



# 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.

//

## Customers

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

### Customers (18.Intermediaries)

***Making use of long-term insurance products' refers to both customers onboarded and/or for whom you carried out an occasional transaction***

#### Q1

Please list the total number of new customers making use of long-term insurance products during the prior calendar year.

*long-term insurance products (as defined in the Second Schedule of the Business Insurance Act) '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.*

or choose one of:

- Not Available

### Customers (29)

#### Q2

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
  - 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
- International Transportation businesses (including by air, land or sea)
- Import or Export Agents

or choose one of:

- Not Applicable
- Not Available

## Customers (Insurance) (1.Undertakings+Intermediaries)

### Q3

What number of long-term business insurance customers have an ownership structure that includes offshore vehicles, trusts, and/or other legal arrangements including bearer shares, fiduciary deposits and foundations?

*The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency. You are kindly requested to refer to the EU list of Non-Cooperative Jurisdictions. The list can be found in the following link: <https://cfr.gov.mt/en/inlandrevenue/tcu/Pages/EU-List-of-non-cooperative-jurisdictions.aspx>*

## Customers (Insurance) (2.Undertakings+Intermediaries)

***Please list the total number of long-term business insurance customers rated as:***

### Q4

a) "High Risk"

*The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.*

## Customers (Insurance) (3.Undertakings+Intermediaries)



***Please list the total number of long-term business insurance customers rated as:***

**Q5**

b) "Medium Risk"

*The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.*

## **Customers (Insurance) (6.Undertakings+Intermediaries)**

***Please list the total number of long-term business insurance customers rated as:***

**Q6**

c) "Low Risk"

*The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.*

## **Customers (Insurance) (7.Undertakings+Intermediaries)**

**Q7**

Are there long-term business insurance customers that have a risk rating outside of the "high", "medium" and "low" categories?

*Choose only one option:*

- Yes
- No

## Customers (Insurance) (8.Undertakings+Intermediaries)

Q8

*If yes, please specify the additional risk rating.*

**[Answer if Q7 is Yes]**

//

## Customers (Insurance) (9.Undertakings+Intermediaries)

Q9

*Please specify the number of long-term insurance business customers in the additional risk category specified in the prior question.*

**[Answer if Q7 is Yes]**

## Customers (Insurance) (12)

Q10

Are any of the customers represented by an agent or third party?

*Agent means a person or entity who has an agreement with a subject person in order to provide services or products to the subject person's customers. These may include portfolio management companies which use the entity's services to trade on behalf of their customers*

*Choose only one option:*

- Yes
- No

## Customer Type (5.5)

**(Relates to Insurance)**

Please state the total number (#) of customers as at end of the prior calendar year for the following

<b>Q11</b>	<input type="text"/>
a) Natural persons	<input type="text"/>
<b>Q12</b>	<input type="text"/>
b) Legal persons	<input type="text"/>

## Customer Type (9.Undertakings+Intermediaries)

***Long-term insurance products' is defined in the Second Schedule of the Business Insurance Act.***

**Q13**

Please list the number of customers making use of long-term insurance products (natural persons) and/or beneficial owners that have benefited from residence or citizenship by investment schemes, or are applicants/prospective applicants for such schemes.

*Investor citizenship schemes are often referred to as CIPs ('citizenship investment programmes'), 'citizenships for sale' or 'golden passports'. They allow foreigners to be naturalised as a citizen of a country in return for an investment, provided certain criteria are fulfilled. Investor citizenship schemes differ from investor residence ('golden visa') schemes, which aim to attract investment in exchange for residence rights in the country concerned.*

## Customer Type (39)

**Q14**

Please specify the total number (#) of customers to whom Simplified Due Diligence (SDD) was applied, given that their risk was classified as low.

## PEPs (2.5)

*(Relates to Insurance)*

### Q15

Of the total number of customers who are legal entities, how many of their beneficial owners were PEPs (including family members and close associates) as at the end of the prior calendar year?

## PEPs (20)

### Q16

Please specify the total number (#) of long-term business customers that were PEPs in the prior calendar year?

## PEPs (21)

### Q17

Please specify the total number (#) of long-term business customers (or, if applicable their beneficial owners) that were local PEPs in the prior calendar year?

## PEPs (22)

### Q18

Please specify the total number (#) of long term business customers (or, if applicable their beneficial owners) that were PEPs from an EU or EEA jurisdiction, in the prior calendar year?

---

## PEPs (23)

### Q19

Please specify the total number (#) of long term business customers (or, if applicable their beneficial owners) that were PEPs from 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, in the prior calendar year.

