

## Financial Intelligence Analysis Unit Risk Evaluation Questionnaire

# Financial Sector Financial Institutions

General remarks from the subject person:

As indicated in the Guidance for Completion of the Anti-Money Laundering and Countering the Financing of Terrorism Risk Evaluation Questionnaire, sole practitioners and entities should, for each of the questions included in this questionnaire, choose the answer option that is best suited to them/ their internal organization.

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 [Text] is therefore important to select an option that is a true reflection of your actual situation / the actual situation within your entity and that can be justified later on.

In the text box below, you can formulate general remarks on the answers submitted by you / your entity. Please note that these general remarks are not taken into account in the initial, automated analysis of your / your entity's answers.

#### Subject Person Information

1.01	Please select the legal formation of your entity.	Public Limited Company / Private Limited Company / Civil Partnership / Commercial Partnership / Branch of a Foreign entity / Association / Other
1.02	If "Other", please specify.	[Text] / Not Applicable
1.03	Please select the status of your entity.	Subsidiary of a foreign traded company / Subsidiary of a privately held foreign company / Subsidiary of a local traded company / Subsidiary of a privately held local company / Privately held company / Branch of a regulated entity / Listed company / Other
1.04	If "Other", please specify.	[Text] / Not Applicable
1.05	If your entity is a subsidiary of a foreign traded company or a subsidiary of a privately held foreign company, is the parent company located in EU / EEA jurisdictions or non-EU / EEA jurisdictions?	EU / EEA jurisdictions / non-EU / EEA jurisdictions / Not Applicable
1.06	Please indicate total annual turnover according to the latest available audited financial statements and / or tax declaration.	[€] / Not Applicable
1.07	Please provide the year end reference date for the financial statements or tax declaration as indicated above.	[Date] / Not Applicable
1.08	Please indicate the total number of employees (including partners, executive directors, associates and staff), expressed in full time equivalents ("FTEs"), working for you / your entity as at the end of the prior calendar year.	[Number] / Not Available / Not Applicable



1.09	How many years experience in this industry do you / does the principal(s) and / or partners and / or director(s) and / or senior management of your entity have?	10 or more years / Between 5-9 years / Between 3-4 years / Between 1-2 years / Less than 1 year
1.10	Does the ownership structure of your entity include one or more of the following: foundation and / or trust and / or partnership and / or direct or indirect holding through bearer shares?	No / Yes
1.11	Does your entity have any subsidiaries, branches, affiliates, representative offices, agents and distributors in other EU / EEA countries?	No / Yes
1.12	Do you / your entity have any subsidiaries, branches, affiliates, representative offices, agents and distributors in non-EU / EEA countries?	No / Yes
1.13	If the answer to the prior question was "Yes", please list the countries in which the subsidiaries, branches, affiliates, representative offices, agents and distributors are situated.	[Text]
1.14	Do you / your entity have any subsidiaries, branches, affiliates, representative offices, agents and distributors in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes
1.15	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
1.16	Please list all persons (name and surname) who are considered as your entity's beneficial owners as defined in the PMLFTR.	[Text] / Not Applicable
1.17	Do any of the BOs reside in a non-EU / EEA jurisdiction?	No / Yes / Not Applicable
1.18	Does your entity have nominee shareholders in its ownership structure?	No / Yes
1.19	If "Yes", what percent of the total shares are held by nominee shareholders?	[%] / Not Applicable
1.20	Has your entity undergone changes in its ownership structure during the prior calendar year?	No / Yes
1.21	Has your entity undergone significant changes in its management and control structure during the prior calendar year?	No / Yes
1.22	Please ATTACH a copy of the ownership and control structure of your entity (optional).	File Upload / Not Applicable

# 2 Governance

2.01	How many agents / distributors did your entity have at the end of the prior calendar year?	[Number] / Not Available / Not Applicable
2.02	Has your entity terminated any agency / distributor relationship due to AML / CFT issues during the prior calendar year?	No / Yes / Not Applicable
2.03	When was the current MLRO appointed?	More than 2 years ago / Between 1-2 years ago / Less than 1 year ago



