



Risk Evaluation Questionnaire 2026

PREVIEW

This document contains provisional questions which will be featured in the REQ for PREVIEW for the year 2026. This document should be utilised by subject persons to initiate the gathering of the necessary information required to ensure timely and accurate submission of the 2026 REQ. Questions presented in this document may be subject to change should the FIAU deem it necessary. The 2026 REQ submission is only considered valid when submitted through the FIAU CASPAR portal and upon payment confirmation.

Subject Person Information

Subject Person Information (1)

Q1

Subject persons are required, for each of the questions included in this questionnaire, to choose the answer option that is best suited to the subject person. 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 the actual situation within the subject person's operations. In the text box, you can formulate general remarks on the subject person's operation. Please note that these general remarks are not taken into account in the initial automated analysis of the answers submitted.

The answers submitted are subject to quality checks by the FIAU from time to time, and therefore it is essential to provide a true and fair reflection of the current situation.

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Product Risk

Product Risk (280)

(Relates to Company Service Providers)

Q1

Please indicate the type of licence authorised by the Malta Financial Services Authority that you hold:

Choose only one option:

- Class A CSP
- Class B CSP
- Class C CSP

Product Risk (281)

(Relates to Company Service Providers)

Q2

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

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

Choose more than one option:

- Formation of companies or other legal entities;
- Provision of a registered office
- Acting or arranging others to act as director, company secretary etc.

Product Risk (282)

(Relates to Company Service Providers)

Q3

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

Choose only one option:

- Yes
- No

Product Risk (283)

(Relates to Company Service Providers)

Q4

Provide details of the de-risking.

[Answer if Q3 is Yes]

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Product Risk (284)

(Relates to Company Service Providers)

Q5

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

[Answer if Q2 is Formation of companies or other legal entities;]

Product Risk (285)

(Relates to Company Service Providers)

Q6

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

[Answer if Q5 is > 0]

Product Risk (286)

(Relates to Company Service Providers)

Q7

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

[Answer if Q2 is Provision of a registered office]

Product Risk (287)

(Relates to Company Service Providers)

Q8

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

[Answer if Q7 is > 0]

Product Risk (288)

(Relates to Company Service Providers)

Q9

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

[Answer if Q7 is > 0]

Product Risk (289)

(Relates to Company Service Providers)

Q10

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

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (414)

(Relates to Company Service Providers)

Q11

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

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (415)

(Relates to Company Service Providers)

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

<p>Q12</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is solely or jointly vested with the legal and judicial representation of the company</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q13</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is vested with the legal and judicial representation of the company, but where legal and judicial representation is vested in different directors acting individually</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q14</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the company</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q15</p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the customer, however, he was authorised through a board resolution or power of attorney to open/manage customer's bank/payment account</i></p> <p>[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]</p>	<input type="text"/>
<p>Q16</p> <p><i>Number of customers as at the end of the previous calendar year, for whom provision of directorship services includes having signatory right on customers' bank or payment accounts</i></p>	<input type="text"/>

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]	
Q17 <i>Number of customers where power of attorney authorisations or board of directors resolutions have been granted to a third party to open and/or manage customers' bank/payment accounts during the previous calendar year</i> [Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]	<input data-bbox="1050 383 1394 423" type="text"/>

Product Risk (417)

(Relates to Company Service Providers)

Q18

Please indicate how many customers to whom you offered directorship services or arranged for another person to act as director of a company, a partner in a partnership or in a similar position, did not have their own bank/payment/crypto account as at the end of the previous calendar but instead used your clients' account.

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]

Product Risk (419)

(Relates to Company Service Providers)

Q19

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

[Answer if Q2 is Acting or arranging others to act as director, company secretary etc.]



Customer Risk

Customer Risk (160)

(Relates to Company Service Providers)

Q1

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

Customer Risk (161)

(Relates to Company Service Providers)

Q2

Please list the number of business relationships that you had as at the end of the previous calendar year where the customer is a company.

[Answer if Q1 is > 0]

Customer Risk (162)

(Relates to Company Service Providers)

Q3

Please list the number of business relationships that you had as at the end of the previous calendar year where the customer is a commercial partnership.

[Answer if Q1 is > 0]

Customer Risk (163)

(Relates to Company Service Providers)

Q4

Please list the number of business relationships that you had as at the end of the previous calendar year where the customer is a foundation or association.

[Answer if Q1 is > 0]

Customer Risk (164)

(Relates to Company Service Providers)

Q5

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

[Answer if Q1 is > 0]

Customer Risk (165)

(Relates to Company Service Providers)

Q6

Please list the number of business relationships that you had as at the end of the previous calendar year where the customer's ownership and control structure involves a trust, foundation or other similar legal arrangement (i.e. it is not the customer who is the trust, foundation or similar legal arrangement).

[Answer if Q1 is > 0]

Customer Risk (166)

(Relates to Company Service Providers)

Q7

Of the total customer base as at the end of the previous calendar year, how many natural persons customers were PEPs (including family members and close associates)?

[Answer if Q1 is > 0]

Customer Risk (167)

(Relates to Company Service Providers)

Q8

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

[Answer if Q1 is > 0]

If a PEP is a beneficial owner of two customers, both customers are to be included.

Customer Risk (168)

(Relates to Company Service Providers)

Q9

Please list the number of customers to whom you provided company services during the previous calendar year, where the customer being a natural persons or at least one of the beneficial owners of the legal person customer benefited from residency

schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by Malta.

[Answer if Q1 is > 0]

Customer Risk (169)

(Relates to Company Service Providers)

Q10

Please list the number of customers to whom you were providing company services (constituting relevant activity) during the previous calendar year, where the customer being a natural persons or at least one of the beneficial owners of the legal person customer benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by countries other than Malta.