*The FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' may be accessed from the following link: <https://fiaumalta.org/country-statements/>*

## PEPs (24)

### Q20

*If your answer to the above question was yes, please select the respective jurisdictions.*

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

*Choose more than one option:*

- Afghanistan
  - Bolivia
  - Burkina Faso
  - Cameroon
  - Lebanon
  - Monaco
  - Mozambique
  - Namibia
  - Nepal
  - Nigeria
  - South Africa
  - Trinidad and Tobago
  - Vanuatu
  - Vietnam
-

- Virgin Islands (UK)
- Haiti
- Kenya
- Algeria
- Angola
- Bulgaria
- Russia
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lao PDR
- Mali
- Myanmar
- South Sudan
- Syrian Arab Republic
- Tanzania, United Republic of
- Yemen

## **Additional (Customers) (2.Undertakings + Intermediaries)**

***Long-term insurance products as defined in the Second Schedule of the Insurance Business***

### **Q21**

Please list the number of customers making use of long-term insurance products, who are operating in high-risk industries.

*Subject persons are required to define their own list of high risk industries and products. For the purpose of responding to this question, subject persons should consider high risk industries to include: productions / trade in war related weapons, productions / trade in radioactive materials, mining, oil and gas, chemical and pharmaceutical industries and adult entertainment.*

or choose one of:

- Not Available

## **Additional (Customers) (3)**

### **Q22**

---

Please list the number of customers who are operating in dual use items.

*In accordance with SL 365.12, dual-use items refers to any used or unused items, including software and technology, which can be used for both civil and military purposes, and including all goods which can be used for both non-explosive uses and for assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices. Dual-use items are to be considered as those designated by the Company's policies and procedures or through the SL 365.12.*

or choose one of:

- Not Available

## **Additional (Customers) (5)**

### **Q23**

Please list the number of customers who operate cash intensive businesses.

*Cash intensive businesses are businesses which through their operations receive or depend largely on cash- based transactions such as restaurants, petrol stations, retail stores, parking garages etc.*

or choose one of:

- Not Available

## 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 (Insurance and Pensions) (1.Intermediaries)

**For long-term business activity brokered during the prior calendar year, please indicate:**

**Q1**

a) the total gross premium / contribution (€) from long-term business policies

*The long-term business activity includes all the classes as listed in Schedule 2 of the Insurance Business Act. Gross premium should be construed to refer to the total premium paid by the policy owner. The gross premium is the total premium of an insurance contract before brokerage or discounts have been deducted. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.*

### Products and Services (Insurance and Pensions) (2.Intermediaries)

**For long-term business activity brokered during the prior calendar year, please indicate:**

**Q2**

b) the total number (#) of long-term business policies

*The long-term business activity includes all the classes as listed in Schedule 2 of the Insurance Business Act.*

or choose one of:



- Not Available

## **Products and Services (Insurance and Pensions) (3.Intermediaries)**

***For long-term business activity brokered as at the end of prior calendar year, please indicate for life and annuity insurance contracts (individuals):***

**Q3**

a) the total volume (#) of active policies

*As per Schedule 2 of the Insurance Business Act, 'Life and Annuity product' is defined as 'Contracts of insurance on human life or contracts to pay annuities on human life, but excluding (in each case) contracts within Classes II and III of this Schedule'.*

## **Products and Services (Insurance and Pensions) (4.Intermediaries)**

**Q4**

b) total gross premium (€) for active policies

***[Answer if Q3 is > 0]***

## **Products and Services (Insurance and Pensions) (5.Intermediaries)**

***For long-term business activity brokered as at the end of prior calendar year, please indicate for life and annuity insurance contracts (groups):***

**Q5**

a) the total volume (#) of active policies

---

*As per Schedule 2 of the Insurance Business Act, 'Life and Annuity product' is defined as 'Contracts of insurance on human life or contracts to pay annuities on human life, but excluding (in each case) contracts within Classes II and III of this Schedule'.*

## **Products and Services (Insurance and Pensions) (6.Intermediaries)**

**Q6**

*b) total gross premium (€) for active policies*

**[Answer if Q5 is > 0]**

## **Products and Services (Insurance and Pensions) (11.Intermediaries)**

***For long-term business activity brokered as at the end of prior calendar year, please indicate for marriage and birth contracts:***

**Q7**

*a) the total volume (#) of active policies*

*As per Schedule 2 of the Insurance Business Act, Marriage and birth product is defined as 'contracts of insurance to provide a sum on marriage or on the birth of a child, being contracts expressed to be in effect for a period of more than one year'.*

## **Products and Services (Insurance and Pensions) (12.Intermediaries)**

**Q8**

*b) total gross premium (€) for active policies*

*[Answer if Q7 is > 0]*

## **Products and Services (Insurance and Pensions) (13.Intermediaries)**

*For long-term business activity brokered as at the end of prior calendar year, please indicate for linked long term contracts:*

**Q9**

a) the total volume (#) of active policies

*As per Schedule 2 of the Insurance Business Act, Marriage and birth product is defined as 'contracts of insurance to provide a sum on marriage or on the birth of a child, being contracts expressed to be in effect for a period of more than one year'.*

