



# 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 (321)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

#### Q1

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

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

*Choose more than one option:*

- Formation of companies or other legal entities
- Provision of a registered office
- Acting or arranging others to act as director, company secretary etc.
- Acting as a mandatary in the holding of securities and/or immovable property for another person
- Acting as a Trustee or co-trustee in terms of Article 43 (1)
- Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)

### Product Risk (322)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

#### Q2

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

*Choose only one option:*

- Yes
- No

## Product Risk (323)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q3**

*Provide details of the de-risking.*

**[Answer if Q2 is Yes]**

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## Product Risk (324)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q4**

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

**[Answer if Q1 is Formation of companies or other legal entities]**

## Product Risk (325)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q5**

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

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



## Product Risk (326)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q6

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

***[Answer if Q1 is Provision of a registered office]***

## Product Risk (327)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q7

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

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

## Product Risk (328)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q8

*Please indicate the total number of customers to whom registered office, a business correspondence or administrative address and other related services was provided*

as at the end of the previous calendar year with whom your entity lost contact, or where the customer became unresponsive.

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

## Product Risk (329)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q9**

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

## Product Risk (330)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q10**

*Please list details (name, surname and I.D. Card Number) of the entity's officers or employees who have been appointed to act as company secretary or in a similar position in client entities.*

**[Answer if Q9 is > 0]**

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## Product Risk (331)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q11**

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

***[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]***

## **Product Risk (332)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q12**

*Please indicate the total number of arrangements for another person to act as director, a partner in a partnership or in a similar position in relation to other client entities during the previous calendar year.*

***[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]***

## **Product Risk (333)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

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

<b>Q13</b>  <i>Number of customers as at the end of the previous calendar year, where the director is solely or jointly vested with the legal and judicial representation of the company</i>  <b><i>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</i></b>	<input type="text"/>
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<p><b>Q14</b></p> <p><i>Number of customers as at the end of the previous calendar year, where the director is vested with the legal and judicial representation of the company, but where legal and judicial representation is vested in different directors acting individually</i></p> <p><b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b></p>	<input type="text"/>
<p><b>Q15</b></p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the company</i></p> <p><b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b></p>	<input type="text"/>
<p><b>Q16</b></p> <p><i>Number of customers as at the end of the previous calendar year, where the director is not vested with the legal and judicial representation of the customer, however, he was authorised through a board resolution or power of attorney to open/manage customer's bank/payment account</i></p> <p><b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b></p>	<input type="text"/>
<p><b>Q17</b></p> <p><i>Number of customers as at the end of the previous calendar year, for whom provision of directorship services includes having signatory right on customers' bank or payment accounts</i></p> <p><b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b></p>	<input type="text"/>
<p><b>Q18</b></p> <p><i>Number of customers where power of attorney authorisations or board of directors resolutions have been granted to a third party to open and/or manage customers' bank/payment accounts during the previous calendar year</i></p> <p><b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b></p>	<input type="text"/>

## Product Risk (334)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q19**

*Please list details (name, surname and I.D. Card Number) of the entity's officers or employees who have been appointed to act as director in customers entities or in a similar position.*

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

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## **Product Risk (335)**

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q20**

*Please indicate how many customers to whom directorship services was provided and who did not have their own bank/payment/crypto account as at the end of the previous calendar year but instead used your entity's clients account.*

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

## **Product Risk (336)**

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q21**

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

**[Answer if Q12 is > 0]**

## Product Risk (337)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q22

*Please indicate the total number of private interest foundations that your entity formed, or assisted in forming such, during the previous calendar year.*

***[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]***

*The term "private interest foundations" is to capture both "private interest foundations" and "private foundations established for the benefit of specific beneficiaries" as defined in the Civil Code.*

## Product Risk (338)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q23

*Please indicate the total number of private interest foundations for which your entity was acting as an administrator as at the end of the previous calendar year.*

***[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]***

*The term "private interest foundations" is to capture both "private interest foundations" and "private foundations established for the benefit of specific beneficiaries" as defined in the Civil Code.*

## Product Risk (339)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q24**

*Please indicate the total value of assets of the private interest foundations that your entity administered as at the end of the previous calendar year.*

**[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]**

## Product Risk (340)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q25**

*Please indicate the total number of private interest foundations that your entity administered as at the end of the previous calendar year where the total value of the assets of the private foundation did not exceed €999,999?*

**[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]**

## Product Risk (341)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q26**

*Please indicate the total number of private interest foundations that your entity administered as at the end of the previous calendar year where the total value of the assets of the foundation was between €1,000,000 and €4,999,999?*

**[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]**

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## Product Risk (342)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q27

*Please indicate the total number of private interest foundations that your entity administered as at the end of the previous calendar year where the total value of the assets of the foundation exceeded €5,000,000?*

***[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]***

## Product Risk (343)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q28

*Please indicate for how many private interest foundations a statement of net assets supported by an audited profit and loss account which is required to be submitted to the MBR each year on the anniversary date of the foundation's birth was not submitted during the previous calendar year.*

***[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]***

## Product Risk (344)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

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## Q29

*Please indicate the total value (€) of payouts distributed from private interest foundations during the previous calendar year for which your entity acted as an administrator for.*

***[Answer if Q1 is Acting as an Administrator of Private Interest Foundations in terms of Article 43(12)(b)]***

## Product Risk (345)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

## Q30

*Please indicate the total number of companies and other legal arrangements in which your entity held shares in fiduciary/mandatary capacity as at the end of the previous calendar year.*

***[Answer if Q1 is Acting as a mandatary in the holding of securities and/or immovable property for another person]***

## Product Risk (346)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

## Q31

*Please indicate the total value (€) of shares that your entity held in fiduciary/mandatary capacity as at the end of the previous calendar year.*

***[Answer if Q1 is Acting as a mandatary in the holding of securities and/or immovable property for another person]***

## Product Risk (347)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q32**

*Please list the type of trusts for which your entity provided trustee or co trustee services or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year:*

***[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]***

*Choose more than one option:*

- Discretionary trust
- Fixed interest trust
- Charitable trust
- Security trust
- Other

## Product Risk (348)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q33**

*Please indicate the total value (€) of the assets held on trust as at the end of the previous calendar year where your entity provided trustee or co-trustee services or arranged by way of business, for another person to act as a trustee.*

***[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]***

## Product Risk (349)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the following held on trust:

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<b>Q34</b> a) the total value (EUR equivalent) of funds in bank accounts held on trust  <b>[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]</b>	<input type="text"/>  
<b>Q35</b> b) the total value of balances (EUR) held in investment accounts (EUR equivalent)  <b>[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]</b>	<input type="text"/>  
<b>Q36</b> c) the total value of crypto assets held (EUR equivalent)  <b>[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]</b>	<input type="text"/>  
<b>Q37</b> d) the total value of immovable properties held on trust (EUR equivalent)  <b>[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]</b>	<input type="text"/>  
<b>Q38</b> e) the total value (EUR equivalent) of any other assets held on trust (such as jewellery, works of art, yachts, rights to receive income and others)  <b>[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]</b>	<input type="text"/>  

## Product Risk (350)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

### Q39

*In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of trusts where, the total value of the assets settled on trust did not exceed €999,999.*

**[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]**

## Product Risk (351)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q40

*In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of trusts where the total value of the assets settled on trust was between €1,000,000 and €4,999,999.*

***[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]***

## Product Risk (352)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q41

*In respect of trusts for which your entity as at the end of the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of trusts where the total value of the assets settled on trust exceeded €5,000,000.*

***[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]***

## Product Risk (353)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

#### Q42

*In respect of trusts for which your entity acted as a trustee or a co-trustee or arranged, by way of business, for another person to act as a trustee during the previous calendar year, please indicate the total value of additional endowments made into trusts during the previous calendar year.*

**[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]**

### Product Risk (354)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

#### Q43

*In respect of trusts for which your entity during the previous calendar year acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total value (€) of the payouts distributed to beneficiaries of trusts during the previous calendar year.*

**[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]**

### Product Risk (355)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

#### Q44

*In respect of trusts for which your entity during the prior calendar year acted as a trustee or co-trustee, or arranged, by way of business, for another person to act as a trustee, please indicate the total number of trusts for which a power of attorney was granted to the settlor.*

**[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]**

## Product Risk (356)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q45

*In respect of trusts for which your entity during the prior calendar year acted as a trustee or co-trustee, or arranged, by way of business, for another person to act as a trustee, please indicate the total number of trusts for which a power of attorney was granted to a third party.*

***[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]***

## Product Risk (357)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q46

*In respect of trusts for which your entity acted as a trustee or a co-trustee, or arranged, by way of business, for another person to act as a trustee, please indicate the total number of trusts for which trust accounts were not available as the end of the previous calendar year.*

***[Answer if Q1 is Acting as a Trustee or co-trustee in terms of Article 43 (1)]***

## Customer Risk

### Customer Risk (225)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**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.

### Customer Risk (226)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q2**

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

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

### Customer Risk (227)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q3**

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

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

## Customer Risk (228)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q4**

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

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

## Customer Risk (229)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q5**

*In respect to the CSP services provided by your entity, please list the number of business relationships your entity had at the end of the previous calendar year where the customer is a company.*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## Customer Risk (230)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***



## Q6

*In respect to the CSP services provided by your entity, please list the number of business relationships your entity had at the end of the previous calendar year where the customer is a commercial partnership.*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## Customer Risk (231)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

## Q7

*In respect to the CSP services provided by your entity, please list the number of business relationships your entity had at the end of the previous calendar year where the customer is a foundation or association.*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## Customer Risk (232)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

## Q8

*In respect to the CSP services provided by your entity please list the number of business relationships that your entity had as at the end of the previous calendar year where the customer's ownership and control structure involves a trust, foundation or other similar legal arrangement (i.e. it is not the customer who is the trust, foundation or similar legal arrangement).*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a***

**registered office, Acting or arranging others to act as director, company secretary etc.]**

## **Customer Risk (233)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q9**

*In respect of the CSP services provided by your entity, how many natural persons customers were PEPs (including family members and close associates) at the end of the previous calendar year?*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## **Customer Risk (234)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q10**

*In respect of the CSP services provided by your entity, how many legal persons customers have at least one beneficial owner who is a PEP (including family members and close associates) as at the end of the previous calendar year?*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## **Customer Risk (235)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q11**

*In respect of the CSP services provided by your entity, please list the number of customers during the previous calendar year, where the customer being a natural person or at least one of the beneficial owners of the legal person customer benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by Malta.*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## **Customer Risk (236)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q12**

*In respect of the CSP services provided by your entity, please list the number of customers during the previous calendar year, where the customer being a natural person or at least one of the beneficial owners of the legal person customer benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes issued by countries other than Malta.*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## **Customer Risk (237)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q13

*In respect of the CSP services provided by your entity, how many customers acted as holding companies with subsidiaries or investments in non-EU/non-EEA jurisdictions as at the end of the previous calendar year.*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## Customer Risk (239)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q14

*In respect of the CSP services provided by your entity, how many customers as at the end of the previous calendar year meet the definition of small companies in line with the Companies Act, that is, companies which on their balance sheet do not exceed the limits of two of the three following criteria: - balance sheet total: EUR4 million (4,000,000); - turnover: EUR8 million (8,000,000); - average number of employees during the accounting period: fifty (50)*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

