



# 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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## Customer Risk

### Customer Risk (100)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q1**

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

### Customer Risk (101)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q2**

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

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

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

### Customer Risk (102)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q3**

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

**Customer Risk (103)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q4**

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

**Customer Risk (104)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q5**

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

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

*For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent*



*in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.*

## **Customer Risk (105)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

### **Q6**

Do you have any customers in the following industries?

*Choose more than one option:*

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

*or choose one of:*

- Not Applicable
- Not Available

## **Customer Risk (108)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

### **Q7**

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

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**Q8**

*(a) How many of these are VASPs*

***[Answer if Q7 is > 0]***

**Q9**

*(b) How many of these are financial intermediaries*

***[Answer if Q7 is > 0]***

**Q10**

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

***[Answer if Q7 is > 0]***

**Q11**

*(d) How many of these are issuers*

***[Answer if Q7 is > 0]***

## **Customer Risk (109)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q12**

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

## Customer Risk (110)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q13

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

## Customer Risk (111)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

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

<b>Q14</b>	<input type="text"/>
a) Allow the use of privacy coins	<input type="text"/>
<b>Q15</b>	<input type="text"/>
b) Allow the transfer of VFAs to or from non-custodian wallets	<input type="text"/>
<b>Q16</b>	<input type="text"/>
c) Accept the transfer of VFAs that have passed through mixers, tumblers, etc	<input type="text"/>
<b>Q17</b>	<input type="text"/>
d) Accept the use of unverifiable IP Addresses or other means to obscure their location	<input type="text"/>

<b>Q18</b>	
e) Had an AML/CFT program that was not sufficiently robust	<input type="text"/>
<b>Q19</b>	
f) A lack of transparency surrounding an issue, including the rights of holders and how financing will be used	<input type="text"/>
<b>Q20</b>	
g) Carried out VFA offerings with no capping per user or, even though capped, there are no controls in place to ensure that the capping is somehow circumvented	<input type="text"/>

## Customer Risk (112)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q21**

*How many customers were subject to AML/CFT obligations?*

**[Answer if Q8 is > 0]**

## Customer Risk (113)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q22**

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

*Choose only one option:*

- Yes
- No

## Customer Risk (114)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

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

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

## Customer Risk (115)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q26**

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

**[Answer if Q2 is > 0]**

*Choose only one option:*

- Yes
- No

## Customer Risk (116)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q27**

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*Please specify the additional risk rating/s.*

**[Answer if Q26 is Yes]**

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## **Customer Risk (117)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q28**

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

**[Answer if Q25 is > 0]**

## **Customer Risk (118)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q29**

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

**[Answer if Q2 is > 0]**

*Choose only one option:*

- Yes
- No

## **Customer Risk (119)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q30**

*Do shell companies form part of the customer base?*

***[Answer if Q2 is > 0]***

*Choose only one option:*

- Yes
- No

## **Customer Risk (120)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q31**

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

***[Answer if Q2 is > 0]***

*Choose only one option:*

- Yes
- No

## **Customer Risk (121)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q32**

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

***[Answer if Q2 is > 0]***

## Customer Risk (122)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q33

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

## Customer Risk (123)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q34

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

**[Answer if Q33 is > 0]**

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Customer Risk (124)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*



**Q35**

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

## Products and Services

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

### Products and Services (1)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q1**

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

### Products and Services (2)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q2**

How does the Company accept VFA deposits?

*Choose more than one option:*

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

### Products and Services (3)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q3**

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*If 'Other', please provide further details.*

**[Answer if Q2 is Other]**

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## **Products and Services (4)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q4**

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

*Choose only one option:*

- Yes
- No

## **Products and Services (5)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q5**

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

**[Answer if Q4 is Yes]**

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

## **Products and Services (6)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q6**

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

***[Answer if Q4 is Yes]***

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

## **Products and Services (7)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q7**

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

***[Answer if Q4 is Yes]***

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

## **Products and Services (8)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q8**

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

***[Answer if Q4 is Yes]***

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

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## Products and Services (9)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q9

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

*Choose only one option:*

- Yes
- No

## Products and Services (10)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q10

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

**[Answer if Q9 is Yes]**

## Products and Services (11)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q11

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

*Choose only one option:*

- Yes
- No

## Products and Services (12)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

### Q12

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

***[Answer if Q11 is Yes]***

## Products and Services (13)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

### Q13

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

## Products and Services (14)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q14**

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

***[Answer if Q13 is > 0]***

## **Products and Services (15)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q15**

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

## **Products and Services (16)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q16**

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

***[Answer if Q15 is > 0]***

## **Products and Services (17)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q17**

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

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## Products and Services (18)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q18**

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

**[Answer if Q17 is > 0]**

## Products and Services (19)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q19**

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

## Products and Services (20)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q20**

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

**[Answer if Q19 is > 0]**



## Products and Services (21)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q21

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

## Products and Services (22)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q22

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

**[Answer if Q21 is > 0]**

## Products and Services (23)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q23

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

## Products and Services (24)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q24**

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

**[Answer if Q23 is > 0]**

## Products and Services (25)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q25**

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

## Products and Services (26)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q26**

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

**[Answer if Q25 is > 0]**

## Products and Services (27)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q27**

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

## **Products and Services (28)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q28**

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

***[Answer if Q27 is > 0]***

## **Products and Services (29)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q29**

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

## **Products and Services (30)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q30**

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

*[Answer if Q29 is > 0]*

## **Products and Services (31)**

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q31**

Please indicate the number of VFAs transferred during the reporting period

## **Products and Services (34)**

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q32**

Please indicate the top 3 deposited VFAs:

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## **Products and Services (35)**

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q33**

Please indicate the top 3 withdrawn VFAs:

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## Products and Services (36)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q34

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

## Products and Services (37)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q35

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

*Choose only one option:*

- Yes
- No

## Products and Services (38)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q36

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

**[Answer if Q35 is Yes]**

## **Products and Services (39)**

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

**Q37**

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

**[Answer if Q35 is Yes]**

## **Products and Services (42)**

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

**Q38**

Please indicate the orders matched during the reporting period

## **Products and Services (43)**

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

**Q39**

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

## Products and Services (44)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q40

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

## Funding Methods (74)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

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

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

## Funding Methods (75)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q45</b>	<input type="text"/>
Number (#) of incoming transactions	
<b>Q46</b>	<input type="text"/>
Value (€) of incoming transactions	
<b>[Answer if Q45 is &gt; 0]</b>	

## Funding Methods (76)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q47</b>	<input type="text"/>
Number (#) of incoming transactions	
<b>Q48</b>	<input type="text"/>
Value (€) of incoming transactions	
<b>[Answer if Q47 is &gt; 0]</b>	

## Funding Methods (77)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

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



Reference to Credit Cards and Debit Cards should exclude crypto-backed cards.	
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## Funding Methods (78)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

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

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

## Funding Methods (79)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

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

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

## Funding Methods (80)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

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

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

## Funding Methods (81)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

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

<b>Q57</b>	
Number (#) of incoming transactions	
<b>Q58</b>	
Value (€) of incoming transactions	
<i>[Answer if Q57 is &gt; 0]</i>	

## De-Risking Risks

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

### De-Risking Risks (3)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

#### Q1

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

*Choose only one option:*

- Yes
- No

### De-Risking Risks (4)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

#### Q2

*Provide details of the de-risking*

***[Answer if Q1 is Yes]***

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# Jurisdiction Risk

## Jurisdiction Risk (88)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q1</b> Malta	<input type="text"/>
<b>Q2</b> EU/EEA (Excluding Malta)  <i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i>	<input type="text"/>
<b>Q3</b> Non-EU/Non-EEA	<input type="text"/>
<b>Q4</b> 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>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"/>

<p><b>Q5</b></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><b>[Answer if Q4 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<p><b>Q6</b></p> <p><i>Afghanistan</i></p> <p><b>[Answer if Q5 is Afghanistan]</b></p>	<input type="text"/>
<p><b>Q7</b></p>	<input type="text"/>

Algeria	
<b>[Answer if Q5 is Algeria]</b>	
Q8	
Angola	<input type="text"/>
<b>[Answer if Q5 is Angola]</b>	
Q9	
Bolivia	<input type="text"/>
<b>[Answer if Q5 is Bolivia]</b>	
Q10	
Bulgaria	<input type="text"/>
<b>[Answer if Q5 is Bulgaria]</b>	
Q11	
Burkina Faso	<input type="text"/>
<b>[Answer if Q5 is Burkina Faso]</b>	
Q12	
Cameroon	<input type="text"/>
<b>[Answer if Q5 is Cameroon]</b>	
Q13	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q5 is Congo, the Democratic Republic of the]</b>	
Q14	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q5 is Cote D'Ivoire]</b>	
Q15	
Haiti	<input type="text"/>
<b>[Answer if Q5 is Haiti]</b>	
Q16	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q5 is Iran, Islamic Republic of]</b>	
Q17	<input type="text"/>

Kenya	
<b>[Answer if Q5 is Kenya]</b>	
<b>Q18</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q5 is Korea, Democratic People's Republic of]</b>	
<b>Q19</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q5 is Lao PDR]</b>	
<b>Q20</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q5 is Lebanon]</b>	
<b>Q21</b>	
Mali	<input type="text"/>
<b>[Answer if Q5 is Mali]</b>	
<b>Q22</b>	
Monaco	<input type="text"/>
<b>[Answer if Q5 is Monaco]</b>	
<b>Q23</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q5 is Mozambique]</b>	
<b>Q24</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q5 is Myanmar]</b>	
<b>Q25</b>	
Namibia	<input type="text"/>
<b>[Answer if Q5 is Namibia]</b>	
<b>Q26</b>	
Nepal	<input type="text"/>
<b>[Answer if Q5 is Nepal]</b>	
<b>Q27</b>	<input type="text"/>

Nigeria	
<b>[Answer if Q5 is Nigeria]</b>	
Q28	
Russia	<input type="text"/>
<b>[Answer if Q5 is Russia]</b>	
Q29	
South Africa	<input type="text"/>
<b>[Answer if Q5 is South Africa]</b>	
Q30	
South Sudan	<input type="text"/>
<b>[Answer if Q5 is South Sudan]</b>	
Q31	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q5 is Syrian Arab Republic]</b>	
Q32	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q5 is Tanzania, United Republic of]</b>	
Q33	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q5 is Trinidad and Tobago]</b>	
Q34	
Vanuatu	<input type="text"/>
<b>[Answer if Q5 is Vanuatu]</b>	
Q35	
Venezuela	<input type="text"/>
<b>[Answer if Q5 is Venezuela]</b>	
Q36	
Vietnam	<input type="text"/>
<b>[Answer if Q5 is Vietnam]</b>	
Q37	<input type="text"/>