2.04	How many years of experience does the MLRO have in AML / CFT?	More than 5 years / Between 3-5 years / Between 1-2 years / Less than 1 year	
2.05	Is the MLRO responsible for areas other than AML / CFT?	No / Yes	
2.06	Does the MLRO also hold MLRO positions with other entities?	No / Yes	
2.07	How many staff members, expressed as FTEs, are part of the AML / CFT team (if one exists)?	[Number] / Not Available / Not Applicable	
2.08	Is any of the AML / CFT team staff responsible for other roles and responsibilities not attributable to AML / CFT (e.g. front office, back office, etc.)?	No / Yes / Not Applicable	
2.09	Do you / does your entity implement appropriate procedures (including obtaining a police conduct or equivalent upon hiring) and assess the conduct and integrity of employees (including partners and directors) handling relevant financial business or relevant activity?	No / Yes / Not Applicable	
	Have you / your entity, MLRO, Compliance Officer, senior management, partners, directors, BOs, and / or shareholders (as applicable) been subject to any of the following in the last five (5) years either in Malta or abroad:		
2.10	a) Regulatory enforcement actions, criminal investigations for ML / FT or any other financial crime	No / Yes	
	b) Subject of negative news reports (if known)	No / Yes	
2.11	In the past five (5) years, have any employees (including directors and partners) been disciplined for non-compliance with the AML / CFT policies within your entity?	No / Yes	
2.12	Have you / your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the group)?	No / Yes (within Group) / Yes (outside Group) / Yes (within and outside Group)	
2.13	If "Yes", please specify the obligations that are being outsourced.	Business Risk Assessment / Customer Risk Assessment / Customer Due Diligence / On-going monitoring / Record keeping / Not Applicable	
2.14	Have you made use of any of the exceptions provided in Section 5.1.2 of the Implementing Procedures - Part I providing for the Money Laundering Reporting Officer to be carried out by someone other than one of your officers?	No / Yes	
2.15	If yes, please indicate the official full name of the service provider.	[Text] / Not Applicable	
2.16	How often has the Board or equivalent body, received a presentation on AML / CFT issues in the prior calendar year?	Monthly / Quarterly / Half yearly / Annually / None / Not Applicable	
3	3 Business Risk Assessment		
2 01	Have your / your entity performed a Business Bick Assessment?	No / Vos	
3.01	Have you / your entity performed a Business Risk Assessment?	No / Yes	
3.02	What is your / your entity's most recent Business Risk Assessment inherent risk scoring / rating for ML / FT risk?	Very High / High / Medium / Low / Not Applicable	



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3.03	What is your / your entity's most recent Business Risk Assessment residual risk scoring / rating for ML / FT risk?	Very High / High / Medium / Low / Not Applicable
	Did the Business Risk Assessment conducted take into account the risks and controls related to:	
	a) your / your entity's customers	No / Yes / Not Applicable
3.04	b) the products and services offered by you / your entity and the transaction risk exposure through same	No / Yes / Not Applicable
	c) specific countries or geographical areas	No / Yes / Not Applicable
	d) the distribution channels	No / Yes / Not Applicable
3.05	Did the Business Risk Assessment conducted take into account the results of the SNRA and NRA?	No / Yes / Not Applicable
3.06	Has the Business Risk Assessment been approved by senior management (including directors and partners) of your entity?	No / Yes / Not Applicable
3.07	Did you / your entity review and / or update the business risk assessment in the prior calendar year?	No / Yes / Not Applicable
3.08	Please ATTACH latest Business Risk Assessment.	[File Upload] / Not Available

# 4 Customer Acceptance and Risk Assessment

4.01	Do you / does your entity perform a customer risk assessment ("CRA") prior to the acceptance and approval of customers?	No / Yes sometimes / Yes most of the times / Yes, always / Not Applicable
	Please indicate, for all your customers where an occasional transaction is carried out, whether you / your entity collects the following:	
	a) Identification and verification information (for both natural and legal persons and BOs of legal persons) including: name, nationality / country of incorporation or registration, country of residence, registered office or main place of business	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.02	b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring person is authorised in writing	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	c) Information on the PEP status of the customer and, where applicable of the beneficial owner	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	d) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover, other income streams)	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	e) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable



