none">• Afghanistan• Algeria• Angola• Barbados• Bulgaria• Burkina Faso• Cameroon• Congo, the Democratic Republic of the• Cote D'Ivoire• Croatia

	<ul style="list-style-type: none"> • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q6 Afghanistan [Answer if Q5 is Afghanistan]	<input type="text"/> <input type="text"/>
Q7 Algeria [Answer if Q5 is Algeria]	<input type="text"/> <input type="text"/>
Q8 Angola [Answer if Q5 is Angola]	<input type="text"/> <input type="text"/>
Q9	<input type="text"/>

Barbados	
[Answer if Q5 is Barbados]	
Q10	
Bulgaria	<input type="text"/>
[Answer if Q5 is Bulgaria]	
Q11	
Burkina Faso	<input type="text"/>
[Answer if Q5 is Burkina Faso]	
Q12	
Cameroon	<input type="text"/>
[Answer if Q5 is Cameroon]	
Q13	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q5 is Congo, the Democratic Republic of the]	
Q14	
Cote D'Ivoire	<input type="text"/>
[Answer if Q5 is Cote D'Ivoire]	
Q15	
Croatia	<input type="text"/>
[Answer if Q5 is Croatia]	
Q16	
Gibraltar	<input type="text"/>
[Answer if Q5 is Gibraltar]	
Q17	
Haiti	<input type="text"/>
[Answer if Q5 is Haiti]	
Q18	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q5 is Iran, Islamic Republic of]	
Q19	<input type="text"/>
Jamaica	

[Answer if Q5 is Jamaica]	
Q20	
Kenya	<input type="text"/>
[Answer if Q5 is Kenya]	
Q21	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q5 is Korea, Democratic People's Republic of]	
Q22	
Lebanon	<input type="text"/>
[Answer if Q5 is Lebanon]	
Q23	
Mali	<input type="text"/>
[Answer if Q5 is Mali]	
Q24	
Monaco	<input type="text"/>
[Answer if Q5 is Monaco]	
Q25	
Mozambique	<input type="text"/>
[Answer if Q5 is Mozambique]	
Q26	
Myanmar	<input type="text"/>
[Answer if Q5 is Myanmar]	
Q27	
Namibia	<input type="text"/>
[Answer if Q5 is Namibia]	
Q28	
Nigeria	<input type="text"/>
[Answer if Q5 is Nigeria]	
Q29	
Panama	<input type="text"/>
[Answer if Q5 is Panama]	

Q30	<input type="text"/>
<i>Philippines</i>	
[Answer if Q5 is Philippines]	
Q31	<input type="text"/>
<i>Senegal</i>	
[Answer if Q5 is Senegal]	
Q32	<input type="text"/>
<i>South Africa</i>	
[Answer if Q5 is South Africa]	
Q33	<input type="text"/>
<i>South Sudan</i>	
[Answer if Q5 is South Sudan]	
Q34	<input type="text"/>
<i>Syrian Arab Republic</i>	
[Answer if Q5 is Syrian Arab Republic]	
Q35	<input type="text"/>
<i>Tanzania, United Republic of</i>	
[Answer if Q5 is Tanzania, United Republic of]	
Q36	<input type="text"/>
<i>Trinidad and Tobago</i>	
[Answer if Q5 is Trinidad and Tobago]	
Q37	<input type="text"/>
<i>Uganda</i>	
[Answer if Q5 is Uganda]	
Q38	<input type="text"/>
<i>United Arab Emirates</i>	
[Answer if Q5 is United Arab Emirates]	
Q39	<input type="text"/>
<i>Vanuatu</i>	
[Answer if Q5 is Vanuatu]	
Q40	<input type="text"/>

Venezuela	
[Answer if Q5 is Venezuela]	
Q41	
Vietnam	
[Answer if Q5 is Vietnam]	
Q42	
Yemen	
[Answer if Q5 is Yemen]	

Jurisdiction Risk (89)