## Customer Risk (240)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q15

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

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

## Customer Risk (241)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q16**

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

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

## Customer Risk (242)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q17**

*For the companies or other legal entities or arrangements that your entity has formed during the previous calendar year, please select the value of the initial share capital.*

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

*Choose more than one option:*

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

## Customer Risk (243)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

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**Q18**

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

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

## Customer Risk (244)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

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

<b>Q19</b>	
<i>Licensed activities</i>	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	
<b>Q20</b>	
<i>Cash intensive activities</i>	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	
<b>Q21</b>	
<i>Consulting, marketing and advisory activities</i>	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	
<b>Q22</b>	
<i>Import/export activities</i>	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	
<b>Q23</b>	
<i>Manufacturing activities</i>	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	
<b>Q24</b>	
<i>Holding entities</i>	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	

<b>Q25</b>	
Operate in/trade dual use items	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	
<b>Q26</b>	
Other	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	

## Customer Risk (245)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q27

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

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

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

## Customer Risk (246)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

## Q28

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

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

## Customer Risk (247)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

## Q29

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

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

## Customer Risk (248)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

## Q30

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

**[Answer if Q9 is > 0]**



## Customer Risk (249)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q31**

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

**[Answer if Q9 is > 0]**

## Customer Risk (250)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q32**

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

**[Answer if Q9 is > 0]**

## Customer Risk (251)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q33**

*Please list the number of customers for whom your entity acted as, or arranged for another person to act as director of a company, a partner in a partnership or in a*

*similar position as at the end of the previous calendar year, who raised capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding.*

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

## **Customer Risk (252)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### **Q34**

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

## **Customer Risk (253)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### **Q35**

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

## Customer Risk (254)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q36

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

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

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

## Customer Risk (255)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

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

<b>Q37</b> <i>Licensed activities</i> <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>
<b>Q38</b> <i>Cash intensive activities</i> <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>
<b>Q39</b> <i>Consulting, marketing and advisory activities</i> <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>

<b>Q40</b>  <i>Import/export activities</i>  <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>  
<b>Q41</b>  <i>Manufacturing activities</i>  <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>  
<b>Q42</b>  <i>Holding entities</i>  <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>  
<b>Q43</b>  <i>Operate in/trade dual use items</i>  <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>  
<b>Q44</b>  <i>Other</i>  <b>[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]</b>	<input type="text"/>  

## Customer Risk (256)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q45**

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

## Customer Risk (257)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q46**

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

## Customer Risk (258)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q47**

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

## Customer Risk (259)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

#### Q48

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

### Customer Risk (260)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

#### Q49

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

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

### Customer Risk (261)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q50**

*In respect of private interest foundations for which your entity was appointed as an administrator as at the end of the previous calendar year, please indicate the total number of beneficial owners (that is, the founder, members of the supervisory council and the beneficiaries) who were PEPs (including family members and close associates).*

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

**Customer Risk (262)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q51**

*Please indicate the total number of private interest foundations for which your entity was appointed as an administrator as at the end of the previous calendar year, who had loans issued by non-financial institutions (both legal and natural persons or legal arrangements).*

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

**Customer Risk (263)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q52**

*Please indicate the total number of customers (private interest foundations) that your entity acts as an administrator for who as at the end of the previous calendar year did not have their own bank/payment/crypto account and instead used your entity's clients' account.*

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

## Customer Risk (265)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q53

*Please indicate the total number of customers (trusts) who as at the end of the previous calendar year did not have their own bank/payment/crypto account and instead used your entity's clients' account.*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

## Customer Risk (266)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q54

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who have been convicted of a criminal offence that could have potentially generated illicit proceeds.*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

## Customer Risk (267)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*



#### Q55

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of beneficiaries who have been convicted of a criminal offence that could have potentially generated illicit proceeds.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

### Customer Risk (268)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

#### Q56

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who, as at the end of the previous calendar year, were PEPs.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

### Customer Risk (269)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

#### Q57

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of beneficiaries who, as at the end of the previous calendar year, were PEPs.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Customer Risk (270)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q58**

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by Malta.*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

## Customer Risk (271)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q59**

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of settlors who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by countries other than Malta.*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

## Customer Risk (272)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q60**

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the number of beneficiaries who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by Malta.*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

## **Customer Risk (273)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q61**

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the total number of beneficiaries who benefited from residency schemes, citizenship by investment schemes, or were applicants or prospective applicants for such schemes issued by countries other than Malta.*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

## **Customer Risk (274)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q62**

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person*

to act as a trustee, please indicate the total number of trusts in which settlor was legal person other than a natural person.

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Customer Risk (275)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

### Q63

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the number of trusts where the settlor indicated on the trust instrument that s/he is acting as mandator for another person (the 'Economic Settlor' or Mandator")*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Customer Risk (276)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

### Q64

*In respect of trusts for whom as at the end of the previous calendar year your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, please indicate the number of trusts in which settlor was also a beneficiary.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Customer Risk (277)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q65**

*Please indicate the total number of trusts that your entity took over from other trust service providers during the previous calendar year.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Customer Risk (278)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q66**

*Please indicate the total number of customers for whom, as at the end of the previous calendar year, your entity acted as a trustee or a co-trustee or arranged by way of business, for another person to act as a trustee, who had loans issued by non-financial institutions (both legal and natural persons or legal arrangements).*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Customer Risk (264)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q67**

*Please indicate the total number of customers (natural persons) or beneficial owners of customers (legal person) for whom your entity provided fiduciary services/acted as mandatary as at the end of the previous calendar year, who were PEPs.*

**[Answer if Q30 is > 0]**

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## Jurisdiction Risk

### Jurisdiction Risk (159)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q1**

*In respect to CSP services provided by your entity, please indicate the respective jurisdiction in which the natural persons (customers or beneficial owners of legal persons) are considered to be PEPs.*

***[Answer if Q1 is Formation of companies or other legal entities, Provision of a registered office, Acting or arranging others to act as director, company secretary etc.]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

### Jurisdiction Risk (160)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q2**

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

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

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Jurisdiction Risk (161)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

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

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



<p><b>Q6</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 &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>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>
<p><b>Q7</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 Q6 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> </ul>

	<ul style="list-style-type: none"> <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>Q8</b> Afghanistan <b>[Answer if Q7 is Afghanistan]</b>	<input type="text"/>
<b>Q9</b> Algeria <b>[Answer if Q7 is Algeria]</b>	<input type="text"/>
<b>Q10</b> Angola <b>[Answer if Q7 is Angola]</b>	<input type="text"/>
<b>Q11</b> Bolivia <b>[Answer if Q7 is Bolivia]</b>	<input type="text"/>
<b>Q12</b> Bulgaria <b>[Answer if Q7 is Bulgaria]</b>	<input type="text"/>
<b>Q13</b> Burkina Faso <b>[Answer if Q7 is Burkina Faso]</b>	<input type="text"/>
<b>Q14</b> Cameroon <b>[Answer if Q7 is Cameroon]</b>	<input type="text"/>
<b>Q15</b> Congo, the Democratic Republic of the <b>[Answer if Q7 is Congo, the Democratic Republic of the]</b>	<input type="text"/>

<b>Q16</b> Cote D'Ivoire <b>[Answer if Q7 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q17</b> Haiti <b>[Answer if Q7 is Haiti]</b>	<input type="text"/>
<b>Q18</b> Iran, Islamic Republic of <b>[Answer if Q7 is Iran, Islamic Republic of]</b>	<input type="text"/>
<b>Q19</b> Kenya <b>[Answer if Q7 is Kenya]</b>	<input type="text"/>
<b>Q20</b> Korea, Democratic People's Republic of <b>[Answer if Q7 is Korea, Democratic People's Republic of]</b>	<input type="text"/>
<b>Q21</b> Lao PDR <b>[Answer if Q7 is Lao PDR]</b>	<input type="text"/>
<b>Q22</b> Lebanon <b>[Answer if Q7 is Lebanon]</b>	<input type="text"/>
<b>Q23</b> Mali <b>[Answer if Q7 is Mali]</b>	<input type="text"/>
<b>Q24</b> Monaco <b>[Answer if Q7 is Monaco]</b>	<input type="text"/>
<b>Q25</b> Mozambique <b>[Answer if Q7 is Mozambique]</b>	<input type="text"/>
<b>Q26</b>	<input type="text"/>

Myanmar	
<b>[Answer if Q7 is Myanmar]</b>	
<b>Q27</b>	
Namibia	<input type="text"/>
<b>[Answer if Q7 is Namibia]</b>	
<b>Q28</b>	
Nepal	<input type="text"/>
<b>[Answer if Q7 is Nepal]</b>	
<b>Q29</b>	
Nigeria	<input type="text"/>
<b>[Answer if Q7 is Nigeria]</b>	
<b>Q30</b>	
Russia	<input type="text"/>
<b>[Answer if Q7 is Russia]</b>	
<b>Q31</b>	
South Africa	<input type="text"/>
<b>[Answer if Q7 is South Africa]</b>	
<b>Q32</b>	
South Sudan	<input type="text"/>
<b>[Answer if Q7 is South Sudan]</b>	
<b>Q33</b>	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q7 is Syrian Arab Republic]</b>	
<b>Q34</b>	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q7 is Tanzania, United Republic of]</b>	
<b>Q35</b>	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q7 is Trinidad and Tobago]</b>	
<b>Q36</b>	<input type="text"/>

Vanuatu	
<b>[Answer if Q7 is Vanuatu]</b>	
<b>Q37</b>	
Venezuela	<input type="text"/>
<b>[Answer if Q7 is Venezuela]</b>	
<b>Q38</b>	
Vietnam	<input type="text"/>
<b>[Answer if Q7 is Vietnam]</b>	
<b>Q39</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q7 is Virgin Islands (UK)]</b>	
<b>Q40</b>	
Yemen	<input type="text"/>
<b>[Answer if Q7 is Yemen]</b>	

## Jurisdiction Risk (162)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

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

<b>Q41</b>	
Malta	<input type="text"/>
<b>[Answer if Q4 is &gt; 0]</b>	
<b>Q42</b>	<input type="text"/>
EU/EEA country (apart from Malta)	
<b>[Answer if Q4 is &gt; 0]</b>	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk	

<p><i>Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q43</b></p> <p>Non-EU/non-EEA country</p> <p><b>[Answer if Q4 is &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 577 1374 618" type="text"/>
<p><b>Q44</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 &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 1218 1374 1258" type="text"/>
<p><b>Q45</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 Q44 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic</li> </ul>

	<ul style="list-style-type: none"> <li>of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<b>Q46</b> Afghanistan <b>[Answer if Q45 is Afghanistan]</b>	<input type="text"/>
<b>Q47</b> Algeria <b>[Answer if Q45 is Algeria]</b>	<input type="text"/>
<b>Q48</b> Angola <b>[Answer if Q45 is Angola]</b>	<input type="text"/>
<b>Q49</b> Bolivia <b>[Answer if Q45 is Bolivia]</b>	<input type="text"/>
<b>Q50</b>	<input type="text"/>