[Answer if Q1 is > 0]

Customer Risk (170)

(Relates to Company Service Providers)

Q11

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

[Answer if Q1 is > 0]

Customer Risk (171)

(Relates to Company Service Providers)

Q12

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

[Answer if Q1 is > 0]

Customer Risk (172)

(Relates to Company Service Providers)

Q13

Of the total customer base as at the end of the previous calendar year, how many customers acted as holding companies with subsidiaries or investments in non-EU/non-EEA jurisdictions.

[Answer if Q1 is > 0]

Customer Risk (173)

(Relates to Company Service Providers)

Q14

How many of the customers to whom you were providing company services as at the end of the previous calendar year meet the definition of small companies in line with the Companies Act, that is, companies which on their balance sheet do not exceed the limits of two of the three following criteria: - balance sheet total: EUR4 million (4,000,000); - turnover: EUR8 million (8,000,000); - average number of employees during the accounting period: fifty (50)

[Answer if Q1 is > 0]

or choose one of:

- Not Applicable

Customer Risk (174)

(Relates to Company Service Providers)

Q15

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

[Answer if Q5 is > 0]

Customer Risk (175)

(Relates to Company Service Providers)

Q16

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

[Answer if Q5 is > 0]

Customer Risk (176)

(Relates to Company Service Providers)

Q17

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

[Answer if Q5 is > 0]

Choose more than one option:

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

Customer Risk (177)

(Relates to Company Service Providers)

Q18

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

[Answer if Q5 is > 0]

Customer Risk (178)

(Relates to Company Service Providers)

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

Q19	
<i>Licensed activities</i>	<input type="text"/>
[Answer if Q5 is > 0]	
Q20	
<i>Cash intensive activities</i>	<input type="text"/>
[Answer if Q5 is > 0]	
Q21	
<i>Consulting, marketing and advisory activities</i>	<input type="text"/>
[Answer if Q5 is > 0]	
Q22	<input type="text"/>

Import/export activities	
[Answer if Q5 is > 0]	
Q23	
Manufacturing activities	<input type="text"/>
[Answer if Q5 is > 0]	
Q24	
Holding entities	<input type="text"/>
[Answer if Q5 is > 0]	
Q25	
Operate in/trade dual use items	<input type="text"/>
[Answer if Q5 is > 0]	
Q26	
Other	<input type="text"/>
[Answer if Q5 is > 0]	

Customer Risk (179)

(Relates to Company Service Providers)

Q27

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

[Answer if Q7 is > 0]

Guidance Note: A private company with an accounting period ending on 31 December 2024, would need to file its accounts latest by 12 December 2025. Thus, when filling in the REQ 2026 in April 2026 in respect of the year 2025, Subject Persons are required to indicate the number of customers who did not file their financial statements for financial year 2024. Similarly for other reporting periods, i.e. any financial statements that were due to be reported at any point in 2025 and were not reported.

Customer Risk (180)

(Relates to Company Service Providers)

Q28

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

[Answer if Q7 is > 0]

Customer Risk (181)

(Relates to Company Service Providers)

Q29

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

[Answer if Q7 is > 0]

Customer Risk (182)

(Relates to Company Service Providers)

Q30

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

[Answer if Q10 is > 0]

Customer Risk (183)

(Relates to Company Service Providers)

Q31

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

[Answer if Q10 is > 0]

Customer Risk (184)

(Relates to Company Service Providers)

Q32

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

[Answer if Q10 is > 0]

Customer Risk (185)

(Relates to Company Service Providers)

Q33

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

Customer Risk (186)

(Relates to Company Service Providers)

Q34

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

Customer Risk (187)

(Relates to Company Service Providers)

Q35

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

Customer Risk (189)

(Relates to Company Service Providers)

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

Q36	<input type="text"/>
Licensed activities	<input type="text"/>
Q37	<input type="text"/>
Cash intensive activities	<input type="text"/>
Q38	<input type="text"/>
Consulting, marketing and advisory activities	<input type="text"/>
Q39	<input type="text"/>
Import/export activities	<input type="text"/>
Q40	<input type="text"/>
Manufacturing activities	<input type="text"/>
Q41	<input type="text"/>
Holding entities	<input type="text"/>
Q42	<input type="text"/>
Operate in/trade dual use items	<input type="text"/>
Q43	<input type="text"/>
Other	<input type="text"/>

Customer Risk (190)

(Relates to Company Service Providers)

Q44

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

Customer Risk (191)

(Relates to Company Service Providers)

Q45

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

Customer Risk (192)

(Relates to Company Service Providers)

Q46

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

Customer Risk (193)

(Relates to Company Service Providers)

Q47

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

Customer Risk (194)

(Relates to Company Service Providers)

Q48

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

Guidance Note: A private company with an accounting period ending on 31 December 2024, would need to file its accounts latest by 12 December 2025. Thus, when filling in the REQ 2026 in April 2026 in respect of the year 2025, Subject Persons are required to indicate the number of customers who did not file their financial statements for financial year 2024. Similarly for other reporting periods, i.e. any financial statements that were due to be reported at any point in 2025 and were not reported.

Customer Risk (306)

(Relates to Company Service Providers)

Q49

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

[Answer if Q11 is > 0]

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

Jurisdiction Risk

Jurisdiction Risk (93)

(Relates to Company Service Providers)

Q1

Please indicate the respective jurisdiction in which the natural persons (customers or beneficial owners of legal persons) are considered to be PEPs.

