

**Financial Intelligence Analysis Unit**  
 Risk Evaluation Questionnaire

 Financial Sector  
 Investment Service Providers

General remarks from the subject person:

As indicated in the Guidance for Completion of the Anti-Money Laundering and Countering the Financing of Terrorism Risk Evaluation Questionnaire, sole practitioners and entities should, for each of the questions included in this questionnaire, choose the answer option that is best suited to them/ their internal organization.

The FIAU acknowledges that the answer options defined by it do not always fully capture the actual situation within each subject person. When choosing from the answer options available, it is therefore important to select an option that is a true reflection of your actual situation / the actual situation within your entity and that can be justified later on.

In the text box below, you can formulate general remarks on the answers submitted by you / your entity. Please note that these general remarks are not taken into account in the initial, automated analysis of your / your entity's answers.

[Text]

**1 Subject Person Information**

1.01	Please select the legal formation of your entity.	Public Limited Company / Private Limited Company / Civil Partnership / Commercial Partnership / Branch of a Foreign entity / Association / Other
1.02	If "Other", please specify.	[Text] / Not Applicable
1.03	Please select the status of your entity.	Subsidiary of a foreign traded company / Subsidiary of a privately held foreign company / Subsidiary of a local traded company / Subsidiary of a privately held local company / Privately held company / Branch of a regulated entity / Listed company / Other
1.04	If "Other", please specify.	[Text] / Not Applicable
1.05	If your entity is a subsidiary of a foreign traded company or a subsidiary of a privately held foreign company, is the parent company located in EU / EEA jurisdictions or non-EU / EEA jurisdictions?	EU / EEA jurisdictions / non-EU / EEA jurisdictions / Not Applicable
1.06	Please indicate total annual turnover according to the latest available audited financial statements and / or tax declaration.	[€] / Not Applicable
1.07	Please provide the year end reference date for the financial statements or tax declaration as indicated above.	[Date] / Not Applicable
1.08	Please indicate the total number of employees (including partners, executive directors, associates and staff), expressed in full time equivalents ("FTEs"), working for you / your entity as at the end of the prior calendar year.	[Number] / Not Available / Not Applicable

1.09	How many years experience in this industry do you / does the principal(s) and / or partners and / or director(s) and / or senior management of your entity have?	10 or more years / Between 5-9 years / Between 3-4 years / Between 1-2 years / Less than 1 year
1.10	Does the ownership structure of your entity include one or more of the following: foundation and / or trust and / or partnership and / or direct or indirect holding through bearer shares?	No / Yes
1.11	Does your entity have any subsidiaries, branches, affiliates, representative offices and agencies in other EU / EEA countries?	No / Yes
1.12	Does your entity have any subsidiaries, branches, affiliates, representative offices and agencies in non-EU / EEA countries?	No / Yes
1.13	If the answer to the prior question was "Yes", please list the countries in which the subsidiaries, branches, affiliates, representative offices and agencies are situated.	[Text]
1.14	Does your entity have any subsidiaries, branches, affiliates, representative offices and agencies in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes
1.15	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
1.16	Please list all persons (name and surname) who are considered as your entity's beneficial owners as defined in the PMLFTR.	[Text] / Not Applicable
1.17	Do any of the BOs reside in a non-EU / EEA jurisdiction?	No / Yes / Not Applicable
1.18	Does your entity have nominee shareholders in its ownership structure?	No / Yes
1.19	If "Yes", what percent of the total shares are held by nominee shareholders?	[%] / Not Applicable
1.20	Has your entity undergone changes in its ownership structure during the prior calendar year?	No / Yes
1.21	Has your entity undergone significant changes in its management and control structure during the prior calendar year?	No / Yes
1.22	Please ATTACH a copy of the ownership and control structure of your entity (optional).	File Upload / Not Applicable

## 2 Governance

2.01	When was the current MLRO appointed?	More than 2 years ago / Between 1-2 years ago / Less than 1 year ago
2.02	How many years of experience does the MLRO have in AML / CFT?	More than 5 years / Between 3-5 years / Between 1-2 years / Less than 1 year
2.03	Is the MLRO responsible for areas other than AML / CFT?	No / Yes

