



# Risk Evaluation Questionnaire 2026

## PREVIEW

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

# Subject Person Information

## Subject Person Information (1)

### Q1

Subject persons are required, for each of the questions included in this questionnaire, to choose the answer option that is best suited to the subject person. The FIAU acknowledges that the answer options defined by it do not always fully capture the actual situation within each subject person. When choosing from the answer options available it is therefore important to select an option that is a true reflection of the actual situation within the subject person's operations. In the text box, you can formulate general remarks on the subject person's operation. Please note that these general remarks are not taken into account in the initial automated analysis of the answers submitted.

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

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# Product Risk

## Product Risk (358)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Please indicate the following information covering all gaming relevant activity, during the previous calendar year:

<b>Q1</b>	<input type="text"/>
a) Total value (€) of customer deposits	
<b>Q2</b>	<input type="text"/>
b) Total number (#) of customer deposits	
<i>Total number of customer deposits refer to the amount (count of transactions) of real money deposits made by customers.</i>	
<b>Q3</b>	<input type="text"/>
c) Total value (€) wagered by customers	
<i>Total value wagered by customers means the total amount of money that was gambled by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions and bonus wagers. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a>.</i>	
<b>Q4</b>	<input type="text"/>
d) Total number (#) of wagers made by customers	
<b>Q5</b>	<input type="text"/>
e) Total value (€) of winnings (RTP) for customers	
<i>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></i>	
<b>Q6</b>	<input type="text"/>
f) Total % of winnings (RTP) for customers	

<b>Q7</b>	<input type="text"/>
g) Total value (€) of customer withdrawals	<input type="text"/>
<b>Q8</b>	<input type="text"/>
h) Total number (#) of customer withdrawals	<input type="text"/>

## Product Risk (359)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q9**

Out of the following, please tick the products that have been offered by your entity as a Remote Gaming Operator:

*Choose more than one option:*

- Casino (including live casino)
- Lotteries or secondary lotteries
- Fixed odds betting including live betting
- Pool betting including exchange
- Peer to peer poker / bingo
- Other peer-to-peer games, but excluding pool betting and betting exchange
- Lottery messenger service
- Any other gaming vertical which is not comprised within the above

## Product Risk (360)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q10**

Were any new products offered in the previous calendar year?

*Choose only one option:*

- Yes
- No



## Product Risk (361)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q11**

*Please provide a short description of the new products offered*

**[Answer if Q10 is Yes]**

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## Product Risk (362)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q12**

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

*Choose only one option:*

- Yes
- No

## Product Risk (363)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q13**

*Provide details of the de-risking.*

**[Answer if Q12 is Yes]**

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## Product Risk (364)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Please indicate for gaming vertical - casino (including live casino) the following information for such activities performed by the entity during the previous calendar year:

<p><b>Q14</b></p> <p>a) Total value (€) wagered by customers</p> <p><b>[Answer if Q9 is Casino (including live casino)]</b></p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link:  <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>
<p><b>Q15</b></p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p><b>[Answer if Q9 is Casino (including live casino)]</b></p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>

## Product Risk (365)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Please indicate for gaming vertical - lotteries and secondary lotteries the following information for such activities performed by the entity during the previous calendar year:

<p><b>Q16</b></p> <p>a) Total value (€) wagered by customers</p> <p><b>[Answer if Q9 is Lotteries or secondary lotteries]</b></p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link:  <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>
<p><b>Q17</b></p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p><b>[Answer if Q9 is Lotteries or secondary lotteries]</b></p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>

## Product Risk (366)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate for gaming vertical - fixed odds betting including live betting, the following information for such activities performed by the entity during the previous calendar year:

<p><b>Q18</b></p> <p>a) Total value (€) wagered by customers</p> <p><b>[Answer if Q9 is Fixed odds betting including live betting]</b></p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms converted to € at the official</p>	<input type="text"/>
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<p>daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link:  <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	
<p><b>Q19</b></p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p><b>[Answer if Q9 is Fixed odds betting including live betting]</b></p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>

## Product Risk (367)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate for gaming vertical - pool betting including exchange, the following information for such activities performed by the entity during the previous calendar year:

