



FIAU

Financial
Intelligence
Analysis Unit
Malta



Updated goAML indicators

December 2025



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Tracking Changes Between Publication Versions

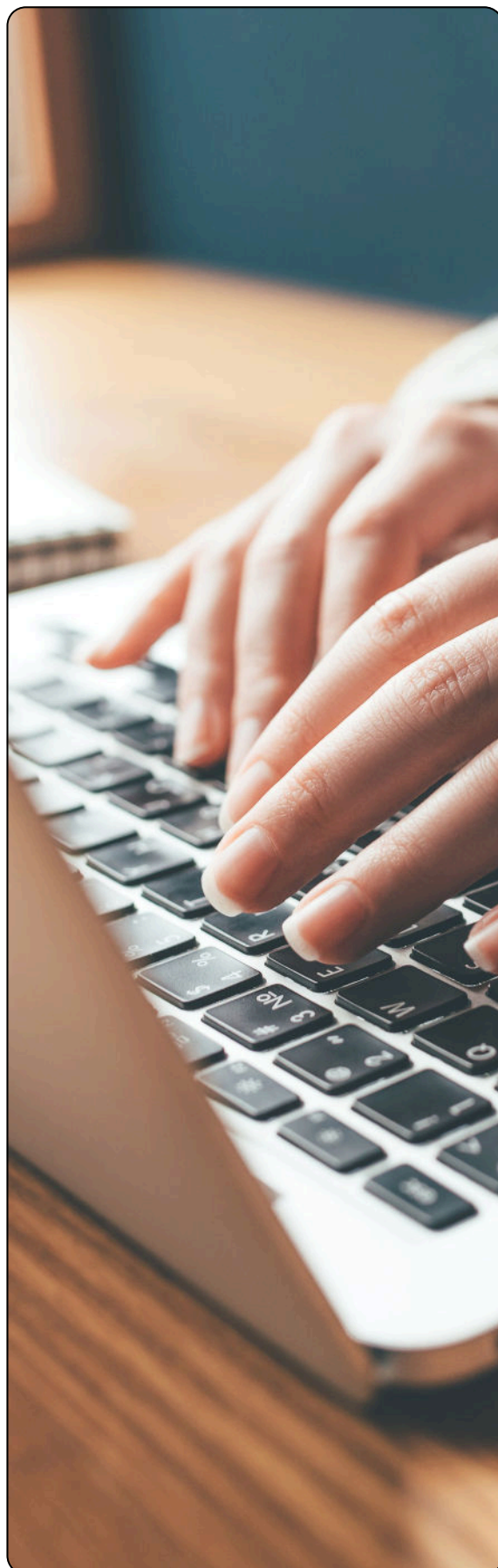
FIAU Revision	Date	Author	Explanation
1.0.0	September 2024	FIU Malta	The initial version of the guidance document covering all the indicators and respective categories
1.1.0	October 2024	FIU Malta	<ol style="list-style-type: none">1. Indicators' category "Predicate Offence – Location" added;2. Internal-10 indicators has been disabled;3. Indicators for sanctions added and amended existing ones;4. Indicators for Predicate Offence – Location category added.

Introduction

This publication is intended to provide reporting entities with an updated and comprehensive overview of the reporting indicators used within the goAML system. These indicators form a key component of the FIAU's analytical framework, supporting the identification, categorisation, and assessment of suspicious activity reported to the FIAU.

The document outlines the structure, scope, and intended use of the indicators, presenting them in a clear and standardised format. Indicators are grouped into defined categories, each accompanied by concise descriptions to ensure uniform interpretation and consistent application by all reporting entities. This publication also reflects the latest updates and amendments introduced since previous editions, incorporating refinements and new indicators designed to align with emerging trends, operational developments, and reporting needs.

Reporting entities are encouraged to refer to this document as a central reference point when preparing or drafting suspicious reports, ensuring that reports are comprehensive, accurate, and aligned with the FIAU's requirements.



Notable Changes



The FIAU has created a new report indicator category related to the predicate offence **Location**. Reporting entities have an option of three indicators to choose from, differentiating between whether the underlying predicate offence and/or suspicions were conducted in Malta, the EU/EEA excluding Malta and/or Non-EU/EEA. One or more of these indicators are to be selected whenever a reporting entity identifies a Predicate offence, to highlight the location/region of the underlying predicate offences and/or suspicions.