(Relates to Virtual Financial Assets Service Providers)

As at end of the previous calendar year, please indicate how many customers are legal persons, that were incorporated or registered in the following jurisdictions:

Q43	
Malta	
Q44	
EU/EEA (Excluding 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.	
Q45	
Non-EU/Non-EEA	
Q46	
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.	
Q47	Choose more than one option:

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 Q46 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

Q48

Afghanistan

[Answer if Q47 is Afghanistan]

Q49 Algeria [Answer if Q47 is Algeria]	<input type="text"/> <input type="text"/>
Q50 Angola [Answer if Q47 is Angola]	<input type="text"/> <input type="text"/>
Q51 Barbados [Answer if Q47 is Barbados]	<input type="text"/> <input type="text"/>
Q52 Bulgaria [Answer if Q47 is Bulgaria]	<input type="text"/> <input type="text"/>
Q53 Burkina Faso [Answer if Q47 is Burkina Faso]	<input type="text"/> <input type="text"/>
Q54 Cameroon [Answer if Q47 is Cameroon]	<input type="text"/> <input type="text"/>
Q55 Congo, the Democratic Republic of the [Answer if Q47 is Congo, the Democratic Republic of the]	<input type="text"/> <input type="text"/>
Q56 Cote D'Ivoire [Answer if Q47 is Cote D'Ivoire]	<input type="text"/> <input type="text"/>
Q57 Croatia [Answer if Q47 is Croatia]	<input type="text"/> <input type="text"/>
Q58 Gibraltar [Answer if Q47 is Gibraltar]	<input type="text"/> <input type="text"/>
Q59	<input type="text"/>

Haiti	
[Answer if Q47 is Haiti]	
Q60	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q47 is Iran, Islamic Republic of]	
Q61	
Jamaica	<input type="text"/>
[Answer if Q47 is Jamaica]	
Q62	
Kenya	<input type="text"/>
[Answer if Q47 is Kenya]	
Q63	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q47 is Korea, Democratic People's Republic of]	
Q64	
Lebanon	<input type="text"/>
[Answer if Q47 is Lebanon]	
Q65	
Mali	<input type="text"/>
[Answer if Q47 is Mali]	
Q66	
Monaco	<input type="text"/>
[Answer if Q47 is Monaco]	
Q67	
Mozambique	<input type="text"/>
[Answer if Q47 is Mozambique]	
Q68	
Myanmar	<input type="text"/>
[Answer if Q47 is Myanmar]	
Q69	<input type="text"/>
Namibia	

[Answer if Q47 is Namibia]	
Q70	
Nigeria	<input type="text"/>
[Answer if Q47 is Nigeria]	
Q71	
Panama	<input type="text"/>
[Answer if Q47 is Panama]	
Q72	
Philippines	<input type="text"/>
[Answer if Q47 is Philippines]	
Q73	
Senegal	<input type="text"/>
[Answer if Q47 is Senegal]	
Q74	
South Africa	<input type="text"/>
[Answer if Q47 is South Africa]	
Q75	
South Sudan	<input type="text"/>
[Answer if Q47 is South Sudan]	
Q76	
Syrian Arab Republic	<input type="text"/>
[Answer if Q47 is Syrian Arab Republic]	
Q77	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q47 is Tanzania, United Republic of]	
Q78	
Trinidad and Tobago	<input type="text"/>
[Answer if Q47 is Trinidad and Tobago]	
Q79	
Uganda	<input type="text"/>
[Answer if Q47 is Uganda]	
Q80	<input type="text"/>

United Arab Emirates	
[Answer if Q47 is United Arab Emirates]	
Q81	
Vanuatu	<input type="text"/>
[Answer if Q47 is Vanuatu]	
Q82	
Venezuela	<input type="text"/>
[Answer if Q47 is Venezuela]	
Q83	
Vietnam	<input type="text"/>
[Answer if Q47 is Vietnam]	
Q84	
Yemen	<input type="text"/>
[Answer if Q47 is Yemen]	