<p><b>Q20</b></p> <p>a) Total value (€) wagered by customers</p> <p><b>[Answer if Q9 is Pool betting including exchange]</b></p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link:  <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>
<b>Q21</b>	<input type="text"/>

b) Total value (€) of winnings (RTP) for customers

**[Answer if Q9 is Pool betting including exchange]**

Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <https://www.centralbankmalta.org/average-exchange-rates>

## Product Risk (368)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate for gaming vertical - peer to peer poker / bingo, the following information for such activities performed by the entity during the previous calendar year

**Q22**

a) Total value (€) wagered by customers

**[Answer if Q9 is Peer to peer poker / bingo]**

Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link: <https://www.centralbankmalta.org/average-exchange-rates>

**Q23**

b) Total value (€) of winnings (RTP) for customers

**[Answer if Q9 is Peer to peer poker / bingo]**

Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following

link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a>	
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## Product Risk (369)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate for gaming vertical - other peer-to-peer games, but excluding pool betting and betting exchange the following information for such activities performed by the entity during the previous calendar year:

<p><b>Q24</b></p> <p>a) Total value (€) wagered by customers</p> <p><b>[Answer if Q9 is Other peer-to-peer games, but excluding pool betting and betting exchange]</b></p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>
<p><b>Q25</b></p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p><b>[Answer if Q9 is Other peer-to-peer games, but excluding pool betting and betting exchange]</b></p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>

## Product Risk (370)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate for gaming vertical - lottery messenger services, the following information for such activities performed by the entity during the previous calendar year:

<p><b>Q26</b></p> <p>a) Total value (€) wagered by customers</p> <p><b>[Answer if Q9 is Lottery messenger service]</b></p> <p>Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>
<p><b>Q27</b></p> <p>b) Total value (€) of winnings (RTP) for customers</p> <p><b>[Answer if Q9 is Lottery messenger service]</b></p> <p>Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <a href="https://www.centralbankmalta.org/average-exchange-rates">https://www.centralbankmalta.org/average-exchange-rates</a></p>	<input type="text"/>

## Product Risk (371)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate for gaming vertical - any other gaming vertical which is not comprised within the above, the following information for such activities performed by the entity during the previous calendar year:

<p><b>Q28</b></p> <p>a) Total value (€) wagered by customers</p>	<input type="text"/>
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**[Answer if Q9 is Any other gaming vertical which is not comprised within the above]**

Total value wagered by customers means the total amount of real money that was gambled / bet by the customer expressed in monetary terms 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 previous calendar year. Real money wagers should exclude customer incentives, jackpot contributions, bonus wagers and other customer financial incentives. Average exchange rates may be accessed through the following link:

<https://www.centralbankmalta.org/average-exchange-rates>

**Q29**

b) Total value (€) of winnings (RTP) for customers

**[Answer if Q9 is Any other gaming vertical which is not comprised within the above]**

Total value of winnings for customer (RTP) refers to the amount of total customer winnings 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 previous calendar year. Average exchange rates may be accessed through the following link: <https://www.centralbankmalta.org/average-exchange-rates>

## Product Risk (372)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

**Q30**

Please indicate the payment methods accepted by your entity, that customers can use to fund their account

Choose more than one option:

- Wire transfers (Banks / PSPs) / Debit Card / Credit Card
- Internet-based payment systems or other e-money services (as defined by FATF)
- Prepaid card / Vouchers
- Cash deposits
- Cheques
- Peer to peer transfers



- Crypto assets
- Other payment methods

## **Product Risk (373)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q31**

*If other payment methods, please specify.*

**[Answer if Q30 is Other payment methods]**

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## **Product Risk (374)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q32**

*Please indicate the total value (€) of incoming transactions made via Wire transfers (Banks / PSPs) / Debit Card / Credit Card during the previous calendar year.*

**[Answer if Q30 is Wire transfers (Banks / PSPs) / Debit Card / Credit Card]**

## **Product Risk (375)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q33**

*Please indicate the total value (€) of incoming transactions made via Internet-based payment systems or other e-money services (as defined by FATF) during the previous calendar year:*