	Please indicate, for all your customers where a business relationship is formed or, depending on the risk, only for a specific part of your customers, whether you / your entity collects the following:	
	a) Identification and verification information (for both natural and legal persons and BOs of legal persons) including: name, nationality / country of incorporation or registration, country of residence, registered office or main place of business	No / Yes / Not Applicable
4.03	b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring person is authorised in writing	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
	c) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover, other income streams)	No / Yes / Not Applicable
	d) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	No / Yes / Not Applicable
	e) Information on the PEP status of the customer and, where applicable of the beneficial owner	No / Yes / Not Applicable
4.04	Please indicate, for all your customers where a business relationship is formed or, depending on the risk, only for a specific part of your customers, whether you / your entity collects information on actual or expected activity (including cash flows) with respect to size, frequency and geographical distribution.	No / Yes, when risk is not low / Yes, only when risk is high / Yes, always / Not Applicable
4.05	Do policies and procedures specify hierarchical authorisation levels within your entity to, on a risk basis, accept a customer or approve a transaction?	No / Yes
4.06	Did you / your entity acquire new clients through an introducer/s in the prior calendar year?	No / Yes
4.07	If "yes", please indicate the number of introducers used during the prior calendar year.	[Number] / Not Available / Not Applicable
4.08	In the case where an introducer was used, was due diligence performed on the introducer?	Never / Yes in some instances / Yes in all instances / Not Available / Not Applicable
4.09	Does your entity establish the identity of its agents / distributors?	No / Yes / Not Applicable
	Are the following verification measures used during the onboarding of non-face-to-face customers:	
	a) Verification on the basis of documents	No / Yes / Not Applicable
	b) Use of video conferencing tools	No / Yes / Not Applicable
4.10	c) Use of identity verification software	No / Yes / Not Applicable
	d) Verification through the use of commercial electronic data providers	No / Yes / Not Applicable
	e) Use of e-IDs	No / Yes / Not Applicable



	f) Verification of Identity Platforms	No / Yes / Not Applicable
4.11	Do you / does your entity screen customers and, where applicable, their beneficial owners against sanction lists, PEP lists and to see whether they were the subject of adverse media at onboarding?	No / Yes
4.12	When making use of any of the exceptions provided for under Regulation 8 of the PMLFTR, do the customer files include a written justification for the exception and formal approval of the exception?	No / Yes / Not Applicable
4.13	Where customer due diligence cannot be completed at the onboarding stage, do the policies and procedures require you / your entity to consider whether there is a need to file a STR with the FIAU and only proceed with the cancellation / termination of the business relationship once it is determined that there is no suspicion justifying the filing of a STR?	No / Yes
4.14	Do policies and procedures require due diligence (including customer risk assessment) to be repeated when there are doubts about the completeness, reliability or accuracy on priorly obtained customer identification information, data or documentation?	No / Yes
4.15	Is your monitoring system able to detect the expiry of due diligence documentation and any conflicting information in relation to customer data?	No / Yes
4.16	Do the policies and procedures require you to revise your customer risk assessment should the customer be evasive or not cooperative to provide the requested information and / or documentation?	No / Yes
4.17	Does your entity have controls that allow it to disable the product until it is satisfied that the customers pose no threat of suspicious activity?	No / Yes
4.18	Are customer identification measures applied each time the payer accesses your services and / or products through remote electronic channels of communication?	No / Yes / Not Applicable
4.19	In case of electronic fund transfer or electronic money remittance or the purchase of any other service / product through electronic means, does your entity monitor the location from where services are being accessed remotely (e.g. monitor for possible different or multiple IP addresses)?	No / Yes / Not Applicable
4.20	In cases where your entity uses an agent to market its products / services, do policies and procedure state what action needs to be taken if the agent fails to provide the originator information upon request?	No / Yes / Not Applicable
4.21	In the event that there are changes to your customer's business model, ownership structure or service offering, do you / does your entity review the existing customer risk assessment and, if necessary, update the said risk assessment?	No / Yes sometimes / Yes most of the times / Yes always
4.22	Do policies and procedures require the carrying out of identification and verification of the identity measures and a revision of the CRA, whenever there is a change in BOs?	No / Yes
4.23	Do policies and procedures require your entity to obtain an understanding of changes in the customer's behaviour, as well as obtain related supporting documentation and revise the CRA, if required?	No / Yes



4.24	Do policies and procedures require your entity to obtain an understanding of high value / high risk transactions, as well as obtain related supporting documentation and revise the CRA, if required?	No / Yes
4.25	Do policies and procedures require the performance of periodic reviews on customer due diligence information and / or documentation, on the basis of customer risk rating?	No / Yes
4.26	Does the CDD and / or monitoring system identify frequent changes in the customer's identification data, such as home address, IP address or linked bank accounts?	No / Yes
4.27	Do policies and procedures require your entity to understand the rationale and the source of funding of transactions happening in the context of an occasional transaction on a risk sensitive basis?	No / Yes