Jurisdiction Risk (90)

(Relates to Virtual Financial Assets Service Providers)

As at end of the previous calendar year, for your customers that are legal entities, please indicate the total number of ultimate beneficial owners (UBOs) that resided in the following jurisdictions:

Q85	<input type="text"/>
Malta	
Q86	
EU/EEA (Excluding 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"/>

Q87 Non-EU/Non-EEA	<div></div>
Q88 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.	<div></div>
Q89 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 Q88 is > 0]	Choose more than one option: <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

	<ul style="list-style-type: none"> • Uganda • United Arab Emirates • Vanuatu • Venezuela • Vietnam • Yemen
Q90 Afghanistan [Answer if Q89 is Afghanistan]	<input type="text"/>
Q91 Algeria [Answer if Q89 is Algeria]	<input type="text"/>
Q92 Angola [Answer if Q89 is Angola]	<input type="text"/>
Q93 Barbados [Answer if Q89 is Barbados]	<input type="text"/>
Q94 Bulgaria [Answer if Q89 is Bulgaria]	<input type="text"/>
Q95 Burkina Faso [Answer if Q89 is Burkina Faso]	<input type="text"/>
Q96 Cameroon [Answer if Q89 is Cameroon]	<input type="text"/>
Q97 Congo, the Democratic Republic of the [Answer if Q89 is Congo, the Democratic Republic of the]	<input type="text"/>
Q98 Cote D'Ivoire	<input type="text"/>

[Answer if Q89 is Cote D'Ivoire]	
Q99	
Croatia	<input type="text"/>
[Answer if Q89 is Croatia]	
Q100	
Gibraltar	<input type="text"/>
[Answer if Q89 is Gibraltar]	
Q101	
Haiti	<input type="text"/>
[Answer if Q89 is Haiti]	
Q102	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q89 is Iran, Islamic Republic of]	
Q103	
Jamaica	<input type="text"/>
[Answer if Q89 is Jamaica]	
Q104	
Kenya	<input type="text"/>
[Answer if Q89 is Kenya]	
Q105	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q89 is Korea, Democratic People's Republic of]	
Q106	
Lebanon	<input type="text"/>
[Answer if Q89 is Lebanon]	
Q107	
Mali	<input type="text"/>
[Answer if Q89 is Mali]	
Q108	
Monaco	<input type="text"/>
[Answer if Q89 is Monaco]	

Q109	<input type="text"/>
<i>Mozambique</i>	
[Answer if Q89 is Mozambique]	
Q110	<input type="text"/>
<i>Myanmar</i>	
[Answer if Q89 is Myanmar]	
Q111	<input type="text"/>
<i>Namibia</i>	
[Answer if Q89 is Namibia]	
Q112	<input type="text"/>
<i>Nigeria</i>	
[Answer if Q89 is Nigeria]	
Q113	<input type="text"/>
<i>Panama</i>	
[Answer if Q89 is Panama]	
Q114	<input type="text"/>
<i>Philippines</i>	
[Answer if Q89 is Philippines]	
Q115	<input type="text"/>
<i>Senegal</i>	
[Answer if Q89 is Senegal]	
Q116	<input type="text"/>
<i>South Africa</i>	
[Answer if Q89 is South Africa]	
Q117	<input type="text"/>
<i>South Sudan</i>	
[Answer if Q89 is South Sudan]	
Q118	<input type="text"/>
<i>Syrian Arab Republic</i>	
[Answer if Q89 is Syrian Arab Republic]	
Q119	<input type="text"/>