**[Answer if Q30 is Internet-based payment systems or other e-money services (as defined by FATF)]**

## Product Risk (376)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q34**

*Please indicate the total value (€) of incoming transactions made via prepaid card / vouchers during the previous calendar year.*

**[Answer if Q30 is Prepaid card / Vouchers]**

## Product Risk (377)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q35**

*Please indicate the total value (€) of incoming transactions made via cash deposits during the previous calendar year.*

**[Answer if Q30 is Cash deposits]**

## Product Risk (378)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q36**

*Please indicate the total value (€) of incoming transactions made via cheques during the previous calendar year.*

**[Answer if Q30 is Cheques]**

## Product Risk (379)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q37**

*Kindly indicate the total value (€) of peer to peer transfers between customers during the previous calendar year.*

**[Answer if Q30 is Peer to peer transfers]**

## Product Risk (380)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q38**

*Please indicate the total value (€) of incoming transactions in crypto assets, made during the previous calendar year?*

**[Answer if Q30 is Crypto assets]**

## Product Risk (381)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q39**

*Please indicate the total value (€) of incoming transactions where the funds originated from crypto assets which were exchanged into fiat currency, made during the previous calendar year?*

**[Answer if Q30 is Crypto assets]**

## Product Risk (382)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q40**

*Please indicate the total value (€) of incoming transactions made via other payment methods during the previous calendar year.*

**[Answer if Q30 is Other payment methods]**

## Product Risk (383)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q41**

*Please indicate the total value of the deposits made through land based intermediaries (regardless of the payment method) during the previous calendar year.*

*Refers to the payments which originated from a land-based intermediary, regardless of the payment method used by the customer with the land-based intermediary (eg. debit / credit card, cash, etc.)*

## Product Risk (384)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q42**

*Please indicate the total value of the withdrawals made through land based intermediaries (regardless of the payment method) during the previous calendar year.*

*Refers to the withdrawals which were made via a land-based intermediary, regardless of the payment method used by the customer to withdraw (eg. debit /*

credit card, cash, etc.)

## Product Risk (385)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q43

How many customer master account arrangements does your entity hold, as at the end of the previous calendar year?

## Product Risk (386)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q44

Please indicate for activity facilitated via intermediary (e.g Master Accounts Agents), the total value (€) of customer deposits effected during the previous calendar year.

## Product Risk (387)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q45

What is the total value (€) of customer deposits for all remote gaming activity that were facilitated through betting syndicates during the previous calendar year?

## Product Risk (388)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q46

Please indicate the total number of single or aggregate deposits in one gaming session in excess of €2,000 during the previous calendar year?

## Product Risk (389)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Please indicate the total number of customers who have deposited (in single deposits or aggregate deposits) the following total amounts, in the previous calendar year:

<b>Q47</b>	<input type="text"/>
a) €20,000 - €50,000	<input type="text"/>
<b>Q48</b>	<input type="text"/>
b) €50,001 - €100,000	<input type="text"/>
<b>Q49</b>	<input type="text"/>
c) more than €100,000	<input type="text"/>

## Customer Risk

### Customer Risk (279)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q1**

Please list the total number of customers with whom your entity had an active business relationship, as at the end of the previous calendar year, and that have reached the €2,000 deposit threshold.

### Customer Risk (280)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q2**

*Please list the total number of customers with whom your entity had an active business relationship, as at the end of the previous calendar year, and that have reached the €2,000 deposit threshold and have transacted at least €2,000 in the last six months of the previous calendar year?*

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

*Transactions include deposit, withdrawal or wagering.*

### Customer Risk (281)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

**Q3**

*Please list the total number of customers who reached the €2,000 threshold since the opening of the account, during the previous calendar year.*

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

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*This question requires consideration of the total number of customers who, at any point in 2025, reached the €2,000 threshold for the first time (as per method defined by the SP's policies), regardless of when they opened their account with the subject person.*

## **Customer Risk (282)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### **Q4**

Please list the total number of business relationships that have been transferred or sold to another gaming entity or shifted onto another licence held by the entity as at the end of the previous calendar year.