# 5 Ongoing Monitoring / Transaction Scrutiny

5.01	Where business relationships are established, how frequently does your entity review and update the information held in the files on customers and BOs that are assessed as high risk (or higher)?	As necessary but at least annually / Annually / Every 18 months / Every 2-3 years / More than every 3 years / Never / Not Available / Not Applicable
5.02	Where business relationships are established, how frequently does your entity review and update the information held in the files on customers and BOs that are not assessed as high risk (or higher)?	As necessary but at least annually / Annually / Every 2-3 years / More than every 3 years / Never / Not Available / Not Applicable
5.03	Where your entity provides payment services, are these services made available online?	No / Yes / Not Applicable
5.04	Where your entity provides payment services, are all PSP related systems fully automated?	No / Yes / Not Applicable
5.05	Is your entity's process / system for monitoring transactions fully automated, partially automated or manual?	Fully automated / Partially automated / Manual / Not Applicable
5.06	Does your monitoring system utilise any of these techniques to monitor customer activity?	No / Profiling Techniques / Rule-based criteria / Both / Not Applicable
5.07	How often are the criteria and rules utilised by the monitoring system reviewed and updated?	Twice or more within a year / Annually / Less frequent than annually / Never / Not Applicable
5.08	Are customers' transactions monitored in real-time, post-event or a combination of both?	Combination of both / Post-event / Real-time / Not Applicable
5.09	Are there customer transactions that are not screened by the monitoring system?	No / Yes / Not Applicable
5.10	In the case where not all payments and / or transactions are screened by the monitoring system, please list the type of payments and / or transactions not screened.	[Text] / Not Applicable
5.11	Does your entity have an expected transaction profile for every customer?	No / Not always / Yes / Not Applicable
5.12	Do you / does your entity request additional information, when transactions that you / your entity are aware of do not match the customer profile?	No / Yes sometimes / Yes always / Not Applicable



5.13	Do you / your entity, when carrying out an occasional transaction, have measures in place to scrutinize transactions that are not consistent with the available information on the customer?	No / Yes / Not Applicable
	Is the monitoring system based on:	
	a) The characteristics of the products and services offered	No / Yes / Not Applicable
	b) The characteristics of the customers	No / Yes / Not Applicable
5.14	c) The characteristics of the relevant countries and geographical areas	No / Yes / Not Applicable
	d) The characteristics of the distribution channels used	No / Yes / Not Applicable
	e) The payment method used by the customer	No / Yes / Not Applicable
	f) Other factors	No / Yes / Not Applicable
5.15	If the monitoring system is based on "Other factors", please provide a description of the factors.	[Text] / Not Applicable
5.16	Does your entity have systems in place to detect instances where services and / or products may be accessed by persons other than the customer?	No / Yes / Not Applicable
5.17	How many alerts were generated by the monitoring system during the prior calendar year?	[Number] / Not Available / Not Applicable
5.18	Of the total alerts generated by the monitoring system, how many resulted in internal investigations during the prior calendar year?	[Number] / Not Available / Not Applicable
5.19	Does the monitoring system in place identify linked transactions?	No / Yes / Not Applicable
5.20	Does the monitoring system in place identify whether transactions from different customers are destined for the same payee?	No / Yes / Not Applicable
5.21	Does the monitoring system in place establish from where funds are being remitted and where funds are being received?	No / Yes / Not Applicable
5.22	Does the monitoring system identify discrepancies between submitted and detected information, for example, between submitted country of origin information and the electronically detected IP address?	No / Yes / Not Applicable
5.23	Does the monitoring system compare data submitted with data held on other business relationships and identify patterns such as the same funding instrument or the same contact details?	No / Yes / Not Applicable
5.23	Please tick any of the jurisdiction lists provided against which the monitoring system screens transactions.	FATF list / EU list / Top 20 jurisdictions featured in the Basel Index / Other / None / Not Applicable
5.24	If "Other", please specify the jurisdiction list utilised by your entity.	[Text] / Not Applicable