Bulgaria	
<b>[Answer if Q45 is Bulgaria]</b>	
<b>Q51</b>	
Burkina Faso	<input type="text"/>
<b>[Answer if Q45 is Burkina Faso]</b>	
<b>Q52</b>	
Cameroon	<input type="text"/>
<b>[Answer if Q45 is Cameroon]</b>	
<b>Q53</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q45 is Congo, the Democratic Republic of the]</b>	
<b>Q54</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q45 is Cote D'Ivoire]</b>	
<b>Q55</b>	
Haiti	<input type="text"/>
<b>[Answer if Q45 is Haiti]</b>	
<b>Q56</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q45 is Iran, Islamic Republic of]</b>	
<b>Q57</b>	
Kenya	<input type="text"/>
<b>[Answer if Q45 is Kenya]</b>	
<b>Q58</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q45 is Korea, Democratic People's Republic of]</b>	
<b>Q59</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q45 is Lao PDR]</b>	



<b>Q60</b> <i>Lebanon</i> <b>[Answer if Q45 is Lebanon]</b>	<input type="text"/>
<b>Q61</b> <i>Mali</i> <b>[Answer if Q45 is Mali]</b>	<input type="text"/>
<b>Q62</b> <i>Monaco</i> <b>[Answer if Q45 is Monaco]</b>	<input type="text"/>
<b>Q63</b> <i>Mozambique</i> <b>[Answer if Q45 is Mozambique]</b>	<input type="text"/>
<b>Q64</b> <i>Myanmar</i> <b>[Answer if Q45 is Myanmar]</b>	<input type="text"/>
<b>Q65</b> <i>Namibia</i> <b>[Answer if Q45 is Namibia]</b>	<input type="text"/>
<b>Q66</b> <i>Nepal</i> <b>[Answer if Q45 is Nepal]</b>	<input type="text"/>
<b>Q67</b> <i>Nigeria</i> <b>[Answer if Q45 is Nigeria]</b>	<input type="text"/>
<b>Q68</b> <i>Russia</i> <b>[Answer if Q45 is Russia]</b>	<input type="text"/>
<b>Q69</b> <i>South Africa</i> <b>[Answer if Q45 is South Africa]</b>	<input type="text"/>

<b>Q70</b> South Sudan <b>[Answer if Q45 is South Sudan]</b>	<input type="text"/>
<b>Q71</b> Syrian Arab Republic <b>[Answer if Q45 is Syrian Arab Republic]</b>	<input type="text"/>
<b>Q72</b> Tanzania, United Republic of <b>[Answer if Q45 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q73</b> Trinidad and Tobago <b>[Answer if Q45 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q74</b> Vanuatu <b>[Answer if Q45 is Vanuatu]</b>	<input type="text"/>
<b>Q75</b> Venezuela <b>[Answer if Q45 is Venezuela]</b>	<input type="text"/>
<b>Q76</b> Vietnam <b>[Answer if Q45 is Vietnam]</b>	<input type="text"/>
<b>Q77</b> Virgin Islands (UK) <b>[Answer if Q45 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q78</b> Yemen <b>[Answer if Q45 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (163)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q79**

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

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

## **Jurisdiction Risk (164)**

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q80**

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

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

## **Jurisdiction Risk (165)**

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

**Q81**

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

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

## Jurisdiction Risk (166)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q82**

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

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

## Jurisdiction Risk (167)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q83**

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

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

## Jurisdiction Risk (168)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

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

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

<p><b>Q84</b></p> <p>Malta</p> <p><b>[Answer if Q6 is &gt; 0]</b></p>	<input type="text"/>
<p><b>Q85</b></p> <p>EU/EEA country (excluding Malta)</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>	<input type="text"/>
<p><b>Q86</b></p> <p>Non-EU/non-EEA country</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>	<input type="text"/>
<p><b>Q87</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 with strategic deficiencies.</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'</p>	<input type="text"/>

<p>and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p><b>Q88</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 Q87 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>

<b>Q89</b> Afghanistan <b>[Answer if Q88 is Afghanistan]</b>	<input type="text"/>
<b>Q90</b> Algeria <b>[Answer if Q88 is Algeria]</b>	<input type="text"/>
<b>Q91</b> Angola <b>[Answer if Q88 is Angola]</b>	<input type="text"/>
<b>Q92</b> Bolivia <b>[Answer if Q88 is Bolivia]</b>	<input type="text"/>
<b>Q93</b> Bulgaria <b>[Answer if Q88 is Bulgaria]</b>	<input type="text"/>
<b>Q94</b> Burkina Faso <b>[Answer if Q88 is Burkina Faso]</b>	<input type="text"/>
<b>Q95</b> Cameroon <b>[Answer if Q88 is Cameroon]</b>	<input type="text"/>
<b>Q96</b> Congo, the Democratic Republic of the <b>[Answer if Q88 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q97</b> Cote D'Ivoire <b>[Answer if Q88 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q98</b> Haiti <b>[Answer if Q88 is Haiti]</b>	<input type="text"/>
<b>Q99</b>	<input type="text"/>

Iran, Islamic Republic of	
<b>[Answer if Q88 is Iran, Islamic Republic of]</b>	
<b>Q100</b>	
Kenya	<input type="text"/>
<b>[Answer if Q88 is Kenya]</b>	
<b>Q101</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q88 is Korea, Democratic People's Republic of]</b>	
<b>Q102</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q88 is Lao PDR]</b>	
<b>Q103</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q88 is Lebanon]</b>	
<b>Q104</b>	
Mali	<input type="text"/>
<b>[Answer if Q88 is Mali]</b>	
<b>Q105</b>	
Monaco	<input type="text"/>
<b>[Answer if Q88 is Monaco]</b>	
<b>Q106</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q88 is Mozambique]</b>	
<b>Q107</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q88 is Myanmar]</b>	
<b>Q108</b>	
Namibia	<input type="text"/>
<b>[Answer if Q88 is Namibia]</b>	
<b>Q109</b>	<input type="text"/>



<i>Nepal</i>	
<b>[Answer if Q88 is Nepal]</b>	
<b>Q110</b>	
<i>Nigeria</i>	<input type="text"/>
<b>[Answer if Q88 is Nigeria]</b>	
<b>Q111</b>	
<i>Russia</i>	<input type="text"/>
<b>[Answer if Q88 is Russia]</b>	
<b>Q112</b>	
<i>South Africa</i>	<input type="text"/>
<b>[Answer if Q88 is South Africa]</b>	
<b>Q113</b>	
<i>South Sudan</i>	<input type="text"/>
<b>[Answer if Q88 is South Sudan]</b>	
<b>Q114</b>	
<i>Syrian Arab Republic</i>	<input type="text"/>
<b>[Answer if Q88 is Syrian Arab Republic]</b>	
<b>Q115</b>	
<i>Tanzania, United Republic of</i>	<input type="text"/>
<b>[Answer if Q88 is Tanzania, United Republic of]</b>	
<b>Q116</b>	
<i>Trinidad and Tobago</i>	<input type="text"/>
<b>[Answer if Q88 is Trinidad and Tobago]</b>	
<b>Q117</b>	
<i>Vanuatu</i>	<input type="text"/>
<b>[Answer if Q88 is Vanuatu]</b>	
<b>Q118</b>	
<i>Venezuela</i>	<input type="text"/>
<b>[Answer if Q88 is Venezuela]</b>	
<b>Q119</b>	<input type="text"/>

Vietnam	
<b>[Answer if Q88 is Vietnam]</b>	
<b>Q120</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q88 is Virgin Islands (UK)]</b>	
<b>Q121</b>	
Yemen	<input type="text"/>
<b>[Answer if Q88 is Yemen]</b>	

## Jurisdiction Risk (169)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

How many beneficial owners of the customers to whom your entity provided company secretary services as at the end of the previous calendar year resided in the following jurisdictions:

<b>Q122</b>	
Malta	<input type="text"/>
<b>[Answer if Q9 is &gt; 0]</b>	
<b>Q123</b>	
EU/EEA country (excluding Malta)	
<b>[Answer if Q9 is &gt; 0]</b>	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q124</b>	<input type="text"/>
Non-EU/non-EEA country	
<b>[Answer if Q9 is &gt; 0]</b>	

<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>Q125</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 with strategic deficiencies.</p> <p><b>[Answer if Q9 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>	<div data-bbox="1018 864 1374 907" style="border: 1px solid black; height: 19px; width: 223px;"></div>
<p><b>Q126</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 Q125 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> </ul>

	<ul style="list-style-type: none"> <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>Q127</b> Afghanistan <b>[Answer if Q126 is Afghanistan]</b>	<input type="text"/> <input type="text"/>
<b>Q128</b> Algeria <b>[Answer if Q126 is Algeria]</b>	<input type="text"/> <input type="text"/>
<b>Q129</b> Angola <b>[Answer if Q126 is Angola]</b>	<input type="text"/> <input type="text"/>
<b>Q130</b> Bolivia <b>[Answer if Q126 is Bolivia]</b>	<input type="text"/> <input type="text"/>
<b>Q131</b> Bulgaria <b>[Answer if Q126 is Bulgaria]</b>	<input type="text"/> <input type="text"/>
<b>Q132</b> Burkina Faso <b>[Answer if Q126 is Burkina Faso]</b>	<input type="text"/> <input type="text"/>
<b>Q133</b>	<input type="text"/> <input type="text"/>

Cameroon	
<b>[Answer if Q126 is Cameroon]</b>	
<b>Q134</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q126 is Congo, the Democratic Republic of the]</b>	
<b>Q135</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q126 is Cote D'Ivoire]</b>	
<b>Q136</b>	
Haiti	<input type="text"/>
<b>[Answer if Q126 is Haiti]</b>	
<b>Q137</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q126 is Iran, Islamic Republic of]</b>	
<b>Q138</b>	
Kenya	<input type="text"/>
<b>[Answer if Q126 is Kenya]</b>	
<b>Q139</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q126 is Korea, Democratic People's Republic of]</b>	
<b>Q140</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q126 is Lao PDR]</b>	
<b>Q141</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q126 is Lebanon]</b>	
<b>Q142</b>	
Mali	<input type="text"/>
<b>[Answer if Q126 is Mali]</b>	

<b>Q143</b> <i>Monaco</i> <b>[Answer if Q126 is Monaco]</b>	<input type="text"/>
<b>Q144</b> <i>Mozambique</i> <b>[Answer if Q126 is Mozambique]</b>	<input type="text"/>
<b>Q145</b> <i>Myanmar</i> <b>[Answer if Q126 is Myanmar]</b>	<input type="text"/>
<b>Q146</b> <i>Namibia</i> <b>[Answer if Q126 is Namibia]</b>	<input type="text"/>
<b>Q147</b> <i>Nepal</i> <b>[Answer if Q126 is Nepal]</b>	<input type="text"/>
<b>Q148</b> <i>Nigeria</i> <b>[Answer if Q126 is Nigeria]</b>	<input type="text"/>
<b>Q149</b> <i>Russia</i> <b>[Answer if Q126 is Russia]</b>	<input type="text"/>
<b>Q150</b> <i>South Africa</i> <b>[Answer if Q126 is South Africa]</b>	<input type="text"/>
<b>Q151</b> <i>South Sudan</i> <b>[Answer if Q126 is South Sudan]</b>	<input type="text"/>
<b>Q152</b> <i>Syrian Arab Republic</i> <b>[Answer if Q126 is Syrian Arab Republic]</b>	<input type="text"/>