## **Products and Services (Insurance and Pensions) (14.Intermediaries)**

**Q10**

*b) total gross premium (€) for active policies*

*[Answer if Q9 is > 0]*

## **Products and Services (Insurance and Pensions) (15.Intermediaries)**

***For long-term business activity brokered as at the end of prior calendar year, please indicate for permanent health contracts:***

**Q11**

a) the total volume (#) of active policies

*As per Schedule 2 of the Insurance Business Act, Permanent health product is defined as 'Contracts of insurance providing specified benefits against risks of persons becoming incapacitated in consequence of sustaining injury as a result of an accident, or of an accident of a specified class, or of sickness or infirmity, being contracts that: (a) are expressed to be in effect for a period of not less than five years, or until the normal retirement age for the persons concerned, or without limit of time, and (b) either are not expressed to be terminable by the insurer, or are expressed to be so terminable only in special circumstances mentioned in the contract'.*

## **Products and Services (Insurance and Pensions) (16.Intermediaries)**

**Q12**

b) total gross premium (€) for active policies

***[Answer if Q11 is > 0]***

## **Products and Services (Insurance and Pensions) (17.Intermediaries)**

***For long-term business activity brokered as at the end of prior calendar year, please indicate for tontines contracts:***

**Q13**

a) the total volume (#) of active policies

*As per Schedule 2 of the Insurance Business Act, Tontines product is defined as 'Contracts of insurance providing for operations whereby associations of subscribers are to be set up with a view to capitalising their contributions jointly and subsequently*

*distributing the assets thus accumulated among the survivors or among the beneficiaries of the deceased'.*

## **Products and Services (Insurance and Pensions) (18.Intermediaries)**

**Q14**

*b) total gross premium (€) for active policies*

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

## **Products and Services (Insurance and Pensions) (19.Intermediaries)**

***For long-term business activity brokered as at the end of prior calendar year, please indicate for capital redemption contracts:***

**Q15**

a) the total volume (#) of active policies

*As per Schedule 2 of the Insurance Business Act, Capital redemption product is defined as 'Contracts of insurance providing for capital redemption operations based on actuarial calculation whereby, in return for single or periodic payments agreed in advance, commitments of specified duration and amount are undertaken.'*

## **Products and Services (Insurance and Pensions) (20.Intermediaries)**

**Q16**

*b) total gross premium (€) for active policies*

*[Answer if Q15 is > 0]*

## **Products and Services (Insurance and Pensions) (23.Intermediaries)**

*For long-term business activity brokered as at the end of prior calendar year, please indicate for collective insurance product contracts:*

**Q17**

a) the total volume (#) of active policies

*As per Schedule 2 of the Insurance Business Act, 'Collective insurance product' is defined as 'Contracts of a kind referred to in Article 2(3)(b)(v) of the Solvency II Directive.*

## **Products and Services (Insurance and Pensions) (24.Intermediaries)**

**Q18**

*b) total gross premium (€) for active policies*

*[Answer if Q17 is > 0]*

## **Products and Services (Insurance and Pensions) (25.Intermediaries)**

***For long-term business activity brokered as at the end of prior calendar year, please indicate for social insurance product contracts:***

**Q19**

a) the total volume (#) of active policies

*As per Schedule 2 of the Insurance Business Act, 'Social insurance product' is defined as 'Contracts of a kind referred to in Article 2(3)(c) of the Solvency II Directive.'*

## **Products and Services (Insurance and Pensions) (26.Intermediaries)**

**Q20**

b) total gross premium (€) for active policies

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

## **Products and Services (Insurance and Pensions) (27.Undertakings+Intermediaries)**

**Q21**

During the prior calendar year, were specific long-term business products (as described in the Second Schedule of the Insurance Business Act) ceased to be offered due to exposure to higher ML/FT risk?

*Respondents that are insurance managers should select the 'Not Applicable' option in their response.*

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

## **Products and Services (Insurance and Pensions) (28.Intermediaries)**

### **Q22**

Do any of the long-term business insurance products brokered allow for easy access to funds?

*Easy access to funds' include partial withdrawal or early surrender at any time with limited charges or fees.*

*Choose only one option:*

- Yes
- No

## **Products and Services (Insurance and Pensions) (34.Intermediaries)**

### **Q23**

Do any of the long-term business insurance products brokered allow for the transferability of the policy?

*Choose only one option:*

- Yes
- No

## **Products and Services (Insurance and Pensions) (36.Intermediaries)**

### **Q24**

Are long-term business insurance products, that are funded in part or in whole by an employer through employer contributions and/or deductions made from employee salaries, brokered?



*Choose only one option:*

- Yes
- No

## **Products and Services (Insurance and Pensions) (37.Intermediaries)**

### **Q25**

Are insurance products with a short-term maturity period brokered?

*A short term maturity period should be construed to be a period of up to 3 years.*

*Choose only one option:*

- Yes
- No

## **Products and Services (Insurance and Pensions) (38.Intermediaries)**

### **Q26**

Are premiums from the customer handled or collected, or are these paid directly to the insurance undertaking?