Tanzania, United Republic of	
[Answer if Q89 is Tanzania, United Republic of]	
Q120	
Trinidad and Tobago	<input type="text"/>
[Answer if Q89 is Trinidad and Tobago]	
Q121	
Uganda	<input type="text"/>
[Answer if Q89 is Uganda]	
Q122	
United Arab Emirates	<input type="text"/>
[Answer if Q89 is United Arab Emirates]	
Q123	
Vanuatu	<input type="text"/>
[Answer if Q89 is Vanuatu]	
Q124	
Venezuela	<input type="text"/>
[Answer if Q89 is Venezuela]	
Q125	
Vietnam	<input type="text"/>
[Answer if Q89 is Vietnam]	
Q126	
Yemen	<input type="text"/>
[Answer if Q89 is Yemen]	

Jurisdiction Risk (91)

(Relates to Virtual Financial Assets Service Providers)

As at end of the previous calendar year, please indicate how many customers who were issuers operated in or from the following jurisdictions:

Q127	<input type="text"/>
Malta	

<p>Q128</p> <p><i>EU/EEA (Excluding Malta)</i></p> <p>[Answer if Q15 is > 0]</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</i></p>	<div></div>
<p>Q129</p> <p><i>Non-EU/Non-EEA</i></p> <p>[Answer if Q15 is > 0]</p>	<div></div>
<p>Q130</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 Q15 is > 0]</p>	<div></div>
<p>Q131</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 Q130 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

	<ul style="list-style-type: none"> • 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
Q132 Afghanistan [Answer if Q131 is Afghanistan]	<input type="text"/> <input type="text"/>
Q133 Algeria [Answer if Q131 is Algeria]	<input type="text"/> <input type="text"/>
Q134 Angola [Answer if Q131 is Angola]	<input type="text"/> <input type="text"/>
Q135 Barbados [Answer if Q131 is Barbados]	<input type="text"/> <input type="text"/>
Q136 Bulgaria [Answer if Q131 is Bulgaria]	<input type="text"/> <input type="text"/>

Q137	<input type="text"/>
Burkina Faso	
[Answer if Q131 is Burkina Faso]	
Q138	<input type="text"/>
Cameroon	
[Answer if Q131 is Cameroon]	
Q139	<input type="text"/>
Congo, the Democratic Republic of the	
[Answer if Q131 is Congo, the Democratic Republic of the]	
Q140	<input type="text"/>
Cote D'Ivoire	
[Answer if Q131 is Cote D'Ivoire]	
Q141	<input type="text"/>
Croatia	
[Answer if Q131 is Croatia]	
Q142	<input type="text"/>
Gibraltar	
[Answer if Q131 is Gibraltar]	
Q143	<input type="text"/>
Haiti	
[Answer if Q131 is Haiti]	
Q144	<input type="text"/>
Iran, Islamic Republic of	
[Answer if Q131 is Iran, Islamic Republic of]	
Q145	<input type="text"/>
Jamaica	
[Answer if Q131 is Jamaica]	
Q146	<input type="text"/>
Kenya	
[Answer if Q131 is Kenya]	
Q147	<input type="text"/>

<i>Korea, Democratic People's Republic of</i>	
[Answer if Q131 is Korea, Democratic People's Republic of]	
Q148	
<i>Lebanon</i>	<input type="text"/>
[Answer if Q131 is Lebanon]	
Q149	
<i>Mali</i>	<input type="text"/>
[Answer if Q131 is Mali]	
Q150	
<i>Monaco</i>	<input type="text"/>
[Answer if Q131 is Monaco]	
Q151	
<i>Mozambique</i>	<input type="text"/>
[Answer if Q131 is Mozambique]	
Q152	
<i>Myanmar</i>	<input type="text"/>
[Answer if Q131 is Myanmar]	
Q153	
<i>Namibia</i>	<input type="text"/>
[Answer if Q131 is Namibia]	
Q154	
<i>Nigeria</i>	<input type="text"/>
[Answer if Q131 is Nigeria]	
Q155	
<i>Panama</i>	<input type="text"/>
[Answer if Q131 is Panama]	
Q156	
<i>Philippines</i>	<input type="text"/>
[Answer if Q131 is Philippines]	
Q157	<input type="text"/>
<i>Senegal</i>	