Virgin Islands (UK)	
<b>[Answer if Q5 is Virgin Islands (UK)]</b>	
<b>Q38</b>	
Yemen	<input type="text"/>
<b>[Answer if Q5 is Yemen]</b>	

## Jurisdiction Risk (89)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q39</b>	<input type="text"/>
Malta	
<b>Q40</b>	
EU/EEA (Excluding Malta)	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q41</b>	<input type="text"/>
Non-EU/Non-EEA	
<b>Q42</b>	<input type="text"/>
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.	
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	

<p><i>"Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q43</b></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><b>[Answer if Q42 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<p><b>Q44</b></p>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>

Afghanistan	
<b>[Answer if Q43 is Afghanistan]</b>	
<b>Q45</b>	
Algeria	<input type="text"/>
<b>[Answer if Q43 is Algeria]</b>	
<b>Q46</b>	
Angola	<input type="text"/>
<b>[Answer if Q43 is Angola]</b>	
<b>Q47</b>	
Bolivia	<input type="text"/>
<b>[Answer if Q43 is Bolivia]</b>	
<b>Q48</b>	
Bulgaria	<input type="text"/>
<b>[Answer if Q43 is Bulgaria]</b>	
<b>Q49</b>	
Burkina Faso	<input type="text"/>
<b>[Answer if Q43 is Burkina Faso]</b>	
<b>Q50</b>	
Cameroon	<input type="text"/>
<b>[Answer if Q43 is Cameroon]</b>	
<b>Q51</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q43 is Congo, the Democratic Republic of the]</b>	
<b>Q52</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q43 is Cote D'Ivoire]</b>	
<b>Q53</b>	
Haiti	<input type="text"/>
<b>[Answer if Q43 is Haiti]</b>	
<b>Q54</b>	<input type="text"/>

Iran, Islamic Republic of	
<b>[Answer if Q43 is Iran, Islamic Republic of]</b>	
<b>Q55</b>	
Kenya	<input type="text"/>
<b>[Answer if Q43 is Kenya]</b>	
<b>Q56</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q43 is Korea, Democratic People's Republic of]</b>	
<b>Q57</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q43 is Lao PDR]</b>	
<b>Q58</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q43 is Lebanon]</b>	
<b>Q59</b>	
Mali	<input type="text"/>
<b>[Answer if Q43 is Mali]</b>	
<b>Q60</b>	
Monaco	<input type="text"/>
<b>[Answer if Q43 is Monaco]</b>	
<b>Q61</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q43 is Mozambique]</b>	
<b>Q62</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q43 is Myanmar]</b>	
<b>Q63</b>	
Namibia	<input type="text"/>
<b>[Answer if Q43 is Namibia]</b>	
<b>Q64</b>	<input type="text"/>

Nepal	
<b>[Answer if Q43 is Nepal]</b>	
Q65	
Nigeria	<input type="text"/>
<b>[Answer if Q43 is Nigeria]</b>	
Q66	
Russia	<input type="text"/>
<b>[Answer if Q43 is Russia]</b>	
Q67	
South Africa	<input type="text"/>
<b>[Answer if Q43 is South Africa]</b>	
Q68	
South Sudan	<input type="text"/>
<b>[Answer if Q43 is South Sudan]</b>	
Q69	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q43 is Syrian Arab Republic]</b>	
Q70	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q43 is Tanzania, United Republic of]</b>	
Q71	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q43 is Trinidad and Tobago]</b>	
Q72	
Vanuatu	<input type="text"/>
<b>[Answer if Q43 is Vanuatu]</b>	
Q73	
Venezuela	<input type="text"/>
<b>[Answer if Q43 is Venezuela]</b>	
Q74	<input type="text"/>

Vietnam	
<b>[Answer if Q43 is Vietnam]</b>	
<b>Q75</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q43 is Virgin Islands (UK)]</b>	
<b>Q76</b>	
Yemen	<input type="text"/>
<b>[Answer if Q43 is Yemen]</b>	

## Jurisdiction Risk (90)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q77</b>	<input type="text"/>
Malta	
<b>Q78</b>	
EU/EEA (Excluding Malta)	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q79</b>	<input type="text"/>
Non-EU/Non-EEA	
<b>Q80</b>	<input type="text"/>
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>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><b>Q81</b></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><b>[Answer if Q80 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> </ul>

	<ul style="list-style-type: none"> <li>• Yemen</li> </ul>
<b>Q82</b> Afghanistan [Answer if Q81 is Afghanistan]	<input type="text"/>
<b>Q83</b> Algeria [Answer if Q81 is Algeria]	<input type="text"/>
<b>Q84</b> Angola [Answer if Q81 is Angola]	<input type="text"/>
<b>Q85</b> Bolivia [Answer if Q81 is Bolivia]	<input type="text"/>
<b>Q86</b> Bulgaria [Answer if Q81 is Bulgaria]	<input type="text"/>
<b>Q87</b> Burkina Faso [Answer if Q81 is Burkina Faso]	<input type="text"/>
<b>Q88</b> Cameroon [Answer if Q81 is Cameroon]	<input type="text"/>
<b>Q89</b> Congo, the Democratic Republic of the [Answer if Q81 is Congo, the Democratic Republic of the]	<input type="text"/>
<b>Q90</b> Cote D'Ivoire [Answer if Q81 is Cote D'Ivoire]	<input type="text"/>
<b>Q91</b>	<input type="text"/>