*The option 'paid directly to the insurance undertaking' should be chosen if only the first premium is handled and collected.*

*Choose only one option:*

- Handled and collected
- Paid directly to the insurance undertaking
- Mixture of both

*or choose one of:*

- Not Applicable

- Not Available

## **Products and Services (Insurance and Pensions) (39.Intermediaries.handled&collected)**

### **Q27**

Please list the total number of customers, making use of long-term insurance products, for which an active business relationship was established as at the end of the prior calendar year.

*'Long-term insurance products' refers to the definition in the Second Schedule of the Insurance Business Act.*

## **Products and Services (Insurance and Pensions) (39.Intermediaries.paidtoundertaking)**

*'Long-term insurance products' refers to the definition in the Second Schedule of the Insurance Business Act.*

### **Q28**

Please list the total number of customers, making use of long-term insurance products, for which an occasional transaction was established as at the end of the prior calendar year.

*Distribution activities carried out by insurance brokers relating to long-term insurance businesses, are deemed to be occasional transactions whenever the premia are paid directly to the insurance company as the insurance brokers do not handle premia, and no further services are provided to the customer. The occasional transactions' threshold to be taken into consideration should be based on the planned amounts of the total premia that are to be paid for the term of the policy. If they are more than Euro 15,000 then the AML/CFT obligations would be triggered and that particular transaction should be deemed as being an occasional transaction*

## Funding Methods (33.Intermediaries)

***Please indicate the following details for premium payments and/or contributions made through bank transfers in EU/EEA (or equivalent safeguards), in the prior calendar year:***

**Q29**

Volume (#)

*Insurance Intermediaries that are not handling premia should mark this question as 'Not applicable'.*

*or choose one of:*

- Not Applicable
- Not Available

## Funding Methods (34.Intermediaries)

***Please indicate the following details for premium payments and/or contributions made through bank transfers in EU/EEA (or equivalent safeguards), in the prior calendar year:***

**Q30**

Value (€)

*Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

*or choose one of:*

- Not Applicable
- Not Available

## Funding Methods (35.Intermediaries)

---

***Please indicate the following details for premium payments and/or contributions made through bank transfers in non-EU/non-EEA (or equivalent safeguards), in the prior calendar year:***

**Q31**

Volume (#)

*Insurance Intermediaries that are not handling premia should mark this question as 'Not applicable'.*

*or choose one of:*

- Not Applicable
- Not Available

## **Funding Methods (36.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through bank transfers in non-EU/non-EEA (or equivalent safeguards), in the prior calendar year:***

**Q32**

Value (€)

*Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

*or choose one of:*

- Not Applicable
- Not Available

## **Funding Methods (37.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by EU/EEA (or equivalent***

**safeguards) banks or other licensed financial institutions:**  
**Q33**

Volume (#)

*Insurance Intermediaries that are not handling premia should mark this question as 'Not applicable'.*

or choose one of:

- Not Applicable
- Not Available

## **Funding Methods (38.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:***

**Q34**

Value (€)

*Where applicable, amounts are to converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

or choose one of:

- Not Applicable
- Not Available

## **Funding Methods (39.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by non-EU/non-EEA (or equivalent safeguards) banks or other licensed financial institutions:***

**Q35**

---

Volume (#)

*Insurance Intermediaries that are not handling premia should mark this question as 'Not applicable'.*

*or choose one of:*

- Not Applicable
- Not Available

## **Funding Methods (40.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through debit/credit cards issued by non-EU/non-EEA (or equivalent safeguards) banks or other licensed financial institutions:***

**Q36**

Value (€)

*Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

*or choose one of:*

- Not Applicable
- Not Available

## **Funding Methods (41.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through prepaid cards and/or vouchers:***

**Q37**

Volume (#)

*Insurance Intermediaries that are not handling premia should mark this question as 'Not applicable'.*

*or choose one of:*

- Not Applicable
- Not Available

## **Funding Methods (42.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through prepaid cards and/or vouchers:***

**Q38**

Value (€)

*Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

*or choose one of:*

- Not Applicable
- Not Available

## **Funding Methods (43.Intermediaries)**

***Please indicate the following details for premium payments and/or contributions made through cash:***

**Q39**

Volume (#)

*Insurance Intermediaries that are not handling premia should mark this question as 'Not applicable'.*

or choose one of:

- Not Applicable
- Not Available

## Funding Methods (44.Intermediaries)

***Please indicate the following details for premium payments and/or contributions made through cash:***

### Q40

Value (€)

*Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

or choose one of:

- Not Applicable
- Not Available



## 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 (1)

#### Q1

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

*"De-risking" refers to a process being carried out by a Subject Person, which includes terminating or restricting business relationships, to avoid, rather than manage risk.*

*Choose only one option:*

- Yes
- No

### De-Risking Risks (2)

#### Q2

*Provide details of the de-risking*

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

*Such reasons should explain whether business relationship was entirely terminated or restricted to limited services.*