[Answer if Q131 is Senegal]	
Q158	
South Africa	<input type="text"/>
[Answer if Q131 is South Africa]	
Q159	
South Sudan	<input type="text"/>
[Answer if Q131 is South Sudan]	
Q160	
Syrian Arab Republic	<input type="text"/>
[Answer if Q131 is Syrian Arab Republic]	
Q161	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q131 is Tanzania, United Republic of]	
Q162	
Trinidad and Tobago	<input type="text"/>
[Answer if Q131 is Trinidad and Tobago]	
Q163	
Uganda	<input type="text"/>
[Answer if Q131 is Uganda]	
Q164	
United Arab Emirates	<input type="text"/>
[Answer if Q131 is United Arab Emirates]	
Q165	
Vanuatu	<input type="text"/>
[Answer if Q131 is Vanuatu]	
Q166	
Venezuela	<input type="text"/>
[Answer if Q131 is Venezuela]	
Q167	
Vietnam	<input type="text"/>
[Answer if Q131 is Vietnam]	
Q168	<input type="text"/>

Yemen	
[Answer if Q131 is Yemen]	

Jurisdiction Risk (92)

(Relates to Virtual Financial Assets Service Providers)

As at end of the previous calendar year, please indicate how many customers who were VASPs operated in or from the following jurisdictions:

Q169 Malta [Answer if Q8 is > 0]	<input type="text"/>
Q170 EU/EEA (Excluding Malta) [Answer if Q8 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"/>
Q171 Non-EU/Non-EEA [Answer if Q8 is > 0]	<input type="text"/>
Q172 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 Q8 is > 0]	<input type="text"/>
Q173 Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action'	Choose more than one option: <ul style="list-style-type: none"> • Afghanistan

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

[Answer if Q172 is > 0]

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

Q174

Afghanistan

[Answer if Q173 is Afghanistan]

Q175	<input type="text"/>
Algeria	
[Answer if Q173 is Algeria]	
Q176	<input type="text"/>
Angola	
[Answer if Q173 is Angola]	
Q177	<input type="text"/>
Barbados	
[Answer if Q173 is Barbados]	
Q178	<input type="text"/>
Bulgaria	
[Answer if Q173 is Bulgaria]	
Q179	<input type="text"/>
Burkina Faso	
[Answer if Q173 is Burkina Faso]	
Q180	<input type="text"/>
Cameroon	
[Answer if Q173 is Cameroon]	
Q181	<input type="text"/>
Congo, the Democratic Republic of the	
[Answer if Q173 is Congo, the Democratic Republic of the]	
Q182	<input type="text"/>
Cote D'Ivoire	
[Answer if Q173 is Cote D'Ivoire]	
Q183	<input type="text"/>
Croatia	
[Answer if Q173 is Croatia]	
Q184	<input type="text"/>
Gibraltar	
[Answer if Q173 is Gibraltar]	
Q185	<input type="text"/>

Haiti	
[Answer if Q173 is Haiti]	
Q186	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q173 is Iran, Islamic Republic of]	
Q187	
Jamaica	<input type="text"/>
[Answer if Q173 is Jamaica]	
Q188	
Kenya	<input type="text"/>
[Answer if Q173 is Kenya]	
Q189	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q173 is Korea, Democratic People's Republic of]	
Q190	
Lebanon	<input type="text"/>
[Answer if Q173 is Lebanon]	
Q191	
Mali	<input type="text"/>
[Answer if Q173 is Mali]	
Q192	
Monaco	<input type="text"/>
[Answer if Q173 is Monaco]	
Q193	
Mozambique	<input type="text"/>
[Answer if Q173 is Mozambique]	
Q194	
Myanmar	<input type="text"/>
[Answer if Q173 is Myanmar]	
Q195	<input type="text"/>
Namibia	