## **Customer Risk (283)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### **Q5**

*Please indicate details of where the customers have been transferred / sold / shifted.*

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

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## **Customer Risk (284)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### **Q6**



Please specify the total number (#) of customers that are classified as VIPs, as defined by the policies and procedures.

## Customer Risk (286)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q7

How many customers hold multiple accounts as at the end of previous year?

*Refers to activity carried out under the MGA license.*

## Customer Risk (287)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Please provide the total number of customers to which the following product was offered during the previous calendar year

<b>Q8</b> <i>casino (including live casino)</i> <b>[Answer if Q9 is Casino (including live casino)]</b>	<input type="text"/>
<b>Q9</b> <i>lotteries and secondary lotteries</i> <b>[Answer if Q9 is Lotteries or secondary lotteries]</b>	<input type="text"/>
<b>Q10</b> <i>fixed odds betting including live betting</i> <b>[Answer if Q9 is Fixed odds betting including live betting]</b>	<input type="text"/>
<b>Q11</b>	<input type="text"/>

pool betting including exchange	
<b>[Answer if Q9 is Pool betting including exchange]</b>	
<b>Q12</b>	
peer to peer poker / bingo	<input type="text"/>
<b>[Answer if Q9 is Peer to peer poker / bingo]</b>	
<b>Q13</b>	
other peer-to-peer games, but excluding pool betting and betting exchange	<input type="text"/>
<b>[Answer if Q9 is Other peer-to-peer games, but excluding pool betting and betting exchange]</b>	
<b>Q14</b>	
lottery messenger services	<input type="text"/>
<b>[Answer if Q9 is Lottery messenger service]</b>	
<b>Q15</b>	
other gaming vertical	<input type="text"/>
<b>[Answer if Q9 is Any other gaming vertical which is not comprised within the above]</b>	

## Customer Risk (288)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Please specify the total number (#) of:

<b>Q16</b>	<input type="text"/>
a) customers rated as high risk	
<b>Q17</b>	<input type="text"/>
b) customers rated as medium risk	
<b>Q18</b>	<input type="text"/>
c) customers rated as low risk	

## Customer Risk (289)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q19

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

*Answer should not include customers who have not reached the threshold of €2,000 in deposits*

## Customer Risk (290)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q20

Please specify the total number (#) of customers to whom Enhanced Due Diligence (EDD) was applied, given that their risk was classified as high, during the previous calendar year.

## Customer Risk (291)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q21

Please list the total number of customers who during the previous calendar year, deposited and withdrew funds from their account with a gameplay of less than 20% of the total deposited amount?

*This should be calculated as follows: 1. Identify customers who have withdrawn funds from their account in the previous year; 2. Calculate the total deposits and total wagering per player 3. Exclude the number of players whose wagering value is at least 80% + ?0.01c of total deposits.*

## Customer Risk (292)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q22

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

## Customer Risk (293)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q23

Does your entity accept legal persons as customers?

*Choose only one option:*

- Yes
- No

# Jurisdiction Risk

## Jurisdiction Risk (201)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Out of the total value of customer deposits in the previous year, kindly indicate the value of deposits originating from customers resident in:

<b>Q1</b>  <i>Malta</i>  <b>[Answer if Q1 is &gt; 0]</b>  <i>The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.</i>	<input type="text"/>
<b>Q2</b>  <i>EU/EEA (Excluding Malta)</i>  <b>[Answer if Q1 is &gt; 0]</b>  <i>The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.</i>	<input type="text"/>
<b>Q3</b>  <i>Non-EU/Non-EEA</i>  <b>[Answer if Q1 is &gt; 0]</b>  <i>The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.</i>	<input type="text"/>
<b>Q4</b>  <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</i>  <b>[Answer if Q1 is &gt; 0]</b>	<input type="text"/>

<p><i>The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.</i></p>	
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## Jurisdiction Risk (202)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Out of the Total value of customer Withdrawals in the previous year, kindly indicate the value of withdrawals requested by customers resident in:

<p><b>Q5</b></p> <p>Malta</p> <p><b>[Answer if Q7 is &gt; 0]</b></p> <p><i>The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.</i></p>	<input type="text"/>
<p><b>Q6</b></p> <p>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q7 is &gt; 0]</b></p> <p><i>The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.</i></p>	<input type="text"/>
<p><b>Q7</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q7 is &gt; 0]</b></p> <p><i>The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.</i></p>	<input type="text"/>
<p><b>Q8</b></p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under</p>	<input type="text"/>

*Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries*

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

*The total values of deposits and withdrawals made during the previous calendar year by all customers under the MGA license. This includes both active and inactive customers and regardless of whether the €2,000 deposit threshold has been met.*

## Jurisdiction Risk (203)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

If your entity accepts to service legal persons, please indicate the total number of legal persons with which your entity had an active business relationship, as at the end of the previous calendar year, and are established in:

<p><b>Q9</b></p> <p>Malta</p> <p><b>[Answer if Q23 is Yes]</b></p>	<input type="text"/>
<p><b>Q10</b></p> <p>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q23 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>	<input type="text"/>
<p><b>Q11</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q23 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</p>	<input type="text"/>

<p><i>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>Q12</b></p> <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</i></p> <p><b>[Answer if Q23 is Yes]</b></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>	<div></div>

## Jurisdiction Risk (205)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate the number of customers residing in every category of jurisdictions, as at the end of the previous calendar year.

<p><b>Q13</b></p> <p>Malta</p>	<div></div>
<p><b>Q14</b></p> <p>EU/EEA (Excluding Malta)</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>	<div></div>
<p><b>Q15</b></p>	<div></div>



<p>Non-EU/Non-EEA</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>Q16</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><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>	<div data-bbox="1023 922 1374 965" style="border: 1px solid black; height: 19px; width: 220px;"></div>
<p><b>Q17</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 Q16 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> </ul>

	<ul style="list-style-type: none"> <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>Q18</b> <i>Afghanistan</i> <b>[Answer if Q17 is Afghanistan]</b>	<input type="text"/>
<b>Q19</b> <i>Algeria</i> <b>[Answer if Q17 is Algeria]</b>	<input type="text"/>
<b>Q20</b> <i>Angola</i> <b>[Answer if Q17 is Angola]</b>	<input type="text"/>
<b>Q21</b> <i>Bolivia</i> <b>[Answer if Q17 is Bolivia]</b>	<input type="text"/>
<b>Q22</b> <i>Bulgaria</i> <b>[Answer if Q17 is Bulgaria]</b>	<input type="text"/>
<b>Q23</b> <i>Burkina Faso</i> <b>[Answer if Q17 is Burkina Faso]</b>	<input type="text"/>

<b>Q24</b> Cameroon <b>[Answer if Q17 is Cameroon]</b>	<input type="text"/>
<b>Q25</b> Congo, the Democratic Republic of the <b>[Answer if Q17 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q26</b> Cote D'Ivoire <b>[Answer if Q17 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q27</b> Haiti <b>[Answer if Q17 is Haiti]</b>	<input type="text"/>
<b>Q28</b> Iran, Islamic Republic of <b>[Answer if Q17 is Iran, Islamic Republic of]</b>	<input type="text"/>
<b>Q29</b> Kenya <b>[Answer if Q17 is Kenya]</b>	<input type="text"/>
<b>Q30</b> Korea, Democratic People's Republic of <b>[Answer if Q17 is Korea, Democratic People's Republic of]</b>	<input type="text"/>
<b>Q31</b> Lao PDR <b>[Answer if Q17 is Lao PDR]</b>	<input type="text"/>
<b>Q32</b> Lebanon <b>[Answer if Q17 is Lebanon]</b>	<input type="text"/>
<b>Q33</b> Mali <b>[Answer if Q17 is Mali]</b>	<input type="text"/>