//

## Jurisdiction Risk.

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

### Residence of Customers + BOs (1)

As at the end of the prior calendar year, what is the total number (#) of customers that are resident, or otherwise, incorporated or have their principal place of business in:

<b>Q1</b> a) Malta?	<input type="text"/>
<b>Q2</b> b) an EU/EEA jurisdiction, 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> c) a non-EU/non-EEA jurisdiction?  <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>Q4</b> d) a country 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?	<input type="text"/>

<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>Q5</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 Q4 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>

	• Yemen
<b>Q6</b> <i>Afghanistan</i> <b>[Answer if Q5 is Afghanistan]</b>	<input type="text"/>
<b>Q7</b> <i>Algeria</i> <b>[Answer if Q5 is Algeria]</b>	<input type="text"/>
<b>Q8</b> <i>Angola</i> <b>[Answer if Q5 is Angola]</b>	<input type="text"/>
<b>Q9</b> <i>Bolivia</i> <b>[Answer if Q5 is Bolivia]</b>	<input type="text"/>
<b>Q10</b> <i>Bulgaria</i> <b>[Answer if Q5 is Bulgaria]</b>	<input type="text"/>
<b>Q11</b> <i>Burkina Faso</i> <b>[Answer if Q5 is Burkina Faso]</b>	<input type="text"/>
<b>Q12</b> <i>Cameroon</i> <b>[Answer if Q5 is Cameroon]</b>	<input type="text"/>
<b>Q13</b> <i>Congo, the Democratic Republic of the</i> <b>[Answer if Q5 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q14</b> <i>Cote D'Ivoire</i> <b>[Answer if Q5 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q15</b> <i>Haiti</i> <b>[Answer if Q5 is Haiti]</b>	<input type="text"/>

<b>Q16</b> <i>Iran, Islamic Republic of</i> <b>[Answer if Q5 is Iran, Islamic Republic of]</b>	<input type="text"/>
<b>Q17</b> <i>Kenya</i> <b>[Answer if Q5 is Kenya]</b>	<input type="text"/>
<b>Q18</b> <i>Korea, Democratic People's Republic of</i> <b>[Answer if Q5 is Korea, Democratic People's Republic of]</b>	<input type="text"/>
<b>Q19</b> <i>Lao PDR</i> <b>[Answer if Q5 is Lao PDR]</b>	<input type="text"/>
<b>Q20</b> <i>Lebanon</i> <b>[Answer if Q5 is Lebanon]</b>	<input type="text"/>
<b>Q21</b> <i>Mali</i> <b>[Answer if Q5 is Mali]</b>	<input type="text"/>
<b>Q22</b> <i>Monaco</i> <b>[Answer if Q5 is Monaco]</b>	<input type="text"/>
<b>Q23</b> <i>Mozambique</i> <b>[Answer if Q5 is Mozambique]</b>	<input type="text"/>
<b>Q24</b> <i>Myanmar</i> <b>[Answer if Q5 is Myanmar]</b>	<input type="text"/>
<b>Q25</b> <i>Namibia</i> <b>[Answer if Q5 is Namibia]</b>	<input type="text"/>
<b>Q26</b>	<input type="text"/>

Nepal	
<b>[Answer if Q5 is Nepal]</b>	
<b>Q27</b>	
Nigeria	<input type="text"/>
<b>[Answer if Q5 is Nigeria]</b>	
<b>Q28</b>	
Russia	<input type="text"/>
<b>[Answer if Q5 is Russia]</b>	
<b>Q29</b>	
South Africa	<input type="text"/>
<b>[Answer if Q5 is South Africa]</b>	
<b>Q30</b>	
South Sudan	<input type="text"/>
<b>[Answer if Q5 is South Sudan]</b>	
<b>Q31</b>	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q5 is Syrian Arab Republic]</b>	
<b>Q32</b>	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q5 is Tanzania, United Republic of]</b>	
<b>Q33</b>	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q5 is Trinidad and Tobago]</b>	
<b>Q34</b>	
Vanuatu	<input type="text"/>
<b>[Answer if Q5 is Vanuatu]</b>	
<b>Q35</b>	
Venezuela	<input type="text"/>
<b>[Answer if Q5 is Venezuela]</b>	
<b>Q36</b>	<input type="text"/>

Vietnam	
<b>[Answer if Q5 is Vietnam]</b>	
<b>Q37</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q5 is Virgin Islands (UK)]</b>	
<b>Q38</b>	
Yemen	<input type="text"/>
<b>[Answer if Q5 is Yemen]</b>	

## Residence of Customers + BOs (2)

Please specify the total number of customers' BOs that are resident in:

<b>Q39</b>	<input type="text"/>
a) Malta?	
<b>Q40</b>	
b) an EU/EEA jurisdiction, 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>Q41</b>	
c) a non-EU/non-EEA jurisdiction?	
<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>Q42</b>	<input type="text"/>

<p>d) a country 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><i>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><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> </ul>