2.04	Does the MLRO also hold MLRO positions with other entities?	No / Yes
2.05	If yes, please include total number of MLRO positions held.	[Number] / Not Available / Not Applicable
2.06	How many staff members, expressed as FTEs, are part of the AML / CFT team (if one exists)?	[Number] / Not Available / Not Applicable
2.07	Is any of the AML / CFT team staff responsible for other roles and responsibilities not attributable to AML / CFT (e.g. front office, back office, etc.)?	No / Yes / Not Applicable
2.08	Do you / does your entity implement appropriate procedures (including obtaining a police conduct or equivalent upon hiring) and assess the conduct and integrity of employees (including partners and directors) handling relevant financial business or relevant activity?	No / Yes / Not Applicable
2.09	Have you / your entity, MLRO, Compliance Officer, senior management, partners, directors, BOs, and / or shareholders (as applicable) been subject to any of the following in the last five (5) years either in Malta or abroad:	
	a) Regulatory enforcement actions, criminal investigations for ML / FT or any other financial crime	No / Yes
	b) Subject of negative news reports (if known)	No / Yes
2.10	In the past five (5) years, have any employees (including directors and partners) been disciplined for non-compliance with the AML / CFT policies within your entity?	No / Yes
2.11	Have you / your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the group)?	No / Yes (within Group) / Yes (outside Group) / Yes (within and outside Group)
2.12	If "Yes", please specify the obligations that are being outsourced.	Business Risk Assessment / Customer Risk Assessment / Customer Due Diligence / On-going monitoring / Record keeping / Not Applicable
2.13	Have you made use of any of the exceptions provided in Section 5.1.2 of the Implementing Procedures - Part I providing for the Money Laundering Reporting Officer to be carried out by someone other than one of your officers?	No / Yes
2.14	If yes, please indicate the official full name of the service provider.	[Text] / Not Applicable
2.15	Are any of the above-mentioned functions outsourced to service providers situated in a non-EU or non-EEA jurisdiction?	No / Yes / Not Applicable
2.16	How often has the Board or equivalent body, received a presentation on AML / CFT issues in the prior calendar year?	Monthly / Quarterly / Half yearly / Annually / None / Not Applicable

### 3 Business Risk Assessment

3.01	Have you / your entity performed a Business Risk Assessment?	No / Yes
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3.02	What is your / your entity's most recent Business Risk Assessment inherent risk scoring / rating for ML / FT risk?	Very High / High / Medium / Low / Not Applicable
3.03	What is your / your entity's most recent Business Risk Assessment residual risk scoring / rating for ML / FT risk?	Very High / High / Medium / Low / Not Applicable
3.04	Did the Business Risk Assessment conducted take into account the risks and controls related to:	
	a) your / your entity's customers	No / Yes / Not Applicable
	b) the products and services offered by you / your entity and the transaction risk exposure through same	No / Yes / Not Applicable
	c) specific countries or geographical areas	No / Yes / Not Applicable
	d) the distribution channels	No / Yes / Not Applicable
3.05	Did the Business Risk Assessment conducted take into account the results of the SNRA and NRA?	No / Yes / Not Applicable
3.06	Has the Business Risk Assessment been approved by senior management (including directors and partners) of your entity?	No / Yes / Not Applicable
3.07	Did you / your entity review and / or update the business risk assessment in the prior calendar year?	No / Yes / Not Applicable
3.08	Please ATTACH latest Business Risk Assessment.	[File Upload] / Not Available

#### 4 Customer Acceptance and Risk Assessment

4.01	Do you / does your entity perform a customer risk assessment ("CRA") prior to the acceptance and approval of customers?	No / Yes sometimes / Yes most of the times / Yes, always / Not Applicable
4.02	Please indicate, for all your customers where an occasional transaction is carried out, whether you / your entity collects the following:	
	a) Identification and verification information (for both natural and legal persons and BOs of legal persons) including: name, nationality / country of incorporation or registration, country of residence, registered office or main place of business	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring person is authorised in writing	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	c) Information on the PEP status of the customer and, where applicable of the beneficial owner	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	d) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover, other income streams)	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable

	e) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.03	Please indicate, for all your customers where a business relationship is formed or, depending on the risk, only for a specific part of your customers, whether you / your entity collects the following:	
	a) Identification and verification information (for both natural and legal persons and BOs of legal persons) including: name, nationality / country of incorporation or registration, country of residence, registered office or main place of business	No / Yes / Not Applicable
	b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring person is authorised in writing	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	c) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover, other income streams)	No / Yes / Not Applicable
	d) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	No / Yes / Not Applicable
	e) Information on the PEP status of the customer and, where applicable of the beneficial owner	No / Yes / Not Applicable
4.04	Please indicate, for all your customers where a business relationship is formed or, depending on the risk, only for a specific part of your customers, whether you / your entity collects information on actual or expected activity (including cash flows) with respect to size, frequency and geographical distribution.	No / Yes, when risk is not low / Yes, only when risk is high / Yes, always / Not Applicable
4.05	Does the subject person verify the source of funds prior to approving a customer's placement of funds for investment?	No / Yes, only for high risk / Yes / Not Applicable
4.06	Do policies and procedures specify hierarchical authorisation levels within your entity to, on a risk basis, accept a customer or approve a transaction?	No / Yes
4.07	Are the following verification measures used during the onboarding of non-face-to-face customers:	
	a) Verification on the basis of documents	No / Yes / Not Applicable
	b) Use of video conferencing tools	No / Yes / Not Applicable
	c) Use of identity verification software	No / Yes / Not Applicable
	d) Verification through the use of commercial electronic data providers	No / Yes / Not Applicable
	e) Use of e-IDs	No / Yes / Not Applicable
	f) Verification of Identity Platforms	No / Yes / Not Applicable

