



# 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 (9)

#### Q1

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

*Choose only one option:*

- Yes
- No

### Product Risk (10)

#### Q2

*Provide details of the de-risking.*

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

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### Product Risk (113)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

#### Q3

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

*Choose more than one option:*

- Administering the operation of a retirement scheme
- Acting as custodian or trustee of a retirement scheme
- Acting as a custodian of a retirement fund
- Management of the assets of a retirement scheme
- Management of the assets of a retirement fund

## Product Risk (114)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q4**

*Please tick the type of retirement schemes that your entity administers*

**[Answer if Q3 is Administering the operation of a retirement scheme]**

*Choose more than one option:*

- Personal retirement schemes
- Occupational retirement schemes

## Product Risk (115)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q5**

*What is the total number of personal retirement schemes that your entity administered as at end of the previous calendar year?*

**[Answer if Q4 is Personal retirement schemes]**

## Product Risk (116)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q6**

*What is the total number of occupational retirement schemes that your entity administered as at end of the previous calendar year?*

**[Answer if Q4 is Occupational retirement schemes]**

## Product Risk (117)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

Please indicate the total value of contributions paid into personal retirement schemes by individual members during the previous calendar year through the following payment methods:

<b>Q7</b>	
Cash	<input type="text"/>
<b>[Answer if Q4 is Personal retirement schemes]</b>	
<b>Q8</b>	
Bank transfer and card payments	<input type="text"/>
<b>[Answer if Q4 is Personal retirement schemes]</b>	
<b>Q9</b>	
Cheque	<input type="text"/>
<b>[Answer if Q4 is Personal retirement schemes]</b>	
<b>Q10</b>	
In Specie Transfers	<input type="text"/>
<b>[Answer if Q4 is Personal retirement schemes]</b>	
<b>Q11</b>	
Other means	<input type="text"/>
<b>[Answer if Q4 is Personal retirement schemes]</b>	

## Product Risk (118)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q12**

*In the case of personal retirement schemes, do you accept contributions to be paid by persons other than members?*

**[Answer if Q4 is Personal retirement schemes]**

*Choose only one option:*

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- Yes
- No

## Product Risk (119)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

### Q13

*If your entity allows contributions in personal retirement schemes to be paid by persons other than members, please indicate the total value of such contributions during the previous calendar year.*

**[Answer if Q12 is Yes]**

## Product Risk (120)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

Please indicate the total value of contributions paid into occupational retirement schemes by employers during the previous calendar year through the following payment methods:

<b>Q14</b>	
Cash	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q15</b>	
Bank transfer and card payments	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q16</b>	
Cheque	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q17</b>	
In Specie Transfers	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q18</b>	<input type="text"/>

Other means	
<b>[Answer if Q4 is Occupational retirement schemes]</b>	

## Product Risk (121)

**(Relates to Service Providers licensed under the Retirement Pensions Act)**

Please indicate the total value of contributions paid into occupational retirement schemes by individual members during the previous calendar year through the following payment methods:

<b>Q19</b>	
Cash	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q20</b>	
Bank transfer and card payments	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q21</b>	
Cheque	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q22</b>	
In Specie Transfers	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	
<b>Q23</b>	
Other means	<input type="text"/>
<b>[Answer if Q4 is Occupational retirement schemes]</b>	

## Product Risk (122)

**(Relates to Service Providers licensed under the Retirement Pensions Act)**

**Q24**

*In the case of occupational retirement schemes, do you accept contributions to be paid by persons other than members or their employers?*

***[Answer if Q4 is Occupational retirement schemes]***

*Choose only one option:*

- Yes
- No

## **Product Risk (123)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

**Q25**

*If your entity allows contributions in occupational retirement schemes to be paid by persons other than members and employers, please indicate the total value of such contributions during the previous calendar year.*

***[Answer if Q24 is Yes]***

## **Product Risk (124)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

**Q26**

*What is the total value of additional contributions paid into personal retirement schemes (i.e. apart from ordinary/planned contributions) during the previous calendar year?*

***[Answer if Q4 is Personal retirement schemes]***

## **Product Risk (125)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

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## **Q27**

*What is the total value of additional contributions paid into occupational retirement schemes (i.e. apart from ordinary/planned contributions) during the previous calendar year?*

***[Answer if Q4 is Occupational retirement schemes]***

## **Product Risk (126)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

## **Q28**

*As at end of the previous calendar year, what was the total value of assets under administration (AUA) held in retirement funds for personal retirement schemes that your entity administers?*