<b>Q153</b> <i>Tanzania, United Republic of</i> <b>[Answer if Q126 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q154</b> <i>Trinidad and Tobago</i> <b>[Answer if Q126 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q155</b> <i>Vanuatu</i> <b>[Answer if Q126 is Vanuatu]</b>	<input type="text"/>
<b>Q156</b> <i>Venezuela</i> <b>[Answer if Q126 is Venezuela]</b>	<input type="text"/>
<b>Q157</b> <i>Vietnam</i> <b>[Answer if Q126 is Vietnam]</b>	<input type="text"/>
<b>Q158</b> <i>Virgin Islands (UK)</i> <b>[Answer if Q126 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q159</b> <i>Yemen</i> <b>[Answer if Q126 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (170)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

### Q160

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

**[Answer if Q1 is Acting or arranging others to act as director, company secretary etc.]**

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Jurisdiction Risk (171)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

How many beneficial owners of customers to whom your entity provided directorship services at the end of the previous calendar year resided in the following jurisdictions:

<b>Q161</b>  Malta  <b>[Answer if Q11 is &gt; 0]</b>	<input type="text"/>
<b>Q162</b>  EU/EEA country (excluding Malta)  <b>[Answer if Q11 is &gt; 0]</b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q163</b>  non-EU/non-EEA country  <b>[Answer if Q11 is &gt; 0]</b>	<input type="text"/>



<p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p><b>Q164</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 Q11 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>	<div data-bbox="1018 864 1374 907" style="border: 1px solid black; height: 19px; width: 223px;"></div>
<p><b>Q165</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 Q164 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> </ul>

	<ul style="list-style-type: none"> <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>Q166</b> Afghanistan <b>[Answer if Q165 is Afghanistan]</b>	<input type="text"/>
<b>Q167</b> Algeria <b>[Answer if Q165 is Algeria]</b>	<input type="text"/>
<b>Q168</b> Angola <b>[Answer if Q165 is Angola]</b>	<input type="text"/>
<b>Q169</b> Bolivia <b>[Answer if Q165 is Bolivia]</b>	<input type="text"/>
<b>Q170</b> Bulgaria <b>[Answer if Q165 is Bulgaria]</b>	<input type="text"/>
<b>Q171</b> Burkina Faso <b>[Answer if Q165 is Burkina Faso]</b>	<input type="text"/>
<b>Q172</b>	<input type="text"/>

Cameroon	
<b>[Answer if Q165 is Cameroon]</b>	
<b>Q173</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q165 is Congo, the Democratic Republic of the]</b>	
<b>Q174</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q165 is Cote D'Ivoire]</b>	
<b>Q175</b>	
Haiti	<input type="text"/>
<b>[Answer if Q165 is Haiti]</b>	
<b>Q176</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q165 is Iran, Islamic Republic of]</b>	
<b>Q177</b>	
Kenya	<input type="text"/>
<b>[Answer if Q165 is Kenya]</b>	
<b>Q178</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q165 is Korea, Democratic People's Republic of]</b>	
<b>Q179</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q165 is Lao PDR]</b>	
<b>Q180</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q165 is Lebanon]</b>	
<b>Q181</b>	
Mali	<input type="text"/>
<b>[Answer if Q165 is Mali]</b>	

<b>Q182</b> <i>Monaco</i> <b>[Answer if Q165 is Monaco]</b>	<input type="text"/>
<b>Q183</b> <i>Mozambique</i> <b>[Answer if Q165 is Mozambique]</b>	<input type="text"/>
<b>Q184</b> <i>Myanmar</i> <b>[Answer if Q165 is Myanmar]</b>	<input type="text"/>
<b>Q185</b> <i>Namibia</i> <b>[Answer if Q165 is Namibia]</b>	<input type="text"/>
<b>Q186</b> <i>Nepal</i> <b>[Answer if Q165 is Nepal]</b>	<input type="text"/>
<b>Q187</b> <i>Nigeria</i> <b>[Answer if Q165 is Nigeria]</b>	<input type="text"/>
<b>Q188</b> <i>Russia</i> <b>[Answer if Q165 is Russia]</b>	<input type="text"/>
<b>Q189</b> <i>South Africa</i> <b>[Answer if Q165 is South Africa]</b>	<input type="text"/>
<b>Q190</b> <i>South Sudan</i> <b>[Answer if Q165 is South Sudan]</b>	<input type="text"/>
<b>Q191</b> <i>Syrian Arab Republic</i> <b>[Answer if Q165 is Syrian Arab Republic]</b>	<input type="text"/>

<b>Q192</b> <i>Tanzania, United Republic of</i> <b>[Answer if Q165 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q193</b> <i>Trinidad and Tobago</i> <b>[Answer if Q165 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q194</b> <i>Vanuatu</i> <b>[Answer if Q165 is Vanuatu]</b>	<input type="text"/>
<b>Q195</b> <i>Venezuela</i> <b>[Answer if Q165 is Venezuela]</b>	<input type="text"/>
<b>Q196</b> <i>Vietnam</i> <b>[Answer if Q165 is Vietnam]</b>	<input type="text"/>
<b>Q197</b> <i>Virgin Islands (UK)</i> <b>[Answer if Q165 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q198</b> <i>Yemen</i> <b>[Answer if Q165 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (172)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

### Q199

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

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

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Jurisdiction Risk (173)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q200

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

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

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Jurisdiction Risk (174)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

Please indicate how many private interest foundations were set up by your entity in the previous calendar year in the following jurisdictions:

<b>Q201</b>	<input type="text"/>

Malta	
<b>[Answer if Q22 is &gt; 0]</b>	
<b>Q202</b>  EU/EEA jurisdiction (apart from Malta)  <b>[Answer if Q22 is &gt; 0]</b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q203</b>  Non-EU/non-EEA  <b>[Answer if Q22 is &gt; 0]</b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q204</b>  Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.  <b>[Answer if Q22 is &gt; 0]</b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and	<input type="text"/>

<p><i>'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>Q205</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 Q204 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<p><b>Q206</b></p> <p><i>Afghanistan</i></p> <p><b>[Answer if Q205 is Afghanistan]</b></p>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>



<b>Q207</b> Algeria <b>[Answer if Q205 is Algeria]</b>	<input type="text"/>
<b>Q208</b> Angola <b>[Answer if Q205 is Angola]</b>	<input type="text"/>
<b>Q209</b> Bolivia <b>[Answer if Q205 is Bolivia]</b>	<input type="text"/>
<b>Q210</b> Bulgaria <b>[Answer if Q205 is Bulgaria]</b>	<input type="text"/>
<b>Q211</b> Burkina Faso <b>[Answer if Q205 is Burkina Faso]</b>	<input type="text"/>
<b>Q212</b> Cameroon <b>[Answer if Q205 is Cameroon]</b>	<input type="text"/>
<b>Q213</b> Congo, the Democratic Republic of the <b>[Answer if Q205 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q214</b> Cote D'Ivoire <b>[Answer if Q205 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q215</b> Haiti <b>[Answer if Q205 is Haiti]</b>	<input type="text"/>
<b>Q216</b> Iran, Islamic Republic of <b>[Answer if Q205 is Iran, Islamic Republic of]</b>	<input type="text"/>
<b>Q217</b>	<input type="text"/>

Kenya	
<b>[Answer if Q205 is Kenya]</b>	
<b>Q218</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q205 is Korea, Democratic People's Republic of]</b>	
<b>Q219</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q205 is Lao PDR]</b>	
<b>Q220</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q205 is Lebanon]</b>	
<b>Q221</b>	
Mali	<input type="text"/>
<b>[Answer if Q205 is Mali]</b>	
<b>Q222</b>	
Monaco	<input type="text"/>
<b>[Answer if Q205 is Monaco]</b>	
<b>Q223</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q205 is Mozambique]</b>	
<b>Q224</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q205 is Myanmar]</b>	
<b>Q225</b>	
Namibia	<input type="text"/>
<b>[Answer if Q205 is Namibia]</b>	
<b>Q226</b>	
Nepal	<input type="text"/>
<b>[Answer if Q205 is Nepal]</b>	
<b>Q227</b>	<input type="text"/>

Nigeria	
<b>[Answer if Q205 is Nigeria]</b>	
Q228	
Russia	<input type="text"/>
<b>[Answer if Q205 is Russia]</b>	
Q229	
South Africa	<input type="text"/>
<b>[Answer if Q205 is South Africa]</b>	
Q230	
South Sudan	<input type="text"/>
<b>[Answer if Q205 is South Sudan]</b>	
Q231	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q205 is Syrian Arab Republic]</b>	
Q232	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q205 is Tanzania, United Republic of]</b>	
Q233	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q205 is Trinidad and Tobago]</b>	
Q234	
Vanuatu	<input type="text"/>
<b>[Answer if Q205 is Vanuatu]</b>	
Q235	
Venezuela	<input type="text"/>
<b>[Answer if Q205 is Venezuela]</b>	
Q236	
Vietnam	<input type="text"/>
<b>[Answer if Q205 is Vietnam]</b>	
Q237	<input type="text"/>

Virgin Islands (UK)	
<b>[Answer if Q205 is Virgin Islands (UK)]</b>	
<b>Q238</b>	
Yemen	<input type="text"/>
<b>[Answer if Q205 is Yemen]</b>	

## Jurisdiction Risk (175)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

Please indicate how many private interest foundations that your entity administered as at the end of the previous calendar year were registered in the following jurisdictions:

<b>Q239</b>	
Malta	<input type="text"/>
<b>[Answer if Q23 is &gt; 0]</b>	
<b>Q240</b>	
EU/EEA country (apart from Malta)	
<b>[Answer if Q23 is &gt; 0]</b>	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q241</b>	<input type="text"/>
Non-EU/non-EEA country	
<b>[Answer if Q23 is &gt; 0]</b>	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option	

<p><i>"Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q242</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 &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>	<div data-bbox="1023 685 1375 728" style="border: 1px solid black; height: 19px; width: 221px;"></div>
<p><b>Q243</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 Q242 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> </ul>

	<ul style="list-style-type: none"> <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>Q244</b> Afghanistan <b>[Answer if Q243 is Afghanistan]</b>	<input type="text"/>
<b>Q245</b> Algeria <b>[Answer if Q243 is Algeria]</b>	<input type="text"/>
<b>Q246</b> Angola <b>[Answer if Q243 is Angola]</b>	<input type="text"/>
<b>Q247</b> Bolivia <b>[Answer if Q243 is Bolivia]</b>	<input type="text"/>
<b>Q248</b> Bulgaria <b>[Answer if Q243 is Bulgaria]</b>	<input type="text"/>
<b>Q249</b> Burkina Faso <b>[Answer if Q243 is Burkina Faso]</b>	<input type="text"/>
<b>Q250</b> Cameroon <b>[Answer if Q243 is Cameroon]</b>	<input type="text"/>
<b>Q251</b>	<input type="text"/>

