



Guidance for the registration and use of the CASPAR platform

First Issued on 28th February 2019

Last amended on 18th June 2024

www.fiaumalta.org

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1) Abbreviations

AML/CFT	Anti-money laundering / combatting funding of terrorism
CASPAR	Compliance and Supervision Platform for Assessing Risk
CSP	Corporate Service Provider
DE	Designated Employee
FAQ	Frequently asked questions
FIAU	Financial Intelligence Analysis Unit
MFSA	Malta Financial Services Authority
MGA	Malta Gaming Authority
MLRO	Money Laundering Reporting Officer
REQ	AML/CFT Risk Evaluation Questionnaire
SP	Subject person

2) Introduction

The FIAU drafted AML/CFT Risk Evaluation Questionnaires (REQ) for each type of activity to take into account sector specific activities.

The FIAU developed a data collection tool, the Compliance and Supervision Platform for Assessing Risk (CASPAR), which is a multifunctional system that allows the Unit to gather information from multiple sources. Subject persons must use the CASPAR system to submit the annual REQs. This guidance is being issued to explain the registration process to CASPAR, as well as the process for the submission of the REQ.

3) Registration to CASPAR

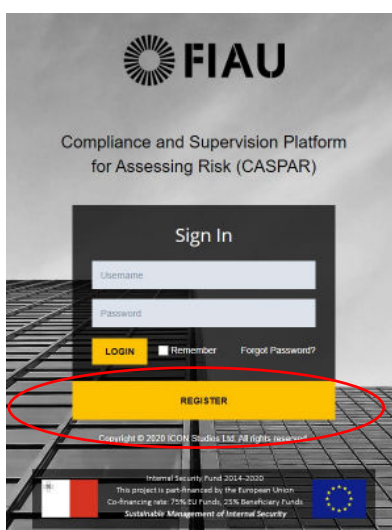
Is it your first time on the CASPAR platform?

- If yes, you need to perform 2 steps to access it:

Step 1: First-time user registration

Step 2: Create/Subscribe to an Existing subject person record.

Go to <https://caspar.fiaumalta.org/> and click 'Register' to access the user registration form.



- If not, you only need to login. Go to <https://caspar.fiaumalta.org/> and input the username and password created at registration. Your username is the email address used during the registration process.

The website is optimised for Google Chrome and Mozilla Firefox. Kindly note that the website is not compatible with Internet Explorer, Microsoft Edge and Safari as well as all the Apple devices, that is, Iphone, Ipad, Mac Books and IMacs.

A user account is required to access the CASPAR platform. There are three types of user account registrations:

A. MLRO

Appointed for a Legal Entity which is carrying out relevant financial business and/or relevant activity, who is either approved by the MFSA or awaiting approval by the MGA.

For guidance on registration, refer to section [A. MLRO](#)

B. Designated Employee

Employee/s designated to assist the MLRO in the fulfilment of the AML/CFT duties of a Legal Entity.

For guidance on registration, refer to section [B. Designated Employee](#)

C. Sole Practitioner

Individuals who undertake any relevant financial business and/or relevant activity in their own name or under a trade name.

For guidance on registration, refer to section [C. Sole Practitioner](#)

A. MLRO

This type of registration should be used by the appointed MLROs of legal entities who are either approved by the MFSA or awaiting approval by the MGA, as well as Interim MLROs.

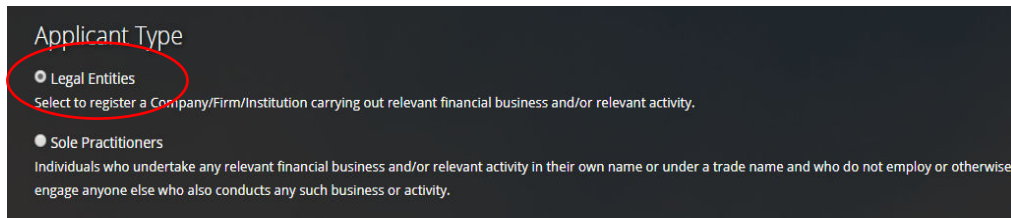
Upon successful registration, an MLRO is given the following rights:

- Creation of a subject person record.
- Editing of details of the subject person record.
- Approval of a Designated Employee (DE).
- Online compilation and submission of REQ.
- Payment of applicable fee relating to REQ submissions.

Step 1: First-time Registration of User Account

The steps indicated hereunder should be followed to complete the successful registration of a user account:

- 1) Select 'Legal Entities' in the Applicant Type section.

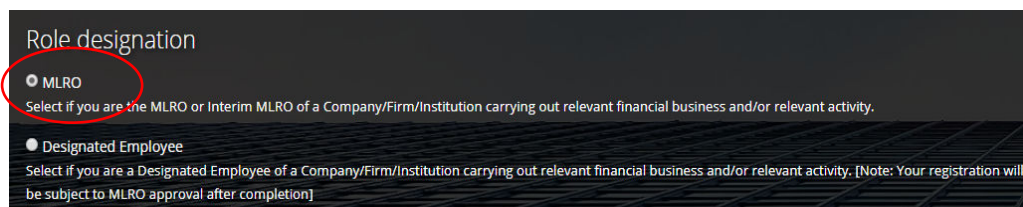


Applicant Type

☒ Legal Entities
Select to register a Company/Firm/Institution carrying out relevant financial business and/or relevant activity.

☐ Sole Practitioners
Individuals who undertake any relevant financial business and/or relevant activity in their own name or under a trade name and who do not employ or otherwise engage anyone else who also conducts any such business or activity.

- 2) Select 'MLRO' as Role Designation.



Role designation

☒ MLRO
Select if you are the MLRO or Interim MLRO of a Company/Firm/Institution carrying out relevant financial business and/or relevant activity.

☐ Designated Employee
Select if you are a Designated Employee of a Company/Firm/Institution carrying out relevant financial business and/or relevant activity. [Note: Your registration will be subject to MLRO approval after completion]

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- 3) Complete the registration form by inserting your personal details in the respective fields.
Please note that the email address provided will be your username to login to CASPAR.

Personal details

Title Mr	First Name Joe	Last Name Borg	
Designation (Optional) Designation			
Date of Birth			
Country Of Residence Malta		Nationality Maltese	
Identification Document Type ID Card		Identification Document Number	
Identification Document Expiry Date		Identification Document Country of Issue Malta	
Mobile Prefix +356	Mobile Number 99000000	Phone Prefix +356	Phone Number 27000000
Email joe@Borg.com			

- 4) CASPAR maintains a list of all registered **subject** persons. Insert three consecutive letters of the name of the Legal Entity in the section Professional Details. If the subject person record has already been created on CASPAR, the name of the subject person as registered will appear in this field. In this case, select the subject person from the dropdown menu.

Professional details

Type the name of the Company to check if it has already been registered. If not, select ADD SUBJECT PERSON below. If you are the Appointed MLRO of multiple Subject Persons, click the button accordingly.

Name of Legal Entity (Name of Company/Firm/Institution)
ABC Company Limited

No matches found

Company not listed?
Add Subject Person

If the name of the subject person does not feature, click on 'Add Subject Person' and insert the name of the Legal Entity.

Professional details

Type the name of the Company to check if it has already been registered. If not, select ADD SUBJECT PERSON below. If you are the Appointed MLRO of multiple Subject Persons, click the button accordingly.

Name of Legal Entity (Name of Company/Firm/Institution)
Search for a Company

Company not listed?
Add Subject Person

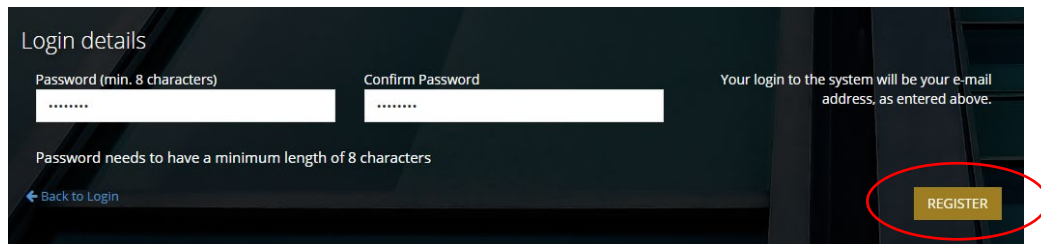
New Subject Person ABC Company Limited

If you are the appointed MLRO for more than one legal entity, repeat this step for each additional subject person.

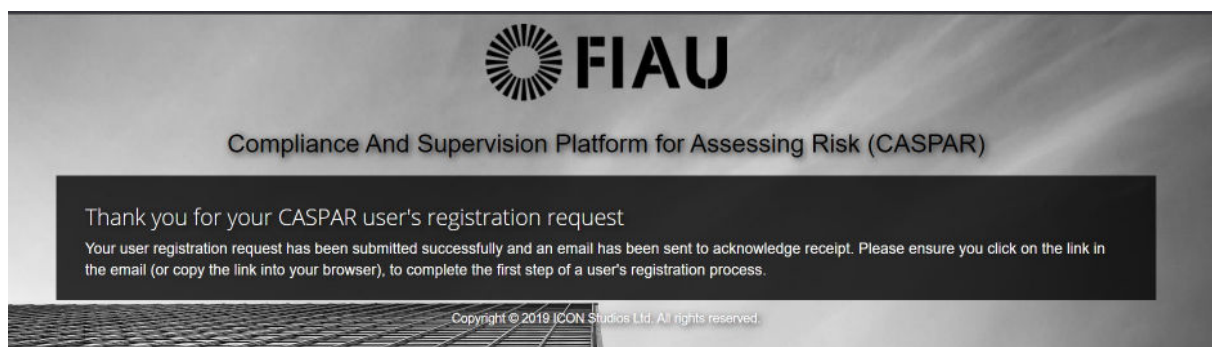
The creation of a user in CASPAR requires the approval of FIAU. The name of the legal entity / entities entered in this section will solely be used by FIAU during the approval of the user. After receipt of approval, the user must carry out an additional step to create/subscribe to a subject person record – Refer to guidance in [Step 2](#).

Guidance for the registration and use of the CASPAR platform

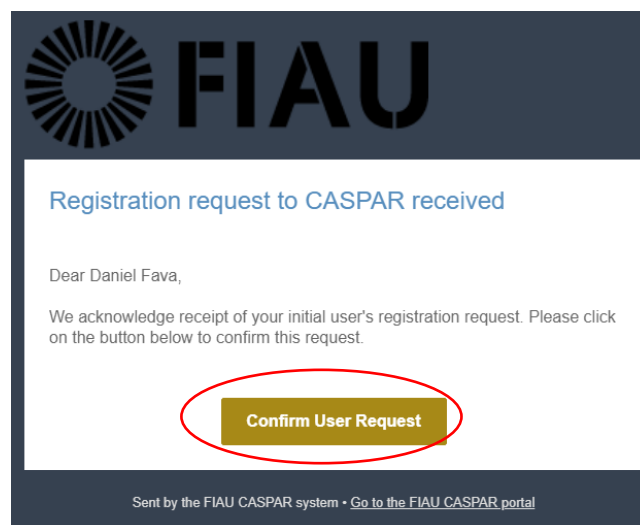
- 5) Create a password which will be used to access your personal account and note that the selected password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Once you have completed the form, click 'Register'.

A screenshot of the CASPAR registration form. It features a dark background with white text. The form has two input fields: 'Password (min. 8 characters)' and 'Confirm Password', both with masked characters. Below the password field, a message states: 'Password needs to have a minimum length of 8 characters'. To the right, a note says: 'Your login to the system will be your e-mail address, as entered above.' At the bottom left is a link 'Back to Login'. At the bottom right is a yellow 'REGISTER' button, which is circled in red.

- 6) The following screen will appear, acknowledging the submission of the Registration Form.

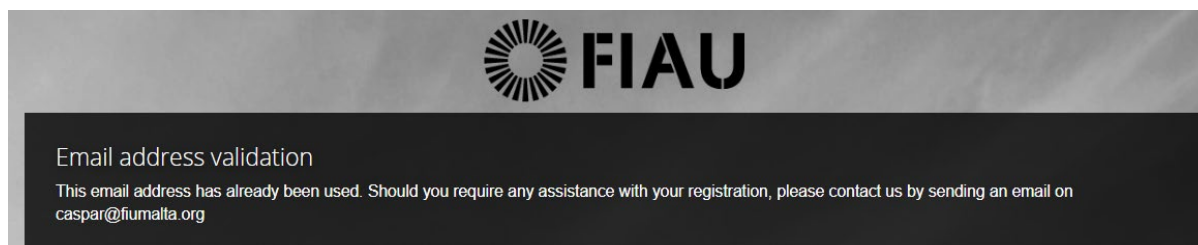


- 7) An automated email is transmitted to the email address provided at registration. This email features a link required to complete this first step of the registration process. Click on 'Confirm User Request' to confirm the email address or copy and paste the URL into your web browser.

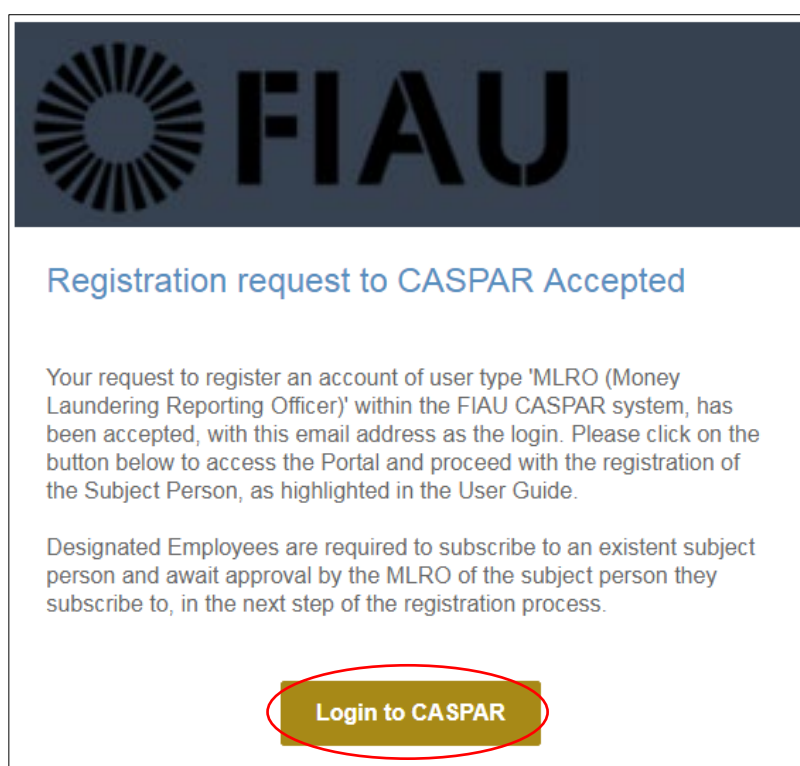


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- 8) This next screen confirms that the email address has been verified and that your registration request will be submitted to the FIAU for approval. An email will be submitted once this request is reviewed by FIAU.



- 9) Upon receipt of the email confirming approval of the user's registration, click on 'Login to CASPAR', and log into the newly created user account by inserting the email address and password selected upon the initial user's registration process. You may wish to contact the FIAU on compliance@fiaumalta.org for clarification purposes and further guidance, should your initial user's registration be rejected.



Step 2: Creating/Subscribing to a subject person record

A one-time registration should be carried out to create the entity's subject person record and allow users to subscribe to it.

Was the subject person record created on CASPAR?

- **No** - You need to create the subject person record by completing a one-time registration form. Refer to guidance in [Creating a subject person record](#)
- **Yes** - You only need to subscribe to an existing subject person. Refer to guidance in [Subscribing to an existing subject person record](#)

How do I know whether a subject person record is created?