4.08	Do you / does your entity screen customers and, where applicable, their beneficial owners against sanction lists, PEP lists and to see whether they were the subject of adverse media at onboarding?	No / Yes
4.09	Do policies and procedures allow for a variation of the timing of due diligence for lower risk customers and where SDD may be applied?	No / Yes
4.10	If variation in the timing of due diligence is permitted as indicated above, what pre-determined triggering criteria is applied?	
	a) Transaction, customer activity threshold	No / Yes / Not Applicable
	b) Pre-determined time frame	No / Yes / Not Applicable
	c) Prior to completion of service provided	No / Yes / Not Applicable
4.11	When making use of any of the exceptions provided for under Regulation 8 of the PMLFTR, do the customer files include a written justification for the exception and formal approval of the exception?	No / Yes / Not Applicable
4.12	Where customer due diligence cannot be completed at the onboarding stage, do the policies and procedures require you / your entity to consider whether there is a need to file a STR with the FIAU and only proceed with the cancellation / termination of the business relationship once it is determined that there is no suspicion justifying the filing of a STR?	No / Yes
4.13	Do policies and procedures require due diligence (including customer risk assessment) to be repeated when there are doubts about the completeness, reliability or accuracy on priorly obtained customer identification information, data or documentation?	No / Yes
4.14	Does your entity have the ability to block, suspend or otherwise limit the services provided to customers when there are AML / CFT concerns?	No / Yes
4.15	Is your monitoring system able to detect the expiry of due diligence documentation and any conflicting information in relation to customer data?	No / Yes
4.16	Do the policies and procedures require you to revise your customer risk assessment should the customer be evasive or not cooperative to provide the requested information and / or documentation?	No / Yes
4.17	In the event that there are changes to your customer's business model, ownership structure or service offering, do you / does your entity review the existing customer risk assessment and, if necessary, update the said risk assessment?	No / Yes sometimes / Yes most of the times / Yes always
4.18	Do policies and procedures require the carrying out of identification and verification of the identity measures and a revision of the CRA, whenever there is a change in BOs?	No / Yes
4.19	Do policies and procedures require your entity to obtain an understanding of changes in the customer's behaviour, as well as obtain related supporting documentation and revise the CRA, if required?	No / Yes
4.20	Do policies and procedures require your entity to obtain an understanding of high value / high risk transactions, as well as obtain related supporting documentation and revise the CRA, if required?	No / Yes

4.21	Do policies and procedures require the performance of periodic reviews on customer due diligence information and / or documentation, on the basis of customer risk rating?	No / Yes
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<b>5</b>	<b>Ongoing Monitoring / Transaction Scrutiny</b>
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5.01	Is your entity's process / system for monitoring transactions fully automated, partially automated or manual?	Fully automated / Partially automated / Manual / Not Applicable
5.02	Does your monitoring system utilise any of these techniques to monitor customer activity?	No / Profiling Techniques / Rule-based criteria / Both / Not Applicable
5.03	How often are the criteria and rules utilised by the monitoring system reviewed and updated?	Twice or more within a year / Annually / Less frequent than annually / Never / Not Applicable
5.04	Are customers' transactions monitored in real-time, post-event or a combination of both?	Combination of both / Post-event / Real-time / Not Applicable
5.05	Are there customer transactions that are not screened by the monitoring system?	No / Yes / Not Applicable
5.06	In the case where not all payments and / or transactions are screened by the monitoring system, please list the type of payments and / or transactions not screened.	[Text] / Not Applicable
5.07	Does your entity have an expected transaction profile for every customer?	No / Not always / Yes / Not Applicable
5.08	Do you / your entity, when carrying out an occasional transaction, have measures in place to scrutinize transactions that are not consistent with the available information on the customer?	No / Yes / Not Applicable
5.09	Is the monitoring system based on:	
	a) The characteristics of the products and services offered	No / Yes / Not Applicable
	b) The characteristics of the customers	No / Yes / Not Applicable
	c) The characteristics of the relevant countries and geographical areas	No / Yes / Not Applicable
	d) The characteristics of the distribution channels used	No / Yes / Not Applicable
	e) The payment method used by the customer	No / Yes / Not Applicable
	f) Other factors	No / Yes / Not Applicable
5.10	If the monitoring system is based on "Other factors", please provide a description of the factors.	[Text] / Not Applicable
5.11	How many alerts were generated by the monitoring system during the prior calendar year?	[Number] / Not Available / Not Applicable