Congo, the Democratic Republic of the	
<b>[Answer if Q243 is Congo, the Democratic Republic of the]</b>	
<b>Q252</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q243 is Cote D'Ivoire]</b>	
<b>Q253</b>	
Haiti	<input type="text"/>
<b>[Answer if Q243 is Haiti]</b>	
<b>Q254</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q243 is Iran, Islamic Republic of]</b>	
<b>Q255</b>	
Kenya	<input type="text"/>
<b>[Answer if Q243 is Kenya]</b>	
<b>Q256</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q243 is Korea, Democratic People's Republic of]</b>	
<b>Q257</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q243 is Lao PDR]</b>	
<b>Q258</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q243 is Lebanon]</b>	
<b>Q259</b>	
Mali	<input type="text"/>
<b>[Answer if Q243 is Mali]</b>	
<b>Q260</b>	
Monaco	<input type="text"/>
<b>[Answer if Q243 is Monaco]</b>	

<b>Q261</b> Mozambique <b>[Answer if Q243 is Mozambique]</b>	<input type="text"/>
<b>Q262</b> Myanmar <b>[Answer if Q243 is Myanmar]</b>	<input type="text"/>
<b>Q263</b> Namibia <b>[Answer if Q243 is Namibia]</b>	<input type="text"/>
<b>Q264</b> Nepal <b>[Answer if Q243 is Nepal]</b>	<input type="text"/>
<b>Q265</b> Nigeria <b>[Answer if Q243 is Nigeria]</b>	<input type="text"/>
<b>Q266</b> Russia <b>[Answer if Q243 is Russia]</b>	<input type="text"/>
<b>Q267</b> South Africa <b>[Answer if Q243 is South Africa]</b>	<input type="text"/>
<b>Q268</b> South Sudan <b>[Answer if Q243 is South Sudan]</b>	<input type="text"/>
<b>Q269</b> Syrian Arab Republic <b>[Answer if Q243 is Syrian Arab Republic]</b>	<input type="text"/>
<b>Q270</b> Tanzania, United Republic of <b>[Answer if Q243 is Tanzania, United Republic of]</b>	<input type="text"/>



<b>Q271</b> <i>Trinidad and Tobago</i> <b>[Answer if Q243 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q272</b> <i>Vanuatu</i> <b>[Answer if Q243 is Vanuatu]</b>	<input type="text"/>
<b>Q273</b> <i>Venezuela</i> <b>[Answer if Q243 is Venezuela]</b>	<input type="text"/>
<b>Q274</b> <i>Vietnam</i> <b>[Answer if Q243 is Vietnam]</b>	<input type="text"/>
<b>Q275</b> <i>Virgin Islands (UK)</i> <b>[Answer if Q243 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q276</b> <i>Yemen</i> <b>[Answer if Q243 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (176)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

Please indicate how many founders of the private interest foundations that your entity administered as at the end of the previous calendar year resided in the following jurisdictions:

<b>Q277</b> <i>Malta</i> <b>[Answer if Q23 is &gt; 0]</b>	<input type="text"/>
<b>Q278</b> <i>EU/EEA country (apart from Malta)</i> <b>[Answer if Q23 is &gt; 0]</b>	<input type="text"/>

<p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p><b>Q279</b></p> <p>Non-EU/non-EEA country</p> <p><b>[Answer if Q23 is &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input type="text"/>
<p><b>Q280</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 Q23 is &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input type="text"/>
<p><b>Q281</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'</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> </ul>

and the EU Commission Delegated Acts on High Risk Third Countries.

**[Answer if Q280 is > 0]**

- 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

**Q282**

*Afghanistan*

**[Answer if Q281 is Afghanistan]**

**Q283**

*Algeria*

**[Answer if Q281 is Algeria]**

**Q284**

*Angola*

**[Answer if Q281 is Angola]**

<b>Q285</b> <i>Bolivia</i> <b>[Answer if Q281 is Bolivia]</b>	<input type="text"/>
<b>Q286</b> <i>Bulgaria</i> <b>[Answer if Q281 is Bulgaria]</b>	<input type="text"/>
<b>Q287</b> <i>Burkina Faso</i> <b>[Answer if Q281 is Burkina Faso]</b>	<input type="text"/>
<b>Q288</b> <i>Cameroon</i> <b>[Answer if Q281 is Cameroon]</b>	<input type="text"/>
<b>Q289</b> <i>Congo, the Democratic Republic of the</i> <b>[Answer if Q281 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q290</b> <i>Cote D'Ivoire</i> <b>[Answer if Q281 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q291</b> <i>Haiti</i> <b>[Answer if Q281 is Haiti]</b>	<input type="text"/>
<b>Q292</b> <i>Iran, Islamic Republic of</i> <b>[Answer if Q281 is Iran, Islamic Republic of]</b>	<input type="text"/>
<b>Q293</b> <i>Kenya</i> <b>[Answer if Q281 is Kenya]</b>	<input type="text"/>
<b>Q294</b> <i>Korea, Democratic People's Republic of</i> <b>[Answer if Q281 is Korea, Democratic People's Republic of]</b>	<input type="text"/>

<b>Q295</b> <i>Lao PDR</i> <b>[Answer if Q281 is Lao PDR]</b>	<input type="text"/>
<b>Q296</b> <i>Lebanon</i> <b>[Answer if Q281 is Lebanon]</b>	<input type="text"/>
<b>Q297</b> <i>Mali</i> <b>[Answer if Q281 is Mali]</b>	<input type="text"/>
<b>Q298</b> <i>Monaco</i> <b>[Answer if Q281 is Monaco]</b>	<input type="text"/>
<b>Q299</b> <i>Mozambique</i> <b>[Answer if Q281 is Mozambique]</b>	<input type="text"/>
<b>Q300</b> <i>Myanmar</i> <b>[Answer if Q281 is Myanmar]</b>	<input type="text"/>
<b>Q301</b> <i>Namibia</i> <b>[Answer if Q281 is Namibia]</b>	<input type="text"/>
<b>Q302</b> <i>Nepal</i> <b>[Answer if Q281 is Nepal]</b>	<input type="text"/>
<b>Q303</b> <i>Nigeria</i> <b>[Answer if Q281 is Nigeria]</b>	<input type="text"/>
<b>Q304</b> <i>Russia</i> <b>[Answer if Q281 is Russia]</b>	<input type="text"/>

<b>Q305</b> South Africa <b>[Answer if Q281 is South Africa]</b>	<input type="text"/>
<b>Q306</b> South Sudan <b>[Answer if Q281 is South Sudan]</b>	<input type="text"/>
<b>Q307</b> Syrian Arab Republic <b>[Answer if Q281 is Syrian Arab Republic]</b>	<input type="text"/>
<b>Q308</b> Tanzania, United Republic of <b>[Answer if Q281 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q309</b> Trinidad and Tobago <b>[Answer if Q281 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q310</b> Vanuatu <b>[Answer if Q281 is Vanuatu]</b>	<input type="text"/>
<b>Q311</b> Venezuela <b>[Answer if Q281 is Venezuela]</b>	<input type="text"/>
<b>Q312</b> Vietnam <b>[Answer if Q281 is Vietnam]</b>	<input type="text"/>
<b>Q313</b> Virgin Islands (UK) <b>[Answer if Q281 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q314</b> Yemen <b>[Answer if Q281 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (177)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

Please indicate how many beneficiaries of the private interest foundations that your entity administered as at the end of the previous calendar year resided in the following jurisdictions:

<b>Q315</b>  Malta  <b>[Answer if Q23 is &gt; 0]</b>	<input type="text"/>
<b>Q316</b>  EU/EEA country (apart from Malta)  <b>[Answer if Q23 is &gt; 0]</b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q317</b>  Non-EU/non-EEA country  <b>[Answer if Q23 is &gt; 0]</b>  Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q318</b>  Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU	<input type="text"/>

<p><i>Commission Delegated Acts on High Risk Third Countries.</i></p> <p><b>[Answer if Q23 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>Q319</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 Q318 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> </ul>



	<ul style="list-style-type: none"> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<b>Q320</b> Afghanistan <b>[Answer if Q319 is Afghanistan]</b>	<input type="text"/>
<b>Q321</b> Algeria <b>[Answer if Q319 is Algeria]</b>	<input type="text"/>
<b>Q322</b> Angola <b>[Answer if Q319 is Angola]</b>	<input type="text"/>
<b>Q323</b> Bolivia <b>[Answer if Q319 is Bolivia]</b>	<input type="text"/>
<b>Q324</b> Bulgaria <b>[Answer if Q319 is Bulgaria]</b>	<input type="text"/>
<b>Q325</b> Burkina Faso <b>[Answer if Q319 is Burkina Faso]</b>	<input type="text"/>
<b>Q326</b> Cameroon <b>[Answer if Q319 is Cameroon]</b>	<input type="text"/>
<b>Q327</b> Congo, the Democratic Republic of the <b>[Answer if Q319 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q328</b> Cote D'Ivoire <b>[Answer if Q319 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q329</b>	<input type="text"/>

Haiti	
<b>[Answer if Q319 is Haiti]</b>	
<b>Q330</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q319 is Iran, Islamic Republic of]</b>	
<b>Q331</b>	
Kenya	<input type="text"/>
<b>[Answer if Q319 is Kenya]</b>	
<b>Q332</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q319 is Korea, Democratic People's Republic of]</b>	
<b>Q333</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q319 is Lao PDR]</b>	
<b>Q334</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q319 is Lebanon]</b>	
<b>Q335</b>	
Mali	<input type="text"/>
<b>[Answer if Q319 is Mali]</b>	
<b>Q336</b>	
Monaco	<input type="text"/>
<b>[Answer if Q319 is Monaco]</b>	
<b>Q337</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q319 is Mozambique]</b>	
<b>Q338</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q319 is Myanmar]</b>	
<b>Q339</b>	<input type="text"/>

Namibia	
<b>[Answer if Q319 is Namibia]</b>	
Q340	
Nepal	<input type="text"/>
<b>[Answer if Q319 is Nepal]</b>	
Q341	
Nigeria	<input type="text"/>
<b>[Answer if Q319 is Nigeria]</b>	
Q342	
Russia	<input type="text"/>
<b>[Answer if Q319 is Russia]</b>	
Q343	
South Africa	<input type="text"/>
<b>[Answer if Q319 is South Africa]</b>	
Q344	
South Sudan	<input type="text"/>
<b>[Answer if Q319 is South Sudan]</b>	
Q345	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q319 is Syrian Arab Republic]</b>	
Q346	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q319 is Tanzania, United Republic of]</b>	
Q347	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q319 is Trinidad and Tobago]</b>	
Q348	
Vanuatu	<input type="text"/>
<b>[Answer if Q319 is Vanuatu]</b>	
Q349	<input type="text"/>

Venezuela	
<b>[Answer if Q319 is Venezuela]</b>	
<b>Q350</b>	
Vietnam	<input type="text"/>
<b>[Answer if Q319 is Vietnam]</b>	
<b>Q351</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q319 is Virgin Islands (UK)]</b>	
<b>Q352</b>	
Yemen	<input type="text"/>
<b>[Answer if Q319 is Yemen]</b>	

## Jurisdiction Risk (178)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

### Q353

*With respect to private interest foundations for which your entity was appointed as an administrator, Please indicate the jurisdictions in which the customers' beneficial owners (that is, the founder, members of the supervisory council and the beneficiaries) were considered as PEPs (including family members and close associates) as at the end of the previous calendar year.*

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

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Jurisdiction Risk (179)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q354**