Haiti	
<b>[Answer if Q81 is Haiti]</b>	
<b>Q92</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q81 is Iran, Islamic Republic of]</b>	
<b>Q93</b>	
Kenya	<input type="text"/>
<b>[Answer if Q81 is Kenya]</b>	
<b>Q94</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q81 is Korea, Democratic People's Republic of]</b>	
<b>Q95</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q81 is Lao PDR]</b>	
<b>Q96</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q81 is Lebanon]</b>	
<b>Q97</b>	
Mali	<input type="text"/>
<b>[Answer if Q81 is Mali]</b>	
<b>Q98</b>	
Monaco	<input type="text"/>
<b>[Answer if Q81 is Monaco]</b>	
<b>Q99</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q81 is Mozambique]</b>	
<b>Q100</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q81 is Myanmar]</b>	
<b>Q101</b>	<input type="text"/>

Namibia	
<b>[Answer if Q81 is Namibia]</b>	
Q102	
Nepal	<input type="text"/>
<b>[Answer if Q81 is Nepal]</b>	
Q103	
Nigeria	<input type="text"/>
<b>[Answer if Q81 is Nigeria]</b>	
Q104	
Russia	<input type="text"/>
<b>[Answer if Q81 is Russia]</b>	
Q105	
South Africa	<input type="text"/>
<b>[Answer if Q81 is South Africa]</b>	
Q106	
South Sudan	<input type="text"/>
<b>[Answer if Q81 is South Sudan]</b>	
Q107	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q81 is Syrian Arab Republic]</b>	
Q108	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q81 is Tanzania, United Republic of]</b>	
Q109	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q81 is Trinidad and Tobago]</b>	
Q110	
Vanuatu	<input type="text"/>
<b>[Answer if Q81 is Vanuatu]</b>	
Q111	<input type="text"/>

Venezuela	
<b>[Answer if Q81 is Venezuela]</b>	
<b>Q112</b>	
Vietnam	<input type="text"/>
<b>[Answer if Q81 is Vietnam]</b>	
<b>Q113</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q81 is Virgin Islands (UK)]</b>	
<b>Q114</b>	
Yemen	<input type="text"/>
<b>[Answer if Q81 is Yemen]</b>	

## Jurisdiction Risk (91)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q115</b>	<input type="text"/>
Malta	
<b>Q116</b>	
EU/EEA (Excluding Malta)	
<b>[Answer if Q15 is &gt; 0]</b>	
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"/>
<b>Q117</b>	<input type="text"/>

Non-EU/Non-EEA	
<b>[Answer if Q15 is &gt; 0]</b>	
<b>Q118</b>  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.  <b>[Answer if Q15 is &gt; 0]</b>  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.	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>
<b>Q119</b>  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.  <b>[Answer if Q118 is &gt; 0]</b>	Choose more than one option: <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> </ul>

	<ul style="list-style-type: none"> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<b>Q120</b> Afghanistan <b>[Answer if Q119 is Afghanistan]</b>	<input type="text"/>
<b>Q121</b> Algeria <b>[Answer if Q119 is Algeria]</b>	<input type="text"/>
<b>Q122</b> Angola <b>[Answer if Q119 is Angola]</b>	<input type="text"/>
<b>Q123</b> Bolivia <b>[Answer if Q119 is Bolivia]</b>	<input type="text"/>
<b>Q124</b> Bulgaria <b>[Answer if Q119 is Bulgaria]</b>	<input type="text"/>
<b>Q125</b> Burkina Faso <b>[Answer if Q119 is Burkina Faso]</b>	<input type="text"/>
<b>Q126</b> Cameroon <b>[Answer if Q119 is Cameroon]</b>	<input type="text"/>
<b>Q127</b> Congo, the Democratic Republic of the	<input type="text"/>

<b>[Answer if Q119 is Congo, the Democratic Republic of the]</b>	
<b>Q128</b> <i>Cote D'Ivoire</i>	<input type="text"/>
<b>[Answer if Q119 is Cote D'Ivoire]</b>	
<b>Q129</b> <i>Haiti</i>	<input type="text"/>
<b>[Answer if Q119 is Haiti]</b>	
<b>Q130</b> <i>Iran, Islamic Republic of</i>	<input type="text"/>
<b>[Answer if Q119 is Iran, Islamic Republic of]</b>	
<b>Q131</b> <i>Kenya</i>	<input type="text"/>
<b>[Answer if Q119 is Kenya]</b>	
<b>Q132</b> <i>Korea, Democratic People's Republic of</i>	<input type="text"/>
<b>[Answer if Q119 is Korea, Democratic People's Republic of]</b>	
<b>Q133</b> <i>Lao PDR</i>	<input type="text"/>
<b>[Answer if Q119 is Lao PDR]</b>	
<b>Q134</b> <i>Lebanon</i>	<input type="text"/>
<b>[Answer if Q119 is Lebanon]</b>	
<b>Q135</b> <i>Mali</i>	<input type="text"/>
<b>[Answer if Q119 is Mali]</b>	
<b>Q136</b> <i>Monaco</i>	<input type="text"/>
<b>[Answer if Q119 is Monaco]</b>	
<b>Q137</b>	<input type="text"/>