5.12	Please tick any of the jurisdiction lists provided against which the monitoring system screens transactions.	FATF list / EU list / Top 20 jurisdictions featured in the Basel Index / Other / None / Not Applicable
5.13	If "Other", please specify the jurisdiction list utilised by your entity.	[Text] / Not Applicable
5.14	How many customer relationships were terminated / blocked / suspended or were otherwise provided limited services, for AML / CFT related reasons, during the prior calendar year?	[Number] / Not Available / Not Applicable
5.15	How many potential customers did you / your entity refuse to onboard or service during the prior calendar year, because the ML / FT risk presented fell outside your / your entity's risk appetite?	[Number] / Not Available / Not Applicable
5.16	Is your entity aware of any of its customers whose assets were frozen (due to AML / CFT considerations) in any jurisdiction?	No / Yes / Not Applicable
5.17	Does your monitoring system:	
	a) Establish the source of funds and destination of capital gains / location of settlement, ensuring that the investment profile and settlement location are in-line with the customer profile	No / Yes / Not Applicable
	b) Identify occurrences of customers transferring funds in excess of those required for the investment	No / Yes / Not Applicable
	c) Identify occurrences of the customer asking to repurchase or redeem a long-term investment within a short period after the initial investment or before the payout date, without a clear rationale, in particular where this results in financial loss or payment of high transaction fees	No / Yes / Not Applicable
	d) Identify occurrences of the customer requesting the repeated purchase and sale of shares within a short period of time without an obvious strategy or economic rationale	No / Yes / Not Applicable
	e) monitor for investment funds originating from or capital gains being paid out to an unidentified third party	No / Yes / Not Applicable
	f) monitor for multiple investment accounts linked to same persons	No / Yes / Not Applicable
	g) monitor for transactions which appear to be undertaken in a manner to avoid applicable transaction monitoring / reporting thresholds	No / Yes / Not Applicable
5.18	Does your entity regularly check if there are any changes to beneficiaries of an investment account, as part of its ongoing monitoring obligations?	No / Yes / Not Applicable
5.19	Does the entity, on a risk sensitive basis, perform ongoing monitoring to establish the reasons for an unusual increase in trading activity?	No / Yes / Not Applicable

<b>6</b>	<b>Policies and Procedures</b>
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6.01	Do you / your entity have written AML / CFT policies and procedures?	No / Yes
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6.02	Do policies and procedures require you / your entity to assess risks associated with funding of terrorism?	No / Yes
6.03	How frequently do you / does your entity review and, where necessary, update your AML / CFT written policies and procedures?	As needed / Monthly / Quarterly / Annually / Between 1-3 years / Every 3 or more years
6.04	Do you / do your entity's procedures provide for measures to determine whether customers and, where applicable, their beneficial owners, are politically exposed persons (PEPs) or PEPs' family members or close associates, prior to commencement of service?	No / Yes
6.05	Do you / do your entity's policies and procedures require senior management's approval to service or otherwise continue business relationships with, or having the involvement of, PEPs or their family members / close associates?	No / We do not offer services to PEPs / Yes / Not Applicable
6.06	In case of business relationships, do you / does your entity have policies and measures in place to screen customers, including BOs, against sanctions lists, PEP lists and against adverse media as part of the ongoing monitoring?	No / Yes / Not Applicable
6.07	Do your entity's policies and procedures allow payments to be effected to third parties other than the original investor?	No / Yes
6.08	Does your entity have policies and procedures regarding the reporting of suspicious transactions to the FIAU?	No / Yes
6.09	Do you / your entity have policies and procedures to identify, analyse and escalate transactions over given thresholds and where applicable report suspicious transactions to the MLRO?	No / Yes
6.10	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes / Not Applicable
6.11	Do your entity's policies and procedures define the instances and the actions, where applicable, to be undertaken to impose limitations on transaction / customer activity, caps and / or other restrictions on its customers?	No / Yes / Not Applicable
6.12	Do you / does your entity have procedures for dealing with customers who request transactions to be completed in unusually tight or accelerated timeframes without reasonable explanation?	No / Yes
6.13	Do policies and procedures require you / your entity to assess the AML / CFT framework of individuals / entities on whom reliance is being placed?	Never / Yes in some instances / Yes in all instances / Not Applicable
6.14	Do you / does your entity have policies and procedures in place to assess the AML / CFT compliance framework of your intermediaries / brokers / agents / respondents / introducers?	No / Yes / Not Applicable
6.15	Do your entity's policies and procedures:	
	a) Define controls and processes for the collection and testing of information regarding the investment rationale of the investor to ensure it has clear economic purpose	No / Yes / Not Applicable
	b) Set out a clear reimbursement process in situations when a customer provides funds in excess of those required for the investment, or when a customer closes an investment account	No / Yes / Not Applicable

	c) Set out the terms by which a customer qualifies for redemption possibilities as per investment agreement	No / Yes / Not Applicable
6.16	Do your entity's policies and procedures require the approval of senior management before setting up a correspondent relationship?	No / Yes / Not Applicable
6.17	Do your entity's policies and procedures require your entity to ensure that respondent institutions do not permit their accounts to be used by shell banks or securities providers?	No / Yes / Not Applicable
6.18	Does your entity have internal whistleblowing procedures?	No / Yes / Not Applicable