*With respect to private interest foundations for which your entity was appointed as an administrator as at the end of the previous calendar year, please indicate the value per jurisdictions from which loans issued by non-financial institutions (both legal and natural persons or legal arrangements) originated.*

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

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## **Jurisdiction Risk (180)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q355**

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

*Choose only one option:*

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

## **Jurisdiction Risk (181)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q356

*Please provide the number of subsidiaries per jurisdiction*

**[Answer if Q355 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 (182)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q357

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

*Choose only one option:*

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

## Jurisdiction Risk (186)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

With respect to customers (natural persons) to whom your entity provided fiduciary services/acted as mandatory as at the end of the previous calendar year, please indicate how many customers resided in the following jurisdictions:

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<p><b>Q358</b></p> <p>Malta</p> <p><b>[Answer if Q30 is &gt; 0]</b></p>	<input data-bbox="1023 235 1374 280" type="text"/>
<p><b>Q359</b></p> <p>EU/EEA country (apart from Malta)</p> <p><b>[Answer if Q30 is &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 607 1374 651" type="text"/>
<p><b>Q360</b></p> <p>Non-EU/non-EEA country</p> <p><b>[Answer if Q30 is &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 1176 1374 1220" type="text"/>
<p><b>Q361</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 Q30 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</p>	<input data-bbox="1023 1507 1374 1552" type="text"/>

<p><i>"Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q362</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 Q361 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<p><b>Q363</b></p>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>



Afghanistan	
<b>[Answer if Q362 is Afghanistan]</b>	
<b>Q364</b>	
Algeria	<input type="text"/>
<b>[Answer if Q362 is Algeria]</b>	
<b>Q365</b>	
Angola	<input type="text"/>
<b>[Answer if Q362 is Angola]</b>	
<b>Q366</b>	
Bolivia	<input type="text"/>
<b>[Answer if Q362 is Bolivia]</b>	
<b>Q367</b>	
Bulgaria	<input type="text"/>
<b>[Answer if Q362 is Bulgaria]</b>	
<b>Q368</b>	
Burkina Faso	<input type="text"/>
<b>[Answer if Q362 is Burkina Faso]</b>	
<b>Q369</b>	
Cameroon	<input type="text"/>
<b>[Answer if Q362 is Cameroon]</b>	
<b>Q370</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q362 is Congo, the Democratic Republic of the]</b>	
<b>Q371</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q362 is Cote D'Ivoire]</b>	
<b>Q372</b>	
Haiti	<input type="text"/>
<b>[Answer if Q362 is Haiti]</b>	
<b>Q373</b>	<input type="text"/>

Iran, Islamic Republic of	
<b>[Answer if Q362 is Iran, Islamic Republic of]</b>	
<b>Q374</b>	
Kenya	<input type="text"/>
<b>[Answer if Q362 is Kenya]</b>	
<b>Q375</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q362 is Korea, Democratic People's Republic of]</b>	
<b>Q376</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q362 is Lao PDR]</b>	
<b>Q377</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q362 is Lebanon]</b>	
<b>Q378</b>	
Mali	<input type="text"/>
<b>[Answer if Q362 is Mali]</b>	
<b>Q379</b>	
Monaco	<input type="text"/>
<b>[Answer if Q362 is Monaco]</b>	
<b>Q380</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q362 is Mozambique]</b>	
<b>Q381</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q362 is Myanmar]</b>	
<b>Q382</b>	
Namibia	<input type="text"/>
<b>[Answer if Q362 is Namibia]</b>	
<b>Q383</b>	<input type="text"/>

Nepal	
<b>[Answer if Q362 is Nepal]</b>	
Q384	
Nigeria	<input type="text"/>
<b>[Answer if Q362 is Nigeria]</b>	
Q385	
Russia	<input type="text"/>
<b>[Answer if Q362 is Russia]</b>	
Q386	
South Africa	<input type="text"/>
<b>[Answer if Q362 is South Africa]</b>	
Q387	
South Sudan	<input type="text"/>
<b>[Answer if Q362 is South Sudan]</b>	
Q388	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q362 is Syrian Arab Republic]</b>	
Q389	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q362 is Tanzania, United Republic of]</b>	
Q390	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q362 is Trinidad and Tobago]</b>	
Q391	
Vanuatu	<input type="text"/>
<b>[Answer if Q362 is Vanuatu]</b>	
Q392	
Venezuela	<input type="text"/>
<b>[Answer if Q362 is Venezuela]</b>	
Q393	<input type="text"/>

Vietnam	
<b>[Answer if Q362 is Vietnam]</b>	
<b>Q394</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q362 is Virgin Islands (UK)]</b>	
<b>Q395</b>	
Yemen	<input type="text"/>
<b>[Answer if Q362 is Yemen]</b>	

## Jurisdiction Risk (187)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

With respect to customers (legal persons or legal arrangements) to whom your entity provided fiduciary services/acted as mandatary as at the end of the previous calendar year, please indicate how many customers were incorporated or registered in the following jurisdictions:

<b>Q396</b>	
Malta	<input type="text"/>
<b>[Answer if Q30 is &gt; 0]</b>	
<b>Q397</b>	
EU/EEA country (apart from Malta)	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q398</b>	<input type="text"/>
Non-EU/non-EEA country	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring'	

<p>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>Q399</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>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<div data-bbox="1023 723 1374 763" style="border: 1px solid black; height: 18px; width: 220px;"></div>
<p><b>Q400</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 Q399 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> </ul>

	<ul style="list-style-type: none"> <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>Q401</b> Afghanistan <b>[Answer if Q400 is Afghanistan]</b>	<input type="text"/>
<b>Q402</b> Algeria <b>[Answer if Q400 is Algeria]</b>	<input type="text"/>
<b>Q403</b> Angola <b>[Answer if Q400 is Angola]</b>	<input type="text"/>
<b>Q404</b> Bolivia <b>[Answer if Q400 is Bolivia]</b>	<input type="text"/>
<b>Q405</b> Bulgaria <b>[Answer if Q400 is Bulgaria]</b>	<input type="text"/>
<b>Q406</b> Burkina Faso <b>[Answer if Q400 is Burkina Faso]</b>	<input type="text"/>
<b>Q407</b> Cameroon <b>[Answer if Q400 is Cameroon]</b>	<input type="text"/>
<b>Q408</b>	<input type="text"/>

Congo, the Democratic Republic of the	
<b>[Answer if Q400 is Congo, the Democratic Republic of the]</b>	
<b>Q409</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q400 is Cote D'Ivoire]</b>	
<b>Q410</b>	
Haiti	<input type="text"/>
<b>[Answer if Q400 is Haiti]</b>	
<b>Q411</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q400 is Iran, Islamic Republic of]</b>	
<b>Q412</b>	
Kenya	<input type="text"/>
<b>[Answer if Q400 is Kenya]</b>	
<b>Q413</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q400 is Korea, Democratic People's Republic of]</b>	
<b>Q414</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q400 is Lao PDR]</b>	
<b>Q415</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q400 is Lebanon]</b>	
<b>Q416</b>	
Mali	<input type="text"/>
<b>[Answer if Q400 is Mali]</b>	
<b>Q417</b>	
Monaco	<input type="text"/>
<b>[Answer if Q400 is Monaco]</b>	

<b>Q418</b> Mozambique <b>[Answer if Q400 is Mozambique]</b>	<input type="text"/>
<b>Q419</b> Myanmar <b>[Answer if Q400 is Myanmar]</b>	<input type="text"/>
<b>Q420</b> Namibia <b>[Answer if Q400 is Namibia]</b>	<input type="text"/>
<b>Q421</b> Nepal <b>[Answer if Q400 is Nepal]</b>	<input type="text"/>
<b>Q422</b> Nigeria <b>[Answer if Q400 is Nigeria]</b>	<input type="text"/>
<b>Q423</b> Russia <b>[Answer if Q400 is Russia]</b>	<input type="text"/>
<b>Q424</b> South Africa <b>[Answer if Q400 is South Africa]</b>	<input type="text"/>
<b>Q425</b> South Sudan <b>[Answer if Q400 is South Sudan]</b>	<input type="text"/>
<b>Q426</b> Syrian Arab Republic <b>[Answer if Q400 is Syrian Arab Republic]</b>	<input type="text"/>
<b>Q427</b> Tanzania, United Republic of <b>[Answer if Q400 is Tanzania, United Republic of]</b>	<input type="text"/>



<b>Q428</b> Trinidad and Tobago <i>[Answer if Q400 is Trinidad and Tobago]</i>	<input type="text"/>
<b>Q429</b> Vanuatu <i>[Answer if Q400 is Vanuatu]</i>	<input type="text"/>
<b>Q430</b> Venezuela <i>[Answer if Q400 is Venezuela]</i>	<input type="text"/>
<b>Q431</b> Vietnam <i>[Answer if Q400 is Vietnam]</i>	<input type="text"/>
<b>Q432</b> Virgin Islands (UK) <i>[Answer if Q400 is Virgin Islands (UK)]</i>	<input type="text"/>
<b>Q433</b> Yemen <i>[Answer if Q400 is Yemen]</i>	<input type="text"/>

## Jurisdiction Risk (188)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

Please indicate how many companies and other legal arrangements in which your entity held shares in fiduciary/mandatary capacity as at the end of the previous calendar year were incorporated or registered in the following jurisdictions:

<b>Q434</b> Malta	<input type="text"/>
<b>Q435</b> EU/EEA country (apart from Malta) Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring'	<input type="text"/>

<p>and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p><b>Q436</b></p> <p>Non-EU/non-EEA country</p> <p><b>[Answer if Q30 is &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 685 1374 725" type="text"/>
<p><b>Q437</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 Q30 is &gt; 0]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 1323 1374 1364" type="text"/>
<p><b>Q438</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 Q437 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> </ul>

	<ul style="list-style-type: none"> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<b>Q439</b> Afghanistan <b>[Answer if Q438 is Afghanistan]</b>	<input type="text"/>
<b>Q440</b> Algeria <b>[Answer if Q438 is Algeria]</b>	<input type="text"/>
<b>Q441</b> Angola <b>[Answer if Q438 is Angola]</b>	<input type="text"/>
<b>Q442</b>	<input type="text"/>

<i>Bolivia</i>	
<b>[Answer if Q438 is Bolivia]</b>	
<b>Q443</b>	
<i>Bulgaria</i>	<input type="text"/>
<b>[Answer if Q438 is Bulgaria]</b>	
<b>Q444</b>	
<i>Burkina Faso</i>	<input type="text"/>
<b>[Answer if Q438 is Burkina Faso]</b>	
<b>Q445</b>	
<i>Cameroon</i>	<input type="text"/>
<b>[Answer if Q438 is Cameroon]</b>	
<b>Q446</b>	
<i>Congo, the Democratic Republic of the</i>	<input type="text"/>
<b>[Answer if Q438 is Congo, the Democratic Republic of the]</b>	
<b>Q447</b>	
<i>Cote D'Ivoire</i>	<input type="text"/>
<b>[Answer if Q438 is Cote D'Ivoire]</b>	
<b>Q448</b>	
<i>Haiti</i>	<input type="text"/>
<b>[Answer if Q438 is Haiti]</b>	
<b>Q449</b>	
<i>Iran, Islamic Republic of</i>	<input type="text"/>
<b>[Answer if Q438 is Iran, Islamic Republic of]</b>	
<b>Q450</b>	
<i>Kenya</i>	<input type="text"/>
<b>[Answer if Q438 is Kenya]</b>	
<b>Q451</b>	
<i>Korea, Democratic People's Republic of</i>	<input type="text"/>
<b>[Answer if Q438 is Korea, Democratic People's Republic of]</b>	