Mozambique	
<b>[Answer if Q119 is Mozambique]</b>	
Q138	
Myanmar	<input type="text"/>
<b>[Answer if Q119 is Myanmar]</b>	
Q139	
Namibia	<input type="text"/>
<b>[Answer if Q119 is Namibia]</b>	
Q140	
Nepal	<input type="text"/>
<b>[Answer if Q119 is Nepal]</b>	
Q141	
Nigeria	<input type="text"/>
<b>[Answer if Q119 is Nigeria]</b>	
Q142	
Russia	<input type="text"/>
<b>[Answer if Q119 is Russia]</b>	
Q143	
South Africa	<input type="text"/>
<b>[Answer if Q119 is South Africa]</b>	
Q144	
South Sudan	<input type="text"/>
<b>[Answer if Q119 is South Sudan]</b>	
Q145	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q119 is Syrian Arab Republic]</b>	
Q146	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q119 is Tanzania, United Republic of]</b>	
Q147	<input type="text"/>

Trinidad and Tobago	
<b>[Answer if Q119 is Trinidad and Tobago]</b>	
<b>Q148</b>	
Vanuatu	<input type="text"/>
<b>[Answer if Q119 is Vanuatu]</b>	
<b>Q149</b>	
Venezuela	<input type="text"/>
<b>[Answer if Q119 is Venezuela]</b>	
<b>Q150</b>	
Vietnam	<input type="text"/>
<b>[Answer if Q119 is Vietnam]</b>	
<b>Q151</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q119 is Virgin Islands (UK)]</b>	
<b>Q152</b>	
Yemen	<input type="text"/>
<b>[Answer if Q119 is Yemen]</b>	

## Jurisdiction Risk (92)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q153</b>	
Malta	<input type="text"/>
<b>[Answer if Q8 is &gt; 0]</b>	
<b>Q154</b>	<input type="text"/>
EU/EEA (Excluding Malta)	
<b>[Answer if Q8 is &gt; 0]</b>	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call	



<p>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><b>Q155</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q8 is &gt; 0]</b></p>	<input data-bbox="1023 526 1375 568" type="text"/>
<p><b>Q156</b></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><b>[Answer if Q8 is &gt; 0]</b></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 data-bbox="1023 972 1375 1014" type="text"/>
<p><b>Q157</b></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><b>[Answer if Q156 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> </ul>

	<ul style="list-style-type: none"> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<b>Q158</b> <i>Afghanistan</i> <b>[Answer if Q157 is Afghanistan]</b>	<input type="text"/>
<b>Q159</b> <i>Algeria</i> <b>[Answer if Q157 is Algeria]</b>	<input type="text"/>
<b>Q160</b> <i>Angola</i> <b>[Answer if Q157 is Angola]</b>	<input type="text"/>
<b>Q161</b> <i>Bolivia</i> <b>[Answer if Q157 is Bolivia]</b>	<input type="text"/>
<b>Q162</b> <i>Bulgaria</i> <b>[Answer if Q157 is Bulgaria]</b>	<input type="text"/>
<b>Q163</b>	<input type="text"/>

Burkina Faso	
<b>[Answer if Q157 is Burkina Faso]</b>	
<b>Q164</b>	
Cameroon	<input type="text"/>
<b>[Answer if Q157 is Cameroon]</b>	
<b>Q165</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q157 is Congo, the Democratic Republic of the]</b>	
<b>Q166</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q157 is Cote D'Ivoire]</b>	
<b>Q167</b>	
Haiti	<input type="text"/>
<b>[Answer if Q157 is Haiti]</b>	
<b>Q168</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q157 is Iran, Islamic Republic of]</b>	
<b>Q169</b>	
Kenya	<input type="text"/>
<b>[Answer if Q157 is Kenya]</b>	
<b>Q170</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q157 is Korea, Democratic People's Republic of]</b>	
<b>Q171</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q157 is Lao PDR]</b>	
<b>Q172</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q157 is Lebanon]</b>	

<b>Q173</b> <i>Mali</i> <b>[Answer if Q157 is Mali]</b>	<input type="text"/>
<b>Q174</b> <i>Monaco</i> <b>[Answer if Q157 is Monaco]</b>	<input type="text"/>
<b>Q175</b> <i>Mozambique</i> <b>[Answer if Q157 is Mozambique]</b>	<input type="text"/>
<b>Q176</b> <i>Myanmar</i> <b>[Answer if Q157 is Myanmar]</b>	<input type="text"/>
<b>Q177</b> <i>Namibia</i> <b>[Answer if Q157 is Namibia]</b>	<input type="text"/>
<b>Q178</b> <i>Nepal</i> <b>[Answer if Q157 is Nepal]</b>	<input type="text"/>
<b>Q179</b> <i>Nigeria</i> <b>[Answer if Q157 is Nigeria]</b>	<input type="text"/>
<b>Q180</b> <i>Russia</i> <b>[Answer if Q157 is Russia]</b>	<input type="text"/>
<b>Q181</b> <i>South Africa</i> <b>[Answer if Q157 is South Africa]</b>	<input type="text"/>
<b>Q182</b> <i>South Sudan</i> <b>[Answer if Q157 is South Sudan]</b>	<input type="text"/>