***[Answer if Q4 is Personal retirement schemes]***

## **Product Risk (127)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

## **Q29**

*As at end of the previous calendar year, what was the total value of assets under administration (AUA) held in retirement funds for occupational retirement schemes that your entity administers?*

***[Answer if Q4 is Occupational retirement schemes]***

## **Product Risk (128)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

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### Q30

*What is the total value of retirement benefit payments made during the previous calendar year to beneficiaries of personal retirement schemes?*

***[Answer if Q4 is Personal retirement schemes]***

*Note: This includes any type of payments to anyone that falls within the definition of beneficiary.*

## Product Risk (129)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

### Q31

*What is the total value of retirement benefit payments made during the previous calendar year to beneficiaries of occupational retirement schemes?*

***[Answer if Q4 is Occupational retirement schemes]***

*Note: This includes any type of payments to anyone that falls within the definition of beneficiary.*

## Product Risk (130)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

### Q32

*What is the total value of retirement benefit payments made during the previous calendar year to individuals other than members of personal retirement schemes.*

***[Answer if Q4 is Personal retirement schemes]***

## Product Risk (131)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q33**

*What is the total value of retirement benefit payments made during the previous calendar year to individuals other than members of occupational retirement schemes?*

***[Answer if Q4 is Occupational retirement schemes]***

## Product Risk (132)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q34**

*In what format are retirement benefit payments to beneficiaries made?*

***[Answer if Q3 is Administering the operation of a retirement scheme]***

*Choose more than one option:*

- Initial cash lump sum
- Additional cash lump sum
- Programmed withdrawals
- Life annuity

## Product Risk (133)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q35**

*Through what means are retirement benefit payments to beneficiaries made?*

***[Answer if Q3 is Administering the operation of a retirement scheme]***

*Choose more than one option:*

- Cash
-

- Bank payments
- Cheques
- Others

## Product Risk (134)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q36**

*How many in specie transfers of assets out of personal retirement schemes were affected during the previous calendar year?*

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

## Product Risk (135)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q37**

*How many in specie transfers of assets out of occupational retirement schemes were affected during the previous calendar year?*

***[Answer if Q3 is Administering the operation of a retirement scheme]***

## Product Risk (136)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q38**

*How many personal retirement schemes were surrendered earlier than maturity by individual members during the previous calendar year?*

***[Answer if Q4 is Personal retirement schemes]***

## Product Risk (137)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q39**

*How many occupational retirement schemes were surrendered earlier than maturity by individual members during the previous calendar year?*

***[Answer if Q4 is Occupational retirement schemes]***

## Product Risk (138)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q40**

*What was the value of personal retirement schemes that were surrendered earlier than maturity by individual members during the previous calendar year?*

***[Answer if Q4 is Personal retirement schemes]***

## Product Risk (139)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q41**

*What was the value of occupational retirement schemes that were surrendered earlier than maturity by individual members during the previous calendar year?*

***[Answer if Q4 is Occupational retirement schemes]***

## Product Risk (140)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q42**

*In the case of members of retirement schemes who meet the definition of High Net Worth Individuals, please indicate the value of the pension funds held as at end of the last calendar year.*

***[Answer if Q3 is Administering the operation of a retirement scheme]***

## Product Risk (141)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q43**

*What is the total value of retirement schemes and retirement funds that your entity manages?*

***[Answer if Q3 is Acting as custodian or trustee of a retirement scheme, Acting as a custodian of a retirement fund]***

## Product Risk (142)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q44**

*What is the total value of retirement schemes and retirement funds that your entity acts as a custodian for?*

***[Answer if Q3 is Management of the assets of a retirement scheme, Management of the assets of a retirement fund]***



## Customer Risk

### Customer Risk (18)

Q1

According to the entity's policies and procedures, how many business relationships in the customer portfolio are subject to EDD?

### Customer Risk (19)

Q2

According to the entity's policies and procedures, how many business relationships in the customer portfolio are subject to SDD?