<b>Q34</b> Monaco <b>[Answer if Q17 is Monaco]</b>	<input type="text"/>
<b>Q35</b> Mozambique <b>[Answer if Q17 is Mozambique]</b>	<input type="text"/>
<b>Q36</b> Myanmar <b>[Answer if Q17 is Myanmar]</b>	<input type="text"/>
<b>Q37</b> Namibia <b>[Answer if Q17 is Namibia]</b>	<input type="text"/>
<b>Q38</b> Nepal <b>[Answer if Q17 is Nepal]</b>	<input type="text"/>
<b>Q39</b> Nigeria <b>[Answer if Q17 is Nigeria]</b>	<input type="text"/>
<b>Q40</b> Russia <b>[Answer if Q17 is Russia]</b>	<input type="text"/>
<b>Q41</b> South Africa <b>[Answer if Q17 is South Africa]</b>	<input type="text"/>
<b>Q42</b> South Sudan <b>[Answer if Q17 is South Sudan]</b>	<input type="text"/>
<b>Q43</b> Syrian Arab Republic <b>[Answer if Q17 is Syrian Arab Republic]</b>	<input type="text"/>

<b>Q44</b> Tanzania, United Republic of <b>[Answer if Q17 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q45</b> Trinidad and Tobago <b>[Answer if Q17 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q46</b> Vanuatu <b>[Answer if Q17 is Vanuatu]</b>	<input type="text"/>
<b>Q47</b> Venezuela <b>[Answer if Q17 is Venezuela]</b>	<input type="text"/>
<b>Q48</b> Vietnam <b>[Answer if Q17 is Vietnam]</b>	<input type="text"/>
<b>Q49</b> Virgin Islands (UK) <b>[Answer if Q17 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q50</b> Yemen <b>[Answer if Q17 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (225)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

### Q51

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 (226)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q52

*Please provide the number of subsidiaries per jurisdiction*

**[Answer if Q51 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 (227)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q53

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 (228)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### **Q54**

*Please provide the number of branches per jurisdiction*

**[Answer if Q53 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 (229)**

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### **Q55**

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 (230)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q56

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

**[Answer if Q55 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 (231)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

Please indicate the jurisdictions in which customers that are classified as VIP reside.

<b>Q57</b> <i>Malta</i> <b>[Answer if Q6 is &gt; 0]</b>	<i>Choose only one option:</i> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<b>Q58</b> <i>EU/EEA (Excluding Malta)</i> <b>[Answer if Q6 is &gt; 0]</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</i>	<i>Choose only one option:</i> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>



<p><i>EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q59</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q6 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>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q60</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 Q6 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>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q61</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 Q60 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> </ul>

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

## Interface Risk

### Interface Risk (43)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

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

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

### Interface Risk (44)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

#### Q3

How many agents did your entity have at the end of the previous calendar year that are physical establishments where customers can open an account in their name and use it to deposit and wager?

*Subject Persons are kindly requested to refer to Section 2.2.2 of the Implementing Procedures Part II for Remote Gaming Sector*

### Interface Risk (45)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

#### Q4

How many agents did your entity have at the end of the previous calendar year that are physical establishments where customers use an account held by the operator to conduct transactions on their behalf?

*Subject Persons are kindly requested to refer to Section 2.2.2 of the Implementing Procedures Part II for Remote Gaming Sector*

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## Interface Risk (46)

**(Relates to Remote Gaming Operators or Land-Based Casinos)**

Please indicate the jurisdictions in which the agents operate.

<b>Q5</b> Malta	Choose only one option: <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>
<b>Q6</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>	Choose only one option: <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>
<b>Q7</b> Non-EU/Non-EEA <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>	Choose only one option: <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>
<b>Q8</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.	Choose only one option: <ul style="list-style-type: none"><li>• Yes</li><li>• No</li></ul>

<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>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> <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> </ul>

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

## Interface Risk (47)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q10

What is the % of customers that were onboarded via physical establishments / land-based intermediaries during the previous calendar year?

## Interface Risk (48)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q11

Has your entity terminated any agency relationship with agents which are physical establishments due to AML/CFT issues during the previous calendar year?

*Choose only one option:*

- Yes
- No

## Interface Risk (49)

*(Relates to Remote Gaming Operators or Land-Based Casinos)*

### Q12

What is the % 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?

---



## **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)

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#### 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 (124)

### Q9

How many customers are included in the entity's customer portfolio, where customer due diligence has not been completed once the customers have reached the € two thousand (€2,000) threshold in deposits?