## 7 Internal Audit / Independent Testing

7.01	Have you / your entity, given the size and nature of its business, appointed an officer at management level to monitor the day to day implementation of its AML / CFT measures, policies, controls and procedures?	No, MLRO has taken this role / Yes, other officer at management level appointed / Considered but not required / Not considered
7.02	What was the frequency of the reviews carried out by the appointed officer in the prior calendar year?	Monthly / Half yearly / Annually / As needed / No reviews performed / Not Applicable
7.03	Have you / your entity, given the size and nature of its business, appointed an independent audit function to test its AML / CFT measures, policies, controls and procedures?	Not considered / Considered but function not required / Yes, independent officer at management level / Yes, external consultant / Yes, internal audit / Not Applicable
7.04	What is the frequency of audits carried out by the independent audit function?	Monthly / Quarterly / Half yearly / Annually / Between 1-3 years / Every 3 or more years / As needed / No reviews performed / Not Applicable
7.05	When was the last independent audit performed in regards to you / your entity's compliance with the AML / CFT regulations?	Less than 1 year ago / Between 1 -2 years ago / More than 2 years ago / Never / Not Applicable
7.06	What was the overall result of the last audit (relating to AML / CFT) carried out?	Satisfactory / Satisfactory but improvements required / Unsatisfactory / No audits carried out / Not Applicable
7.07	How many "high risk" audit issues were identified in the latest audit report (relating to AML / CFT)?	[Number] / Not Available / Not Applicable
7.08	How many "high risk" audit issues are currently open (relating to AML / CFT)?	[Number] / Not Available / Not Applicable
7.09	When was the last time the monitoring system was independently tested?	Between 1-2 years ago / Less than 1 year ago / More than 2 years ago / Never before / Not Applicable
7.10	If you / your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the Group), have you / your entity defined a policy or procedure for testing the quality of the outsourced tasks?	No / Yes / Not Applicable
7.11	Where applicable, when was the last time that you / your entity formally assessed the quality of the services provided to you by your outsourced service provider (within and outside the group) which are located in a EU / EEA jurisdiction (including Malta)?	Within the last 3 months / Within the last 6 months / Within the last 12 months / Within the last 2 years / Within the last 3 years / Over 3 years ago / Never / Not Applicable

7.12	Where applicable, when was the last time that you / your entity formally assessed the quality of the services provided to you by your outsourced service provider (within and outside the group) which are located in a non-EU / EEA jurisdiction?	Within the last 3 months / Within the last 6 months / Within the last 12 months / Within the last 2 years / Within the last 3 years / Over 3 years ago / Never / Not Applicable
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## 8 Reporting

8.01	How many STRs were submitted to the FIAU during the prior calendar year?	[Number] / Not Available
8.02	How many internal suspicious reports were raised during the prior calendar year?	[Number] / Not Available
8.03	From the internal reports raised in the prior calendar year, how many cases are still open?	[Number] / Not Available / Not Applicable
8.04	How many internal suspicious reports were not reported to FIAU after investigation ("closed") during the prior calendar year?	[Number] / Not Available
8.05	Were records of all "internal reports" raised during the prior calendar year and the analysis conducted thereon maintained by you / your entity?	No / No measures relating to internal reporting or alerts are in place / No internal reports submitted / Only internal reports maintained / Yes, internal report & analysis maintained
8.06	In those instances where an STR was not submitted to the FIAU, were the reasons and analysis documented on file?	No internal reports submitted / Reasons are not documented / Yes, most of the time / Yes, reasons are always retained
8.07	How many requests for information from the Maltese authorities did you / your entity receive about any of your customers during the prior calendar year?	[Number] / Not Available

## 9 AML / CFT Training

9.01	How often do you and / or any relevant staff attend AML / CFT training?	Every 3 or more years / Between 1-3 years / Annually / Monthly / Quarterly / As needed but at least annually / Not Applicable
9.02	Have you and / or relevant staff from your entity attended or received training in the prior calendar year, in relation to specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)?	No / Yes / Not Applicable
9.03	Please provide the % of staff within the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[%] / Not Available / Not Applicable
9.04	Please provide the % of staff outside the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[%] / Not Available / Not Applicable
9.05	Please provide the % of board members / partners that received AML / CFT training throughout the prior calendar year.	[%] / Not Available
9.06	Is your entity's training program uniformly applied to all staff carrying out a relevant activity / relevant financial business (including directors and partners) equally, or is it differentiated according to their duties?	Differentiated / The same for everyone / Not Applicable