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (115)

(Relates to Company Service Providers)

Q2

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

[Answer if Q5 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (116)

(Relates to Company Service Providers)

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

<p>Q3</p> <p>Malta</p> <p>[Answer if Q5 is > 0]</p>	<input type="text"/>
<p>Q4</p> <p>EU/EEA country (apart from Malta)</p> <p>[Answer if Q5 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input type="text"/>
<p>Q5</p> <p>Non EU/EEA country</p> <p>[Answer if Q5 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input type="text"/>
<p>Q6</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q5 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring'</p>	<input type="text"/>

<p>and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p>Q7</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q6 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Bolivia • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Haiti • Iran, Islamic Republic of • Kenya • Korea, Democratic People's Republic of • Lao PDR • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nepal • Nigeria • Russia • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Vanuatu • Venezuela • Vietnam • Virgin Islands (UK) • Yemen

Q8 Afghanistan [Answer if Q7 is Afghanistan]	<input type="text"/>
Q9 Algeria [Answer if Q7 is Algeria]	<input type="text"/>
Q10 Angola [Answer if Q7 is Angola]	<input type="text"/>
Q11 Bolivia [Answer if Q7 is Bolivia]	<input type="text"/>
Q12 Bulgaria [Answer if Q7 is Bulgaria]	<input type="text"/>
Q13 Burkina Faso [Answer if Q7 is Burkina Faso]	<input type="text"/>
Q14 Cameroon [Answer if Q7 is Cameroon]	<input type="text"/>
Q15 Congo, the Democratic Republic of the [Answer if Q7 is Congo, the Democratic Republic of the]	<input type="text"/>
Q16 Cote D'Ivoire [Answer if Q7 is Cote D'Ivoire]	<input type="text"/>
Q17 Haiti [Answer if Q7 is Haiti]	<input type="text"/>
Q18	<input type="text"/>

Iran, Islamic Republic of	
[Answer if Q7 is Iran, Islamic Republic of]	
Q19	
Kenya	<input type="text"/>
[Answer if Q7 is Kenya]	
Q20	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q7 is Korea, Democratic People's Republic of]	
Q21	
Lao PDR	<input type="text"/>
[Answer if Q7 is Lao PDR]	
Q22	
Lebanon	<input type="text"/>
[Answer if Q7 is Lebanon]	
Q23	
Mali	<input type="text"/>
[Answer if Q7 is Mali]	
Q24	
Monaco	<input type="text"/>
[Answer if Q7 is Monaco]	
Q25	
Mozambique	<input type="text"/>
[Answer if Q7 is Mozambique]	
Q26	
Myanmar	<input type="text"/>
[Answer if Q7 is Myanmar]	
Q27	
Namibia	<input type="text"/>
[Answer if Q7 is Namibia]	
Q28	<input type="text"/>

Nepal	
[Answer if Q7 is Nepal]	
Q29	
Nigeria	<input type="text"/>
[Answer if Q7 is Nigeria]	
Q30	
Russia	<input type="text"/>
[Answer if Q7 is Russia]	
Q31	
South Africa	<input type="text"/>
[Answer if Q7 is South Africa]	
Q32	
South Sudan	<input type="text"/>
[Answer if Q7 is South Sudan]	
Q33	
Syrian Arab Republic	<input type="text"/>
[Answer if Q7 is Syrian Arab Republic]	
Q34	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q7 is Tanzania, United Republic of]	
Q35	
Trinidad and Tobago	<input type="text"/>
[Answer if Q7 is Trinidad and Tobago]	
Q36	
Vanuatu	<input type="text"/>
[Answer if Q7 is Vanuatu]	
Q37	
Venezuela	<input type="text"/>
[Answer if Q7 is Venezuela]	
Q38	<input type="text"/>

Vietnam	
[Answer if Q7 is Vietnam]	
Q39	
Virgin Islands (UK)	<input type="text"/>
[Answer if Q7 is Virgin Islands (UK)]	
Q40	
Yemen	<input type="text"/>
[Answer if Q7 is Yemen]	

Jurisdiction Risk (117)

(Relates to Company Service Providers)

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

Q41	
Malta	<input type="text"/>
[Answer if Q5 is > 0]	
Q42	
EU/EEA country (apart from Malta)	
[Answer if Q5 is > 0]	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
Q43	<input type="text"/>
Non EU/EEA country	
[Answer if Q5 is > 0]	

<p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p>Q44</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q5 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<div data-bbox="1018 864 1374 907" style="border: 1px solid black; height: 19px; width: 223px;"></div>
<p>Q45</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q44 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Bolivia • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Haiti • Iran, Islamic Republic of • Kenya • Korea, Democratic People's Republic of • Lao PDR • Lebanon

	<ul style="list-style-type: none"> • Mali • Monaco • Mozambique • Myanmar • Namibia • Nepal • Nigeria • Russia • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Vanuatu • Venezuela • Vietnam • Virgin Islands (UK) • Yemen
Q46 Afghanistan [Answer if Q45 is Afghanistan]	<input type="text"/>
Q47 Algeria [Answer if Q45 is Algeria]	<input type="text"/>
Q48 Angola [Answer if Q45 is Angola]	<input type="text"/>
Q49 Bolivia [Answer if Q45 is Bolivia]	<input type="text"/>
Q50 Bulgaria [Answer if Q45 is Bulgaria]	<input type="text"/>
Q51 Burkina Faso [Answer if Q45 is Burkina Faso]	<input type="text"/>
Q52	<input type="text"/>

Cameroon	
[Answer if Q45 is Cameroon]	
Q53	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q45 is Congo, the Democratic Republic of the]	
Q54	
Cote D'Ivoire	<input type="text"/>
[Answer if Q45 is Cote D'Ivoire]	
Q55	
Haiti	<input type="text"/>
[Answer if Q45 is Haiti]	
Q56	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q45 is Iran, Islamic Republic of]	
Q57	
Kenya	<input type="text"/>
[Answer if Q45 is Kenya]	
Q58	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q45 is Korea, Democratic People's Republic of]	
Q59	
Lao PDR	<input type="text"/>
[Answer if Q45 is Lao PDR]	
Q60	
Lebanon	<input type="text"/>
[Answer if Q45 is Lebanon]	
Q61	
Mali	<input type="text"/>
[Answer if Q45 is Mali]	