*or choose one of:*

- Not Applicable

## 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 (125)

### Q12

When does your entity carry out the first CRA?

*Choose only one option:*

- At onboarding
- At first transaction
- When the two thousand (€2,000) threshold in deposits is reached
- CRA not carried out
- Other

**Q13**

*Kindly provide details if "other".*

**[Answer if Q12 is Other]**

//

## Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

<b>Q14</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>Q15</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>Q16</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>

	• Not Applicable
--	------------------

## Customer Acceptance and Risk Assessment (126)

### Q17

How does your entity determine when the threshold of €2,000 in deposits has been reached by a customer ?

*Implementing Procedures part II for Remote Gaming Sector - Section 3.3.2. Also Note that the option "based on lifetime deposits" refers to "on a daily basis taking into account all deposits effected by a customer since beginning of business relationship", while the option "based on rolling period of 180 days" refers to "on the basis of a rolling period of one hundred and eighty (180) day by considering if a customer's overall deposits in the previous 180 days have met or exceeded the Euro two thousand (€2,000) threshold".*

*Choose only one option:*

- Based on lifetime deposits
- Based on rolling period of 180 days
- Threshold of €2,000 in deposits not considered

## Customer Acceptance and Risk Assessment (127)

### Q18

*Does your entity have controls in place to prevent circumventing the €2,000 deposit threshold?*

***[Answer if Q17 is Based on lifetime deposits, Based on rolling period of 180 days]***

*Choose only one option:*

- Yes
- No

### Q19

*Please describe such controls*

***[Answer if Q18 is Yes]***

//

## Customer Acceptance and Risk Assessment (106)

### Q20

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)

### Q21

*What was the reason for the de-risking exercise?*

*[Answer if Q20 is > 0]*

//

## Customer Acceptance and Risk Assessment (108)

### Q22

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 (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 (77)

Q14

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*If others, explain*

**[Answer if Q13 is Others]**

//

# 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 (13)

### Q3

*If your entity outsourced the carrying out of any applicable AML/CFT obligations outside the group, please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

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

- Record-Keeping
- Drafting of policies and procedures
- MLRO function

## Outsourcing (14)

### Q4

*If your entity outsourced the carrying out of any applicable AML/CFT obligations within the group, please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

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

## Outsourcing (15)

### Q5

*If your entity outsources AML/CFT obligations to a service provider/s, whether within or outside the group, 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 (24)

Please indicate the jurisdictions where the service providers 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</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>



<p><i>Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p><b><i>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</i></b></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>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><i>[Answer if Q9 is Yes]</i></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</li> </ul>

- 
- |  |  |
|--|--|
|  | <p>Republic of</p> <ul style="list-style-type: none"><li>• Trinidad and Tobago</li><li>• Vanuatu</li><li>• Venezuela</li><li>• Vietnam</li><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

---

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 (14)

### Q7

Does your entity provide AML/CFT training to 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?

---

## 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?

## 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

---

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) (50)

### Q9

Does your entity implement a closed-loop policy with regards to withdrawals?

*Choose only one option:*

- Yes
- No
- Not always

## Ongoing monitoring (Transaction Scrutiny) (51)

### Q10

*Kindly provide details if "not always".*

***[Answer if Q9 is Not always]***

//

## Ongoing monitoring (Transaction Scrutiny) (52)

### Q11

Does your entity have controls in place to detect the opening of multiple accounts by the same customer?

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

## Ongoing monitoring (Transaction Scrutiny) (53)

### Q12

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Does your entity have measures in place to be able to detect collusion between customers?

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

## **Ongoing monitoring (Transaction Scrutiny) (25)**

### **Q13**

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

//

## **Ongoing monitoring (Transaction Scrutiny) (27)**

### **Q14**

Please explain measures that your entity applies in respect of transactions flagged for scrutiny.

//

## **Ongoing monitoring (Transaction Scrutiny) (49)**

### **Q15**

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

or choose one of:

- Not Applicable

## **Ongoing monitoring (Transaction Scrutiny) (54)**

**Q16**

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

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

//

## **Ongoing monitoring (Transaction Scrutiny) (55)**

**Q17**

*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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