9.07	Where AML operational tasks are outsourced (within or outside the Group), have the outsourced provider's staff directly servicing your entity, received training during the prior calendar year in relation to:	
	a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)	No / Yes / Not Applicable
	b) your / your entity's AML / CFT policies and procedures	No / Yes / Not Applicable
9.08	Where tasks relating to AML / CFT compliance are outsourced (within or outside the Group), what % of the provider's staff directly servicing you / your entity, received training on AML / CFT throughout the prior year?	[%] / Not Available / Not Applicable
9.09	Where applicable, when was the last time that you / your entity verified that your outsourced service provider's staff received training on Maltese AML / CFT regulations and on you / your entity's AML / CFT policies and procedures?	Last year / Two years ago / Three years ago / More than three years ago / Never / Not Applicable
9.10	Does your entity provide AML / CFT training to brokers / agents / intermediaries who are established in Malta / EU / EEA, 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?	No / Yes / Not Applicable
9.11	Does your entity provide AML / CFT training to non-EU / EEA brokers / agents / 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?	No / Yes / Not Applicable

## 10 Record Keeping

10.01	Do you / your entity have policies and procedures in place providing for compliance with the record keeping obligations arising from the PMLFTR?	No / Yes
10.02	Upon request by the FIAU, are you / your entity in a position to retrieve the requested customer records / or investigative records within the established deadlines?  <i>*If you / your entity received reminders or requested extensions for deadlines imposed by the FIAU, do not mark as [yes, always].</i>	No / Depending on the request / Yes always / Yes most of the time

## 11 Products and Services

	Please indicate the type of services offered by your entity as at end of prior calendar year, and indicate percentage of the total volume (# [also known as "number"] of contracts / transactions) and value (% of total value) of each (multiple activities possible):	
11.01	Please indicate the value of 'Portfolios under management' as at the beginning of the prior calendar year.	€ / Not Available / Not Applicable
11.02	Please indicate the value of 'Portfolios under management' as at the end of the prior calendar year.	€ / Not Available / Not Applicable

	Reception and transmission of orders in relation to one or more instruments:	
11.03	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Execution of orders on behalf of clients:	
11.04	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Dealing on own account:	
11.05	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
11.06	Trustee services: Value of assets held at the beginning of the prior calendar year	[€] / Not Available / Not Applicable
11.07	Trustee services: Value of assets held at end of the prior calendar year	[€] / Not Available / Not Applicable
11.08	Custodian services: Value of assets held at the beginning of the prior calendar year	[€] / Not Available / Not Applicable
11.09	Custodian services: Value of assets held at end of the prior calendar year	[€] / Not Available / Not Applicable
11.10	Nominee services: Value of assets held at the beginning of the prior calendar year	[€] / Not Available / Not Applicable
11.11	Nominee services: Value of assets held at end of the prior calendar year	[€] / Not Available / Not Applicable
	Investment advice:	
11.12	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Underwriting of instruments and / or placing of instruments on a firm commitment basis:	
11.13	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable

	Placing of instruments without a firm commitment basis:	
11.14	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Operation of a Multilateral Trading Facility:	
11.15	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Please indicate the percentage of the total volume (#) and value (€) of products offered with the given maturity durations as at end of prior calendar year	
	The reception, transmission and submission of a bid relating to emission allowances:	
11.16	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Operation of an Organised Trading Facility:	
11.17	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Long-term investment products:	
11.18	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Short-term investment products:	
11.19	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable
	Correspondent activity services (for instance, for securities transactions):	
11.20	a) Volume of transactions (#)	[Number] / Not Available / Not Applicable
	b) Value of transactions (€)	[€] / Not Available / Not Applicable

11.21	Does your entity offer internet-based securities trading accounts?	No / Yes / Not Applicable
11.22	Did your entity provide foreign exchange services in the prior calendar year?	No / Yes / Not Applicable
11.23	Did your entity provide binary options in the prior calendar year?	No / Yes / Not Applicable
11.24	Did your entity's investment services include the trade of bearer securities in the prior calendar year?	No / Yes / Not Applicable
11.25	Did your entity's investment services include the trade of derivatives in the prior calendar year?	No / Yes / Not Applicable
11.26	Does your entity allow for investment accounts to be linked to bank accounts established in countries listed in the EU list of Non-Cooperative Jurisdictions for Tax Purposes?	No / Yes
11.27	Does your entity offer pooled accounts and subaccounts (for financial intermediaries / custodian services)?	No / Yes
11.28	Does your entity enforce limits on volume and value of investment activity?	No / Yes
11.29	Does your entity offer services, products or funds that invest in high risk industries established in jurisdictions listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes
11.30	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

## 12 Customers

12.01	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.	[Number] / Not Available
12.02	Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.	[Number] / Not Available
12.03	Please list the total number of new customers onboarded during the prior calendar year.	[Number] / Not Available