### Customer Risk (43)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

Q3

*In the case of personal retirement schemes, please list the total number of members with whom your entity had an active business relationship as at the end of the prior calendar year.*

***[Answer if Q4 is Personal retirement schemes]***

### Customer Risk (44)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

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#### Q4

*In the case of occupational retirement schemes, please list the total number of members with whom your entity had an active business relationship as at the end of the prior calendar year.*

***[Answer if Q4 is Occupational retirement schemes]***

### Customer Risk (45)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

#### Q5

*In the case of occupational retirement schemes, please list the total number of employers with whom your entity had an active business relationship as at the end of the prior calendar year.*

***[Answer if Q4 is Occupational retirement schemes]***

### Customer Risk (46)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

In the case of employers (for occupational retirement schemes), please state the total number of business relationships as at the end of the prior calendar year where the employer is a:

<b>Q6</b>	
Natural person	<input type="text"/>
<b><i>[Answer if Q5 is &gt; 0]</i></b>	
<b>Q7</b>	
A person other than a natural person	<input type="text"/>
<b><i>[Answer if Q5 is &gt; 0]</i></b>	

## Customer Risk (47)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q8**

*Please list the number of business relationships with employers (for occupational retirement schemes), where the employer is part of a multi-tier ownership structure (i.e. at least two additional layers of legal persons or arrangements on top of the employer)*

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

## Customer Risk (48)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q9**

*Please list the number of business relationships with employers (for occupational retirement schemes), where the employer is part of an ownership and control structure which involves a trust, foundation or other similar legal arrangement (i.e. it is Not the employer who is the trust, foundation or similar legal arrangement).*

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

## Customer Risk (49)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q10**

*Of the total individual members, how many were PEPs (including family members and close associates), as at the end of the prior calendar year?*

**[Answer if Q3 is Administering the operation of a retirement scheme]**

## Customer Risk (50)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

**Q11**

*Please indicate the total number of individual member PEPs per jurisdiction*

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

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Customer Risk (51)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

Of the total number of active business relationships, please specify the total number of:

<b>Q12</b> business relationships rated as high risk	<input type="text"/>
<b>Q13</b> business relationships rated as medium risk	<input type="text"/>
<b>Q14</b> business relationships rated as low risk	<input type="text"/>

## Customer Risk (52)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

### **Q15**

*Please list the number of employers (for occupational retirement schemes) who are operating in dual use items.*

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

## **Customer Risk (53)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

### **Q16**

*Please list the number of employers who operate in cash intensive businesses.*

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

## **Customer Risk (54)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

### **Q17**

*Please list the number of members of retirements schemes that meet the definition of High Net Worth Individuals.*

***[Answer if Q3 is Administering the operation of a retirement scheme]***

## **Customer Risk (55)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

### Q18

*Please list the total number of retirement schemes and retirement funds that your entity acted as a custodian for as at the end of the prior calendar year.*

***[Answer if Q3 is Acting as custodian or trustee of a retirement scheme, Acting as a custodian of a retirement fund]***

## Customer Risk (56)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

### Q19

*Please list the total number of retirement schemes and retirement funds that your entity acted as a manager for as at the end of the prior calendar year.*

***[Answer if Q3 is Management of the assets of a retirement scheme, Management of the assets of a retirement fund]***

# Jurisdiction Risk

## Jurisdiction Risk (53)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

Please specify the jurisdiction in which the personal retirement schemes that your entity administers are established.

<p><b>Q1</b></p> <p>Malta</p> <p><b>[Answer if Q4 is Personal retirement schemes]</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q2</b></p> <p>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q4 is Personal retirement schemes]</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>Q3</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q4 is Personal retirement schemes]</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>Q4</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

<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 Q4 is Personal retirement schemes]</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>Q5</b></p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p><b>[Answer if Q4 is Yes]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> </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>
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## Jurisdiction Risk (54)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

Please specify the jurisdiction in which the occupational retirement schemes that your entity administers are established.

<b>Q6</b> Malta <b>[Answer if Q4 is Occupational retirement schemes]</b>	Choose only one option: <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<b>Q7</b> EU/EEA (Excluding Malta) <b>[Answer if Q4 is Occupational retirement schemes]</b> Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	Choose only one option: <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<b>Q8</b> Non-EU/Non-EEA <b>[Answer if Q4 is Occupational retirement schemes]</b> Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU	Choose only one option: <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

<p><i>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>Q9</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 Q4 is Occupational retirement schemes]</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><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q10</b></p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p><b>[Answer if Q9 is Yes]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> </ul>

	<ul style="list-style-type: none"> <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>
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## Jurisdiction Risk (55)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

### Q11

*What is the total number of individual members of personal retirement schemes as at end of the previous calendar year that are resident in the following jurisdictions?*

***[Answer if Q4 is Personal retirement schemes]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Jurisdiction Risk (56)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

### Q12

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*What is the total number of individual members of occupational retirement schemes as at end of the previous calendar year that are resident in the following jurisdictions?*

***[Answer if Q4 is Occupational retirement schemes]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## **Jurisdiction Risk (57)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

**Q13**

*What is the total number of employers who are natural persons and contributing to occupational retirement schemes as at end of the previous calendar year that reside in the following jurisdictions?*

***[Answer if Q6 is > 0]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## **Jurisdiction Risk (58)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

**Q14**

What is the total number of employers who are not natural persons and contributing to occupational retirement schemes as at end of the previous calendar year that are incorporated or registered in the following jurisdictions?