	<ul style="list-style-type: none"> <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>Q44</b> Afghanistan <b>[Answer if Q43 is Afghanistan]</b>	<input type="text"/>
<b>Q45</b> Algeria <b>[Answer if Q43 is Algeria]</b>	<input type="text"/>
<b>Q46</b> Angola <b>[Answer if Q43 is Angola]</b>	<input type="text"/>
<b>Q47</b> Bolivia <b>[Answer if Q43 is Bolivia]</b>	<input type="text"/>
<b>Q48</b> Bulgaria <b>[Answer if Q43 is Bulgaria]</b>	<input type="text"/>
<b>Q49</b> Burkina Faso <b>[Answer if Q43 is Burkina Faso]</b>	<input type="text"/>
<b>Q50</b> Cameroon <b>[Answer if Q43 is Cameroon]</b>	<input type="text"/>
<b>Q51</b> Congo, the Democratic Republic of the <b>[Answer if Q43 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q52</b>	<input type="text"/>

Cote D'Ivoire	
<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>	
Iran, Islamic Republic of	<input type="text"/>
<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>	<input type="text"/>

Myanmar	
<b>[Answer if Q43 is Myanmar]</b>	
Q63	
Namibia	<input type="text"/>
<b>[Answer if Q43 is Namibia]</b>	
Q64	
Nepal	<input type="text"/>
<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	<input type="text"/>

Vanuatu	
<b>[Answer if Q43 is Vanuatu]</b>	
<b>Q73</b>	
Venezuela	<input type="text"/>
<b>[Answer if Q43 is Venezuela]</b>	
<b>Q74</b>	
Vietnam	<input type="text"/>
<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>	

## Residence of Customers + BOs (6)

### Q77

Do any of the customers making part of the customer base provide goods and/or services (main markets) in, or to, a country 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?

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Available

## Residence of Customers + BOs (7)

### Q78

---

*Please select the respective jurisdictions.*

**[Answer if Q77 is Yes]**

*Choose more than one option:*

- Afghanistan
- Bolivia
- Burkina Faso
- Cameroon
- Lebanon
- Monaco
- Mozambique
- Namibia
- Nepal
- Nigeria
- South Africa
- Trinidad and Tobago
- Vanuatu
- Vietnam
- Virgin Islands (UK)
- Algeria
- Angola
- Bulgaria
- Haiti
- Kenya
- Russia
- Venezuela
- Congo, the Democratic Republic of the
- Cote D'Ivoire
- Iran, Islamic Republic of
- Korea, Democratic People's Republic of
- Lao PDR
- Mali
- Myanmar
- South Sudan
- Syrian Arab Republic
- Tanzania, United Republic of
- Yemen

*or choose one of:*

- Not Available

## **Transactions / Payments (1.Undertakings+Intermediaries)**

***Please indicate the following details for long-term insurance policy premium and/or contribution payments originated from domestic payees and/or insured persons in the prior calendar year:***

---

**Q79**

a) Volume (#)

*For Insurance Intermediaries: This should be only applicable to those brokers that are handling premia.*

or choose one of:

- Not Applicable
- Not Available

**Transactions / Payments (2.Undertakings+Intermediaries)****Q80**

b) Value (€)

***[Answer if Q79 is > 0, Not Available]***

*Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

or choose one of:

- Not Applicable
- Not Available

**Transactions / Payments (3.Undertakings+Intermediaries)**

***Please indicate the following details for long-term insurance policies paid out to domestic-based insured-persons in the prior calendar year:***

**Q81**

a) Volume (#)

---

*For Insurance Intermediaries: This should be only applicable to those brokers that are handling premia.*

*or choose one of:*

- Not Applicable
- Not Available

## **Transactions / Payments (4.Undertakings+Intermediaries)**

**Q82**

*b) Value (€)*

***[Answer if Q81 is > 0, Not Available]***

*Where applicable, amounts are to converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

*or choose one of:*

- Not Applicable
- Not Available

## **Transactions / Payments (5.Undertakings+Intermediaries)**

***Please indicate the following details for long-term insurance policies paid out to cross border insured-persons or beneficiaries in the prior calendar year:***

**Q83**

*a) Volume (#)*

*For Insurance Intermediaries: This should be only applicable to those brokers that are handling premia.*

or choose one of:

- Not Applicable
- Not Available

## Transactions / Payments (6.Undertakings+Intermediaries)

**Q84**

b) Value (€)

**[Answer if Q83 is > 0, Not Available]**

Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year

or choose one of:

- Not Applicable
- Not Available

## Transactions / Payments (7&8.Undertakings+Intermediaries)

Please indicate the following details for long-term insurance policy premium and/or contribution payments originated from foreign payees and/or insured persons in the prior calendar year