<b>Q183</b> <i>Syrian Arab Republic</i> <b>[Answer if Q157 is Syrian Arab Republic]</b>	<input type="text"/>
<b>Q184</b> <i>Tanzania, United Republic of</i> <b>[Answer if Q157 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q185</b> <i>Trinidad and Tobago</i> <b>[Answer if Q157 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q186</b> <i>Vanuatu</i> <b>[Answer if Q157 is Vanuatu]</b>	<input type="text"/>
<b>Q187</b> <i>Venezuela</i> <b>[Answer if Q157 is Venezuela]</b>	<input type="text"/>
<b>Q188</b> <i>Vietnam</i> <b>[Answer if Q157 is Vietnam]</b>	<input type="text"/>
<b>Q189</b> <i>Virgin Islands (UK)</i> <b>[Answer if Q157 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q190</b> <i>Yemen</i> <b>[Answer if Q157 is Yemen]</b>	<input type="text"/>

## Transactions / Payments (1)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q191</b>	<input type="text"/>
-------------	----------------------

a) Malta (In) The volume (#) (number of transactions)	
<b>Q192</b>	
b) The value (€) of transactions	
<i>[Answer if Q191 is &gt; 0]</i>	

## Transactions / Payments (2)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

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

<b>Q193</b>	
a) Malta (Out) The volume (#) (number of transactions)	
<b>Q194</b>	
b) The value (€) of transactions	
<i>[Answer if Q193 is &gt; 0]</i>	

## Transactions / Payments (3)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

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

<b>Q195</b>	
a) EU/EEA (In) (Excluding Malta) The volume (#) (number of transactions)	
<b>Q196</b>	
b) The value (€) of transactions	
<i>[Answer if Q195 is &gt; 0]</i>	

## Transactions / Payments (4)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

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

<b>Q197</b>	<input type="text"/>
a) EU/EEA (Out) The volume (#) (number of transactions)	<input type="text"/>
<b>Q198</b>	<input type="text"/>
b) The value (€) of transactions	<input type="text"/>
<b>[Answer if Q197 is &gt; 0]</b>	<input type="text"/>

## Transactions / Payments (5)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

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

<b>Q199</b>	<input type="text"/>
a) Non-EU/Non-EEA (In) The volume (#) (number of transactions)	<input type="text"/>
<b>Q200</b>	<input type="text"/>
b) The value (€) of transactions	<input type="text"/>
<b>[Answer if Q199 is &gt; 0]</b>	<input type="text"/>

## Transactions / Payments (6)

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

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

<b>Q201</b>	<input type="text"/>
a) Non-EU/Non-EEA (Out) The volume (#) (number of transactions)	<input type="text"/>
<b>Q202</b>	<input type="text"/>
	<input type="text"/>

<b>b) The value (€) of transactions</b> <b>[Answer if Q201 is &gt; 0]</b>	
--	--

## Transactions / Payments (9)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q203</b> a) Incoming transactions volume (#) (number of transactions)	<input type="text"/>
<b>Q204</b> b) The value (€) of transactions <b>[Answer if Q203 is &gt; 0]</b>	<input type="text"/>

## Transactions / Payments (10)

**(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)**

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

<b>Q205</b> a) Outgoing transactions volume (#) (number of transactions)	<input type="text"/>
<b>Q206</b> b) The value (€) of transactions <b>[Answer if Q205 is &gt; 0]</b>	<input type="text"/>

## Jurisdiction Risk (219)



***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q207**

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

*Choose only one option:*

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

*or choose one of:*

- Not Applicable

**Jurisdiction Risk (220)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q208**

*Please provide the number of subsidiaries per jurisdiction*

***[Answer if Q207 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

**Jurisdiction Risk (221)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q209**

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

*Choose only one option:*

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

*or choose one of:*

- Not Applicable

**Jurisdiction Risk (222)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q210**

*Please provide the number of branches per jurisdiction*

***[Answer if Q209 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

**Jurisdiction Risk (223)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q211**

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

*Choose only one option:*

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

*or choose one of:*

- Not Applicable

**Jurisdiction Risk (224)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q212**

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

***[Answer if Q211 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Interface / Distribution Channels

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

### Interface / Distribution Channels (59)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

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

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

### Interface / Distribution Channels (60)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q3**

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

**[Answer if Q2 is > 0]**

### Interface / Distribution Channels (61)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

**Q4**

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

*Choose only one option:*

- Yes
- No

## **Interface / Distribution Channels (62)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q5**

*Where are the third parties located?*

***[Answer if Q4 is Yes]***

//

## **Interface / Distribution Channels (63)**

***(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)***

**Q6**

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

***[Answer if Q4 is Yes]***

*Choose only one option:*

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

## Interface / Distribution Channels (64)

*(Relates to Virtual Financial Assets Service Providers and Crypto Assets Service Providers)*

### Q7

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

*Choose only one option:*

- Yes
- No

## **MLRO, Monitoring Function and Employees**

### **MLRO, Monitoring Function and Employees (1)**

#### **Q1**

How many years of experience does the MLRO have in AML/CFT?

*Choose only one option:*

- 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 (3)**

#### **Q3**

Is the MLRO responsible for other areas other than AML/CFT within the entity?