In the initial registration form, you were required to input the name of the Legal Entity. If the name of the entity appeared in a list, the legal entity is already created on CASPAR and you may go to [‘Subscribing to an existing subject person record’](#). On the other hand, if you had to click on ‘Add Subject person’, an additional step must be completed to create the Subject person record on CASPAR ([Creating a subject person record](#)).

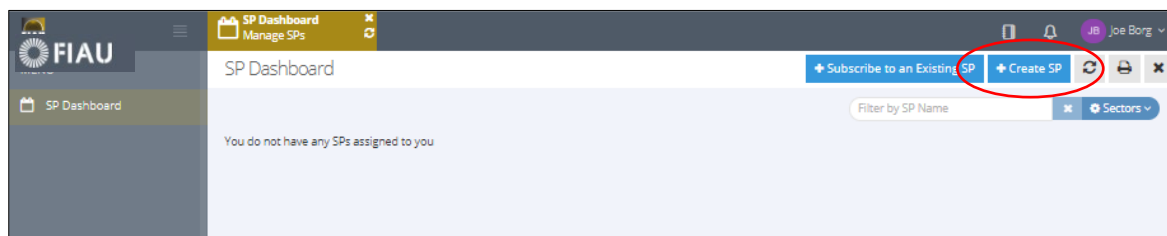
Still not sure? Go to [‘Subscribing to a subject person record’](#).

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Creating a subject person record (Legal Entity)

If the subject person record is not yet created on CASPAR, a one-time registration is required as follows:

- 1) Login to CASPAR. Click on '+ Create SP' on the top right-hand side of the screen.



- 2) Complete the required fields as shown below and click the 'Save' button.

Register a new SP

General information

Name of Subject Person * ABC Company Limited

ROC Company ID 123456

Licence or Warrant Issue Date/Commencement of Operations * 01/01/2018

Appointment Date as MLRO/Designated Employee * 01/11/2018

Approval Status * Approval Not Required

Sector * Non Financial Sector - DNFBP

Sub-Sector * Accountancy/Audit - FIRMS/C... Category Accountancy/Audit - FIRMS/C...

+ Add a category

Registered Address

Address (line 1) * ABC Company Limited

Address (line 2) * Triq Villetta

Town/City * Valletta

Postcode * VLT 1000

Country * Malta

☐ This SP has a correspondence address different from the above

Contact Details

Email * mlo@abccompany.com

Address * Email may be used by FIAU for requests for information purposes

Phone * +35621270000 Description * MLRO

Phone number includes prefix

+ Add additional contact information

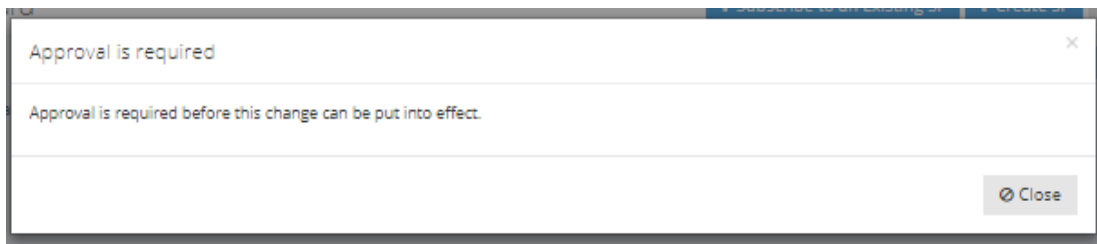
The FIAU's Data Protection Policy may be found on <http://www.fiumalta.org/privacy-policy>.

Cancel Save

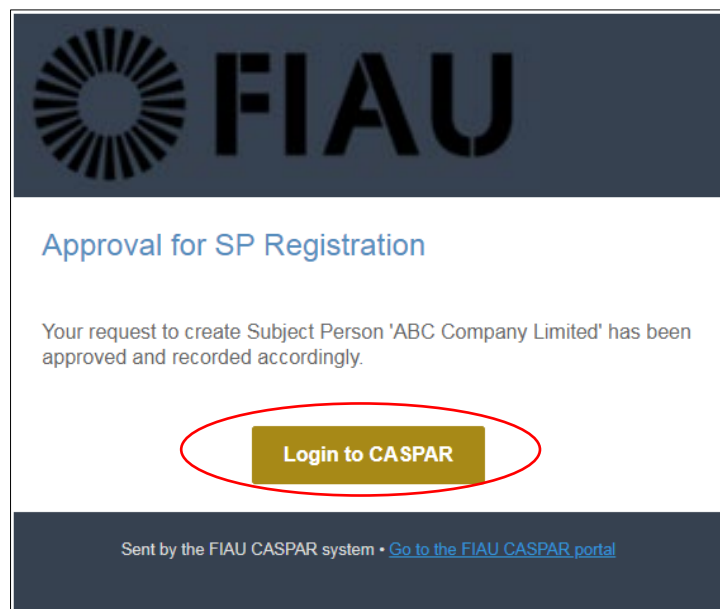
Kindly refer to [Section 4](#) for further guidance on the selection of the relevant sector, sub-sector/s and category/ies

Guidance for the registration and use of the CASPAR platform

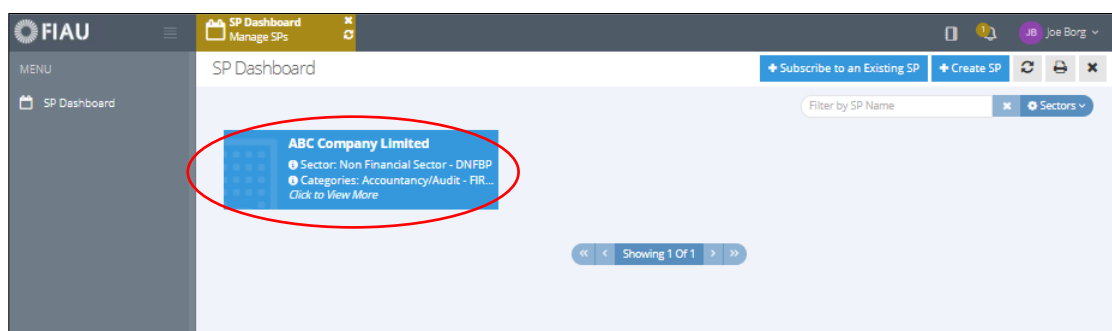
- 3) The creation of the subject person record requires the approval of the FIAU. Click 'Close' and await FIAU approval.



- 4) Once this request has been approved/rejected, a notification will be transmitted to the email address provided at registration.



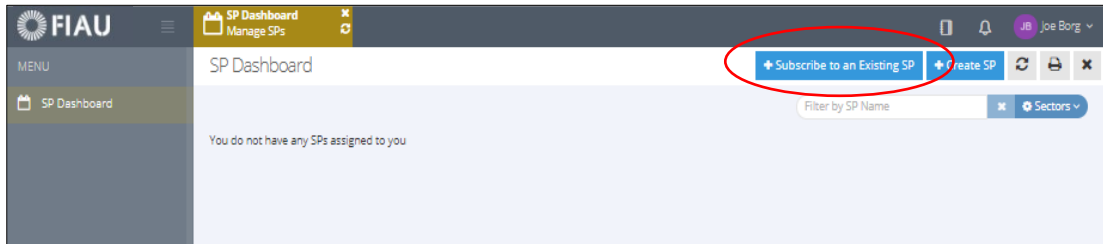
- 5) Upon receipt of FIAU approval, log into CASPAR and the subject person record will appear as a tile on the user's 'SP Dashboard' as follows:



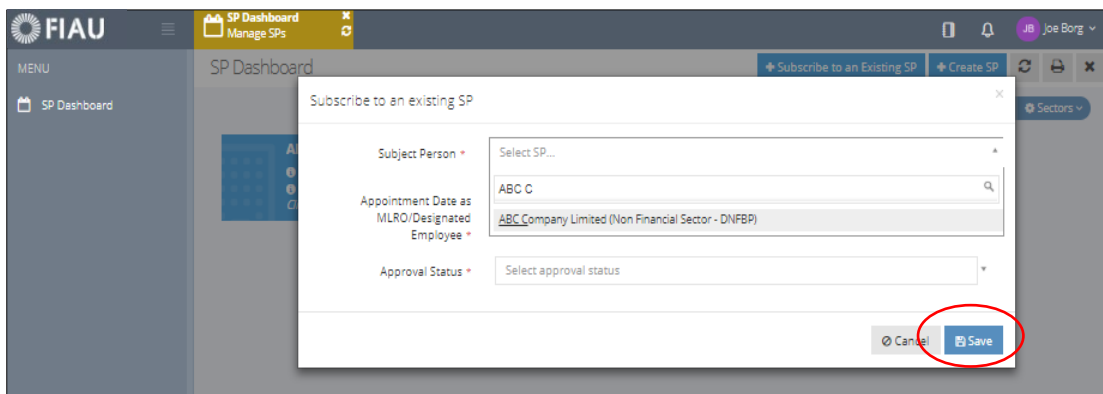
Subscribing to an existing subject person record

The steps indicated hereunder should be followed to subscribe to an existing subject person record previously created on CASPAR:

- 1) Log into CASPAR. Click on '+ Subscribe to an existing SP' on the top right-hand side of the screen.

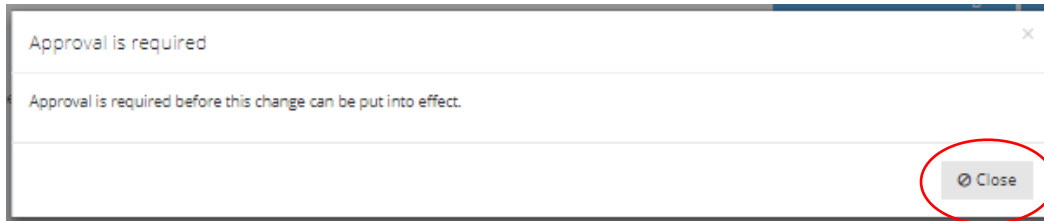


- 2) Insert three consecutive letters of the name of the subject person and select the name from the dropdown menu. Complete the additional fields and press 'Save'.

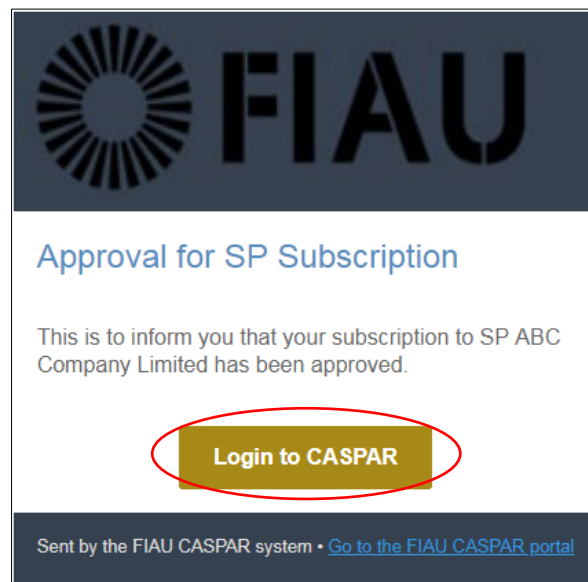


If the subject person does not feature on the list, this would mean that the subject person record was not previously registered on CASPAR. Refer to the guidance section '[Creating a subject person record](#)' for instructions on how to create a Subject person record on the system.

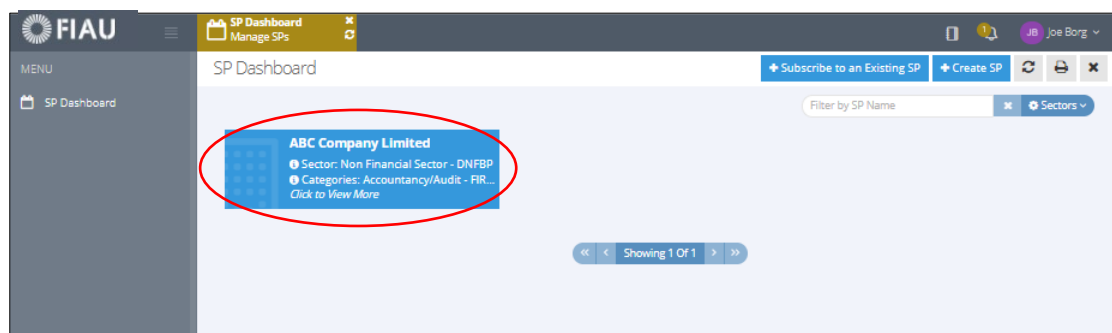
- 3) The subscription to a subject person record requires the approval of the FIAU. Click 'Close' and await FIAU approval.



- 4) Once this request has been approved/rejected, a notification will be transmitted to the email address provided at registration.



- 5) Upon receipt of FIAU approval, log into CASPAR and the subject person record will appear on the user's 'SP Dashboard' as follows:



Approval of a Designated Employee

This section applies only to MLROs who wish to appoint a Designated Employee to assist them in the performance of their AML/CFT duties.

The appointment of a Designated Employee involves the following steps:

1. *The Designated Employee/s must first register as a DE user account on CASPAR.*
2. *The Designated Employee must then subscribe to an existing subject person record.*
3. *The MLRO approves the subscription to the subject person record.*

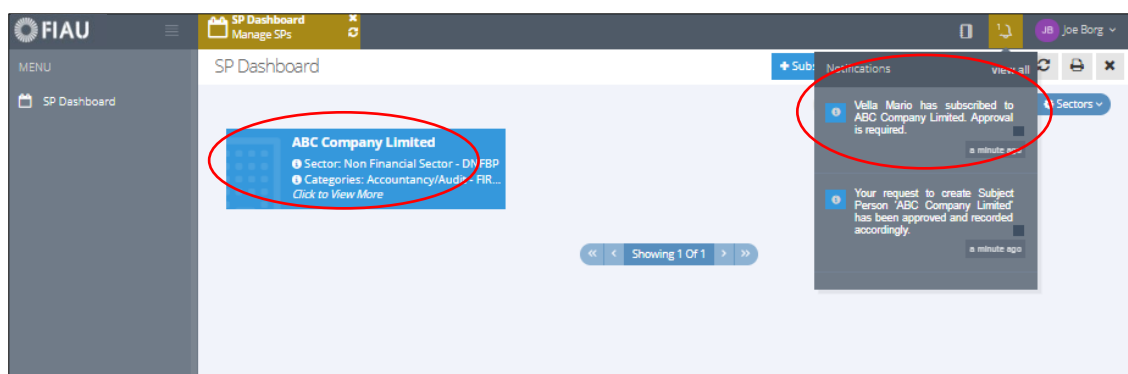
Step 1 and Step 2 should be undertaken by the Designated Employee, as explained under [Section B. 'Designated Employee'](#).

Following the successful registration of the Designated Employee on CASPAR and his/her request to subscribe to a subject person record, the MLRO must review and approve/reject this request. This section explains the steps which must be undertaken by the MLRO.

Kindly note that while Designated Employees may complete the REQs, submission and payment can only be affected by the MLRO.

The following steps must be undertaken by the MLRO to approve the subscription of a Designated Employee to a subject person record:

- 1) Log into CASPAR. A notification will appear at the top right-hand side of the screen. Click on the subject person record.



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- 2) Click again on the information shown under the header 'Pending DE Subscriptions'.

ABC Company Limited

BASIC DETAILS

Sector: Non Financial Sector - DNFBP
 Categories: Accountancy/Audit - FIRMS/COMPANIES
 ROC Company Id: 123456
 Licence or Warrant Issue Date/Commencement of Operations: 01/01/2018
 Registered address: ABC Company Limited
 Triq Valletta, Valletta, VLT 1000, Malta
 Emails: mlro@abccompany.com [MLRO]
 Phones: +35621270000 [MLRO]

PENDING DE SUBSCRIPTIONS

Pending SP subscription for V...