[Answer if Q173 is Namibia]	
Q196	
Nigeria	<input type="text"/>
[Answer if Q173 is Nigeria]	
Q197	
Panama	<input type="text"/>
[Answer if Q173 is Panama]	
Q198	
Philippines	<input type="text"/>
[Answer if Q173 is Philippines]	
Q199	
Senegal	<input type="text"/>
[Answer if Q173 is Senegal]	
Q200	
South Africa	<input type="text"/>
[Answer if Q173 is South Africa]	
Q201	
South Sudan	<input type="text"/>
[Answer if Q173 is South Sudan]	
Q202	
Syrian Arab Republic	<input type="text"/>
[Answer if Q173 is Syrian Arab Republic]	
Q203	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q173 is Tanzania, United Republic of]	
Q204	
Trinidad and Tobago	<input type="text"/>
[Answer if Q173 is Trinidad and Tobago]	
Q205	
Uganda	<input type="text"/>
[Answer if Q173 is Uganda]	
Q206	<input type="text"/>

United Arab Emirates	
[Answer if Q173 is United Arab Emirates]	
Q207	
Vanuatu	<input type="text"/>
[Answer if Q173 is Vanuatu]	
Q208	
Venezuela	<input type="text"/>
[Answer if Q173 is Venezuela]	
Q209	
Vietnam	<input type="text"/>
[Answer if Q173 is Vietnam]	
Q210	
Yemen	<input type="text"/>
[Answer if Q173 is Yemen]	

Transactions / Payments (1)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for incoming domestic payment transactions, during the previous calendar year:

Q211	<input type="text"/>
a) Malta (In) The volume (#) (number of transactions)	<input type="text"/>
Q212	
b) The value (€) of transactions	<input type="text"/>
[Answer if Q211 is > 0]	

Transactions / Payments (2)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for outgoing domestic payment transactions, during the previous calendar year:

Q213	<input type="text"/>
a) Malta (Out) The volume (#) (number of transactions)	
Q214	<input type="text"/>
b) The value (€) of transactions	
[Answer if Q213 is > 0]	

Transactions / Payments (3)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for incoming payment transactions, during the previous calendar year:

Q215	<input type="text"/>
a) EU/EEA (In) (Excluding Malta) The volume (#) (number of transactions)	
Q216	<input type="text"/>
b) The value (€) of transactions	
[Answer if Q215 is > 0]	

Transactions / Payments (4)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for outgoing domestic payment transactions, during the previous calendar year:

Q217	<input type="text"/>
a) EU/EEA (Out) The volume (#) (number of transactions)	
Q218	<input type="text"/>
b) The value (€) of transactions	
[Answer if Q217 is > 0]	

Transactions / Payments (5)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for incoming domestic payment transactions, during the previous calendar year:

Q219	
a) Non-EU/Non-EEA (In) The volume (#) (number of transactions)	
Q220	
b) The value (€) of transactions	
[Answer if Q219 is > 0]	

Transactions / Payments (6)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for outgoing domestic payment transactions, during the previous calendar year:

Q221	
a) Non-EU/Non-EEA (Out) The volume (#) (number of transactions)	
Q222	
b) The value (€) of transactions	
[Answer if Q221 is > 0]	

Transactions / Payments (9)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for incoming payment transactions received from payment accounts in jurisdictions listed in the FATF lists and/or the EU list identifying high risk 3rd countries with strategic deficiencies, during the previous calendar year:

Q223	
a) Incoming transactions volume (#) (number of transactions)	
Q224	

b) The value (€) of transactions	
----------------------------------	--

[Answer if Q223 is > 0]	
-------------------------	--

Transactions / Payments (10)

(Relates to Virtual Financial Assets Service Providers)

Please indicate the following for outgoing payment transactions remitted to payment accounts in countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.