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

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Jurisdiction Risk (59)

**(Relates to Service Providers licensed under the Retirement Pensions Act)**

In the case of members requesting a transfer of benefits from personal retirement schemes that your entity administers to other schemes during the previous calendar year, please indicate the jurisdiction in which such schemes are established?

<p><b>Q15</b></p> <p>Malta</p> <p><b>[Answer if Q4 is Personal retirement schemes]</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q16</b></p> <p>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q4 is Personal retirement schemes]</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>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>

<p><b>Q17</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q4 is Personal retirement schemes]</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>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q18</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 Q4 is Personal retirement schemes]</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>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q19</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 Q18 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>

	<ul style="list-style-type: none"> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
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## Jurisdiction Risk (60)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

In cases where members requesting a transfer of benefits from occupational retirement schemes that your entity administers to other schemes during the previous calendar year, please indicate the jurisdiction in which such schemes are established?

<p><b>Q20</b></p> <p>Malta</p> <p><b>[Answer if Q4 is Occupational retirement schemes]</b></p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
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<p><b>Q21</b></p> <p><i>EU/EEA (Excluding Malta)</i></p> <p><b>[Answer if Q4 is Occupational retirement schemes]</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><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q22</b></p> <p><i>Non-EU/Non-EEA</i></p> <p><b>[Answer if Q4 is Occupational retirement schemes]</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><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q23</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 Q4 is Occupational retirement schemes]</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><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q24</b></p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and</i></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> </ul>

*'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.*  
**[Answer if Q23 is Yes]**

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

## **Jurisdiction Risk (61)**

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

Please specify the jurisdiction in which the retirement schemes or retirement funds that your entity manages are established.

<p><b>Q25</b></p> <p>Malta</p> <p><b>[Answer if Q3 is Management of the assets of a retirement scheme, Management of the assets of a retirement fund]</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q26</b></p> <p>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q3 is Management of the assets of a retirement scheme, Management of the assets of a retirement fund]</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>Q27</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q3 is Management of the assets of a retirement scheme, Management of the assets of a retirement fund]</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>Q28</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 Q3 is Management of the assets of a retirement scheme, Management of the assets of a retirement fund]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

<p><i>'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q29</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 Q28 is Yes]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> </ul>

	<ul style="list-style-type: none"> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
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## Jurisdiction Risk (62)

***(Relates to Service Providers licensed under the Retirement Pensions Act)***

Please specify the jurisdiction in which the retirement schemes or retirement funds that your entity acts as a custodian for are established.

<b>Q30</b>  Malta  <b><i>[Answer if Q3 is Acting as custodian or trustee of a retirement scheme, Acting as a custodian of a retirement fund]</i></b>	Choose only one option:  <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<b>Q31</b>  EU/EEA (Excluding Malta)  <b><i>[Answer if Q3 is Acting as custodian or trustee of a retirement scheme, Acting as a custodian of a retirement fund]</i></b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	Choose only one option:  <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<b>Q32</b>  Non-EU/Non-EEA  <b><i>[Answer if Q3 is Acting as custodian or trustee of a retirement scheme, Acting as a custodian of a retirement fund]</i></b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the	Choose only one option:  <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>Q33</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 Q3 is Acting as custodian or trustee of a retirement scheme, Acting as a custodian of a retirement fund]</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><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q34</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 Q33 is Yes]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> </ul>

- 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 (8)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

From the total number of employers contributing to occupational retirement schemes, what % were onboarded:

<b>Q1</b> on a face-to-face basis during the prior calendar year? [Answer if Q5 is > 0]	<input type="text"/> or choose one of: <ul style="list-style-type: none"><li>• Not Applicable</li></ul>
<b>Q2</b> on a non-face-to-face basis, during the prior calendar year? [Answer if Q5 is > 0]	<input type="text"/> or choose one of: <ul style="list-style-type: none"><li>• Not Applicable</li></ul>

### Interface Risk (9)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

From the total number of individual members to retirement schemes, what % were onboarded (applies only to individual members applying to retirement schemes directly and not through employers):

<b>Q3</b> on a face-to-face basis during the prior calendar year?	<input type="text"/> or choose one of: <ul style="list-style-type: none"><li>• Not Applicable</li></ul>
<b>Q4</b> on a non-face-to-face basis, during the prior calendar year?	<input type="text"/> or choose one of: <ul style="list-style-type: none"><li>• Not Applicable</li></ul>

### Interface Risk (10)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

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## Q5

How many investment advisors did your entity have at the end of the previous calendar year?

or choose one of:

- Not Applicable

## Interface Risk (11)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

### Q6

What is the % of employers who were introduced by an investment advisor?