### Customer Type

12.04	For each instance noted below, please state the total expressed as a % of the total customers as at the end of the prior calendar year:	
	a) Natural persons	[%] / Not Available
	b) Legal persons	[%] / Not Available

	c) Customers with an ownership structure that includes offshore vehicles, trusts, or other legal arrangements including bearer shares and nominee shareholding	[%] / Not Available
	d) Customers with an ownership structure that includes foundations, charities or other not-for-profit entities	[%] / Not Available
12.05	Please list the number of customers (natural persons) and / or BOs that have benefited from residence or citizenship by investment schemes, or are applicants / prospective applicants for such schemes.	[Number] / Not Available
12.06	What type of investors are serviced by your entity?	Retail Investors / Professional Investors / Eligible counterparties / Any two or more of the above / Not Available / Not Applicable
12.07	Please indicate the type of investors onboarded by the collective investment scheme serviced by your entity:	Retail Investors / Professional Investors / Experienced Investors / Qualifying Investors / Private Collective Investment Schemes / Overseas funds / Not Applicable
12.08	Of the total number of customers, please specify:	
	a) % of customers scored / rated as "High Risk"	[%] / Not Available
	b) % of customers scored / rated as "Medium High Risk"	[%] / Not Available
	c) % of customers scored / rated as "Medium Risk"	[%] / Not Available
	d) % of customers scored / rated as "Low Medium Risk"	[%] / Not Available
	e) % of customers scored / rates as "Low Risk"	[%] / Not Available
12.09	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
12.10	If "Yes", please specify any additional risk rating.	[Text] / Not Applicable
12.11	Please specify the corresponding % of customers of the risk rating stated above.	[%] / Not Available / Not Applicable
12.12	For what percentage of your customer base was simplified due diligence applied given that the customer was classified as low risk?	[%] / Not Available
12.13	Do you / does your entity hold funds on trust, or in another fiduciary capacity for customers through a client account?	No / Yes
12.14	Do you / your entity have customers that act as holding companies with subsidiaries or investments in non-EU / EEA jurisdictions?	No / Yes / Not Available
12.15	Do you / does your entity have customers for which management is vested in a representative or an agent (i.e. where you deal primarily with a third party and not the customer directly)?	No / Yes / Not Available

Please indicate the type of services offered by your entity during the prior calendar year, and indicate the total volume (# of contracts / transactions) and value (€) of each:		
12.15	What is the total volume and value of contracts / transactions where the customer is another legal person or arrangement?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.16	What is the total volume and value of contracts / transactions where the beneficiary of an investment account is a charity or other non-profit organisation?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.17	What is the total volume and value of contracts / transactions where the customer is a natural person whose total investment exceeds € 100K and who is resident in Malta?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.18	What is the total volume and value of contracts / transactions where the customer is a legal person whose total investment exceeds € 100K and is incorporated or has its principal place of business in Malta?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.19	What is the total volume and value of contracts / transactions where the customer is a natural person whose total investment exceeds € 100K and who is resident in an EU / EEA jurisdiction (other than Malta)?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.20	What is the total volume and value of contracts / transactions where the customer is a legal person whose total investment exceeds € 100K and is incorporated or has its principal place of business in an EU / EEA jurisdiction (other than Malta)?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable

12.21	What is the total volume and value of contracts / transactions where the customer is a natural person whose total investment exceeds € 100K and who is resident in a non-EU or non-EEA jurisdiction?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.22	What is the total volume and value of contracts / transactions where the customer is a legal person whose total investment exceeds € 100K and is incorporated or has its principal place of business in a non-EU or non-EEA jurisdiction?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.23	What is the total volume and value of contracts / transactions where the customer is a natural person whose total investment exceeds € 100K and who is resident in a jurisdiction listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.24	If the answer to the above question is positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
12.25	What is the total volume and value of contracts / transactions where the customer is a legal person whose total investment exceeds € 100K and is incorporated or has its principal place of business the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.26	If the answer to the above question is positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
12.27	What is the total volume and value of contracts / transactions where the customer is holding units / shares on behalf of underlying investors:	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable

12.28	What is the total volume and value of contracts / transactions where the customer is a foundation?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.29	What is the total volume and value of contracts / transactions where the customer is a Maltese government agency / body?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.30	What is the total volume and value of contracts / transactions where the customer is a EU or EEA government agency / body?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.31	What is the total volume and value of contracts / transactions where the customer is a non-EU or non-EEA government agency / body?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.32	What is the total volume and value of contracts / transactions where the customer is a government agency / body of a jurisdictions listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.33	What is the total volume and value of contracts / transactions where the customer is another collective investment scheme or similar vehicle?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable

12.34	What is the total volume and value of customers where the contracts / transactions is an investment vehicle?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.35	Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).	[Number] / Not Available
12.36	Please list the number of customers who are operating in dual use products (as designated by your policies and procedures), or separately as per SL 365.12.	[Number] / Not Available
12.37	If applicable and in relation to the last two questions, please list the industries and products.	[Text] / Not Applicable
12.38	Please list the number of customers who operate cash intensive businesses.	[Number] / Not Available
12.39	Did you / your entity have any customers that were re-domiciled or whose economic activity was transferred to a jurisdiction listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index in the prior calendar year?	No / Yes / Not Available
12.40	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