<b>Q85</b> Volume (number of transactions)	<input type="text"/> or choose one of: <ul style="list-style-type: none"><li>• Not Applicable</li><li>• Not Available</li></ul>
<b>Q86</b> Value (€) <b>[Answer if Q85 is &gt; 0, Not Available]</b>	<input type="text"/> or choose one of: <ul style="list-style-type: none"><li>• Not Applicable</li><li>• Not Available</li></ul>



<i>Total amount is to be presented in ?. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year.</i>	
--	--

## **Jurisdiction Risk (207)**

***(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)***

### **Q87**

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

## **Jurisdiction Risk (208)**

***(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)***

### **Q88**

*Please provide the number of subsidiaries per jurisdiction*

***[Answer if Q87 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 (209)

*(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)*

### Q89

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

## Jurisdiction Risk (210)

*(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)*

### Q90

*Please provide the number of branches per jurisdiction*

***[Answer if Q89 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 (211)

---

***(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)***

**Q91**

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

**Jurisdiction Risk (212)**

***(Relates to Investment Services & Securities Markets or Insurance or Accountancy/Audit or Advocates or Tax Advisors)***

**Q92**

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

***[Answer if Q91 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 (14.Undertakings+Intermediaries)

#### Q1

Please state the total number (#) of the customers relating to long-term insurance business which were onboarded on a non-face-to-face basis

*Non- face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Examples include online postal or telephone sales.*

### Interface / Distribution Channels (15.Undertakings+Intermediaries)

#### Q2

Please state the total number (#) of long-term business insurance customers onboarded on a non-face-to-face basis that were introduced by an EU/EEA, or otherwise by a regulated broker/agent/introducer

*Non- face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Examples include online postal or telephone sales.*

### Interface / Distribution Channels (16.Undertakings+Intermediaries)

#### Q3

Please state the total number (#) of long-term business insurance customers onboarded on a non-face-to-face basis that were introduced by a non-EU/non-EEA, or otherwise by a broker/agent/introducer

*Non- face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Examples include online postal or telephone sales.*

## **Interface / Distribution Channels (18.Undertakings+Intermediaries)**

### **Q4**

Please state the total number (#) of long-term business insurance customers where the Customer Due Diligence was conducted by the agent/broker/introducer/TII

*Customer Due Diligence obtained by the broker and passed to the undertaking and double checked by the undertaking it is still to be included in this question.*

## **Interface / Distribution Channels (47)**

### **Q5**

Please state the total number (#) of customers whose Customer Due Diligence had been carried out by another subject person/third party, on the basis of a reliance agreement between your entity and the other subject person/third party.

*The PMLFTR permit subject persons to rely on the CDD measures carried out by other subject persons or by certain other third parties. A reliance arrangement can be set up between entities when those entities are servicing the same customer, or when that same customer is in contact with multiple entities to a transaction, with each entity being under a legal obligation to carry out CDD measures on the customer. Subject persons should take adequate steps to ensure that, on request, the entity relied on immediately forwards relevant copies of the identification and verification documents on the CDD measures undertaken. In this regard, subject persons should have a written formal agreement with the entity, signed by both parties, that would regulate the procedures and conditions on these requests to ensure that the data is made available immediately*

## Customer Acceptance and Risk Assessment (39)

### Q6

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

*The term introducer refers to an individual / entity that introduces a customer/s to a subject person. The introducer does not represent or act on behalf of the customer. The relationship between an introducer and the subject person may or may not be governed by an agreement. The subject person may remunerate (e.g. commission/finders fee) for their service. An official or an employee of the subject person is not an introducer. Furthermore, group entities that introduce customers to other entities within the same group are not to be considered as introducers.*

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

## Customer Acceptance and Risk Assessment (43)

### Q7

If yes, please indicate the number of introducers used during the prior calendar year.

**[Answer if Q6 is Yes]**

*The term introducer refers to an individual / entity that introduces a customer/s to a subject person. The introducer does not represent or act on behalf of the customer. The relationship between an introducer and the subject person may or may not be governed by an agreement. The subject person may remunerate (e.g. commission/finders fee) for their service. An official or an employee of the subject person is not an introducer. Furthermore, group entities that introduce customers to other entities within the same group are not to be considered as introducers.*



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

### **MLRO, Monitoring Function and Employees (16)**

#### **Q1**

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

*Choose only one option:*

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

### **MLRO, Monitoring Function and Employees (2)**

#### **Q2**

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

*Choose only one option:*

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

### **MLRO, Monitoring Function and Employees (17)**

#### **Q3**

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



## MLRO, Monitoring Function and Employees (11)

### Q4

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

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

## MLRO, Monitoring Function and Employees (12)

### Q5

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

**[Answer if Q4 is > 0]**

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

## MLRO, Monitoring Function and Employees (18)

### Q6

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

*Choose only one option:*

---

- Yes
- No

**Q7**

*If 'Yes', please explain.*

***[Answer if Q6 is Yes]***

//

## **MLRO, Monitoring Function and Employees (19)**

**Q8**

Do you also hold MLRO positions with other entities?