- Type: Pending SP Subscription
- Created on: 25/02/2019 17:24
- Assigned to: (no one)

AVAILABLE REQs

Year	Status
2019	Pending

- 3) Review the information and click 'Approve'/'Reject'.

Pending DE Subscription

Data

Approval requested by DE: Mario Vella
 Appointment Date as DE: 05/02/2019
 Subject Person Name: ABC Company Limited

Approve

Reject

Cancel

The subscription of the Designated Employee to the subject person record requires the final approval of the FIAU. Once it is approved by the FIAU, the Designated Employee will receive an email notification to this effect and may access the subject person record from the 'SP Dashboard'.

B. Designated Employee

This role type should be used by employee/s designated to assist the MLRO in the fulfilment of the AML/CFT duties of a Legal Entity.

Upon successful registration, a Designated Employee is given the following rights:

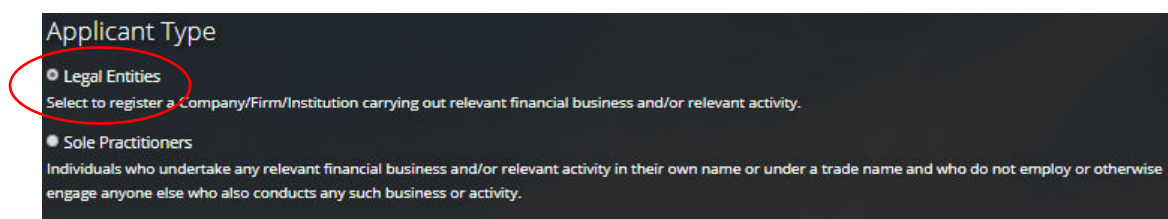
- Editing of details on the subject person record.
- Online compilation of REQ.

Kindly note that submission of the REQ and the related payment may only be carried out by the MLRO.

Step 1: First-time Registration of User Account

The following steps must be followed to complete the successful registration of a user account:

- 1) Select 'Legal entities' in Applicant Type section.

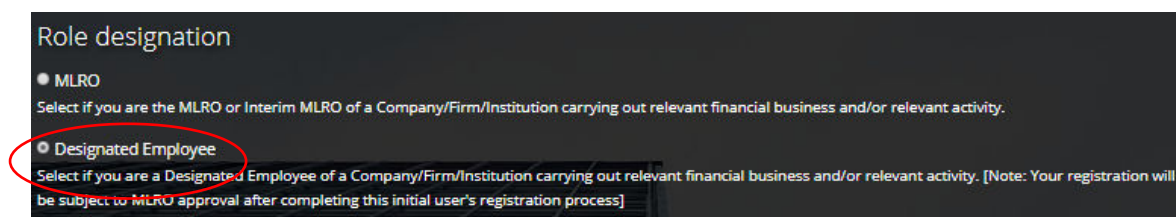


Applicant Type

☒ Legal Entities
Select to register a Company/Firm/Institution carrying out relevant financial business and/or relevant activity.

☐ Sole Practitioners
Individuals who undertake any relevant financial business and/or relevant activity in their own name or under a trade name and who do not employ or otherwise engage anyone else who also conducts any such business or activity.

- 2) Select 'Designated Employee' role designation.



Role designation

☐ MLRO
Select if you are the MLRO or Interim MLRO of a Company/Firm/Institution carrying out relevant financial business and/or relevant activity.

☒ Designated Employee
Select if you are a Designated Employee of a Company/Firm/Institution carrying out relevant financial business and/or relevant activity. [Note: Your registration will be subject to MLRO approval after completing this initial user's registration process]

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- 3) Complete the registration form by inserting personal details in the respective fields and note that the email address provided will be your username to log into CASPAR.

Personal details

Title Mr	First Name joe	Last Name Borg	
Designation (Optional) Designation			
Date of Birth			
Country Of Residence Malta	Nationality Maltese		
Identification Document Type ID Card	Identification Document Number		
Identification Document Expiry Date	Identification Document Country of Issue Malta		
Mobile Prefix +356	Mobile Number 99000000	Phone Prefix +356	Phone Number 27000000
Email joe@Borg.com			

- 4) CASPAR maintains a list of all registered subject persons. Insert three consecutive letters of the name of the Legal Entity in the section Professional Details and select the subject person from the dropdown menu. If the name of the subject person does not appear in the list, contact the appointed MLRO who would yet be required to register the Subject person on CASPAR.

If you are the Designated Employee for more than one subject person, this step should be repeated for each subject person by clicking on 'Add Subject Person' button.

Professional details

Note: The Company name will appear in the search field below only upon completion of the MLRO's registration process.

Name of Legal Entity (Name of Company/Firm/Institution)

ABC C

ABC Company Limited

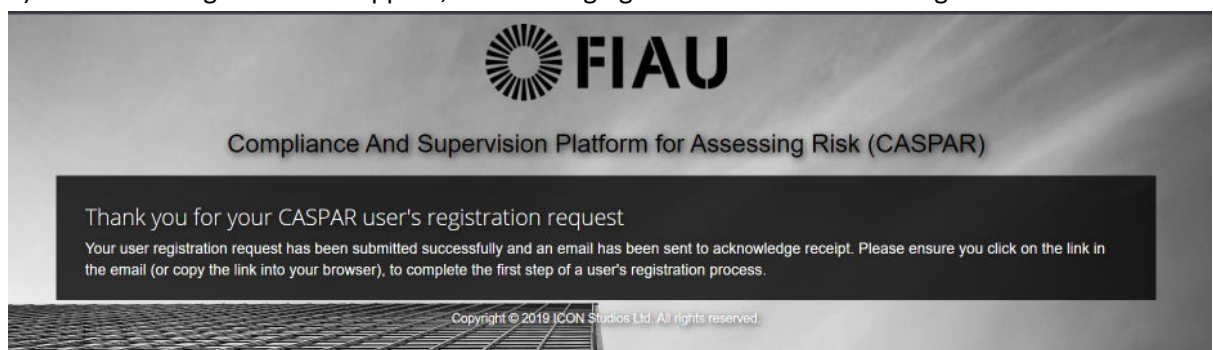
Login details

The creation of a user account on CASPAR requires the approval of the FIAU. The FIAU will only use the name of the legal entity/entities entered in this section during the user's approval. After receipt of approval, the user must carry out an additional step to subscribe to a subject person record – Refer to guidance in [Step 2: Subscribing to an existing subject person record](#).

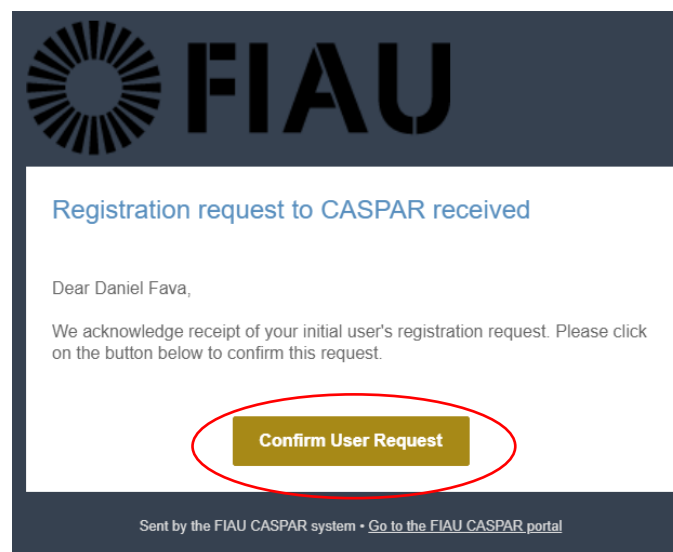
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- 5) Create a password that will be used to access your personal user account and note that the selected password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Once you have completed the form, click 'Register'.

- 6) The following screen will appear, acknowledging the submission of the Registration Form.



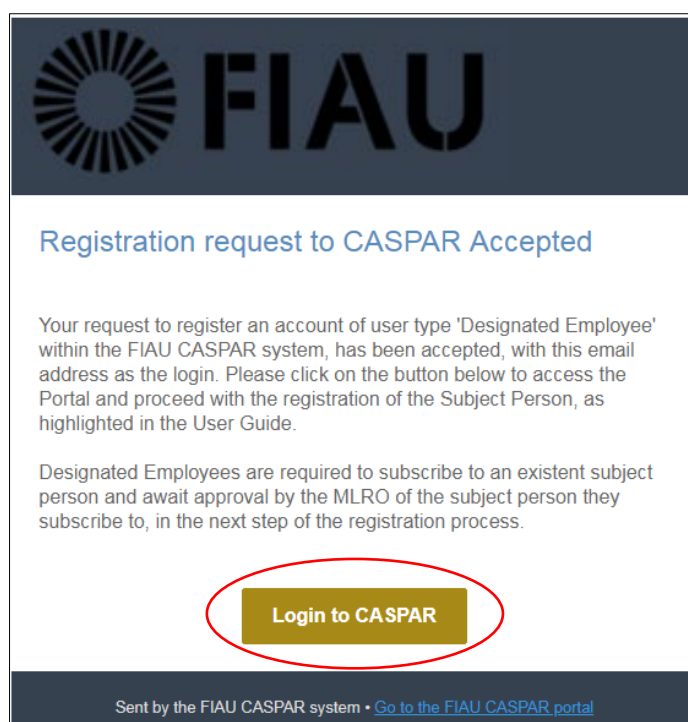
- 7) An automated email is transmitted to the email address provided at registration. The email includes a link required to complete this first step of the registration process. Click on 'Confirm User Request' to confirm the email address or copy and paste the URL into your web browser.



- 8) This next screen confirms that the email address has been verified and that your registration request was submitted to the FIAU for approval. An email will be transmitted once this request is reviewed by the FIAU.



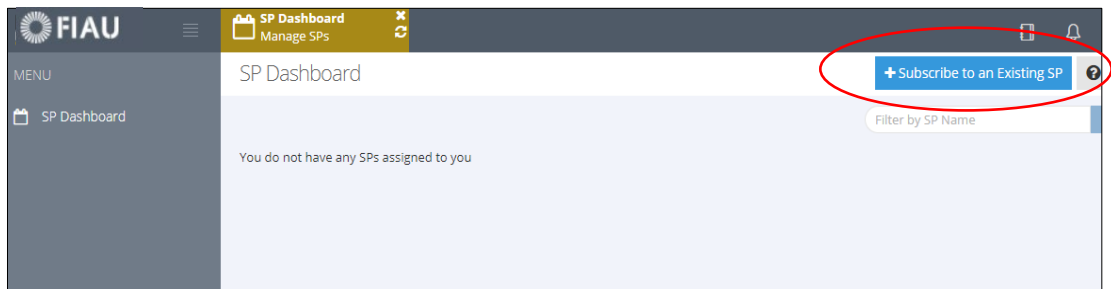
- 9) Upon receipt of email confirming approval of the user's registration, click on 'Login to CASPAR' and log into the newly created user account by inserting the email address and password selected upon the initial user account's registration process. You may wish to contact the FIAU on compliance@fiaumalta.org for clarification purposes and further guidance, should your initial user's registration be rejected.



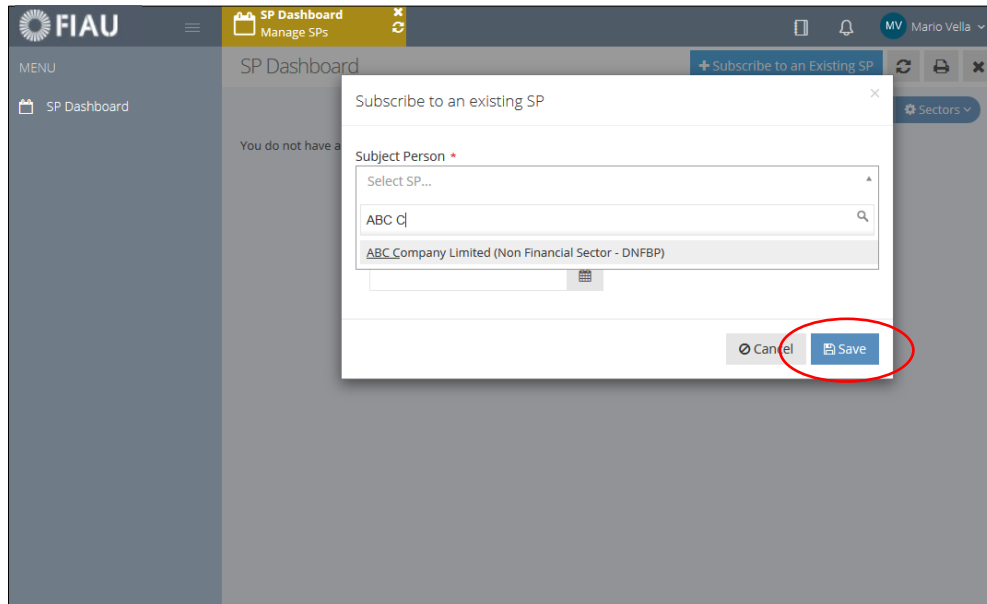
Step 2: Subscribing to an existing subject person record

Following the successful user registration on CASPAR, you are now required to subscribe to an existing subject person record to be able to complete its REQ, as follows:

- 1) Login to CASPAR. Click on '+ Subscribe to an Existing SP' at the top right-hand side of the screen.

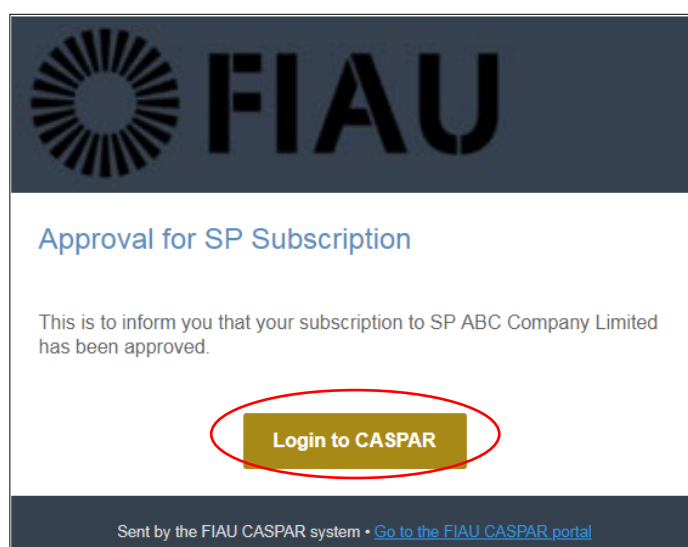


- 2) Insert three consecutive letters of the name of the subject person record and select the subject person from the dropdown menu. Insert your appointment date and press 'Save'.

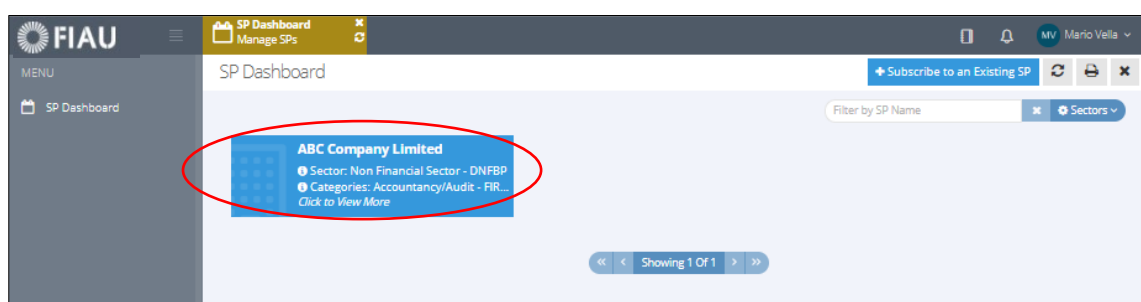


- 3) The subscription to a subject person record requires the following approvals:
- The approval by the appointed MLRO of the subject person (*MLROs should refer to guidance in section [‘Approval of a Designated Employee’](#).*)
 - FIAU approval.