Q225	
a) Outgoing transactions volume (#) (number of transactions)	<input type="text"/>
Q226	
b) The value (€) of transactions	<input type="text"/>
[Answer if Q225 is > 0]	

Jurisdiction Risk (219)

(Relates to Virtual Financial Assets Service Providers)

Q227

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

Choose only one option:

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

or choose one of:

- Not Applicable

Jurisdiction Risk (220)

(Relates to Virtual Financial Assets Service Providers)

Q228

Please provide the number of subsidiaries per jurisdiction

[Answer if Q227 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 (221)

(Relates to Virtual Financial Assets Service Providers)

Q229

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

Choose only one option:

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

or choose one of:

- Not Applicable

Jurisdiction Risk (222)

(Relates to Virtual Financial Assets Service Providers)

Q230

Please provide the number of branches per jurisdiction

[Answer if Q229 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 (223)

(Relates to Virtual Financial Assets Service Providers)

Q231

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

Choose only one option:

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

or choose one of:

- Not Applicable

Jurisdiction Risk (224)

(Relates to Virtual Financial Assets Service Providers)

Q232

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

[Answer if Q231 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable



Interface / Distribution Channels

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

Interface / Distribution Channels (59)

(Relates to Virtual Financial Assets Service Providers)

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

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

Interface / Distribution Channels (60)

(Relates to Virtual Financial Assets Service Providers)

Q3

Of those customers who are legal persons, and who were onboarded and/or serviced on a non-face-to-face basis in the previous calendar year, indicate whether the majority are incorporated in Malta, within EU/EEA or outside EU/EEA jurisdictions?

[Answer if Q2 is > 0]

Interface / Distribution Channels (61)

(Relates to Virtual Financial Assets Service Providers)

Q4

Does your entity have any reliance agreements in place, in terms of Regulation 12 of the PMLFTR?

Choose only one option:

- Yes
- No

Interface / Distribution Channels (62)

(Relates to Virtual Financial Assets Service Providers)

Q5

Where are the third parties located?

[Answer if Q4 is Yes]

Interface / Distribution Channels (63)

(Relates to Virtual Financial Assets Service Providers)

Q6

Do the third parties carry out relevant financial business (or equivalent activities) or relevant activity (or equivalent)?

[Answer if Q4 is Yes]

Choose only one option:

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

Interface / Distribution Channels (64)

(Relates to Virtual Financial Assets Service Providers)

Q7

Do any of your customers make use of VPNs, proxy servers or TOR?

Choose only one option:

- Yes
- No



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

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.

Customer Acceptance and Risk Assessment (118)

Q18

Were new clients acquired through an introducer/s in the previous calendar year?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (119)

Q19

Indicate the number of introducers used during the previous calendar year.

[Answer if Q18 is Yes]

Policies & Procedures

Policies and Procedures (36)

Q1

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

Choose only one option:

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

Policies and Procedures (37)

Q2

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

Choose more than one option:

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

Policies and Procedures (38)

Q3

How do you determine whether individuals/entities are sanctioned?

Choose more than one option:

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

Policies and Procedures (39)

Q4

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

Choose only one option:

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

Policies and Procedures (40)

Q5

Does your entity have internal whistleblowing procedures?

Choose only one option:

- Yes
- No
- Not applicable

Q6

If not applicable, please explain why.

[Answer if Q5 is Not applicable]

Policies and Procedures (41)

Q7

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

Choose only one option:

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

Policies and Procedures (42)

Q8

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

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

Choose only one option:

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

Policies and Procedures (43)

Q9

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

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

Choose only one option:

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

Policies and Procedures (44)

Q10

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

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

Choose only one option:

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

Policies and Procedures (45)

Q11

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

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

Policies and Procedures (46)

Q12

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

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

Policies and Procedures (47)

Q13

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

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

Choose more than one option:

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

Policies and Procedures (48)

Q14

If others, explain

[Answer if Q13 is Others]

Policies and Procedures (63)

Q15

Do your entity's policies and procedures define, on a risk basis, processes and controls to identify and review customers / customer accounts, which regularly change the source of payment methods into their wallet account?