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

or choose one of:

- Not Applicable

## Interface Risk (12)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

### Q7

What is the % of individual members who were introduced by either an investment advisor? (applies only to individual members applying to retirement schemes directly and not through employers)

**[Answer if Q3 is Administering the operation of a retirement scheme]**

or choose one of:

- Not Applicable

## Interface Risk (13)

*(Relates to Service Providers licensed under the Retirement Pensions Act)*

Please indicate the jurisdictions in which the investment advisor/s operate.

<p><b>Q8</b></p> <p>Malta</p> <p><b>[Answer if Q5 is &gt; 0]</b></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>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q5 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>Q10</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q5 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>Q11</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

<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 Q5 is &gt; 0]</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>Q12</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 Q11 is Yes]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> </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> |
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## **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 (102)

**Q9**

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

## Customer Acceptance and Risk Assessment (103)

**Q10**

---

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

or choose one of:

- Not Applicable

## Customer Acceptance and Risk Assessment (104)

**Q11**

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

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

//

## Customer Acceptance and Risk Assessment (105)

How often is the CRA reviewed for the following:

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

	<p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q14</b></p> <p><i>c) High risk customers</i></p> <p><b>[Answer if Q6 is Yes]</b></p>	<p>Choose more than one option:</p> <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> <p>or choose one of:</p> <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 (36)

### Q1

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

*Choose only one option:*

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

## Policies and Procedures (37)

### Q2

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

*Choose more than one option:*

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

## Policies and Procedures (38)

### Q3

How do you determine whether individuals/entities are sanctioned?

*Choose more than one option:*

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

## **Policies and Procedures (39)**

### **Q4**

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

*Choose only one option:*

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

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

### **Q5**

Does your entity have internal whistleblowing procedures?

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

### **Q6**

*If not applicable, please explain why.*

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

//

## Policies and Procedures (41)

### Q7

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

*Choose only one option:*

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

## Policies and Procedures (42)

### Q8

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

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

*Choose only one option:*

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

## Policies and Procedures (43)

## Q9

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

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

*Choose only one option:*

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

## Policies and Procedures (44)

### Q10

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

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

*Choose only one option:*

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

## Policies and Procedures (45)

### Q11

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

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

//

## Policies and Procedures (46)

Q12

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

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

//

## Policies and Procedures (47)

Q13

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

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

*Choose more than one option:*

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

## Policies and Procedures (48)

Q14

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*If others, explain*

**[Answer if Q13 is Others]**

//

# Outsourcing

## Outsourcing (1)

### Q1

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

*Choose only one option:*

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

## Outsourcing (2)

### Q2

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

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

//

## Outsourcing (3)

### Q3

*Please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

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

- MLRO function

## Outsourcing (4)

### Q4

*Please specify the obligations that are being outsourced.*

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

*Choose more than one option:*

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

## Outsourcing (5)

### Q5

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

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

*Choose only one option:*

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


## Outsourcing (6)

---

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

<p><b>Q6</b></p> <p>Malta</p> <p><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q7</b></p> <p>EU/EEA (Excluding Malta)</p> <p><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q8</b></p> <p>Non-EU/Non-EEA</p> <p><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q9</b></p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p><b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

<p><i>'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q10</b></p> <p><i>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</i></p> <p><b>[Answer if Q9 is Yes]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> </ul>

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

# Record-keeping

## Record-keeping (1)

### Q1

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

*Choose only one option:*

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

## Training

### Training (1)

#### Q1

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

### Training (2)

#### Q2

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

### Training (3)

#### Q3

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

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

*or choose one of:*

- Not Applicable

### Training (10)

#### Q4

---

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

or choose one of:

- Not Applicable

## Training (5)

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

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

## Training (7)

### Q7

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

*Choose only one option:*

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

## Reporting

### Reporting (15)

Q1

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

### Reporting (16)

Q2

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

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

### Reporting (17)

Q3

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

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

### Reporting (18)

Q4

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

---

## 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) (49)

### Q9

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)

### Q10

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

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

//

## Ongoing monitoring (Transaction Scrutiny) (55)

### Q11

*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]***

//