Once final approval from the FIAU is obtained, an email will be transmitted to the email address provided at registration.



- 4) Upon receipt of FIAU approval, log into CASPAR and the subject person record will appear on the 'SP Dashboard' as follows.



C. Sole Practitioner

This registration type should be used by individuals who undertake any relevant financial business and/or relevant activity directly in their own name or under a trade name.

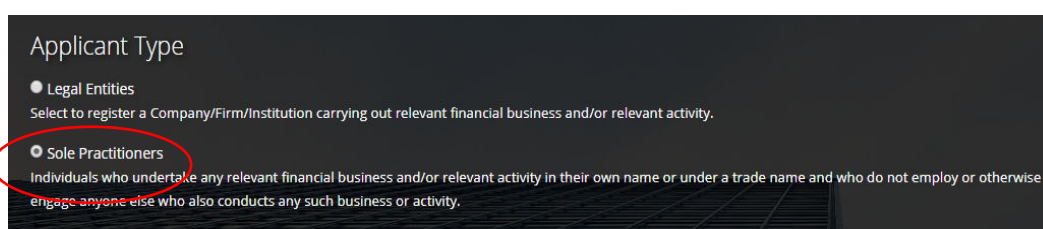
Upon successful registration, a Sole Practitioner will have the following rights:

- Creation of a subject person record.
- Editing of details of the subject person record.
- Compilation and submission of REQ.
- Payment of applicable fees related to REQ submissions.

Step 1: First-time Registration of User Account

The steps indicated hereunder should be followed to complete the successful registration of a user:

- 1) Select 'Sole Practitioners' in the Applicant Type section.

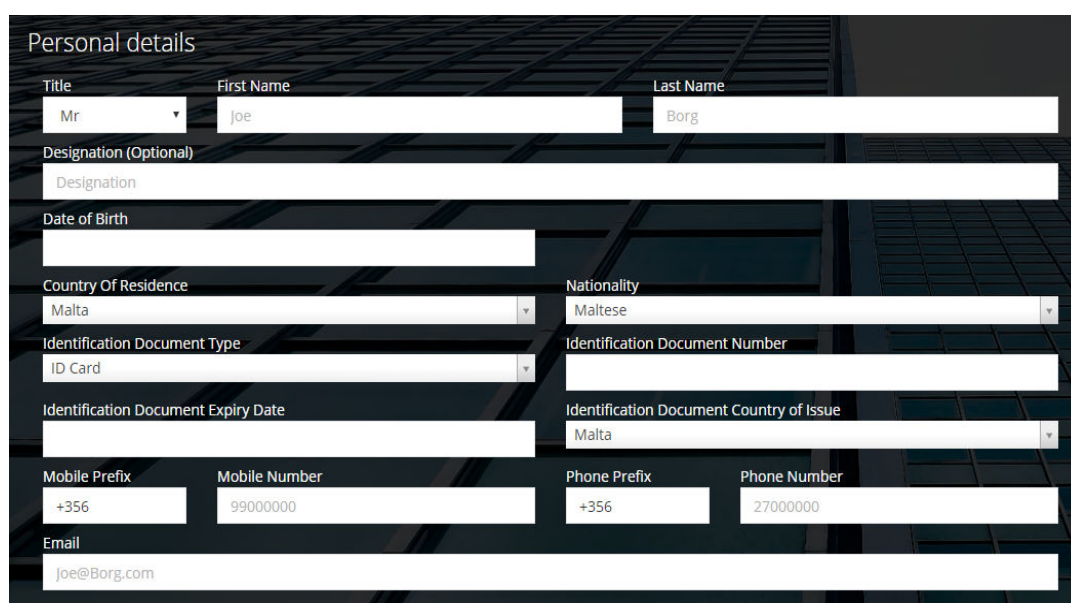


Applicant Type

☐ Legal Entities
Select to register a Company/Firm/Institution carrying out relevant financial business and/or relevant activity.

☒ **Sole Practitioners**
Individuals who undertake any relevant financial business and/or relevant activity in their own name or under a trade name and who do not employ or otherwise engage anyone else who also conducts any such business or activity.

- 2) Complete the registration form by entering the personal details in the respective fields and note that the email address provided will be your username to log into CASPAR.

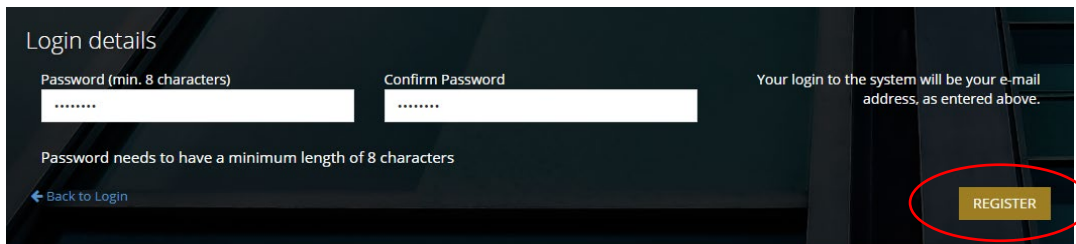


Personal details

Title Mr	First Name Joe	Last Name Borg	
Designation (Optional) Designation			
Date of Birth 			
Country Of Residence Malta	Nationality Maltese		
Identification Document Type ID Card	Identification Document Number 		
Identification Document Expiry Date 	Identification Document Country of Issue Malta		
Mobile Prefix +356	Mobile Number 99000000	Phone Prefix +356	Phone Number 27000000
Email joe@Borg.com			

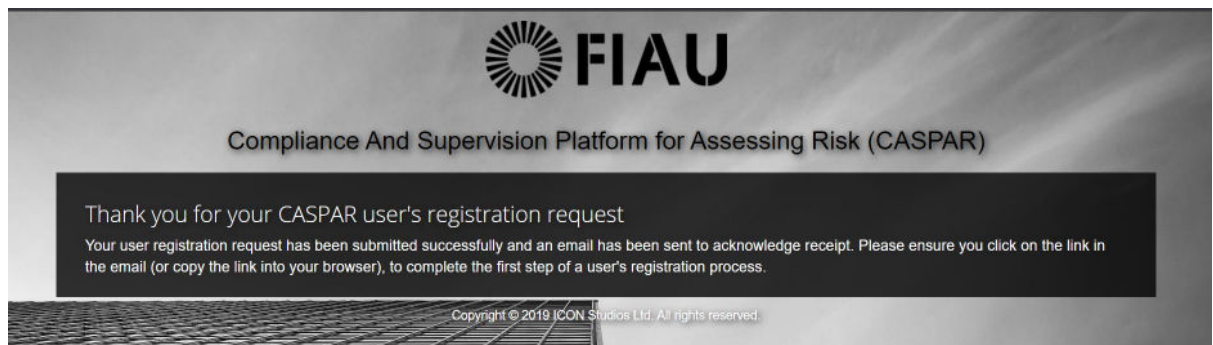
Guidance for the registration and use of the CASPAR platform

- 3) Create a password that will be used to access your personal account. The password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Once you have completed the form, click 'Register'.



The screenshot shows a registration form titled 'Login details'. It contains two input fields: 'Password (min. 8 characters)' and 'Confirm Password', both with masked characters. Below the password field, a note states: 'Password needs to have a minimum length of 8 characters'. To the right, a message says: 'Your login to the system will be your e-mail address, as entered above.' At the bottom left is a link '← Back to Login'. At the bottom right is a yellow button labeled 'REGISTER', which is circled in red.

- 4) The following screen will appear, acknowledging the submission of the Registration Form.



- 5) An automated email is transmitted to the e-mail address provided at registration. This email includes a link required to complete this first step of the registration process. Click on 'Confirm User Request' to confirm the email address.



- 6) This next screen confirms that the email address has been verified and that your registration request will be submitted to the FIAU for approval. An email will be sent once the request is reviewed by the FIAU.



- 7) Upon receipt of email confirming approval of the user's registration, click on 'Login to CASPAR' and log into the newly created user account by inserting the email address and password selected upon the initial user's registration process. You may wish to contact the FIAU on compliance@fiaumalta.org for clarification and further guidance, should your initial user's registration be rejected.

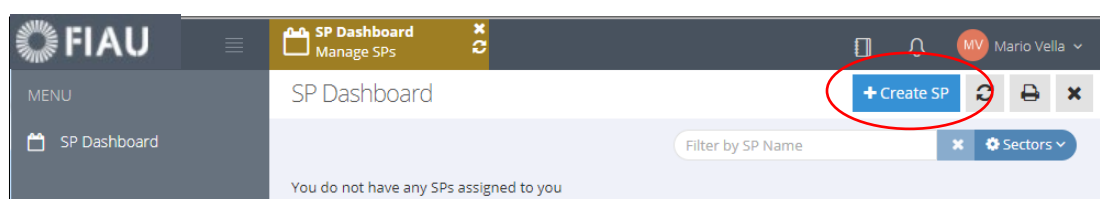


Step 2: Creating a subject person record

A one-time registration form must be completed to create the sole practitioner's subject person record and allow the user to subscribe to it.

The steps indicated hereunder must be followed to complete the successful creation of a subject person record:

- 1) Log into CASPAR. Click on '+ Create SP' on the top right-hand side of the screen.



- 2) Complete the required fields as shown below and click 'Save' button.

General Information

Name of Subject Person * ACC Company Limited

Licence or Warrant Issue Date/Commencement of Operations * 01/01/2018

Sector * Non Financial Sector - DNFBP

Sub-Sector * Accountancy/Audit - INDIVIDU... Category Accountancy/Audit - INDIVIDU...

+ Add a category

Registered Address

Address (line 1) * ACC Company Limited

Address (line 2) * Triq Valletta

Town/City * Valletta

Postcode * VLT 1000

Country * Malta

☐ This SP has a correspondence address different from the above

Contact Details

Email * email@acccompany.com

Address * Email may be used by FIAU for requests for information purposes

Phone * +35621210000 Designation * Sole Practitioner

Phone number includes prefix

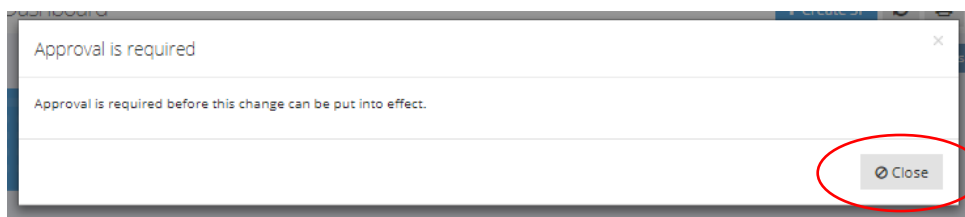
+ Add additional contact information

The FIAU's Data Protection Policy may be found on <http://www.fiumalta.org/privacy-policy>.

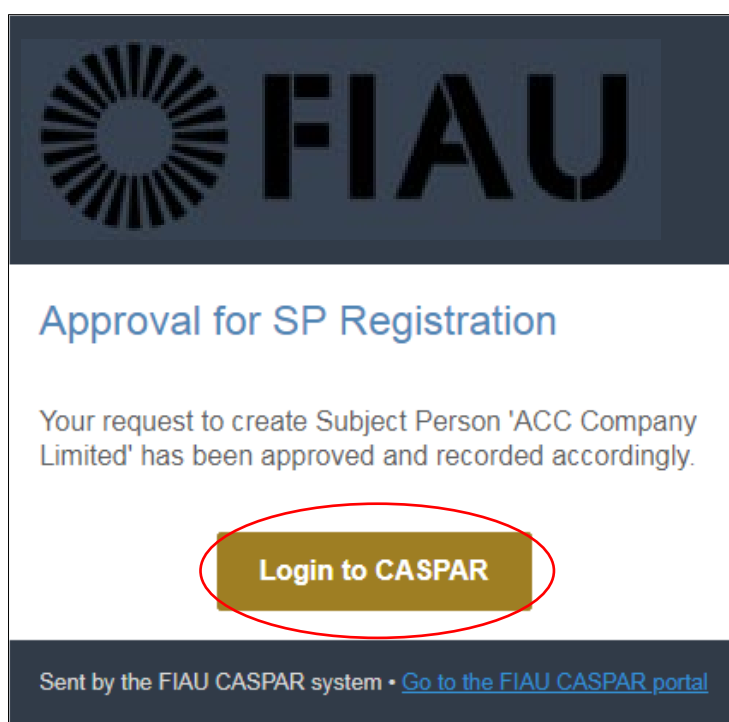
Cancel Save

Kindly refer to [Section 4](#) for further guidance on the selection of the relevant sector, sub-sector/s and category/ies

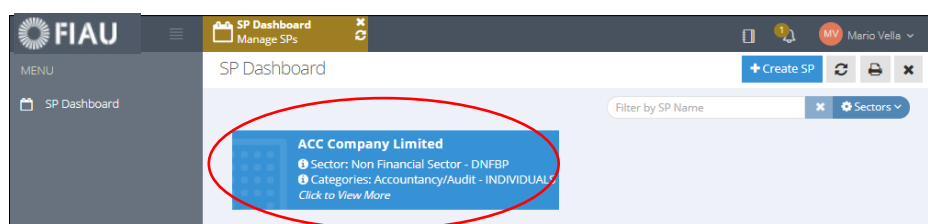
- 3) The creation of a Sole Practitioner subject person record requires the approval of the FIAU. Click 'Close' and await FIAU's approval.



- 4) Once this request has been approved/rejected, a notification will be submitted to the email address provided at registration. Upon receipt of the FIAU approval, click on 'Login to CASPAR' and log into your account by entering the email address used during registration and the password created.



- 5) Following the approval of a subject person record, log into CASPAR and the Subject person record will appear on the user's 'SP Dashboard' as follows.



4) Sectors, sub-sectors, categories

During the registration of a subject person, the user is required to input the sector, sub-sector, and category in which the subject person operates.

The tables shown below list the sectors, sub-sectors and categories for each relevant financial business and relevant activity as per Regulation 2 of the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR).

Subject persons which carry out multiple activities that fall under different sub-sectors and categories, should specify the different sub-sectors/categories by clicking the '+ Add Category' button.

Register a new SP

General Information

Name of Subject Person * ABC Company Limited

ROC Company ID 123456

Licence or Warrant Issue Date/Commencement of Operations * 01/01/2018

Appointment Date as MLRO/Designated Employee * 01/11/2018

Approval Status * Approval Not Required

Sector * Non Financial Sector - DNFBP

Sub-Sector * Accountancy/Audit - FIRMS/C... Category Accountancy/Audit - FIRMS/C...

+ Add a category

Registered Address

Address (line 1) * ABC Company Limited

Address (line 2) * Triq Villetta

Town/City * Villetta

Postcode * VLT 1000

Country * Malta

☐ This SP has a correspondence address different from the above

Contact Details

Email * mlro@abccompany.com

Address * Email may be used by FIAU for requests for information purposes

Phone * +35621270000 Description * MLRO

Phone number includes prefix

+ Add additional contact information

The FIAU's Data Protection Policy may be found on <http://www.fiamalta.org/privacy-policy>.