Q62 <i>Monaco</i> [Answer if Q45 is Monaco]	<input type="text"/>
Q63 <i>Mozambique</i> [Answer if Q45 is Mozambique]	<input type="text"/>
Q64 <i>Myanmar</i> [Answer if Q45 is Myanmar]	<input type="text"/>
Q65 <i>Namibia</i> [Answer if Q45 is Namibia]	<input type="text"/>
Q66 <i>Nepal</i> [Answer if Q45 is Nepal]	<input type="text"/>
Q67 <i>Nigeria</i> [Answer if Q45 is Nigeria]	<input type="text"/>
Q68 <i>Russia</i> [Answer if Q45 is Russia]	<input type="text"/>
Q69 <i>South Africa</i> [Answer if Q45 is South Africa]	<input type="text"/>
Q70 <i>South Sudan</i> [Answer if Q45 is South Sudan]	<input type="text"/>
Q71 <i>Syrian Arab Republic</i> [Answer if Q45 is Syrian Arab Republic]	<input type="text"/>

Q72 Tanzania, United Republic of [Answer if Q45 is Tanzania, United Republic of]	<input type="text"/>
Q73 Trinidad and Tobago [Answer if Q45 is Trinidad and Tobago]	<input type="text"/>
Q74 Vanuatu [Answer if Q45 is Vanuatu]	<input type="text"/>
Q75 Venezuela [Answer if Q45 is Venezuela]	<input type="text"/>
Q76 Vietnam [Answer if Q45 is Vietnam]	<input type="text"/>
Q77 Virgin Islands (UK) [Answer if Q45 is Virgin Islands (UK)]	<input type="text"/>
Q78 Yemen [Answer if Q45 is Yemen]	<input type="text"/>

Jurisdiction Risk (118)

(Relates to Company Service Providers)

Q79

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

[Answer if Q5 is > 0]

Jurisdiction Risk (119)

(Relates to Company Service Providers)

Q80

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

[Answer if Q5 is > 0]

Jurisdiction Risk (120)

(Relates to Company Service Providers)

Q81

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

[Answer if Q5 is > 0]

Jurisdiction Risk (121)

(Relates to Company Service Providers)

Q82

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

[Answer if Q7 is > 0]

Jurisdiction Risk (122)

(Relates to Company Service Providers)

Q83

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

[Answer if Q7 is > 0]

Jurisdiction Risk (123)

(Relates to Company Service Providers)

Q84

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

[Answer if Q7 is > 0]

Jurisdiction Risk (124)

(Relates to Company Service Providers)

How many beneficial owners of the customers to whom you provided a registered office, a business correspondence or administrative address and other related

services as at the end of the previous calendar year resided in the following jurisdictions:

<p>Q85</p> <p>Malta</p> <p>[Answer if Q7 is > 0]</p>	<input type="text"/>
<p>Q86</p> <p>EU/EEA country (apart from Malta)</p> <p>[Answer if Q7 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input type="text"/>
<p>Q87</p> <p>Non EU/EEA country</p> <p>[Answer if Q7 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input type="text"/>
<p>Q88</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q7 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring'</p>	<input type="text"/>

<p>and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p>Q89</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q88 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Bolivia • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Haiti • Iran, Islamic Republic of • Kenya • Korea, Democratic People's Republic of • Lao PDR • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nepal • Nigeria • Russia • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Vanuatu • Venezuela • Vietnam • Virgin Islands (UK) • Yemen

Q90 Afghanistan [Answer if Q89 is Afghanistan]	<input type="text"/>
Q91 Algeria [Answer if Q89 is Algeria]	<input type="text"/>
Q92 Angola [Answer if Q89 is Angola]	<input type="text"/>
Q93 Bolivia [Answer if Q89 is Bolivia]	<input type="text"/>
Q94 Bulgaria [Answer if Q89 is Bulgaria]	<input type="text"/>
Q95 Burkina Faso [Answer if Q89 is Burkina Faso]	<input type="text"/>
Q96 Cameroon [Answer if Q89 is Cameroon]	<input type="text"/>
Q97 Congo, the Democratic Republic of the [Answer if Q89 is Congo, the Democratic Republic of the]	<input type="text"/>
Q98 Cote D'Ivoire [Answer if Q89 is Cote D'Ivoire]	<input type="text"/>
Q99 Haiti [Answer if Q89 is Haiti]	<input type="text"/>
Q100	<input type="text"/>

Iran, Islamic Republic of	
[Answer if Q89 is Iran, Islamic Republic of]	
Q101	
Kenya	<input type="text"/>
[Answer if Q89 is Kenya]	
Q102	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q89 is Korea, Democratic People's Republic of]	
Q103	
Lao PDR	<input type="text"/>
[Answer if Q89 is Lao PDR]	
Q104	
Lebanon	<input type="text"/>
[Answer if Q89 is Lebanon]	
Q105	
Mali	<input type="text"/>
[Answer if Q89 is Mali]	
Q106	
Monaco	<input type="text"/>
[Answer if Q89 is Monaco]	
Q107	
Mozambique	<input type="text"/>
[Answer if Q89 is Mozambique]	
Q108	
Myanmar	<input type="text"/>
[Answer if Q89 is Myanmar]	
Q109	
Namibia	<input type="text"/>
[Answer if Q89 is Namibia]	
Q110	<input type="text"/>