Choose only one option:

- Yes
- No

Policies and Procedures (64)

Q16

Do your entity's policies and procedures define controls and processes for tracking the use of the customer's custodial wallet/s held with the company?

Choose only one option:

- Yes
- No

Outsourcing

Outsourcing (1)

Q1

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

Choose only one option:

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

Outsourcing (2)

Q2

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

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

Outsourcing (3)

Q3

Please specify the obligations that are being outsourced.

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

Choose more than one option:

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

- Drafting of policies and procedures
- MLRO function

Outsourcing (4)

Q4

Please specify the obligations that are being outsourced.

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

Choose more than one option:

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

Outsourcing (5)

Q5

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

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

Choose only one option:

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

Outsourcing (6)

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

<p>Q6</p> <p>Malta</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q7</p> <p>EU/EEA (Excluding Malta)</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q8</p> <p>Non-EU/Non-EEA</p> <p>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2024.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q9</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No

<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>Q10</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 Q9 is Yes]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Barbados • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Croatia • Gibraltar • Haiti • Iran, Islamic Republic of • Jamaica • Kenya • Korea, Democratic People's Republic of • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nigeria • Panama • Philippines • Senegal • South Africa • South Sudan

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

Training (7)

Q7

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

Choose only one option:

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

Reporting

Reporting (15)

Q1

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

Reporting (16)

Q2

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

[Answer if Q1 is > 0]

Reporting (17)

Q3

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

[Answer if Q1 is > 0]

Reporting (18)

Q4

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

Reporting (19)

Q5

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



Ongoing monitoring (data, documents and information)

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

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

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

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

Q4

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

Choose more than one option:

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

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

Q5

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

Ongoing monitoring (Transaction Scrutiny)

Ongoing monitoring (Transaction Scrutiny) (5)

Q1

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

Choose only one option:

- Yes
- No

Ongoing monitoring (Transaction Scrutiny) (42)

Q2

In case of a business relationship, are processes and/or systems for monitoring transactions fully automated, partially automated or manual?

Choose only one option:

- N/A - No transaction monitoring is carried out
- Fully automated
- Partially automated
- Manual

Ongoing monitoring (Transaction Scrutiny) (43)

Q3

How often are the criteria and rules utilised by the monitoring system reviewed and updated?

[Answer if Q2 is Fully automated, Partially automated, Manual]

Choose only one option:

- No reviews and updates are carried out
- Monthly basis
- Quarterly basis

- Half yearly
- Yearly
- Every 2 years
- Over 2 years

Ongoing monitoring (Transaction Scrutiny) (44)

Q4

Are customers' transactions monitored in real-time, pre-event, post-event, a combination of all, or a combination of pre-event and post-event?

[Answer if Q2 is Fully automated, Partially automated, Manual]

Choose only one option:

- Real-time
- Pre-event
- Post-event
- Combination of all
- Combination of pre-event and post-event

or choose one of:

- Not Applicable

Ongoing monitoring (Transaction Scrutiny) (45)

Q5

Please explain which transactions are subject to real-time monitoring?

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

Ongoing monitoring (Transaction Scrutiny) (46)

Q6

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

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

or choose one of:

- Not Applicable

Ongoing monitoring (Transaction Scrutiny) (47)

Q7

Please list the number of ML/FT related alerts generated as part of transaction monitoring during the prior calendar year.

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

Ongoing monitoring (Transaction Scrutiny) (48)

Q8

How many transaction monitoring alerts were triggered last calendar year, but not yet closed by end of January of this calendar year?

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

or choose one of:

- Not Available

Ongoing monitoring (Transaction Scrutiny) (26)

Q9

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

Ongoing monitoring (Transaction Scrutiny) (22)

Q10

Please explain transaction monitoring process in instances where 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 does and did not have access to customer's bank/payment accounts.

Ongoing monitoring (Transaction Scrutiny) (49)

Q11

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