*Choose only one option:*

- Yes, within the same group structure
- Yes, outside of the group structure
- No

# Business Risk Assessment

## Business Risk Assessment (10)

### Q1

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

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

*Choose only one option:*

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

## Business Risk Assessment (12)

### Q2

*What is your most recent BRA controls effectiveness rating?*

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

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

*Choose only one option:*

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

## Business Risk Assessment (21)

## Business Risk Assessment (22)

Q3

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

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

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

*Choose only one option:*

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

## Business Risk Assessment (26)

Q4

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

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

//

## Business Risk Assessment (27)

Q5

---

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

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

//

## **Business Risk Assessment (28)**

**Q6**

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

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

//

## **Business Risk Assessment (24)**

**Q7**

*Please indicate the jurisdictions which you consider as high risk*

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

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

//

## **Business Risk Assessment (29)**

**Q8**

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

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

//

## **Business Risk Assessment (23)**

**Q9**

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

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

*Choose only one option:*

- Yes
- No

# Customer Acceptance and Risk Assessment

## Customer Acceptance and Risk Assessment (109)

### Q1

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

*Choose only one option:*

- Yes
- No
- CAP Not Available

## Customer Acceptance and Risk Assessment (112)

### Q2

*Did this review result in major changes?*

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

*Choose only one option:*

- Yes
- No

## Customer Acceptance and Risk Assessment (113)

### Q3

*Please explain these changes.*

***[Answer if Q2 is Yes]***

//

## Customer Acceptance and Risk Assessment (117)

---

#### Q4

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

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

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

*or choose one of:*

- Not Available

### Customer Acceptance and Risk Assessment (110)

#### Q5

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

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

### Customer Acceptance and Risk Assessment (99)

#### Q6

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

*Choose only one option:*

- Yes
- No
- CRA Methodology Not Available

### Customer Acceptance and Risk Assessment (100)

---



**Q7**

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

**[Answer if Q6 is Yes]**

//

## **Customer Acceptance and Risk Assessment (101)**

**Q8**

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

*Choose only one option:*

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

## **Customer Acceptance and Risk Assessment (111)**

**Q9**

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

## **Customer Acceptance and Risk Assessment (103)**

**Q10**

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

---

or choose one of:

- Not Applicable

## Customer Acceptance and Risk Assessment (104)

**Q11**

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

**[Answer if Q10 is > 0]**

//

## Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

<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> <i>or choose one of:</i>

	<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>	<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>• Never</li> <li>• More than 3 years</li> </ul> <i>or choose one of:</i> <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?

# Policies & Procedures

## Policies and Procedures (53)

### Q1

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

*Choose only one option:*

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

## Policies and Procedures (37)

### Q2

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

*Choose more than one option:*

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

## Policies and Procedures (38)

### Q3

How do you determine whether individuals/entities are sanctioned?

*Choose more than one option:*

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

## **Policies and Procedures (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 (54)**

### **Q5**

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

*Choose only one option:*

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

## **Policies and Procedures (55)**

### **Q6**

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

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

*Choose only one option:*

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

## **Policies and Procedures (56)**

**Q7**

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

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

//

## **Policies and Procedures (57)**

**Q8**

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

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

//

## **Policies and Procedures (58)**

**Q9**

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

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

*Choose more than one option:*

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

## **Policies and Procedures (59)**

**Q10**

*If others, explain*

***[Answer if Q9 is Others]***

//



## Outsourcing

### Outsourcing (7)

#### Q1

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

*Choose only one option:*

- Yes
- No

### Outsourcing (8)

#### Q2

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

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

//

### Outsourcing (9)

#### Q3

*Please specify the obligations that are being outsourced.*

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

*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
  - MLRO function
  - Drafting of policies and procedures
-

## Outsourcing (10)

**Q4**

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

**[Answer if Q1 is Yes]**

*Choose only one option:*

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

## Outsourcing (11)

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

<b>Q5</b>  <i>Malta</i>  <b>[Answer if Q1 is Yes]</b>	<i>Choose only one option:</i> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>
<b>Q6</b>  <i>EU/EEA (Excluding Malta)</i>  <b>[Answer if Q1 is Yes]</b>  <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>	<i>Choose only one option:</i> <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>

<p><b>Q7</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q1 is Yes]</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>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]</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>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 Q8 is Yes]</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>

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

# Record-keeping

## Record-keeping (1)

### Q1

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

*Choose only one option:*

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

## Training

### Training (3)

#### Q1

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

**[Answer if Q4 is > 0]**

*or choose one of:*

- Not Applicable

### Training (10)

#### Q2

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

*or choose one of:*

- Not Applicable

### Training (8)

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

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

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

## Reporting

### Reporting (15)

Q1

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

### Reporting (16)

Q2

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

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

### Reporting (17)

Q3

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

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

### Reporting (18)

Q4

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

---



## Reporting (19)

### Q5

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

## Ongoing monitoring (data, documents and information)

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

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

<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:*

---

- 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?