<i>Nepal</i>	
[Answer if Q89 is Nepal]	
Q111	
<i>Nigeria</i>	<input type="text"/>
[Answer if Q89 is Nigeria]	
Q112	
<i>Russia</i>	<input type="text"/>
[Answer if Q89 is Russia]	
Q113	
<i>South Africa</i>	<input type="text"/>
[Answer if Q89 is South Africa]	
Q114	
<i>South Sudan</i>	<input type="text"/>
[Answer if Q89 is South Sudan]	
Q115	
<i>Syrian Arab Republic</i>	<input type="text"/>
[Answer if Q89 is Syrian Arab Republic]	
Q116	
<i>Tanzania, United Republic of</i>	<input type="text"/>
[Answer if Q89 is Tanzania, United Republic of]	
Q117	
<i>Trinidad and Tobago</i>	<input type="text"/>
[Answer if Q89 is Trinidad and Tobago]	
Q118	
<i>Vanuatu</i>	<input type="text"/>
[Answer if Q89 is Vanuatu]	
Q119	
<i>Venezuela</i>	<input type="text"/>
[Answer if Q89 is Venezuela]	
Q120	<input type="text"/>

Vietnam	
[Answer if Q89 is Vietnam]	
Q121	
Virgin Islands (UK)	<input type="text"/>
[Answer if Q89 is Virgin Islands (UK)]	
Q122	
Yemen	<input type="text"/>
[Answer if Q89 is Yemen]	

Jurisdiction Risk (125)

(Relates to Company Service Providers)

How many beneficial owners of the customers to whom you provided company secretary services, or arranged for, as at the end of the previous calendar year resided in the following jurisdictions:

Q123	
Malta	<input type="text"/>
[Answer if Q10 is > 0]	
Q124	
EU/EEA country (apart from Malta)	
[Answer if Q10 is > 0]	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
Q125	<input type="text"/>
Non EU/EEA country	
[Answer if Q10 is > 0]	

<p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p>Q126</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q10 is > 0]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<div data-bbox="1018 864 1374 907" style="border: 1px solid black; height: 19px; width: 223px;"></div>
<p>Q127</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q126 is > 0]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Bolivia • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Haiti • Iran, Islamic Republic of • Kenya • Korea, Democratic People's Republic of • Lao PDR • Lebanon

	<ul style="list-style-type: none"> • Mali • Monaco • Mozambique • Myanmar • Namibia • Nepal • Nigeria • Russia • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Vanuatu • Venezuela • Vietnam • Virgin Islands (UK) • Yemen
Q128 Afghanistan [Answer if Q127 is Afghanistan]	<input type="text"/>
Q129 Algeria [Answer if Q127 is Algeria]	<input type="text"/>
Q130 Angola [Answer if Q127 is Angola]	<input type="text"/>
Q131 Bolivia [Answer if Q127 is Bolivia]	<input type="text"/>
Q132 Bulgaria [Answer if Q127 is Bulgaria]	<input type="text"/>
Q133 Burkina Faso [Answer if Q127 is Burkina Faso]	<input type="text"/>
Q134	<input type="text"/>

Cameroon	
[Answer if Q127 is Cameroon]	
Q135	
Congo, the Democratic Republic of the	<input type="text"/>
[Answer if Q127 is Congo, the Democratic Republic of the]	
Q136	
Cote D'Ivoire	<input type="text"/>
[Answer if Q127 is Cote D'Ivoire]	
Q137	
Haiti	<input type="text"/>
[Answer if Q127 is Haiti]	
Q138	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q127 is Iran, Islamic Republic of]	
Q139	
Kenya	<input type="text"/>
[Answer if Q127 is Kenya]	
Q140	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q127 is Korea, Democratic People's Republic of]	
Q141	
Lao PDR	<input type="text"/>
[Answer if Q127 is Lao PDR]	
Q142	
Lebanon	<input type="text"/>
[Answer if Q127 is Lebanon]	
Q143	
Mali	<input type="text"/>
[Answer if Q127 is Mali]	

Q144 <i>Monaco</i> [Answer if Q127 is Monaco]	<input type="text"/>
Q145 <i>Mozambique</i> [Answer if Q127 is Mozambique]	<input type="text"/>
Q146 <i>Myanmar</i> [Answer if Q127 is Myanmar]	<input type="text"/>
Q147 <i>Namibia</i> [Answer if Q127 is Namibia]	<input type="text"/>
Q148 <i>Nepal</i> [Answer if Q127 is Nepal]	<input type="text"/>
Q149 <i>Nigeria</i> [Answer if Q127 is Nigeria]	<input type="text"/>
Q150 <i>Russia</i> [Answer if Q127 is Russia]	<input type="text"/>
Q151 <i>South Africa</i> [Answer if Q127 is South Africa]	<input type="text"/>
Q152 <i>South Sudan</i> [Answer if Q127 is South Sudan]	<input type="text"/>
Q153 <i>Syrian Arab Republic</i> [Answer if Q127 is Syrian Arab Republic]	<input type="text"/>

Q154 <i>Tanzania, United Republic of</i> [Answer if Q127 is Tanzania, United Republic of]	<input type="text"/>
Q155 <i>Trinidad and Tobago</i> [Answer if Q127 is Trinidad and Tobago]	<input type="text"/>
Q156 <i>Vanuatu</i> [Answer if Q127 is Vanuatu]	<input type="text"/>
Q157 <i>Venezuela</i> [Answer if Q127 is Venezuela]	<input type="text"/>
Q158 <i>Vietnam</i> [Answer if Q127 is Vietnam]	<input type="text"/>
Q159 <i>Virgin Islands (UK)</i> [Answer if Q127 is Virgin Islands (UK)]	<input type="text"/>
Q160 <i>Yemen</i> [Answer if Q127 is Yemen]	<input type="text"/>

Jurisdiction Risk (126)

(Relates to Company Service Providers)

Q161

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

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (127)

(Relates to Company Service Providers)

How many beneficial owners of customers to whom you provided directorship services, or arranged for another person to act as director of a company, a partner in a partnership, or in a similar position in relation to other legal entities, as at the end of the previous calendar year resided in the following jurisdictions:

Q162	<input type="text"/>
Malta	
Q163	
EU/EEA country (apart from Malta)	
<i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i>	<input type="text"/>
Q164	
Non EU/EEA country	
<i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i>	<input type="text"/>
Q165	<input type="text"/>
Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and	

<p>'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p>Q166</p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p>[Answer if Q165 is > 0]</p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Bolivia • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Haiti • Iran, Islamic Republic of • Kenya • Korea, Democratic People's Republic of • Lao PDR • Lebanon • Mali • Monaco • Mozambique • Myanmar • Namibia • Nepal • Nigeria • Russia • South Africa • South Sudan • Syrian Arab Republic • Tanzania, United Republic of • Trinidad and Tobago • Vanuatu

	<ul style="list-style-type: none"> • Venezuela • Vietnam • Virgin Islands (UK) • Yemen
Q167 Afghanistan [Answer if Q166 is Afghanistan]	<input type="text"/>
Q168 Algeria [Answer if Q166 is Algeria]	<input type="text"/>
Q169 Angola [Answer if Q166 is Angola]	<input type="text"/>
Q170 Bolivia [Answer if Q166 is Bolivia]	<input type="text"/>
Q171 Bulgaria [Answer if Q166 is Bulgaria]	<input type="text"/>
Q172 Burkina Faso [Answer if Q166 is Burkina Faso]	<input type="text"/>
Q173 Cameroon [Answer if Q166 is Cameroon]	<input type="text"/>
Q174 Congo, the Democratic Republic of the [Answer if Q166 is Congo, the Democratic Republic of the]	<input type="text"/>
Q175 Cote D'Ivoire [Answer if Q166 is Cote D'Ivoire]	<input type="text"/>
Q176	<input type="text"/>

Haiti	
[Answer if Q166 is Haiti]	
Q177	
Iran, Islamic Republic of	<input type="text"/>
[Answer if Q166 is Iran, Islamic Republic of]	
Q178	
Kenya	<input type="text"/>
[Answer if Q166 is Kenya]	
Q179	
Korea, Democratic People's Republic of	<input type="text"/>
[Answer if Q166 is Korea, Democratic People's Republic of]	
Q180	
Lao PDR	<input type="text"/>
[Answer if Q166 is Lao PDR]	
Q181	
Lebanon	<input type="text"/>
[Answer if Q166 is Lebanon]	
Q182	
Mali	<input type="text"/>
[Answer if Q166 is Mali]	
Q183	
Monaco	<input type="text"/>
[Answer if Q166 is Monaco]	
Q184	
Mozambique	<input type="text"/>
[Answer if Q166 is Mozambique]	
Q185	
Myanmar	<input type="text"/>
[Answer if Q166 is Myanmar]	
Q186	<input type="text"/>

Namibia	
[Answer if Q166 is Namibia]	
Q187	
Nepal	<input type="text"/>
[Answer if Q166 is Nepal]	
Q188	
Nigeria	<input type="text"/>
[Answer if Q166 is Nigeria]	
Q189	
Russia	<input type="text"/>
[Answer if Q166 is Russia]	
Q190	
South Africa	<input type="text"/>
[Answer if Q166 is South Africa]	
Q191	
South Sudan	<input type="text"/>
[Answer if Q166 is South Sudan]	
Q192	
Syrian Arab Republic	<input type="text"/>
[Answer if Q166 is Syrian Arab Republic]	
Q193	
Tanzania, United Republic of	<input type="text"/>
[Answer if Q166 is Tanzania, United Republic of]	
Q194	
Trinidad and Tobago	<input type="text"/>
[Answer if Q166 is Trinidad and Tobago]	
Q195	
Vanuatu	<input type="text"/>
[Answer if Q166 is Vanuatu]	
Q196	<input type="text"/>

Venezuela	
[Answer if Q166 is Venezuela]	
Q197	
Vietnam	<input type="text"/>
[Answer if Q166 is Vietnam]	
Q198	
Virgin Islands (UK)	<input type="text"/>
[Answer if Q166 is Virgin Islands (UK)]	
Q199	
Yemen	<input type="text"/>
[Answer if Q166 is Yemen]	

Jurisdiction Risk (232)

(Relates to Company Service Providers)

Q200

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

[Answer if Q12 is > 0]

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

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Jurisdiction Risk (233)

(Relates to Company Service Providers)

Q201

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

[Answer if Q12 is > 0]

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

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Interface Risk

Interface Risk (27)

(Relates to Company Service Providers)

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

Q1 a) on a face-to-face basis during the previous calendar year? <i>Onboarded on a face-to-face basis refers to the cases when the customer is physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group, but not by the subject person, the relationship is to be considered as non-face-to-face - since the subject person did not meet the client (or its agent) for verification purposes.</i>	<input type="text"/>
Q2 b) on a non-face-to-face basis, during the previous calendar year? <i>Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group but not by the subject person, the relationship is to be considered as non-face-to-face - since the subject person did not meet the client (or its agent) for verification purposes.</i>	<input type="text"/>

Interface Risk (51)

(Relates to Company Service Providers)

Q3

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

Interface Risk (29)

(Relates to Company Service Providers)

Q4

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

Interface Risk (30)

(Relates to Company Service Providers)

Q5

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

[Answer if Q4 is > 0]

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

Interface Risk (52)

(Relates to Company Service Providers)

Q6

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



MLRO, Monitoring Function and Employees

MLRO, Monitoring Function and Employees (16)

Q1

How many years of experience do you have in AML/CFT?