Cancel Save

Do you operate in the Financial Sector? If yes, take note of the following:

*Kindly note that the following two sub-sectors should **ONLY** be chosen in the following cases:*

- **Financial Sector offering CSP** – legal entities which carry out any activity falling under the Financial Sector and act as a CSP (e.g., a company that offers both investment services and CSP services).
- **Financial Sector offering trustee services** - legal entities which carry out any activity falling under the Financial Sector and offer trustee services (e.g., a credit institution which offers trustee services).

Relevant Financial Business

Activities (as per Regulation 2)	Sector	Sub-Sector	Categories
(a) any business of banking carried out by a person or institution who is for the time being licensed, or required to be licensed, under the provisions of the Banking Act	Financial Sector	Credit Institutions	Credit Institutions
(b) any activity of a financial institution carried out by a person or institution who is for the time being licensed, or required to be licensed, under the provisions of the Financial Institutions Act	Financial Sector	Financial Institutions	Payment Service Providers, E-Money Issuers Others: Lending, Money Brokering & Factoring
(c) any long-term insurance business other than the business of reinsurance carried out by a person or institution, who is for the time being authorised or is required to be authorised under the provisions of the Insurance Business Act	Financial Sector	Insurance & Pensions	Insurance undertakings
(d) any insurance intermediary activities carried out by an insurance intermediary or by a tied insurance intermediary, related to long-term insurance business which person or institution is enrolled or required to be enrolled under the provisions of the Insurance Distribution Act, other than a natural person who is registered or enrolled and acts on behalf of a tied insurance intermediary or a person or institution enrolled as a tied insurance intermediary that does not collect premiums, or other amounts intended for the policyholder or the beneficiary	Financial Sector	Insurance & Pensions	Intermediaries – Companies, Intermediaries – Individuals, Tied Insurance Intermediaries – Companies, Tied Insurance Intermediaries - Individuals
(e) any long-term insurance business other than the business of reinsurance carried out by a person according to the Insurance Business (Captive Insurance Undertakings and Captive Reinsurance Undertakings) Regulations, by a cell company according to the provisions of the Companies Act (Cell Companies Carrying on Business of Insurance) Regulations or by an incorporated cell company and an incorporated cell in accordance with the provisions of the Companies Act (Incorporated Cell Companies Carrying on Business of Insurance) Regulations	Financial Sector	Insurance & Pensions	Insurance undertakings

(f) investment services carried out by a person or institution licensed or required to be licensed under the provisions of the Investment Services Act	Financial Sector	Investment Services & Securities Markets	Investment Services
(g) administration services to collective investment schemes provided by a person or institution recognised or required to be recognised under the provisions of the Investment Services Act, except for administration services provided by recognised incorporated cell companies in accordance with the Companies Act (Recognised Incorporated Cell Companies) Regulations	Financial Sector	Investment Services & Securities Markets	Recognised Fund Administrators
(h) a collective investment scheme marketing its units or shares, licensed, recognised or notified, or required to be licensed, recognised or notified, under the provisions of the Investment Services Act	Financial Sector	Investment Services & Securities Markets	Collective Investment Schemes
(i) any activity other than that of a retirement scheme or a retirement fund, carried out in relation to a retirement scheme, by a person or institution licensed or required to be licensed under the provisions of the Retirement Pensions Act and for the purpose of this paragraph, "retirement scheme" and "retirement fund" shall have the same meaning as assigned to them in the Retirement Pension Act	Financial Sector	Insurance & Pensions	Service Providers licensed under the Retirement Pensions Act
(j) any activity of a regulated market and that of a central securities depository authorised or required to be authorised under the provisions of the Financial Markets Act	Financial Sector	Investment Services & Securities Markets	Regulated Markets/Central Securities Depository
(k) activity of a VFA agent carried out by a person or institution registered or required to be registered under the provisions of the Virtual Financial Assets Act	Virtual Financial Assets Sector	VFA Agents	VFA Agents
(l) VFA services carried out by a person or institution licensed or required to be licensed under the provisions of the Virtual Financial Assets Act;	Virtual Financial Assets Sector	VFA Service Providers	VFA Service Providers
(m) issue of virtual financial assets for offer to the public in or from Malta in terms of the Virtual Financial Assets Act	Virtual Financial Assets Sector	VFA Issuers	VFA Issuers

Relevant Financial Activity

Activities (as per Regulation 2)	Sectors	Sub-sectors	Categories
(a) auditors, external accountants and tax advisors, including when acting as provided for in paragraph (c)	Non-Financial Sector	Accountancy/Audit - FIRMS/COMPANIES, Accountancy/Audit – INDIVIDUALS, Tax Advisors	Accountancy/Audit - FIRMS/COMPANIES, Accountancy/Audit – INDIVIDUALS, Tax Advisors
(b) Real Estate	Non-Financial Sector	Real Estate	Real Estate
(c) notaries and other independent legal professionals when they participate, whether by acting on behalf of and for their client in any financial or real estate transaction or by assisting in the planning or carrying out of transactions for their clients concerning the – (i) buying and selling of real property or business entities (ii) managing of client money, securities or other assets, unless the activity is undertaken under a license issued under the provisions of the Investment Services Act (iii) opening or management of bank, savings or securities accounts (iv) organisation of contributions necessary for the creation, operation or management of companies (v) creation, operation or management of companies, trusts, foundations or similar structures, or when acting as a trust or company service provider	Non-Financial Sector	Notaries, Advocates - FIRMS/COMPANIES, Advocates - INDIVIDUALS.	Notaries, Advocates - FIRMS/COMPANIES, Advocates - INDIVIDUALS
(d) trust and company service providers	Non-Financial Sector	Trustees & Fiduciaries CSPs – FIRMS/COMPANIES, CSPs – INDIVIDUALS	Trustees Administrators of Private Foundations CSPs - FIRMS/COMPANIES CSPs - INDIVIDUALS
(e) nominee companies holding a warrant under the Malta Financial Services Authority Act and acting in relation to dissolved companies registered under the said Act	Non-Financial Sector	Trustees & Fiduciaries	Fiduciary Service Providers

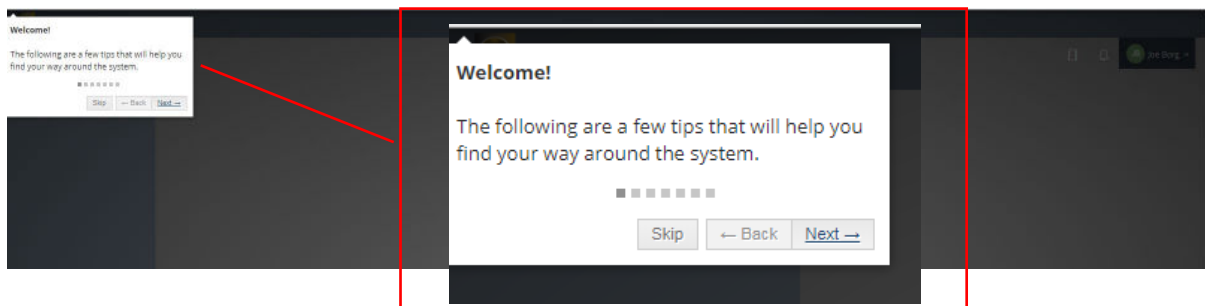
Guidance for the registration and use of the CASPAR platform

(f) Casino Licensees	Gaming Sector	Land-Based Casinos	Land-Based Casinos
(g) Gaming Licensees	Gaming Sector	Remote Gaming Operators Land-Based Operators (other than Casinos)	Remote Gaming Operators Land-Based Operators (other than Casinos)

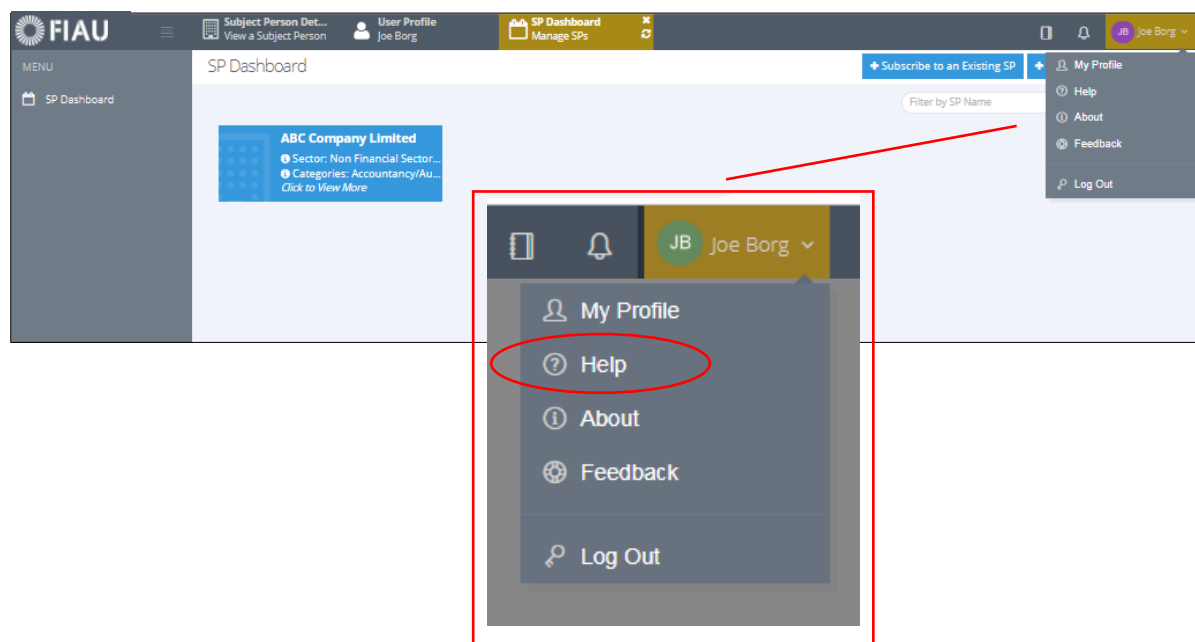
5) Other features of CASPAR

Help function

Following a successful registration process, you may access your user account on CASPAR. When logging in for the first time, you are shown a quick guide on the main features of the system through on-screen notification pop-ups.

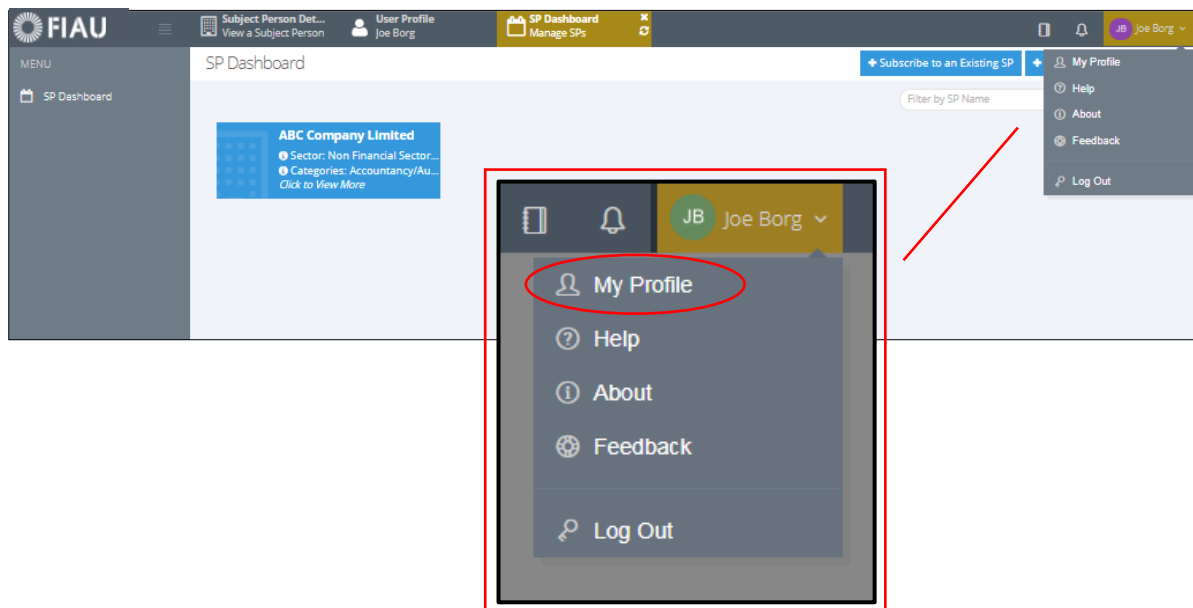



This quick guide can be accessed any time by clicking on your name at the top right-hand side of the screen, and then selecting 'Help'.

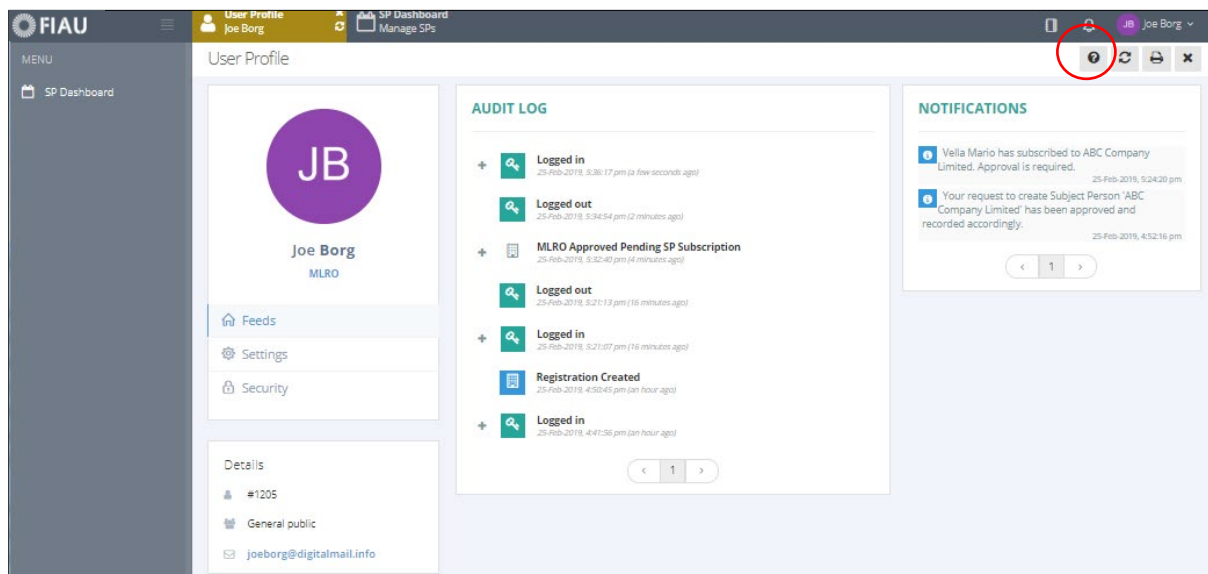


Guidance for the registration and use of the CASPAR platform

Another Help Function is available specifically on the features relating to your profile on CASPAR (e.g. settings and security). Click on your name at the top right corner and click on 'My Profile'.



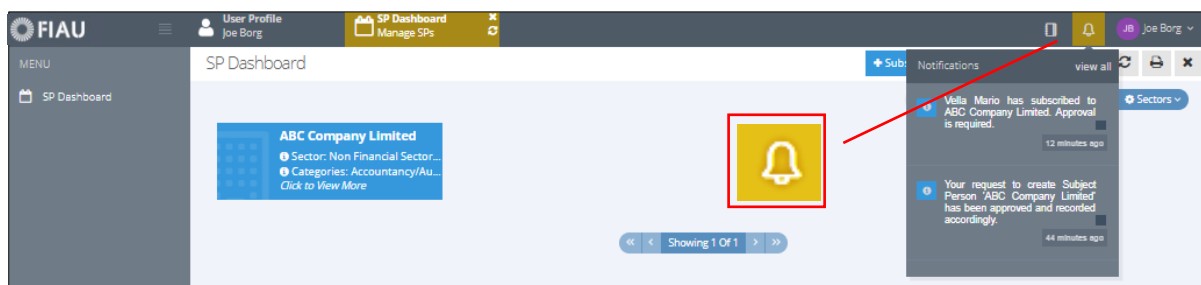
Click on the help button  to access the Quick Profile Guide. The notification pop-ups indicate the functions available within your profile on CASPAR.