<b>Q452</b> <i>Lao PDR</i> <b>[Answer if Q438 is Lao PDR]</b>	<input type="text"/>
<b>Q453</b> <i>Lebanon</i> <b>[Answer if Q438 is Lebanon]</b>	<input type="text"/>
<b>Q454</b> <i>Mali</i> <b>[Answer if Q438 is Mali]</b>	<input type="text"/>
<b>Q455</b> <i>Monaco</i> <b>[Answer if Q438 is Monaco]</b>	<input type="text"/>
<b>Q456</b> <i>Mozambique</i> <b>[Answer if Q438 is Mozambique]</b>	<input type="text"/>
<b>Q457</b> <i>Myanmar</i> <b>[Answer if Q438 is Myanmar]</b>	<input type="text"/>
<b>Q458</b> <i>Namibia</i> <b>[Answer if Q438 is Namibia]</b>	<input type="text"/>
<b>Q459</b> <i>Nepal</i> <b>[Answer if Q438 is Nepal]</b>	<input type="text"/>
<b>Q460</b> <i>Nigeria</i> <b>[Answer if Q438 is Nigeria]</b>	<input type="text"/>
<b>Q461</b> <i>Russia</i> <b>[Answer if Q438 is Russia]</b>	<input type="text"/>

<b>Q462</b> South Africa <b>[Answer if Q438 is South Africa]</b>	<input type="text"/>
<b>Q463</b> South Sudan <b>[Answer if Q438 is South Sudan]</b>	<input type="text"/>
<b>Q464</b> Syrian Arab Republic <b>[Answer if Q438 is Syrian Arab Republic]</b>	<input type="text"/>
<b>Q465</b> Tanzania, United Republic of <b>[Answer if Q438 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q466</b> Trinidad and Tobago <b>[Answer if Q438 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q467</b> Vanuatu <b>[Answer if Q438 is Vanuatu]</b>	<input type="text"/>
<b>Q468</b> Venezuela <b>[Answer if Q438 is Venezuela]</b>	<input type="text"/>
<b>Q469</b> Vietnam <b>[Answer if Q438 is Vietnam]</b>	<input type="text"/>
<b>Q470</b> Virgin Islands (UK) <b>[Answer if Q438 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q471</b> Yemen <b>[Answer if Q438 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (191)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q472**

*Please indicate the total number of trusts that your entity created (under domestic law) during previous calendar year.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Jurisdiction Risk (192)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

**Q473**

*Please indicate the total number of trusts that your entity created (under foreign law) during previous calendar year.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

## Jurisdiction Risk (193)

*(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)*

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate how many settlors of trusts resided in the following jurisdictions:

<b>Q474</b>	<input type="text"/>
Malta	

<p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</b></p>	
<p><b>Q475</b></p> <p>EU/EEA country (apart from Malta)</p> <p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 524 1374 566" type="text"/>
<p><b>Q476</b></p> <p>Non-EU/non-EEA country</p> <p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</b></p> <p>Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	<input data-bbox="1023 1128 1374 1171" type="text"/>
<p><b>Q477</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 Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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</p>	<input data-bbox="1023 1476 1374 1518" type="text"/>



<p><i>"Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</i></p>	
<p><b>Q478</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 Q477 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<p><b>Q479</b></p>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>

Afghanistan	
<b>[Answer if Q478 is Afghanistan]</b>	
<b>Q480</b>	
Algeria	<input type="text"/>
<b>[Answer if Q478 is Algeria]</b>	
<b>Q481</b>	
Angola	<input type="text"/>
<b>[Answer if Q478 is Angola]</b>	
<b>Q482</b>	
Bolivia	<input type="text"/>
<b>[Answer if Q478 is Bolivia]</b>	
<b>Q483</b>	
Bulgaria	<input type="text"/>
<b>[Answer if Q478 is Bulgaria]</b>	
<b>Q484</b>	
Burkina Faso	<input type="text"/>
<b>[Answer if Q478 is Burkina Faso]</b>	
<b>Q485</b>	
Cameroon	<input type="text"/>
<b>[Answer if Q478 is Cameroon]</b>	
<b>Q486</b>	
Congo, the Democratic Republic of the	<input type="text"/>
<b>[Answer if Q478 is Congo, the Democratic Republic of the]</b>	
<b>Q487</b>	
Cote D'Ivoire	<input type="text"/>
<b>[Answer if Q478 is Cote D'Ivoire]</b>	
<b>Q488</b>	
Haiti	<input type="text"/>
<b>[Answer if Q478 is Haiti]</b>	
<b>Q489</b>	<input type="text"/>

Iran, Islamic Republic of	
<b>[Answer if Q478 is Iran, Islamic Republic of]</b>	
<b>Q490</b>	
Kenya	<input type="text"/>
<b>[Answer if Q478 is Kenya]</b>	
<b>Q491</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q478 is Korea, Democratic People's Republic of]</b>	
<b>Q492</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q478 is Lao PDR]</b>	
<b>Q493</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q478 is Lebanon]</b>	
<b>Q494</b>	
Mali	<input type="text"/>
<b>[Answer if Q478 is Mali]</b>	
<b>Q495</b>	
Monaco	<input type="text"/>
<b>[Answer if Q478 is Monaco]</b>	
<b>Q496</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q478 is Mozambique]</b>	
<b>Q497</b>	
Myanmar	<input type="text"/>
<b>[Answer if Q478 is Myanmar]</b>	
<b>Q498</b>	
Namibia	<input type="text"/>
<b>[Answer if Q478 is Namibia]</b>	
<b>Q499</b>	<input type="text"/>

<i>Nepal</i>	
<b>[Answer if Q478 is Nepal]</b>	
<b>Q500</b>	
<i>Nigeria</i>	<input type="text"/>
<b>[Answer if Q478 is Nigeria]</b>	
<b>Q501</b>	
<i>Russia</i>	<input type="text"/>
<b>[Answer if Q478 is Russia]</b>	
<b>Q502</b>	
<i>South Africa</i>	<input type="text"/>
<b>[Answer if Q478 is South Africa]</b>	
<b>Q503</b>	
<i>South Sudan</i>	<input type="text"/>
<b>[Answer if Q478 is South Sudan]</b>	
<b>Q504</b>	
<i>Syrian Arab Republic</i>	<input type="text"/>
<b>[Answer if Q478 is Syrian Arab Republic]</b>	
<b>Q505</b>	
<i>Tanzania, United Republic of</i>	<input type="text"/>
<b>[Answer if Q478 is Tanzania, United Republic of]</b>	
<b>Q506</b>	
<i>Trinidad and Tobago</i>	<input type="text"/>
<b>[Answer if Q478 is Trinidad and Tobago]</b>	
<b>Q507</b>	
<i>Vanuatu</i>	<input type="text"/>
<b>[Answer if Q478 is Vanuatu]</b>	
<b>Q508</b>	
<i>Venezuela</i>	<input type="text"/>
<b>[Answer if Q478 is Venezuela]</b>	
<b>Q509</b>	<input type="text"/>

Vietnam	
<b>[Answer if Q478 is Vietnam]</b>	
<b>Q510</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q478 is Virgin Islands (UK)]</b>	
<b>Q511</b>	
Yemen	<input type="text"/>
<b>[Answer if Q478 is Yemen]</b>	

## Jurisdiction Risk (194)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate how many beneficiaries of trusts resided in the following jurisdictions:

<b>Q512</b>	
Malta	<input type="text"/>
<b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</b>	
<b>Q513</b>	
EU/EEA country (apart from Malta)	
<b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</b>	
Any EU/EEA or Non-EU/Non-EEA jurisdictions identified by the FATF as 'High Risk Jurisdictions Subject to a Call for Action' or 'Jurisdictions Under Increased Monitoring' and/or the EU Commission Delegated Acts on High Risk Third Countries should be recorded under the option "Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.	<input type="text"/>
<b>Q514</b>	<input type="text"/>
Non-EU/non-EEA country	

<p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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><b>Q515</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 Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>	<div data-bbox="1023 996 1374 1039" style="border: 1px solid black; height: 19px; width: 220px;"></div>
<p><b>Q516</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 Q515 is &gt; 0]</b></p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> </ul>

	<ul style="list-style-type: none"> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
<b>Q517</b> <i>Afghanistan</i> <b>[Answer if Q516 is Afghanistan]</b>	<input type="text"/>
<b>Q518</b> <i>Algeria</i> <b>[Answer if Q516 is Algeria]</b>	<input type="text"/>
<b>Q519</b> <i>Angola</i> <b>[Answer if Q516 is Angola]</b>	<input type="text"/>
<b>Q520</b> <i>Bolivia</i> <b>[Answer if Q516 is Bolivia]</b>	<input type="text"/>
<b>Q521</b> <i>Bulgaria</i> <b>[Answer if Q516 is Bulgaria]</b>	<input type="text"/>

<b>Q522</b> <i>Burkina Faso</i> <b>[Answer if Q516 is Burkina Faso]</b>	<input type="text"/>
<b>Q523</b> <i>Cameroon</i> <b>[Answer if Q516 is Cameroon]</b>	<input type="text"/>
<b>Q524</b> <i>Congo, the Democratic Republic of the</i> <b>[Answer if Q516 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q525</b> <i>Cote D'Ivoire</i> <b>[Answer if Q516 is Cote D'Ivoire]</b>	<input type="text"/>
<b>Q526</b> <i>Haiti</i> <b>[Answer if Q516 is Haiti]</b>	<input type="text"/>
<b>Q527</b> <i>Iran, Islamic Republic of</i> <b>[Answer if Q516 is Iran, Islamic Republic of]</b>	<input type="text"/>
<b>Q528</b> <i>Kenya</i> <b>[Answer if Q516 is Kenya]</b>	<input type="text"/>
<b>Q529</b> <i>Korea, Democratic People's Republic of</i> <b>[Answer if Q516 is Korea, Democratic People's Republic of]</b>	<input type="text"/>
<b>Q530</b> <i>Lao PDR</i> <b>[Answer if Q516 is Lao PDR]</b>	<input type="text"/>
<b>Q531</b> <i>Lebanon</i> <b>[Answer if Q516 is Lebanon]</b>	<input type="text"/>



<b>Q532</b> Mali <b>[Answer if Q516 is Mali]</b>	<input type="text"/>
<b>Q533</b> Monaco <b>[Answer if Q516 is Monaco]</b>	<input type="text"/>
<b>Q534</b> Mozambique <b>[Answer if Q516 is Mozambique]</b>	<input type="text"/>
<b>Q535</b> Myanmar <b>[Answer if Q516 is Myanmar]</b>	<input type="text"/>
<b>Q536</b> Namibia <b>[Answer if Q516 is Namibia]</b>	<input type="text"/>
<b>Q537</b> Nepal <b>[Answer if Q516 is Nepal]</b>	<input type="text"/>
<b>Q538</b> Nigeria <b>[Answer if Q516 is Nigeria]</b>	<input type="text"/>
<b>Q539</b> Russia <b>[Answer if Q516 is Russia]</b>	<input type="text"/>
<b>Q540</b> South Africa <b>[Answer if Q516 is South Africa]</b>	<input type="text"/>
<b>Q541</b> South Sudan <b>[Answer if Q516 is South Sudan]</b>	<input type="text"/>