Choose only one option:

- Less than 1 year
- 1-2 years
- 3 - 4 years
- 5 - 6 years
- 7 - 8 years
- 9 - 10 years
- Over 10 years

MLRO, Monitoring Function and Employees (2)

Q2

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

Choose only one option:

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

MLRO, Monitoring Function and Employees (17)

Q3

On average, how many years of experience do you have in the industry?

MLRO, Monitoring Function and Employees (11)

Q4

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

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

MLRO, Monitoring Function and Employees (12)

Q5

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

[Answer if Q4 is > 0]

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

MLRO, Monitoring Function and Employees (19)

Q6

Do you also hold MLRO positions with other entities?

Choose only one option:

- Yes, within the same group structure
-

- Yes, outside of the group structure
- No

MLRO, Monitoring Function and Employees (25)

Q7

In the past five (5) years, were any employees (if the Subject Person has employees) disciplined for non-compliance with the AML/CFT policies and procedures?

Choose only one option:

- Yes
- No

MLRO, Monitoring Function and Employees (26)

Q8

If 'Yes' please explain.

[Answer if Q7 is Yes]

//

Business Risk Assessment

Business Risk Assessment (10)

Q1

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

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

Choose only one option:

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

Business Risk Assessment (12)

Q2

What is your most recent BRA controls effectiveness rating?

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

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

Choose only one option:

- Low
- Lower medium
- Medium
- Higher medium
- High
- Very high
- Control effectiveness not rated

Business Risk Assessment (22)

Q3

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

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

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

Choose only one option:

- Low
- Lower medium
- Medium
- Higher medium
- High
- Very high
- Residual Risk not rated

Business Risk Assessment (26)

Q4

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

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

//

Business Risk Assessment (27)

Q5

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

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

//

Business Risk Assessment (28)

Q6

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

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

//

Business Risk Assessment (24)

Q7

Please indicate the jurisdictions which you consider as high risk

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

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

//

Business Risk Assessment (29)

Q8

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

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

//

Business Risk Assessment (23)

Q9

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

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

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment

Customer Acceptance and Risk Assessment (109)

Q1

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

Choose only one option:

- Yes
- No
- CAP Not Available

Customer Acceptance and Risk Assessment (112)

Q2

Did this review result in major changes?

[Answer if Q1 is Yes]

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (113)

Q3

Please explain these changes.

[Answer if Q2 is Yes]

//

Customer Acceptance and Risk Assessment (117)

Q4

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

[Answer if Q1 is Yes, No]

Choose "Not Available" if information cannot be provided.

or choose one of:

- Not Available

Customer Acceptance and Risk Assessment (110)

Q5

As at end of the last calendar year, how many customers fell outside the CAP but were provided with services?

[Answer if Q1 is Yes, No]

Customer Acceptance and Risk Assessment (99)

Q6

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

Choose only one option:

- Yes
- No
- CRA Methodology Not Available

Customer Acceptance and Risk Assessment (100)

Q7

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

[Answer if Q6 is Yes]

//

Customer Acceptance and Risk Assessment (101)

Q8

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

Choose only one option:

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

Customer Acceptance and Risk Assessment (111)

Q9

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

Customer Acceptance and Risk Assessment (103)

Q10

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

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (104)

Q11

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

[Answer if Q10 is > 0]

//

Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

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

	<ul style="list-style-type: none"> • Not Applicable
Q14 <i>c) High risk customers</i> [Answer if Q6 is Yes]	<i>Choose more than one option:</i> <ul style="list-style-type: none"> • Trigger event based • At least annually • Every 13 - 23 months • Every 2 - 3 years • Never • More than 3 years <i>or choose one of:</i> <ul style="list-style-type: none"> • Not Applicable

Customer Acceptance and Risk Assessment (106)

Q15

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

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

Customer Acceptance and Risk Assessment (107)

Q16

What was the reason for the de-risking exercise?

[Answer if Q15 is > 0]

//

Customer Acceptance and Risk Assessment (108)

Q17

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

Policies & Procedures

Policies and Procedures (53)

Q1

How frequently do you review and / or update your AML/CFT written policies and procedures?

Choose only one option:

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

Policies and Procedures (37)

Q2

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

Choose more than one option:

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

Policies and Procedures (38)

Q3

How do you determine whether individuals/entities are sanctioned?

Choose more than one option:

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

Policies and Procedures (78)

Q4

In respect of intermediaries, do you have policies and procedures in place to assess their AML/CFT compliance framework (in line with Section 2.1.2 of the IPs Part II applicable to CSPs)?

Choose only one option:

- Yes
- No

Policies and Procedures (54)

Q5

Have you ever engaged an independent third party to carry out an independent audit to assess your compliance with AML/CFT obligations?

Choose only one option:

- Yes - During the past 2 years
- Yes - Over 2 years ago
- No

Policies and Procedures (55)

Q6

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

[Answer if Q5 is Yes - During the past 2 years, Yes - Over 2 years ago]

Choose only one option:

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

Policies and Procedures (56)

Q7

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

[Answer if Q5 is Yes - During the past 2 years, Yes - Over 2 years ago]

//

Policies and Procedures (57)

Q8

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

[Answer if Q5 is Yes - During the past 2 years, Yes - Over 2 years ago]

//

Policies and Procedures (58)

Q9

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

[Answer if Q5 is Yes - During the past 2 years, Yes - Over 2 years ago]

~~Choose more than one option:~~ _____

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

Policies and Procedures (59)

Q10

If others, explain

[Answer if Q9 is Others]

//

Policies and Procedures (69)

Q11

Do your policies and procedures contain specific provisions relevant to information required to be obtained in line with Section 2.3 of the of the IPs Part II applicable to CSPs when providing company (or legal arrangement) formation services?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Outsourcing

Outsourcing (7)

Q1

Have you outsourced the carrying out of any applicable AML/CFT obligations during the previous calendar year?