Notification screen

The CASPAR profile includes a notification function which may be accessed as follows:

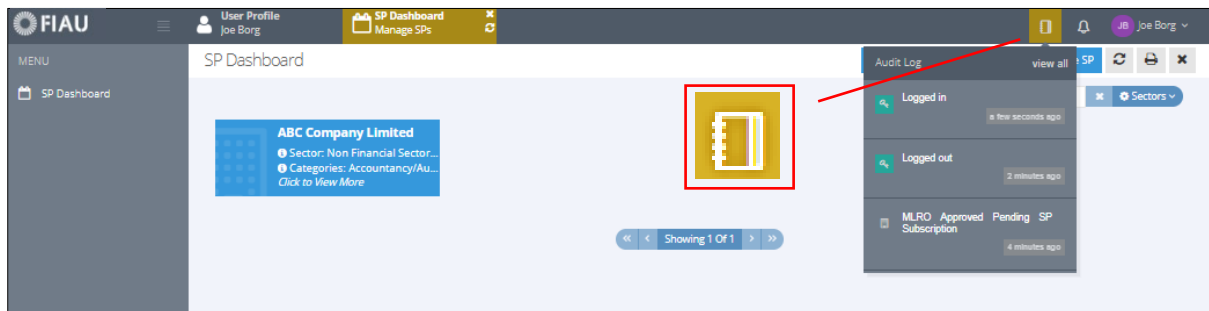
1. Log into your account on Caspar and click on the icon at the top right corner of the screen as shown below.
2. The latest notifications are shown in a pop-up window, but you can access all notifications by clicking on 'view all' at the top of this window.



Audit log

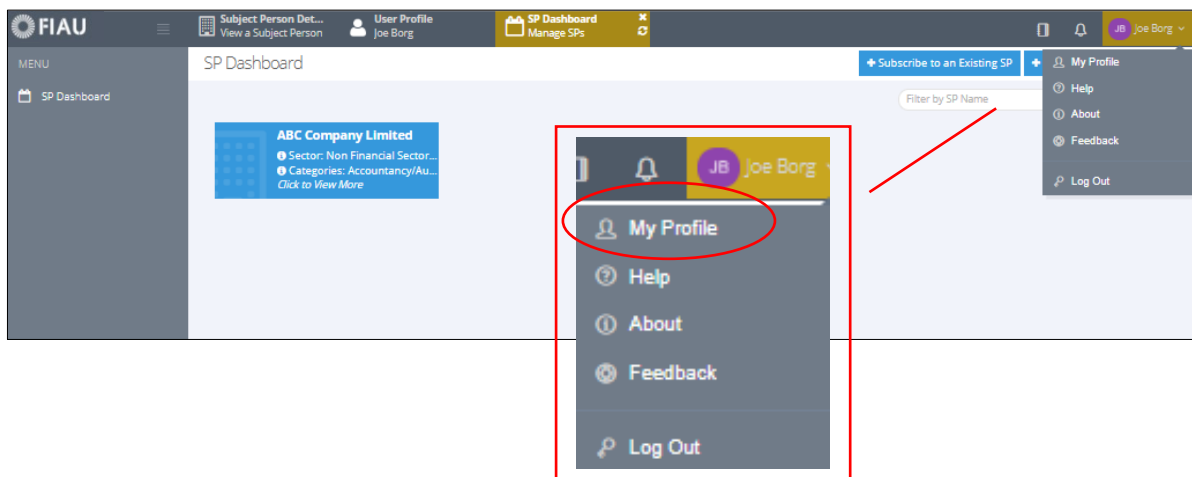
CASPAR maintains a log of all the activity undertaken by the user within the system. This may be accessed as follows:

- Log into your account on CASPAR and click on the icon shown below. The latest logs are shown in a pop-up window. You can access all audit logs by clicking on 'view all' at the top of this window.



Editing of User Account details

- Click on your name at the top right corner of the screen and click on 'My Profile'.



Guidance for the registration and use of the CASPAR platform

- 2) Click on 'Settings' to view and edit the profile details, which include the personal details, profile picture, the email notification settings, and additional personal details.

The screenshot displays the 'User Profile' page for 'Joe Borg' (MLRO). The 'SETTINGS' tab is active, showing fields for 'First Name' (Joe), 'Last Name' (Borg), and 'Email' (joeborg@digitalmail.info). Below these are 'Email Notifications' options: 'None' (selected), 'One Email per Notification', 'Daily Summary', and 'Weekly Summary'. A green 'Save' button is present. The left sidebar shows 'Feeds', 'Settings' (highlighted with a red box and arrow), and 'Security'. The bottom navigation bar also has 'Settings' highlighted with a red box.

- 3) Carry out the necessary changes and select 'Save' in the section edited.

The screenshot displays the 'User Profile' page for 'Joe Borg' (MLRO), specifically the 'ADDITIONAL INFORMATION' section. It contains various fields for personal and professional details, including Title, Phone, Designation, Applicant Type, Nationality, ID number, Country of issue, Mobile phone number, Identification Type, ID expiration date, Date of birth, and Status. Two green 'Save' buttons are visible: one at the top of the section and one at the bottom, both highlighted with red circles.

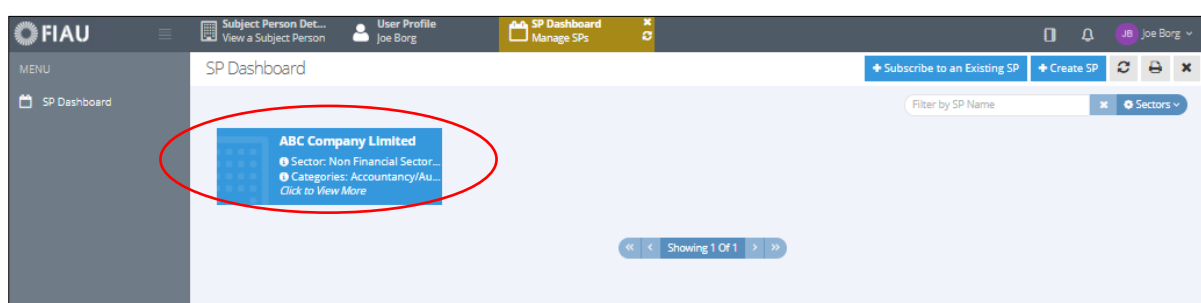
Guidance for the registration and use of the CASPAR platform

It is IMPORTANT that you notify the FIAU on compliance@fiaumalta.org if any changes to the First Name, Last Name or Email address take place.

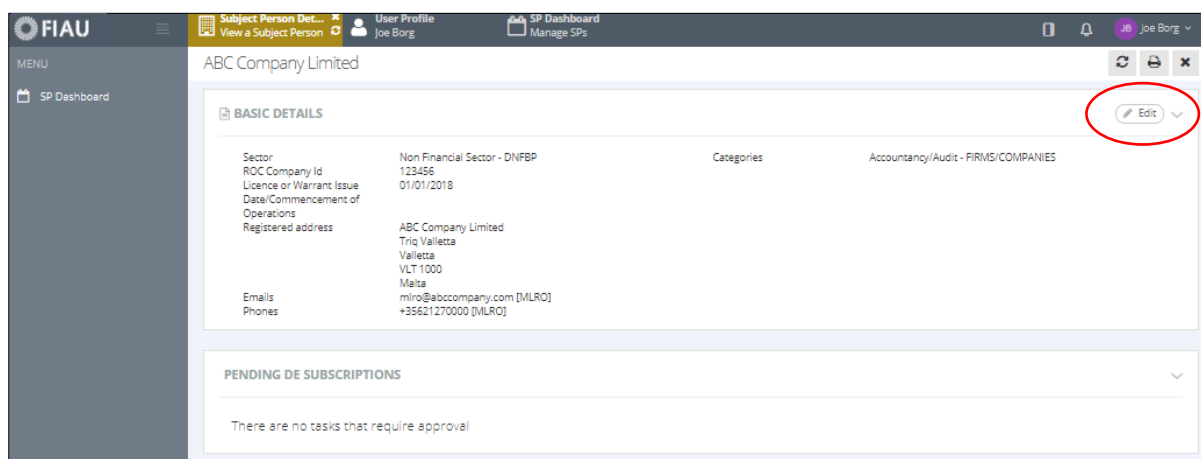
Editing of details on subject person records

MLROs must ensure that CASPAR holds the correct details of the subject person records. Details may be updated as follows:

- 1) Click on the subject person record in the 'SP Dashboard'.



- 2) Click on the 'Edit' button at the top right-hand side of the screen.



Guidance for the registration and use of the CASPAR platform

- 3) You may edit all the details that were inputted when the subject person record was initially created. Click on 'Save'.

Edit basic details

General information

Name of Subject Person *

ABC Company Limited

Licence or Warrant Issue Date/Commencement of Operations *

01/01/2018

Appointment Date as MLRO/Designated Employee *

01/11/2018

Approval Status *

Approval Not Required

Sector *

Non Financial Sector - DNFBP

Sub-Sector *

Accountancy/Audit - FIRMS/C...

Category

Accountancy/Audit - FIRMS/C...

+ Add a category

Registered Address

Address (line 1) *

ABC Company Limited

Address (line 2) *

Triq Valletta

Town/City *

Valletta

Postcode *

VLT 1000

Country

Malta

☐ This SP has a correspondence address different from the above

Contact Details

Email

mlro@abccompany.com

Address *

Email may be used by FIAU for requests for information purposes

Phone *

+35621270000

Description *

MLRO

Phone number includes prefix

+ Add additional contact information

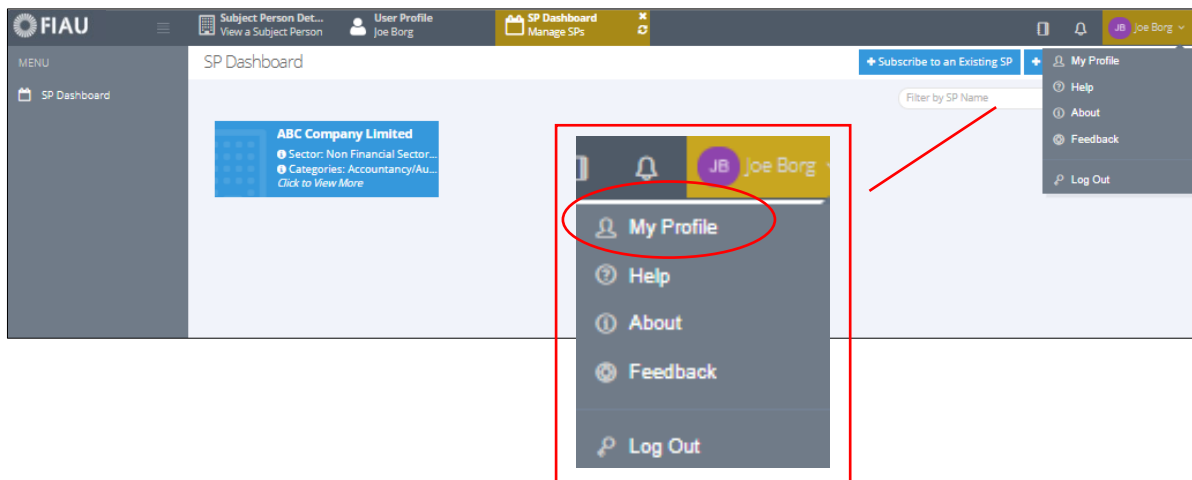
The FIAU's Data Protection Policy may be found on <http://www.fiumalta.org/privacy-policy>.

Cancel

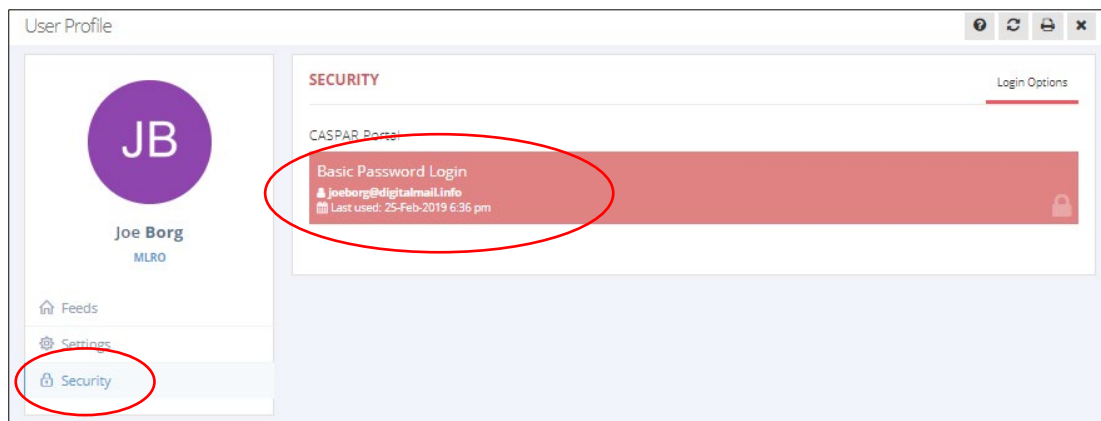
Save

Change password function

- 1) Click on your name at the top right-hand side of the screen and click on 'My Profile'.

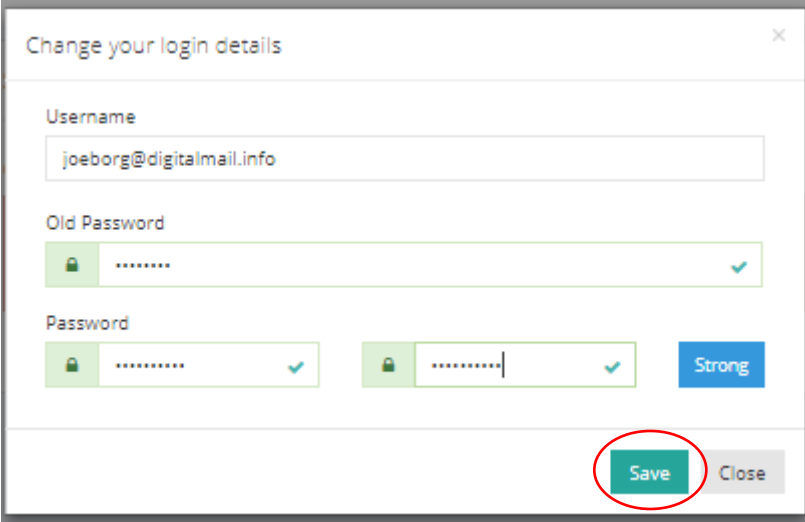


- 2) Click on 'Security' and then click on the red box 'Basic Password Login'.



- 3) Input the current password in the 'Old Password' field and the new password in the 'Password' fields.

The new password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Click on 'Save'.