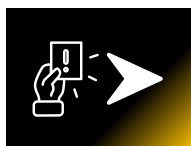


Internal-10 indicator has been disabled
(Subject person disseminated intelligence to foreign counterparts)



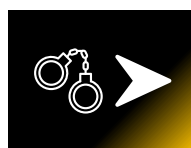
Update on Sanctions-Related Indicators in goAML

The FIAU has created new indicators to improve the classification and analysis of sanctions-related reports. These updates provide a clearer distinction between different sanctions regimes and types of sanctions evasion activity.



New Sanction Regime Indicators:

- RS-61 Sanctions Regime: EU
- RS-62 Sanctions Regime: UN
- RS-63 Sanctions Regime: Other (OFAC, OFSI, Other Country Lists etc.)



Updated PO Indicators:

The introduction of two new indicators replacing the previous Targeted Financial Sanctions indicator.

- **PO - 222** – has been renamed to List-Based Financial Sanctions – this refers to reports where individuals or entities are designated as sanctioned persons.
- **PO - 221** – Sectorial Financial Sanctions – this indicator has been added whereby it would refer to reports involving restrictions on specific industries or trading activities.

These updates aim to enhance the consistency and quality of sanctions-related reporting and analysis.

Indicator Categories

The latest version of goAML introduced a new feature of categorisation of indicators, which enables reporting entities to filter through the list of indicators through the column 'Categories', as shown in 'figure 1' below:

<input type="checkbox"/>	Code ↑	Indicator	Categories
	<input type="text"/>	<input type="text"/>	<input type="text"/>

Figure 1: Updated indicators table with the 'Categories' column



The Categories that appear in the ‘Category’ column are as follows:

Category	Description
Amount Indicators	The reporting entity should select the range of funds at risk of money laundering or funding of terrorism.
Internal Indicators	These indicators mainly relate to internal and/or administrative processes. The reporting entities should select either of these indicators whenever applicable.
Predicate Offence Indicators	The reporting entity should select any applicable predicate offence/s.
Product Indicators	Any products/service used in the perpetration of the underlying crime or that were relevant to the suspicion should be selected.
Reason for suspicion (RS): Account Usage	This category contains a list of reasons for suspicion that relate to the account and/or the transactions carried out within the suspected account.
Reason for suspicion (RS): Customer	This category contains a list of reasons for suspicion that relate to the involved persons/entities.
Predicate Offence - Location	The reporting entity should select any applicable indicators indicating the location/region of the underlying predicate offences and/or suspicions.



List of Indicators

Category	Indic Code	Indicator Description
Amount	Amount-01	EUR 0 - 10,000
Amount	Amount-02	EUR 10,001 - 50,000
Amount	Amount-03	EUR 50,001 - 100,000
Amount	Amount-04	EUR 100,001 - 500,000
Amount	Amount-05	EUR 500,001 - 1,000,000
Amount	Amount-06	EUR 1,000,001 - 5,000,000
Amount	Amount-07	EUR 5,000,001 - 10,000,000
Amount	Amount-08	EUR 10,000,001 - 50,000,000
Amount	Amount-09	EUR 50,000,001 and over
Amount	Amount-10	Amount not specified/not available
Internal	Internal-27	Project Defunct I - 2020
Internal	Internal-28	Project Defunct II - 2021
Internal	Internal-29	Project Defunct III - 2022

Category	Indic Code	Indicator Description
Internal	Internal-30	Project Defunct IV - 2023
Internal	Internal-31	Project Defunct V - 2025
Predicate Offence	PO-1	Corruption and bribery
Predicate Offence	PO-2	Unknown - Predicate Offence could not be established
Predicate Offence	PO-3	Counterfeiting currency
Predicate Offence	PO-4	Environmental crime
Predicate Offence	PO-5	Extortion
Predicate Offence	PO-6	Forgery
Predicate Offence	PO-10	Illicit trafficking in narcotic drugs and psychotropic substances
Predicate Offence	PO-11	Illicit trafficking in stolen and other goods
Predicate Offence	PO-12	Insider trading and market manipulation
Predicate Offence	PO-13	Kidnapping, illegal restraint and hostage-taking
Predicate Offence	PO-14	Murder, grievous bodily injury
Predicate Offence	PO-16	Counterfeiting and piracy of products