*Choose only one option:*

- Yes
  - No
-

## **MLRO, Monitoring Function and Employees (4)**

**Q4**

*Please provide a description of the other areas of responsibility.*

**[Answer if Q3 is Yes]**

//

## **MLRO, Monitoring Function and Employees (8)**

**Q5**

Does the MLRO have a direct reporting line to the Board of Directors?

*Choose only one option:*

- Yes
- No

## **MLRO, Monitoring Function and Employees (9)**

**Q6**

Has the entity appointed an officer at management level to monitor the day-to-day implementation of the AML/CFT measures, policies, controls and procedures adopted by the entity?

*Choose only one option:*

- No
- Yes - The function is carried out by the MLRO
- Yes - The function is carried out by a person who is not also acting as the entity's MLRO



## MLRO, Monitoring Function and Employees (10)

Q7

On average, how many years of experience in the industry does the director(s) and/or senior management of your entity have?

## MLRO, Monitoring Function and Employees (11)

Q8

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

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

## MLRO, Monitoring Function and Employees (12)

Q9

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

**[Answer if Q8 is > 0]**

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

## MLRO, Monitoring Function and Employees (24)

### Q10

How often does your entity assess the conduct and integrity of employees (including partners or directors) handling relevant financial business and/or relevant activity?

*Choose only one option:*

- At onboarding only
- At onboarding and at least yearly
- Not assessed
- At onboarding and every two years or more

## MLRO, Monitoring Function and Employees (14)

### Q11

In the past five (5) years, were any employees (including directors and partners) disciplined for non-compliance with the AML/CFT policies and procedures?

*Choose only one option:*

- Yes
- No

### Q12

*If 'Yes', please explain.*

**[Answer if Q11 is Yes]**

//

# Business Risk Assessment

## Business Risk Assessment (11)

### Q1

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

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

*Choose only one option:*

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

## Business Risk Assessment (30)

### Q2

What is your entity's most recent BRA controls effectiveness rating?

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

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

*Choose only one option:*

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

## Business Risk Assessment (13)

### Q3

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

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

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

*Choose only one option:*

- Low
- Lower Medium
- Medium
- Higher Medium
- High
- Very High
- Residual risk not rated

## Business Risk Assessment (14)

### Q4

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

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

*For this question, you are required to identify and list the three highest residual risk factors across the following categories: customers, products/services, geography, and interface. If for instance, the BRA identifies two high-risk factors under the customer category, while the remaining factors in this category are classified as medium or low risk, you should use your judgmental analysis to determine and list the most significant risk factor from the medium-risk category for the third selection.*

//

## Business Risk Assessment (15)

### Q5

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

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

*For this question, you are required to identify and list the three highest residual risk factors across the following categories: customers, products/services, geography, and interface. If for instance, the BRA identifies two high-risk factors under the customer category, while the remaining factors in this category are classified as medium or low risk, you should use your judgmental analysis to determine and list the most significant risk factor from the medium-risk category for the third selection.*

//

## Business Risk Assessment (16)

### 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]***

*For this question, you are required to identify and list the three highest residual risk factors across the following categories: customers, products/services, geography, and interface. If for instance, the BRA identifies two high-risk factors under the customer category, while the remaining factors in this category are classified as medium or low risk, you should use your judgmental analysis to determine and list the most significant risk factor from the medium-risk category for the third selection.*

//

## Business Risk Assessment (31)

## Q7

*Please indicate the jurisdictions which your entity considers 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.*

//

*or choose one of:*

- Not Applicable

## Business Risk Assessment (18)

### 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]***

*For this question, you are required to identify and list the three highest residual risk factors across the following categories: customers, products/services, geography, and interface. If for instance, the BRA identifies two high-risk factors under the customer category, while the remaining factors in this category are classified as medium or low risk, you should use your judgmental analysis to determine and list the most significant risk factor from the medium-risk category for the third selection.*

//

## Business Risk Assessment (19)

### Q9

*Did your entity review and/or update the BRA in the prior calendar year?*

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

---

*Choose only one option:*

- Yes
- No

# Customer Acceptance and Risk Assessment

## Customer Acceptance and Risk Assessment (94)

### Q1

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

*Choose only one option:*

- Yes
- No
- CAP Not Available

## Customer Acceptance and Risk Assessment (95)

### Q2

*Did this review result in major changes?*

**[Answer if Q1 is Yes]**

*Choose only one option:*

- Yes
- No

## Customer Acceptance and Risk Assessment (96)

### Q3

*Please explain these changes.*

**[Answer if Q2 is Yes]**

//

## Customer Acceptance and Risk Assessment (123)

---



#### Q4

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

**[Answer if Q1 is Yes, No]**

*Choose "Not Available" if information cannot be provided.*

*or choose one of:*

- Not Available

### Customer Acceptance and Risk Assessment (98)

#### Q5

*As at end of the last calendar year, how many customers fell outside the CAP but were provided with services, (including those that were subject to management approval)?*

**[Answer if Q1 is Yes, No]**

### Customer Acceptance and Risk Assessment (99)

#### Q6

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

*Choose only one option:*

- Yes
- No
- CRA Methodology Not Available

## Customer Acceptance and Risk Assessment (100)

**Q7**

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

*[Answer if Q6 is Yes]*

//

## Customer Acceptance and Risk Assessment (101)

**Q8**

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

*Choose only one option:*

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

## Customer Acceptance and Risk Assessment (102)

**Q9**

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

## Customer Acceptance and Risk Assessment (103)

**Q10**

---

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

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:

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

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

## 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?

## Customer Acceptance and Risk Assessment (118)

### Q18

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

*Choose only one option:*

- Yes
- No

## Customer Acceptance and Risk Assessment (119)

### Q19

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

**[Answer if Q18 is Yes]**

## Policies & Procedures

### Policies and Procedures (36)

#### Q1

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

*Choose only one option:*

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

### Policies and Procedures (37)

#### Q2

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

*Choose more than one option:*

- No checks carried out
- 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 (39)**

### **Q4**

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

*Choose only one option:*

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

## **Policies and Procedures (40)**

### **Q5**

Does your entity have internal whistleblowing procedures?

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

### **Q6**

*If not applicable, please explain why.*

***[Answer if Q5 is Not Applicable]***

//

## Policies and Procedures (41)

### Q7

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

*Choose only one option:*

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

## Policies and Procedures (42)

### Q8

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

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

*Choose only one option:*

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

## Policies and Procedures (43)



## Q9

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

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

*Choose only one option:*

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

## Policies and Procedures (44)

### Q10

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

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

*Choose only one option:*

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

## Policies and Procedures (45)

### Q11

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

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

//

## Policies and Procedures (46)

### Q12

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

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

//

## Policies and Procedures (47)

### Q13

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

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

*Choose more than one option:*

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

## Policies and Procedures (48)

### Q14

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*If others, explain*

**[Answer if Q13 is Others]**

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## **Policies and Procedures (63)**

### **Q15**

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

*Choose only one option:*

- Yes
- No

## **Policies and Procedures (64)**

### **Q16**

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

*Choose only one option:*

- Yes
- No

## Outsourcing

### Outsourcing (1)

#### Q1

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

*Choose only one option:*

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

### Outsourcing (2)

#### Q2

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

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

//

### Outsourcing (3)

#### Q3

*Please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

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

- MLRO function

## Outsourcing (4)

### Q4

*Please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

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

## Outsourcing (5)

### Q5

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

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

*Choose only one option:*

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


## Outsourcing (6)

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

<p><b>Q6</b></p> <p>Malta</p> <p><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q7</b></p> <p>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></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"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q8</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></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"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q9</b></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><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></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</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

<p><i>'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><b>Q10</b></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><b>[Answer if Q9 is Yes]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> </ul>

- 
- |  |   |
|--|---|
|  | <ul style="list-style-type: none"><li>• Virgin Islands (UK)</li><li>• Yemen</li></ul> |
|--|---|



# Record-keeping

## Record-keeping (1)

### Q1

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

*Choose only one option:*

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

## Training

### Training (1)

#### Q1

Please provide the % of board members that completed AML/CFT training throughout the prior calendar year.

### Training (2)

#### Q2

Please provide the % of senior management members that completed AML/CFT training throughout the prior calendar year.

### Training (3)

#### Q3

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

***[Answer if Q8 is > 0]***

*or choose one of:*

- Not Applicable

### Training (10)

#### Q4

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

or choose one of:

- Not Applicable

## Training (5)

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

<b>Q5</b> <i>Specific Maltese AML/CFT regulations (PMLA, PMLFTR, IPs)</i> <b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b>	<i>Choose only one option:</i> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>
<b>Q6</b> <i>AML/CFT policies and procedures relating to the subject person</i> <b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b>	<i>Choose only one option:</i> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>

## Training (7)

### Q7

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

*Choose only one option:*

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

## Reporting

### Reporting (15)

Q1

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

### Reporting (16)

Q2

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

**[Answer if Q1 is > 0]**

### Reporting (17)

Q3

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

**[Answer if Q1 is > 0]**

### Reporting (18)

Q4

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

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## 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?

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

### 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:*

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- 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 (Transaction Scrutiny)

### Ongoing monitoring (Transaction Scrutiny) (5)

#### Q1

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

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

### Ongoing monitoring (Transaction Scrutiny) (42)

#### Q2

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

*Choose only one option:*

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

### Ongoing monitoring (Transaction Scrutiny) (43)

#### Q3

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

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

*Choose only one option:*

---



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

## Ongoing monitoring (Transaction Scrutiny) (44)

### Q4

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

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

*Choose only one option:*

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

*or choose one of:*

- Not Applicable

## Ongoing monitoring (Transaction Scrutiny) (45)

### Q5

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

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

//

## Ongoing monitoring (Transaction Scrutiny) (46)

### Q6

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

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

or choose one of:

- Not Applicable

## Ongoing monitoring (Transaction Scrutiny) (47)

**Q7**

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

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

## Ongoing monitoring (Transaction Scrutiny) (48)

**Q8**

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

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

or choose one of:

- Not Available

## Ongoing monitoring (Transaction Scrutiny) (22)

## Q9

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

//

## Ongoing monitoring (Transaction Scrutiny) (49)

### Q10

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

## Ongoing monitoring (Transaction Scrutiny) (54)

### Q11

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

**[Answer if Q4 is Pre-event]**

//

## Ongoing monitoring (Transaction Scrutiny) (55)

## Q12

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

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

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