Change your login details

Username
joeborg@digitalmail.info

Old Password
[Masked] ✓

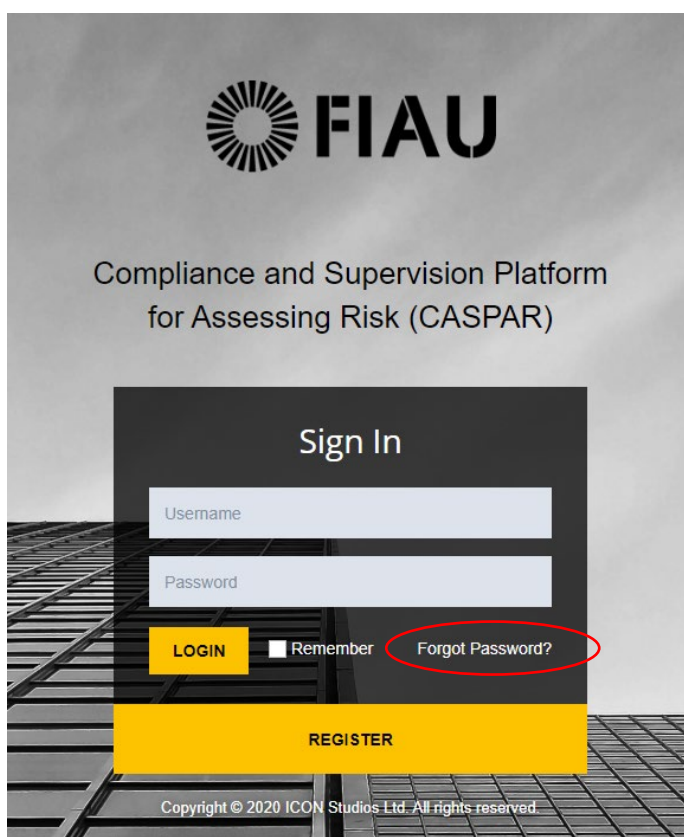
Password
[Masked] ✓ [Masked] ✓ Strong

Save Close

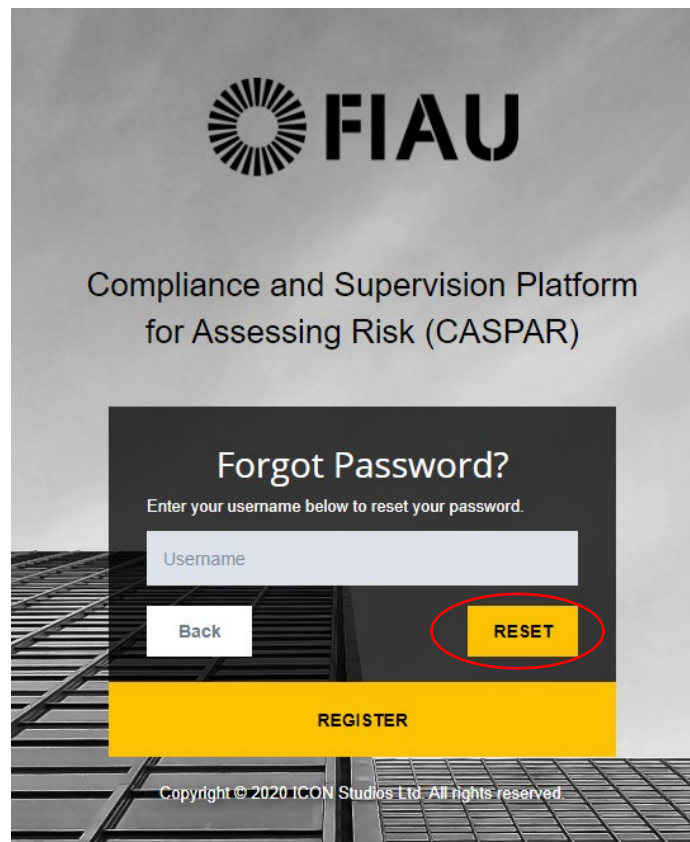
Forgot password function

If you have forgotten the password of your CASPAR account, you can reset it as follows:

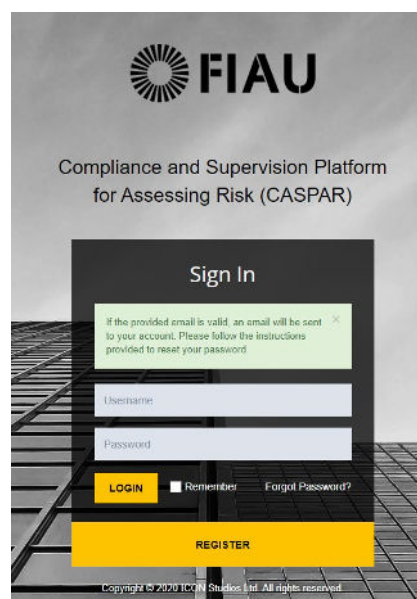
- 1) Click on the 'Forgot Password?' option at CASPAR Login.



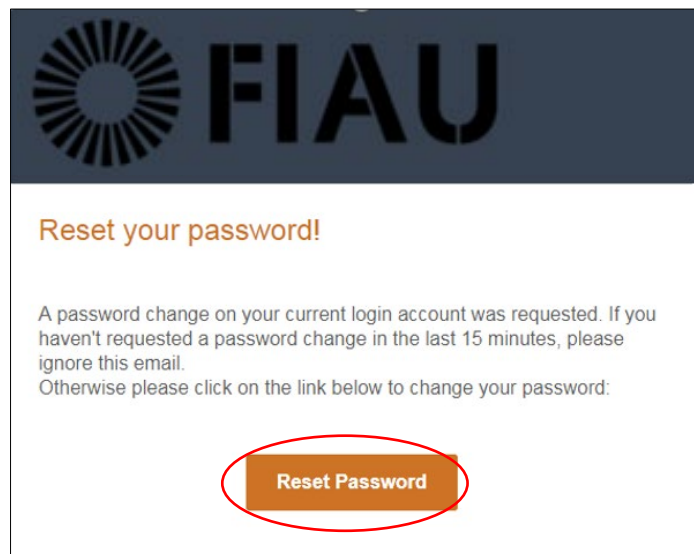
- 2) Input the username for CASPAR, which is the email address provided at registration and click on the 'Reset' button.



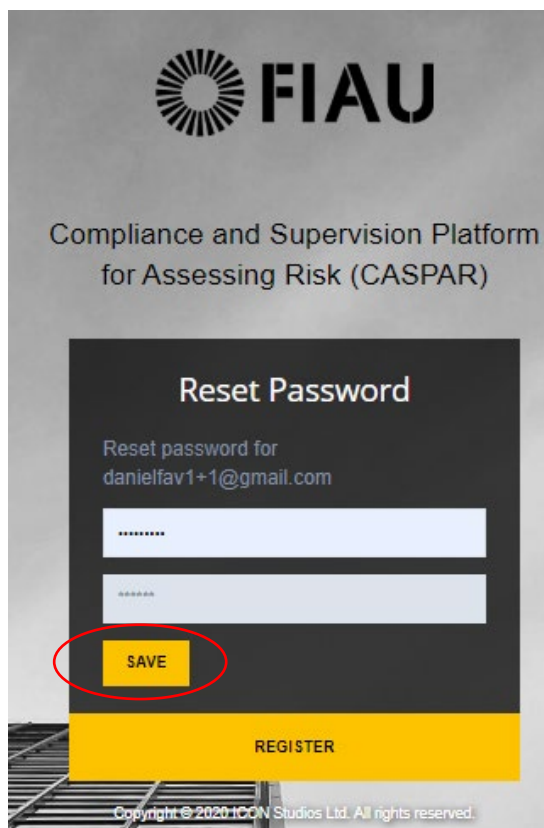
- 3) A notification saying that an email was sent to your account shows up on the screen.



- 4) Open the email and click on the 'Reset Password' button.



- 5) You will be automatically redirected to the 'Reset Password' screen. Input the new password which must contain a minimum of 8 characters, consisting of at least one number, one uppercase and one lowercase letter. Click on 'Save'.



6) Submission of REQs

Following the registration of a user account and the creation of a new subject person record / subscription to an existing subject person record, the MLRO may submit the annual REQ.

The completion of REQs within CASPAR is split into two steps:

- 1) [Step 1: Completion of the online REQ form](#)
- 2) [Step 2: Payment of applicable fees and submission of REQ](#)

During the completion of the REQ, all responses are automatically and instantaneously saved on CASPAR. The responses will **not** be lost if you log out of the system.

A few questions require the uploading of documents. Documents must be uploaded in **pdf format only** and the individual files must not exceed 10MBs.

Kindly note that subject persons with multiple sub-sectors, must complete only one REQ. The questions contained within the REQ will cover all sectors relevant to the subject person.

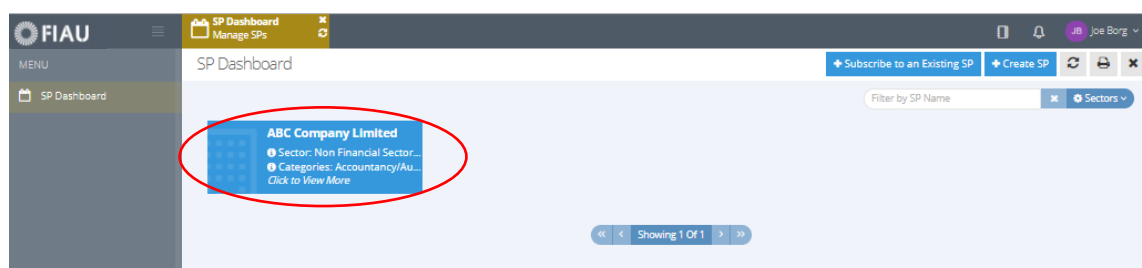
Step 1: Completion of the online REQ form

The following are the steps which must be followed for the completion of an REQ.

Where one person is the appointed MLRO of multiple subject persons, an REQ must be submitted for each subject person. In view of this, the steps listed below must be repeated for each subject person.

Whilst both Designated Employees and MLROs may complete the REQ, submission and payment must be solely undertaken by the MLRO.

- 1) Log into CASPAR
- 2) Click on the subject person record which appears on the SP Dashboard.



- 3) Once you click on the subject person's blue box, you will access the subject person's subject person record. Kindly scroll down until you reach the section 'Available REQs'. This section shows the REQs which are due for submission or that were submitted. Right-click on the REQ for the year and then click on 'Take **** REQ'.

Guidance for the registration and use of the CASPAR platform

ABC Company Limited

BASIC DETAILS Edit

Sector	Non Financial Sector - DNFBP	Categories	Accountancy/Audit - FIRMS/COMPANIES
ROC Company Id	123456		
Licence or Warrant Issue Date/Commencement of Operations	01/01/2018		
Registered address	ABC Company Limited Triq Valletta Valletta VLT 1000 Malta		
Emails	miro@abccompany.com [MLRO]		
Phones	+35621270000 [MLRO]		

PENDING DE SUBSCRIPTIONS

There are no tasks that require approval

AVAILABLE REQs

Year	Status	Filter
2020	Take 2020 REQ	31/03/2020 17:00
2019	Completed	-

Showing 1 Of 1

- 4) The first page of the REQ appears on screen. This section includes a 'free text box' in which MLROs may add explanatory notes to certain sections within the questionnaire. Click on the 'Right' arrow at the top or bottom of the screen to proceed to the next page of the questionnaire. All sections of the questionnaire may be accessed at any time during its completion.

REQ Entry (2020) - ABC Company Limited Printable Report

Showing 1 Of 15

General remarks from the subject person:

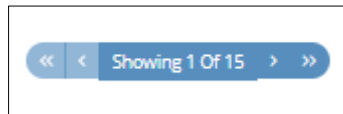
Question: As indicated in the Guidance for Completion of the Anti-Money Laundering and Countering the Financing of Terrorism Risk Evaluation Questionnaire, sole practitioners and institutions should, for each of the questions included in this questionnaire, choose the answer option that is best suited 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 institution and that can be justified later on. In the text box below, you can formulate general remarks on the answers submitted by you / your institution. Please note that these general remarks are not taken into account in the initial, automated analysis of your / your institution's answers.


Question text answer... ☐ Not Applicable

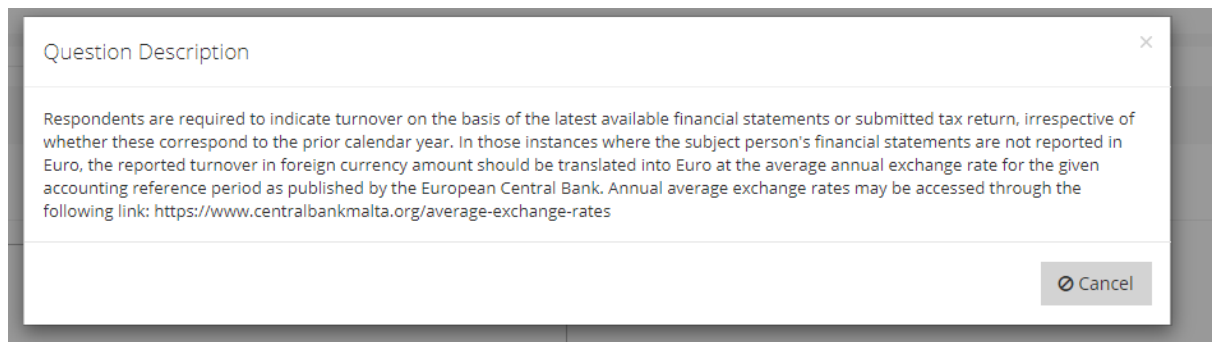
Showing 1 Of 15

Guidance for the registration and use of the CASPAR platform

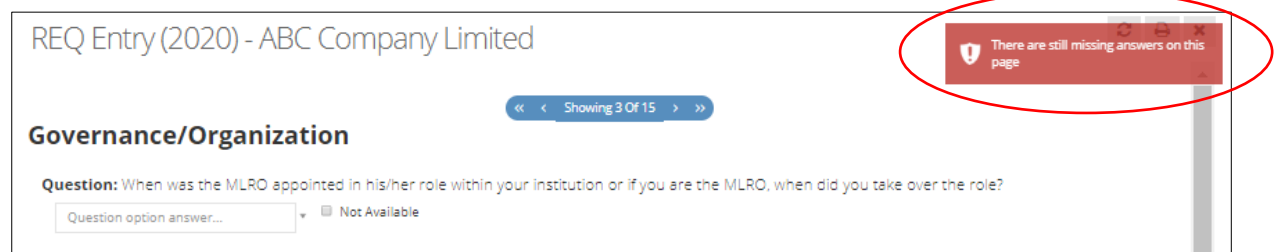
- 5) Fill in all questions on the page and click on the arrows to go back and forward if you would like to skip to other pages of the REQ.



- 6) Clicking on the following sign  opens a pop-up box that will provide guidance related to the specific question.



- 7) You may proceed to other pages of the questionnaire, even if there are unanswered questions on the current page. However, the following warning will appear at the top right-hand side of the screen to notify you that there are fields within the page that are not completed.



- 8) There will be questions where one or more options are available to be ticked. Below is an example of the latter.

Q: If your answer to the above question was "YES", please identify the top 3 jurisdictions from the list. ?

<input type="checkbox"/> Iran	<input checked="" type="checkbox"/> Botswana
<input type="checkbox"/> Iceland	<input checked="" type="checkbox"/> Bosnia and Herzegovina
<input checked="" type="checkbox"/> Uganda	<input checked="" type="checkbox"/> The Bahamas
<input type="checkbox"/> Mongolia	<input type="checkbox"/> Trinidad and Tobago
<input type="checkbox"/> Pakistan	<input type="checkbox"/> Syria
<input type="checkbox"/> Afghanistan	<input type="checkbox"/> Loa PDR
<input type="checkbox"/> Panama	<input type="checkbox"/> Zimbabwe



Guidance for the registration and use of the CASPAR platform

9) Other questions will allow only one answer to be ticked.