Category	Indic Code	Indicator Description
Predicate Offence	PO-18	Robbery or theft
Predicate Offence	PO-19	Trafficking in Human Beings - Sexual exploitation (excluding minors)
Predicate Offence	PO-20	Smuggling (including in relation to customs and excise duties and taxes)
Predicate Offence	PO-22	Terrorism, including terrorist financing
Predicate Offence	PO-24	Usury
Predicate Offence	PO-25	Living off the earnings of prostitution and/or running a brothel
Predicate Offence	PO-26	Illicit arms trade
Predicate Offence	PO-27	Prostitution and solicitation
Predicate Offence	PO-28	Cybercrime
Predicate Offence	PO-35	Embezzlement/Misappropriation of funds
Predicate Offence	PO-36	Conducting a regulated activity without an adequate licence to do so (illegal gambling, underground banking, cheques, hawala, etc.)
Predicate Offence	PO-37	Match-fixing
Predicate Offence	PO-151	Participation in an international organised criminal group and racketeering
Predicate Offence	PO-152	Participation in a domestic organised criminal group and racketeering
Predicate Offence	PO-161	Piracy (Example: Piracy at Sea)

Category	Indic Code	Indicator Description
Predicate Offence	PO-191	Trafficking in Human Beings - Child Sexual Exploitation
Predicate Offence	PO-211	Tax crimes: Corporate Income tax
Predicate Offence	PO-212	Tax crimes: Personal Income tax
Predicate Offence	PO-213	Tax crimes: Other indirect taxes (Excise duty, Import Duties, Stamp Duty, Green Taxes)
Predicate Offence	PO-214	Tax crimes: VAT Fraud
Predicate Offence	PO-215	Tax crimes: Other direct taxes (Example: Property tax, Inheritance tax, Capital Gains tax etc)
Predicate Offence	PO-221	Sectorial Financial Sanctions
Predicate Offence	PO-222	List-Based Financial Sanctions
Predicate Offence	PO-223	Proliferation Financing (including dual-use goods)
Predicate Offence	PO-227	Terrorism: Left-wing extremism (Anarchists, Environmental & Animal Rights extremists, Anti-Fascist)
Predicate Offence	PO-228	Terrorism: Radical Islamic terrorism (Extremist religious ideologies)
Predicate Offence	PO-229	Terrorism: Right-wing extremism (White Supremacists, Anti-government, Anti-immigration, Neo-Nazi)
Predicate Offence	PO-231	Migrant smuggling

Category	Indic Code	Indicator Description
Predicate Offence	PO-232	Trafficking in Human Beings - Forced Labour
Predicate Offence	PO-233	Trafficking in Human Beings - Organ Removal
Predicate Offence	PO-718	Fraud
Predicate Offence - Location	PO-Location-1	Malta
Predicate Offence - Location	PO-Location-2	EU/EEA (excluding Malta)
Predicate Offence - Location	PO-Location-3	Non-EU/EEA
Product	Prod-5	Bank Accounts
Product	Prod-9	Virtual IBANs
Product	Prod-11	Debit/Credit Cards
Product	Prod-14	e-Money Accounts
Product	Prod-17	Payment services
Product	Prod-20	Money remittance services
Product	Prod-22	Acquiring/Merchant Services

Category	Indic Code	Indicator Description
Product	Prod-24	Loans: External finance (Including: Bank loans)
Product	Prod-26	Table Games
Product	Prod-27	Gaming Machines
Product	Prod-30	Random number games
Product	Prod-34	Sports Betting
Product	Prod-36	Cryptocurrency
Product	Prod-42	Crypto mixers/tumblers
Product	Prod-44	Prepaid Cards
Product	Prod-46	Voluntary Organisations
Product	Prod-49	Foundations
Product	Prod-52	Immovable Property: Domestic
Product	Prod-53	Immovable Property: EU/EEA
Product	Prod-54	Immovable Property: Non EU/EEA
Product	Prod-55	Company Formation
Product	Prod-56	Directorship/company secretary services