Choose only one option:

- Yes
- No

Outsourcing (8)

Q2

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

[Answer if Q1 is Yes]

//

Outsourcing (17)

Q3

If you outsourced the carrying out of any applicable AML/CFT obligations, please specify the obligations that are being outsourced.

[Answer if Q1 is Yes]

Choose more than one option:

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

- Drafting of policies and procedures
- MLRO function

Outsourcing (18)

Q4

If you outsource AML/CFT obligations to a service provider/s, what is the frequency of assessing the quality of the services provided?

[Answer if Q1 is Yes]

Choose only one option:

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

Outsourcing (11)

Please indicate the jurisdictions where the service provider/s to whom you have outsourced the carrying out of any applicable AML/CFT obligations, are located..

<p>Q5</p> <p><i>Malta</i></p> <p>[Answer if Q1 is Yes]</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> • Yes • No
<p>Q6</p> <p><i>EU/EEA (Excluding Malta)</i></p> <p>[Answer if Q1 is Yes]</p> <p><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for</i></p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> • Yes • No

<p>Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p>Q7</p> <p>Non-EU/Non-EEA</p> <p>[Answer if Q1 is Yes]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q8</p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q1 is Yes]</p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> • Yes • No
<p>Q9</p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p>[Answer if Q8 is Yes]</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> • Afghanistan • Algeria • Angola • Bolivia • Bulgaria • Burkina Faso • Cameroon • Congo, the Democratic Republic of the • Cote D'Ivoire • Haiti

- Iran, Islamic Republic of
- Kenya
- Korea, Democratic People's Republic of
- Lao PDR
- Lebanon
- Mali
- Monaco
- Mozambique
- Myanmar
- Namibia
- Nepal
- Nigeria
- Russia
- South Africa
- South Sudan
- Syrian Arab Republic
- Tanzania, United Republic of
- Trinidad and Tobago
- Vanuatu
- Venezuela
- Vietnam
- Virgin Islands (UK)
- Yemen

Record-keeping

Record-keeping (1)

Q1

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

Choose only one option:

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

Training

Training (3)

Q1

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

[Answer if Q4 is > 0]

or choose one of:

- Not Applicable

Training (10)

Q2

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

or choose one of:

- Not Applicable

Training (8)

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

Q3 <i>a) specific Maltese AML/CFT regulations (PMLA, PMLFTR, IPs)</i> [Answer if Q1 is Yes]	Choose only one option: <ul style="list-style-type: none">• Yes• No
---	---

Q4 <i>b) AML/CFT policies and procedures relating to the subject person</i> [Answer if Q1 is Yes]	<i>Choose only one option:</i> <ul style="list-style-type: none">• Yes• No
---	---

Reporting

Reporting (15)

Q1

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

Reporting (16)

Q2

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

[Answer if Q1 is > 0]

Reporting (17)

Q3

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

[Answer if Q1 is > 0]

Reporting (18)

Q4

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

Reporting (19)

Q5

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

Ongoing monitoring (data, documents and information)

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

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

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

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

Q4

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

Choose more than one option:

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

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

Q5

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

Ongoing monitoring (Data, documents and information) (6)

Q6

How do you ensure that customer's and/or beneficial owner's information remains up to date and documentation valid?

Choose only one option:

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

Ongoing monitoring (Data, documents and information) (8)

Q7

Do your policies and procedures contain specific provisions relevant to risk based approach to ongoing monitoring depending on the corporate services being provided to customers (in line with Section 2.4.4 of the of the IPs Part II applicable to CSPs)?

Choose only one option:

- Yes
- No

Ongoing monitoring (Transaction Scrutiny)

Ongoing monitoring (Transaction Scrutiny) (14)

Q1

Do you have a documented methodology for transaction monitoring, where a business relationship is present?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing monitoring (Transaction Scrutiny) (28)

Q2

In respect of customers for whom you acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position, please indicate whether transaction monitoring processes and/or systems for monitoring transactions is/are fully automated, partially automated or manual?

Choose only one option:

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

Ongoing monitoring (Transaction Scrutiny) (29)

Q3

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

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

Choose only one option:

- No reviews and updates are carried out
- Monthly basis
- Quarterly basis
- Half yearly
- Yearly
- Every 2 years
- Over 2 years

Ongoing monitoring (Transaction Scrutiny) (30)

Q4

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

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

Choose only one option:

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

Ongoing monitoring (Transaction Scrutiny) (31)

Q5

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

[Answer if Q4 is Real-time, Combination of all]

//

Ongoing monitoring (Transaction Scrutiny) (37)

Q6

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

[Answer if Q4 is Pre-event]

//

Ongoing monitoring (Transaction Scrutiny) (38)

Q7

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

//

Ongoing monitoring (Transaction Scrutiny) (39)

Q8

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

[Answer if Q4 is Pre-event, Post-event]

//

Ongoing monitoring (Transaction Scrutiny) (40)

Q9

Please explain measures that you apply in respect of transactions flagged for scrutiny.

//

Ongoing monitoring (Transaction Scrutiny) (32)

Q10

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

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

Ongoing monitoring (Transaction Scrutiny) (33)

Q11

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

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

Ongoing monitoring (Transaction Scrutiny) (34)

Q12

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

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

Ongoing monitoring (Transaction Scrutiny) (35)

Q13

Please explain transaction monitoring process in instances where you acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at end of the previous calendar year, and did not have access to customer's bank/payment accounts.

//

Ongoing monitoring (Transaction Scrutiny) (36)

Q14

Please explain transaction monitoring process in instances where you acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a similar position as at end of the previous calendar year, and did have access to customer's bank/payment accounts.

//

Ongoing monitoring (Transaction Scrutiny) (49)

Q15

Please provide the total number of customers who had and/or have assets frozen, confiscated or seized (due to AML/CFT considerations)?

or choose one of:

- Not Applicable