<b>Q542</b> <i>Syrian Arab Republic</i> <b>[Answer if Q516 is Syrian Arab Republic]</b>	<input type="text"/>
<b>Q543</b> <i>Tanzania, United Republic of</i> <b>[Answer if Q516 is Tanzania, United Republic of]</b>	<input type="text"/>
<b>Q544</b> <i>Trinidad and Tobago</i> <b>[Answer if Q516 is Trinidad and Tobago]</b>	<input type="text"/>
<b>Q545</b> <i>Vanuatu</i> <b>[Answer if Q516 is Vanuatu]</b>	<input type="text"/>
<b>Q546</b> <i>Venezuela</i> <b>[Answer if Q516 is Venezuela]</b>	<input type="text"/>
<b>Q547</b> <i>Vietnam</i> <b>[Answer if Q516 is Vietnam]</b>	<input type="text"/>
<b>Q548</b> <i>Virgin Islands (UK)</i> <b>[Answer if Q516 is Virgin Islands (UK)]</b>	<input type="text"/>
<b>Q549</b> <i>Yemen</i> <b>[Answer if Q516 is Yemen]</b>	<input type="text"/>

## Jurisdiction Risk (195)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

### Q550

*With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate jurisdictions in which bank/investment/crypto accounts that were held on trust were located.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Jurisdiction Risk (196)

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

### Q551

*With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee as at the end of the previous calendar year, please indicate jurisdictions in which the immovable properties settled on trust were located.*

**[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]**

Answer to be provided for each specific Country

or choose one of:

- Not Applicable

## Jurisdiction Risk (197)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q552**

*With respect to trusts for whom your entity acted as trustee or co-trustee as at the end of the previous calendar year, please indicate jurisdictions in which settlors were considered as PEPs (including family members and close associates).*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## **Jurisdiction Risk (198)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q553**

*With respect to trusts for whom your entity acted as trustee or co-trustee as at the end of the previous calendar year, please indicate jurisdictions in which beneficiaries were considered as PEPs (including family members and close associates)*

***[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## **Jurisdiction Risk (199)**

**(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)**

With respect to trusts for whom your entity acted as trustee or co-trustee or arranged by way of business, for another person to act as a trustee, as at the end of the previous calendar year, please indicate how many trusts were established in the following jurisdictions:

<p><b>Q554</b></p> <p>Malta</p> <p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</b></p>	<input type="text"/>
<p><b>Q555</b></p> <p>EU/EEA country (apart from Malta)</p> <p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>Q556</b></p> <p>Non-EU/non-EEA country</p> <p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>Q557</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</p>	<input type="text"/>

<p><i>Commission Delegated Acts on High Risk Third Countries.</i></p> <p><b>[Answer if Q32 is Discretionary trust, Fixed interest trust, Charitable trust, Security trust, Other]</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>Q558</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 Q557 is &gt; 0]</b></p>	<p><i>Choose more than one option:</i></p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> <li>• Angola</li> <li>• Bolivia</li> <li>• Bulgaria</li> <li>• Burkina Faso</li> <li>• Cameroon</li> <li>• Congo, the Democratic Republic of the</li> <li>• Cote D'Ivoire</li> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> </ul>

	<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>
<b>Q559</b> Afghanistan <b>[Answer if Q558 is Afghanistan]</b>	<input type="text"/>
<b>Q560</b> Algeria <b>[Answer if Q558 is Algeria]</b>	<input type="text"/>
<b>Q561</b> Angola <b>[Answer if Q558 is Angola]</b>	<input type="text"/>
<b>Q562</b> Bolivia <b>[Answer if Q558 is Bolivia]</b>	<input type="text"/>
<b>Q563</b> Bulgaria <b>[Answer if Q558 is Bulgaria]</b>	<input type="text"/>
<b>Q564</b> Burkina Faso <b>[Answer if Q558 is Burkina Faso]</b>	<input type="text"/>
<b>Q565</b> Cameroon <b>[Answer if Q558 is Cameroon]</b>	<input type="text"/>
<b>Q566</b> Congo, the Democratic Republic of the <b>[Answer if Q558 is Congo, the Democratic Republic of the]</b>	<input type="text"/>
<b>Q567</b>	<input type="text"/>

Cote D'Ivoire	
<b>[Answer if Q558 is Cote D'Ivoire]</b>	
<b>Q568</b>	
Haiti	<input type="text"/>
<b>[Answer if Q558 is Haiti]</b>	
<b>Q569</b>	
Iran, Islamic Republic of	<input type="text"/>
<b>[Answer if Q558 is Iran, Islamic Republic of]</b>	
<b>Q570</b>	
Kenya	<input type="text"/>
<b>[Answer if Q558 is Kenya]</b>	
<b>Q571</b>	
Korea, Democratic People's Republic of	<input type="text"/>
<b>[Answer if Q558 is Korea, Democratic People's Republic of]</b>	
<b>Q572</b>	
Lao PDR	<input type="text"/>
<b>[Answer if Q558 is Lao PDR]</b>	
<b>Q573</b>	
Lebanon	<input type="text"/>
<b>[Answer if Q558 is Lebanon]</b>	
<b>Q574</b>	
Mali	<input type="text"/>
<b>[Answer if Q558 is Mali]</b>	
<b>Q575</b>	
Monaco	<input type="text"/>
<b>[Answer if Q558 is Monaco]</b>	
<b>Q576</b>	
Mozambique	<input type="text"/>
<b>[Answer if Q558 is Mozambique]</b>	
<b>Q577</b>	<input type="text"/>



Myanmar	
<b>[Answer if Q558 is Myanmar]</b>	
Q578	
Namibia	<input type="text"/>
<b>[Answer if Q558 is Namibia]</b>	
Q579	
Nepal	<input type="text"/>
<b>[Answer if Q558 is Nepal]</b>	
Q580	
Nigeria	<input type="text"/>
<b>[Answer if Q558 is Nigeria]</b>	
Q581	
Russia	<input type="text"/>
<b>[Answer if Q558 is Russia]</b>	
Q582	
South Africa	<input type="text"/>
<b>[Answer if Q558 is South Africa]</b>	
Q583	
South Sudan	<input type="text"/>
<b>[Answer if Q558 is South Sudan]</b>	
Q584	
Syrian Arab Republic	<input type="text"/>
<b>[Answer if Q558 is Syrian Arab Republic]</b>	
Q585	
Tanzania, United Republic of	<input type="text"/>
<b>[Answer if Q558 is Tanzania, United Republic of]</b>	
Q586	
Trinidad and Tobago	<input type="text"/>
<b>[Answer if Q558 is Trinidad and Tobago]</b>	
Q587	<input type="text"/>

Vanuatu	
<b>[Answer if Q558 is Vanuatu]</b>	
<b>Q588</b>	
Venezuela	<input type="text"/>
<b>[Answer if Q558 is Venezuela]</b>	
<b>Q589</b>	
Vietnam	<input type="text"/>
<b>[Answer if Q558 is Vietnam]</b>	
<b>Q590</b>	
Virgin Islands (UK)	<input type="text"/>
<b>[Answer if Q558 is Virgin Islands (UK)]</b>	
<b>Q591</b>	
Yemen	<input type="text"/>
<b>[Answer if Q558 is Yemen]</b>	

## Jurisdiction Risk (183)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q592**

*Please provide the number of branches per jurisdiction*

***[Answer if Q357 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 (184)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q593**

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

*Choose only one option:*

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

**Jurisdiction Risk (185)**

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q594**

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

***[Answer if Q593 is Yes Relevant Financial Business, Yes Relevant Activity, Yes both]***

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Interface Risk

### Interface Risk (38)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

From the total number of customers, what % was 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 (39)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q3**

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

### Interface Risk (40)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

**Q4**

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

## Interface Risk (41)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q5

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

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

Answer to be provided for each specific Country

*or choose one of:*

- Not Applicable

## Interface Risk (42)

***(Relates to Trustees & Fiduciaries or Financial Sector offering Trustee & Fiduciary Services)***

### Q6

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

---

*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 (5)

### Q4

*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.

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

<p>Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries". This list is as at 31 December 2025.</p>	
<p><b>Q7</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>Q8</b></p> <p>Countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and 'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.</p> <p><b>[Answer if Q1 is Yes, 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>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> </ul>

	<ul style="list-style-type: none"> <li>• Haiti</li> <li>• Iran, Islamic Republic of</li> <li>• Kenya</li> <li>• Korea, Democratic People's Republic of</li> <li>• Lao PDR</li> <li>• Lebanon</li> <li>• Mali</li> <li>• Monaco</li> <li>• Mozambique</li> <li>• Myanmar</li> <li>• Namibia</li> <li>• Nepal</li> <li>• Nigeria</li> <li>• Russia</li> <li>• South Africa</li> <li>• South Sudan</li> <li>• Syrian Arab Republic</li> <li>• Tanzania, United Republic of</li> <li>• Trinidad and Tobago</li> <li>• Vanuatu</li> <li>• Venezuela</li> <li>• Vietnam</li> <li>• Virgin Islands (UK)</li> <li>• Yemen</li> </ul>
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## Outsourcing (16)

Please indicate the jurisdictions where the service providers to whom your entity had outsourced AML/CFT obligations are located.

<b>Q10</b>  <i>Malta</i>  <b>[Answer if Q1 is Yes, outsourcing within the group, Yes, outsourcing outside the group]</b>	<b>Choose only one option:</b>  <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<b>Q11</b>  <i>EU/EEA (Excluding Malta)</i>	<b>Choose only one option:</b>  <ul style="list-style-type: none"> <li>• Yes</li> </ul>

<p><b>[Answer if Q1 is Yes, outsourcing outside the group, Yes, outsourcing within 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>	<ul style="list-style-type: none"> <li>• No</li> </ul>
<p><b>Q12</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>Q13</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 outside the group, Yes, outsourcing within 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>Q14</b></p> <p>Please choose the applicable countries identified under the FATF 'High Risk Jurisdictions Subject to a Call for Action' and</p>	<p>Choose more than one option:</p> <ul style="list-style-type: none"> <li>• Afghanistan</li> <li>• Algeria</li> </ul>

*'Jurisdictions Under Increased Monitoring' and the EU Commission Delegated Acts on High Risk Third Countries.*  
**[Answer if Q13 is Yes]**

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



# Record-keeping

## Record-keeping (1)

### Q1

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

*Choose only one option:*

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

## Training

### Training (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>

## 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 (Data, documents and information)**

### **(7)**

#### **Q6**

How is it ensured that customers (including settlors and protectors, where applicable) and/or beneficial owner's information remains up to date and documentation valid?

*Choose only one option:*

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

## 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) (25)

**Q9**

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

//

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

**Q10**

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

//

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

**Q11**

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)**

**Q12**

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

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

## Ongoing monitoring (Transaction Scrutiny) (55)

Q13

*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]***