Category	Indic Code	Indicator Description
Product	Prod-57	Provision of registered office, business or correspondence address for businesses
Product	Prod-58	Tax Advice
Product	Prod-59	Accounting/Audit Services
Product	Prod-60	Trusts
Product	Prod-63	Investments products
Product	Prod-67	Cheques (Including Bank Draft)
Product	Prod-68	Precious metals/stones and/ or other high value goods
Product	Prod-69	Nominee Shareholding
Product	Prod-71	Fiduciary Services
Product	Prod-72	Crowdfunding
Product	Prod-73	High Value Moveable Assets
Product	Prod-74	Holding Company
Product	Prod-75	Life insurance/assurance products
Product	Prod-76	Loans: BO/Shareholder
Product	Prod-77	Loans: Company-to-company

Category	Indic Code	Indicator Description
Product	Prod-78	Safe Deposit Boxes
Product	Prod-79	Shell Company/ies
Product	Prod-80	Trading Company
Product	Prod-111	Cash
Product	Prod-112	ATM
RS-Account Usage	Ri-02	€2,000 gaming threshold not met
RS-Account Usage	RS-4	Transacting with unrelated/suspicious parties
RS-Account Usage	RS-5	Excessive or accelerated repayments of long term loans (especially in cash)
RS-Account Usage	RS-7	Asset is sold shortly after being purchased
RS-Account Usage	RS-10	Loans secured with assets held by third parties, unrelates to the borrower
RS-Account Usage	RS-17	Abnormal flight ticket purchases
RS-Account Usage	RS-26	Transactional activity is unexplained or is inconsistent with known customer profile
RS-Account Usage	RS-30	Withdrawal of money from foreign jurisdictions not in line with the customer's now profile or without apparent economic sense
RS-Account Usage	RS-34	Funnelling/Channelling of funds

Category	Indic Code	Indicator Description
RS-Account Usage	RS-35	Exposure to the dark web
RS-Account Usage	RS-38	Different IP address/Masking IP address
RS-Account Usage	RS-39	Deposit, minimal activity and request for a withdrawal
RS-Account Usage	RS-46	Linked Accounts/Collusion ring identified
RS-Account Usage	RS-47	Usage of several/multiple debit/credit cards in the name of third-parties
RS-Account Usage	RS-49	Trading based money laundering
RS-Account Usage	RS-51	Chip Dumping
RS-Account Usage	RS-54	Merchant (E-commerce) non-delivery/sub-par delivery of goods
RS-Account Usage	RS-55	Third party/endorsed cheques
RS-Account Usage	RS-56	Withdrawals not in line with the customer's know profile
RS-Account Usage	RS-111	Unnecessarily Complex Series of Transactions
RS-Account Usage	RT-18	Cross-border transportation of cash
RS-Account Usage	RT-35	Chargebacks
RS-Account Usage	RT-36	Structuring/smurfing of transactions

Category	Indic Code	Indicator Description
RS-Customer	Ri-11	IIP - Malta Individual Investor Programme (before 2020)
RS-Customer	Ri-12	IIP - Malta Citizenship by Investment - Citizenship by Naturalisation for Exceptional Services by Direct Investment (from 2020)
RS-Customer	RS-1	Unnecessarily Complex Structure
RS-Customer	RS-2	Uncooperative Customer
RS-Customer	RS-23	Links to Adverse Media
RS-Customer	RS-37	Beneficial owner concealment
RS-Customer	RS-40	Unknown SOF/SOW
RS-Customer	RS-44	Links identified to a Freezing Order
RS-Customer	RS-45	Unexplained wealth
RS-Customer	RS-48	Legal person not filing required documents with authorities (e.g. annual return, financial statements with MBR etc.)
RS-Customer	RS-50	Money Mule(s)
RS-Customer	RS-52	Money Laundering Standalone (including professional money launderers)
RS-Customer	RS-53	Identity theft

Category	Indic Code	Indicator Description
RS-Customer	RS-61	Sanctions Regime: EU
RS-Customer	RS-62	Sanctions Regime: UN
RS-Customer	RS-63	Sanctions Regime: Other (OFAC, OFSI, Other Country Lists etc.)
RS-Customer	RT-11	Customer was refused service/onboarding/occasional transaction due to ML/FT concerns (including attempted transactions)
RS-Customer	RT-13	Business relation was closed due to ML/FT concerns
RS-Customer	RT-23	Exposure to High Risk Jurisdiction
RS-Customer	RT-25	Cash-intensive undertaking
RS-Customer	RT-30	Company set up and liquidated soon after
RS-Customer	RT-38	IIP - Refused Investor Programs applicants (irrespective of the application year)

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