**Politically Exposed Persons ("PEPs")**

*\*as defined in Regulation 2 of the PMLFTR*

12.41	Of the total number of customers who are natural persons, how many were PEPs (including family members and close associates) as at the end of the prior calendar year?	[Number] / Not Available
12.42	Of the total number of customers who are legal entities, how many of their BOs were PEPs (including family members and close associates) as at the end of the prior calendar year?	[Number] / Not Available
12.43	Please list the following information as a percentage of the total number of PEPs at the end of the prior calendar year:	
	a) % of Maltese PEPs (including BOs)	[%] / Not Available / Not Applicable
	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[%] / Not Available / Not Applicable
	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions (other than Malta)	[%] / Not Available / Not Applicable
	d) % of PEPs (EU, EEA, non-EU and non-EEA) from a jurisdiction listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the top 20 countries of the Basel Index	[%] / Not Available / Not Applicable
12.44	If your answer to the above question is greater than 0, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

**Funding Methods**

Please indicate the total volume (#) and value (€) of funding methods used to facilitate investment activity in the prior calendar year:		
12.45	Bank transfers:	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.46	Internet-based, or mobile-application based, payment systems or other e-money / e-wallet services (as defined by FATF):	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.47	Bankdrafts / Cheque payments:	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.48	Cash:	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
12.49	Subscriptions in kind:	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable

**13 Geography****Residence of Customers**

Please provide the following information based on your / your entity's customers as at end of prior calendar year		
13.01	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in Malta?	[%] / Not Available / Not Applicable

13.02	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in an EU / EEA jurisdiction outside Malta?	[%] / Not Available / Not Applicable
13.03	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in a non-EU / EEA jurisdiction?	[%] / Not Available / Not Applicable
13.04	Did your entity, based on the prior calendar year, have customers who were resident or otherwise incorporated or their principal place of business is in a jurisdiction listed in the FATF lists, EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes / Not Available
13.05	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

**Residence of BOs**

Please provide the following information regarding the BOs of your customers as of end of prior calendar year

13.06	What percentage of your customer's BOs are resident in Malta?	[%] / Not Available / Not Applicable
13.07	What percentage of your customer's BOs are foreign and resident in an EU or EEA jurisdiction outside Malta?	[%] / Not Available / Not Applicable
13.08	Please list the % of your customer's BOs who are foreign and are resident in a non-EU / EEA member state jurisdiction.	[%] / Not Available / Not Applicable
13.09	Did your entity have customers, based on the prior calendar year, whose BOs are resident in a jurisdiction listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or jurisdictions featuring in the top 20 countries of the Basel Index during the prior calendar year?	No / Yes / Not Available / Not Applicable
13.10	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

**Transactions / Payments**

Please indicate the total transactional / payment volume (#) and value (€) during the prior calendar year:

13.11	What was the total volume and value of investments linked to client domestically-held investment accounts?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
	What was the total volume and value of investments made through client EU- or EEA-held accounts?	

13.12	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
13.13	What was the total volume and value of investments made through client non-EU or non-EEA-held accounts?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
13.14	What was the total volume and value of investments made through client held accounts in jurisdictions listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index during the prior calendar year?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
13.15	What was the total volume and value of investments made through multiple client held accounts in multiple jurisdictions?	
	a) Volume (#)	[Number] / Not Available / Not Applicable
	b) Value (€)	[€] / Not Available / Not Applicable
13.16	How many instances are there in which the customer and beneficial owner of an investment account are located in:	
	a) Different jurisdictions	[Number] / Not Available / Not Applicable
	b) Different jurisdictions with at least one being in a jurisdictions listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index during the prior calendar year	[Number] / Not Available / Not Applicable

#### 14 Interface / Distribution Channels

Please provide the following information regarding your entity's customers as at end of the prior calendar year:

14.01	Of the total number of customers, what percentage were onboarded face-to-face?	[%] / Not Available
14.02	Of the total number of customers, what percentage were onboarded on a non-face-to-face basis?	[%] / Not Available / Not Applicable
14.03	What % of customers were introduced by an agent / broker / introducer from a jurisdiction listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	[%] / Not Available / Not Applicable

14.04	If your answer to the above question was greater than 0, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
14.05	For what percentage of total customers was Customer Due Diligence 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?	[%] / Not Available / Not Applicable
14.06	What percentage of customers were onboarded by EU or EEA brokers / agents / introducers?	[%] / Not Available / Not Applicable
14.07	What percentage of customers were onboarded by non-EU or EEA brokers / agents / introducers?	[%] / Not Available / Not Applicable
14.08	What percentage of customers were onboarded via digitally enabled broker tools?	[%] / Not Available / Not Applicable
14.09	Of those onboarded on a non-face-to-face basis, what percentage of customers' investment accounts are handled via sub-distributor?	[%] / Not Available / Not Applicable