Did the Business Risk Assessment conducted take into account the risks and controls related to:

Q: a) your / your entity's customers	<input type="radio"/> Not Applicable	<input type="radio"/> No	<input type="radio"/> Yes
Q: b) the products and services offered by you / your entity and the transaction risk exposure through same	<input type="radio"/> No	<input type="radio"/> Yes	<input type="radio"/> Not Applicable
Q: c) specific countries or geographical areas	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Not Applicable
Q: d) the distribution channels ?	<input type="radio"/> Not Applicable	<input type="radio"/> Yes	<input type="radio"/> No

10) You may print the REQ by clicking on the 'Printable Report' button located at the top right-hand side of the screen.

After clicking this button, a print preview of the report will appear on screen. You may proceed by clicking on this button . Otherwise, click on  to go back to editing the REQ.

REQ Entry (2020) - ABC Company Limited

Printable Report

Showing 1 Of 15

General remarks from the subject person:

Question: As indicated in the Guidance for Completion of the Anti-Money Laundering and Countering the Financing of Terrorism Risk Evaluation Questionnaire, sole practitioners and institutions 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 institution and that can be justified later on. In the text box below, you can formulate general remarks on the answers submitted by you / your institution. Please note that these general remarks are not taken into account in the initial, automated analysis of your / your institution's answers.

Question text answer...

☐ Not Applicable

Showing 1 Of 15

Step 2: Payment of applicable fees and submission of REQ

The following are the steps the MLRO must follow to submit the REQs and the payment of applicable fees. Kindly note that this process is only to be undertaken by the MLRO of the subject person. Furthermore, all questions of the REQ must be completed before its submission.

In the case of legal entities, REQs must be reviewed by another individual before their submission (Refer to Step 4 below).


Kindly note that following the declaration, the user is not permitted to edit the content of the REQ. Given this, we recommend that MLROs thoroughly review the responses provided before proceeding to the declaration of the REQ. Following submission, the REQ will be accessible through the CASPAR platform for viewing only.

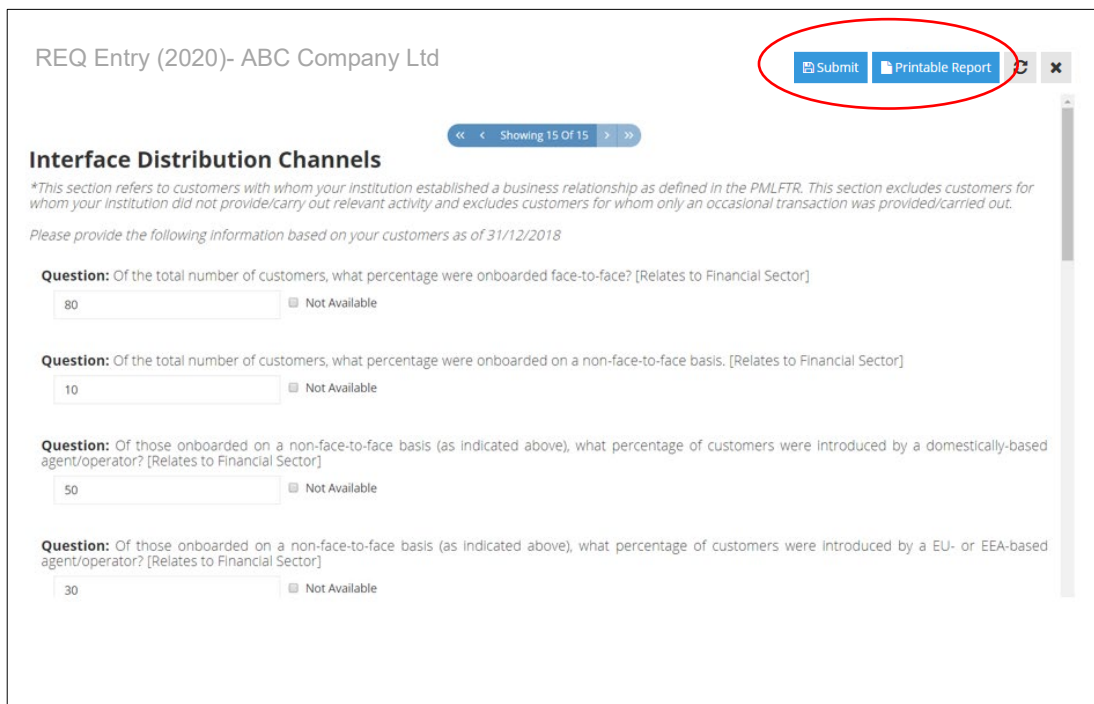
Where one person is the appointed MLRO of multiple subject persons, the REQ with payment must be submitted for each subject person. Because of this, the steps listed below must be repeated for each subject person.

The deadlines for the REQ can be found on the FIAU website.

<https://fiaumalta.org/>

Guidance for the registration and use of the CASPAR platform

- 1) After completing the REQ, proceed to the last page of the REQ and press 'Proceed to Declaration' which is located at the top right-hand side of the screen. You may also print the completed REQ by clicking on 'Printable Report' at the top right-hand side of the screen. A print preview of the report will first appear on the screen, then click on  to print the report. Please note that the REQ may also be printed after its submission.



REQ Entry (2020)- ABC Company Ltd

Submit Printable Report

Showing 15 Of 15

Interface Distribution Channels

**This section refers to customers with whom your institution established a business relationship as defined in the PMLFTR. This section excludes customers for whom your institution did not provide/carry out relevant activity and excludes customers for whom only an occasional transaction was provided/carried out.*

Please provide the following information based on your customers as of 31/12/2018

Question: Of the total number of customers, what percentage were onboarded face-to-face? [Relates to Financial Sector]

80 ☐ Not Available

Question: Of the total number of customers, what percentage were onboarded on a non-face-to-face basis. [Relates to Financial Sector]

10 ☐ Not Available

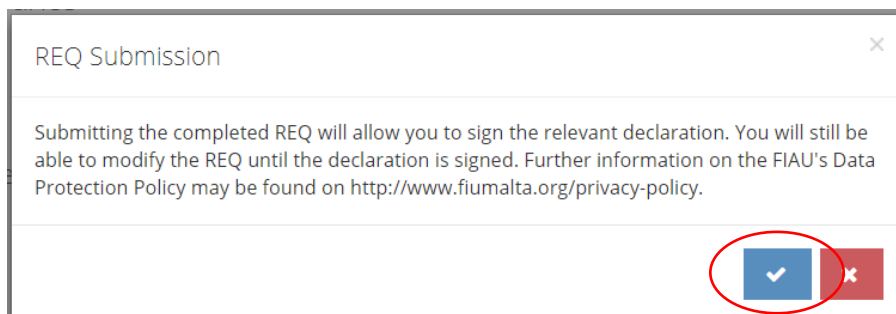
Question: Of those onboarded on a non-face-to-face basis (as indicated above), what percentage of customers were introduced by a domestically-based agent/operator? [Relates to Financial Sector]

50 ☐ Not Available

Question: Of those onboarded on a non-face-to-face basis (as indicated above), what percentage of customers were introduced by a EU- or EEA-based agent/operator? [Relates to Financial Sector]

30 ☐ Not Available

- 2) The following window will appear. Click on the marked sign.

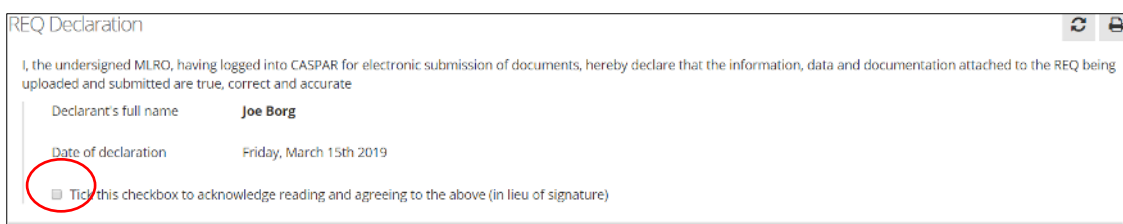


REQ Submission

Submitting the completed REQ will allow you to sign the relevant declaration. You will still be able to modify the REQ until the declaration is signed. Further information on the FIAU's Data Protection Policy may be found on <http://www.fiumalta.org/privacy-policy>.

☒ ☐

- 3) Read the declaration thoroughly and tick the box accordingly, acknowledging reading and accepting the declaration.



REQ Declaration

I, the undersigned MLRO, having logged into CASPAR for electronic submission of documents, hereby declare that the information, data and documentation attached to the REQ being uploaded and submitted are true, correct and accurate

Declarant's full name **Joe Borg**

Date of declaration Friday, March 15th 2019

☒ Tick this checkbox to acknowledge reading and agreeing to the above (in lieu of signature)

Guidance for the registration and use of the CASPAR platform

4) MLROs of legal entities must also complete the following declaration.

Input the required information on the reviewer of the REQ and tick the box acknowledging that you have read and accepted the declaration. Then press 'I Declare' to proceed to payment.


Furthermore, I declare that the REQ has been reviewed by the under-mentioned person, who has confirmed contents of this report.

Reviewer's full name *

Reviewer's designation *

Reviewer's phone number *

Reviewer's e-mail *

Date of review * 

☐ Tick this checkbox to acknowledge reading and agreeing to the above (in lieu of signature)

5) Input the card details in the appropriate fields, then click on 'Submit Secure Payment'.
(Please note that no invoice will be generated)

Online Payment


Order Total:
€ 50.00

Payment Method

Card Number

Please enter the embossed number on the front side of the card

Expiry

CVV
 

(Use the last 3 digits found on the back of your card)


Card Holder Name

Please enter the card holder name as shown on the card


Payment session will expire in 19:15

By proceeding to pay, you hereby confirm that you understand that cancellation

Guidance for the registration and use of the CASPAR platform

- 6) A notification appears stating that payment was successfully affected. A receipt for the payment submitted is generated. Click on the 'Print'  button to print the receipt.

Payment Successful!
Payment has been successfully paid. Below please find the receipt.



FIAU Malta
65C, Tower Street
Birkirkara
BKR 4012

Tel: (+356) 21231333
Fax: (+356) 21231090
Exemption No: EXO 2231

Invoice Number 0000025

Invoice To: ABC Company Limited
ABC Company Limited, Triq Valletta
Valletta, VLT 1000
Malta
Tel: +35621270000
Email: mltro@abccompany.com

Date: 24 Sep 2019

Description	Amount EUR
REQ Fee	50.00
Late Fee	0.00
Vat at 0%	0.00
Total EUR	50.00

This invoice is to be settled within the stipulated time. If not late payment fees shall apply.

FIAU Malta
This is not a Fiscal Document

- 7) The invoice/receipt can be viewed and printed following payment. This can be done by following the steps below:

1. Click on the blue box with the subject person name on the 'SP Dashboard'.
2. Scroll down to the 'Payments' section (as seen below).
3. Right-click on payment status 'PAID' and select 'View Invoice/View Receipt'.

PAYMENTS				
Payment Date	Amount	Payment Status	Category	Category Details
02/04/2019	€ 50.00	PAID	REQ	REQ (2020) - ABC Ltd
		<div>View Invoice</div> <div>View Receipt</div>		

PAYMENTS				
Payment Date	Amount	Payment Status	Category	Category Details
02/04/2019	€ 50.00	PAID	REQ	REQ (2020) - ABC Ltd
		<div>View Invoice</div> <div>View Receipt</div>		

7) Frequently Asked Questions

This Frequently Asked Questions (FAQ) document provides more information about the registration to the Compliance and Supervision Platform for Assessing Risk (CASPAR) and the submission of the AML/CFT Risk Evaluation Questionnaire (REQ) through this platform. Please review this FAQ document to learn more.

1. I am no longer a Subject person – what must I do?

If the subject person ceased operating, no longer undertakes relevant activity and/or relevant financial business, or has surrendered its licence with the relevant authority, you are required to contact the FIAU via email on compliance@fiaumalta.org.

2. Do I need to advise the FIAU of changes to my details?

Yes. Changes to the personal details are to be affected directly on CASPAR while notifying the FIAU of the affected changes via email on compliance@fiaumalta.org. Refer to Section '[Editing of user details](#)'.

3. Do I need to advise the FIAU of changes to the details of the subject person?

Yes, the FIAU must be informed of any changes to the subject person record details, via email. Changes are to be affected directly on CASPAR. Refer to Section '[Editing of details of subject person record](#)'.

4. What should I do if I receive notification that my enrolment was not approved?

The reason for the rejection will be included in the email notification. If further clarification is required, you may contact the FIAU on compliance@fiaumalta.org.

5. How long does enrolment take?

Enrolment is split into two stages:

- a. Creation of a personal User Account on CASPAR
- b. Creation/Subscription to a subject person record

A registration form must be completed for each stage. Completion of the respective forms is a short process taking only a couple of minutes. However, since the approval of the FIAU is required at each stage, the enrolment process may take a couple of hours / days.

6. I successfully managed to register on CASPAR, however as soon as I log in, the buttons to create or subscribe to a subject person record are not showing.

You may be using Internet Explorer. Kindly note that CASPAR is not compatible with this browser. The website is optimised for Google Chrome and Mozilla Firefox.

7. I am an MLRO, however I am still awaiting approval of my appointment by the relevant Authority. May I register on the CASPAR platform as an MLRO?

No. An interim MLRO is to be appointed by the subject person to take over the AML/CFT duties of the subject person. If you will be assuming the role of Interim MLRO until approval by the relevant authority is provided, kindly contact the FIAU via email on compliance@fiaumalta.org. Interim MLRO Registration guidance is found in [A. MLRO](#).

8. My company is in the process of identifying an MLRO. How should I register on CASPAR?

The Company must appoint an interim MLRO. The interim MLRO should register a User Account on CASPAR, and then subscribe to the subject person record - refer to guidance in [A. MLRO](#). If there is a change in MLRO, the FIAU must be informed at the earliest via email on compliance@fiaumalta.org, and the newly appointed MLRO must repeat the registration process.

9. I am the appointed MLRO of multiple subject persons. I have already registered on CASPAR and subscribed to one entity – how should I subscribe to additional entities?

Kindly log into your existing User Account on CASPAR and subscribe to the subject person record/s. You may refer to guidance [Step 2: Creating / Subscribing to an existing subject person record](#). Kindly note that a REQ must be submitted for each subject person.

10. I am an MLRO, and I have erroneously rejected the request of a Designated Employee to subscribe to an existing subject person record. What happens next?

The Designated Employee should repeat the subscription process to the subject person record. You will receive a new request to approve the subscription.

11. I am the MLRO of a Subject person, but I will be resigning since I am leaving the entity. Another person will take the role of MLRO. What should be done?

You should follow the obligations under the IPs for resignation/appointment of the MLRO (IP Section 5.1.3) and send your Resignation Letter **via email** to compliance@fiaumalta.org, at the earliest, which will be pending FIAU approval. Once approved, the updates on CASPAR will be affected by the FIAU and you will be notified. The newly appointed MLRO will be guided to register a User Account on CASPAR and then subscribe to the subject person record. Guidance on registration as a MLRO is available in section [A.MLRO](#).

12. I am encountering difficulties in during registration or submitting the REQ. Who may I contact?

The User Guide provides a wealth of information on CASPAR. However, if you have any remaining queries, you may contact the FIAU on compliance@fiaumalta.org.

13. Question: My entity operates under 2 licenses falling under different sub-sectors and we previously filed a separate Annual Compliance Report (ACR) for each sub-sector. Are we required to complete one REQ for each sub-sector?

No. Only one REQ needs to be submitted per subject person. This REQ will incorporate all the questions applicable to the relevant sub-sectors. This will be based on the sub-sectors selected by the user during the one-time registration of the subject person record on CASPAR.

14. How long does it take to complete and submit a REQ?

The REQ requires time to input the various data required. We urge you to commence the completion of the REQ as soon as possible. Penalties apply for late submissions.