5.25	Does the system identify unusual use of the service, such as customers sending or receiving money to or from themselves or sending funds immediately upon receiving them?	No / Yes / Not Applicable
5.26	Does the monitoring system detect incoming fund transfers which have missing or incomplete information on the payer and / or payee?	No / Yes / Not Applicable
5.27	How many customer relationships were terminated / blocked / suspended or were otherwise provided limited services, for AML / CFT related reasons, during the prior calendar year?	[Number] / Not Available / Not Applicable
5.28	Does your entity consider whether transactions carried out through agents have an unusual pattern when comparing one with the other?	No / Yes / Not Applicable
5.29	How many fund transfers with missing or incomplete information did your entity detect in the prior calendar year?	[Number] / Not Available / Not Applicable
5.30	How many of these transfer of funds did your entity suspend or refuse to execute?	[Number] / Not Available / Not Applicable
5.31	Did your entity terminate any relationship with a payment service provider in the prior calendar year, due to the provider repeatedly failing to provide the necessary information on the payer and / or payee?	No / Yes / Not Applicable
5.32	How many potential customers did you / your entity refuse to onboard or service during the prior calendar year, because the ML / FT risk presented fell outside your / your entity's risk appetite?	[Number] / Not Available / Not Applicable
5.33	Is your entity aware of any of its customers whose assets were frozen (due to AML / CFT considerations) in any jurisdiction?	No / Yes / Not Applicable

## 6 Policies and Procedures

6.01	Do you / your entity have written AML / CFT policies and procedures?	No / Yes
6.02	Do policies and procedures require you / your entity to assess risks associated with funding of terrorism?	No / Yes
6.03	How frequently do you / does your entity review and, where necessary, update your AML / CFT written policies and procedures?	As needed / Monthly / Quarterly / Annually / Between 1-3 years / Every 3 or more years
6.04	Do you / do your entity's procedures provide for measures to determine whether customers and, where applicable, their beneficial owners, are politically exposed persons (PEPs) or PEPs' family members or close associates, prior to commencement of service?	No / Yes
6.05	Do you / do your entity's policies and procedures require senior management's approval to service or otherwise continue business relationships with, or having the involvement of, PEPs or their family members / close associates?	No / We do not offer services to PEPs / Yes / Not Applicable
6.06	In case of business relationships, do you / does your entity have policies and measures in place to screen customers, including BOs, against sanctions lists, PEP lists and against adverse media as part of the ongoing monitoring?	No / Yes / Not Applicable



6.07	Does your entity have policies and procedures regarding the reporting of suspicious transactions to the FIAU?	No / Yes
6.08	Do you / your entity have policies and procedures to identify, analyse and escalate transactions over given thresholds and where applicable report suspicious transactions to the MLRO?	No / Yes
6.09	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes / Not Applicable
6.10	Do your entity's policies and procedures define the instances and the actions, where applicable, to be undertaken to impose limitations on transaction / customer activity, caps and / or other restrictions on its customers?	No / Yes / Not Applicable
6.11	Do you / does your entity have procedures for dealing with customers who request transactions to be completed in unusually tight or accelerated timeframes without reasonable explanation?	No / Yes
6.12	Do policies and procedures require you / your entity to assess the AML / CFT framework of individuals / entities on whom reliance is being placed?	Never / Yes in some instances / Yes in all instances / Not Applicable
6.13	Do you / does your entity have policies and procedures in place to assess the AML / CFT compliance framework of your intermediaries / brokers / agents / respondents / introducers?	No / Yes / Not Applicable
6.14	Do your entity's policies and procedures require you to perform a more detailed review when unusual activity / transactions are detected?	No / Yes
6.15	Does your entity have documented policies and procedures to follow up about the identity of the payee in the case where the customer is reluctant in providing information or has little information about the payee?	No / Yes
6.16	Does your entity have internal whistleblowing procedures?	No / Yes / Not Applicable

# 7 Internal Audit / Independent Testing

7.01	Have you / your entity, given the size and nature of its business, appointed an officer at management level to monitor the day to day implementation of its AML / CFT measures, policies, controls and procedures?	No, MLRO has taken this role / Yes, other officer at management level appointed / Considered but not required / Not considered
7.02	What was the frequency of the reviews carried out by the appointed officer in the prior calendar year?	Monthly / Half yearly / Annually / As needed / No reviews performed / Not Applicable
7.03	Have you / your entity, given the size and nature of its business, appointed an independent audit function to test its AML / CFT measures, policies, controls and procedures?	Not considered / Considered but function not required / Yes, independent officer at management level / Yes, external consultant / Yes, internal audit / Not Applicable
7.04	What is the frequency of audits carried out by the independent audit function?	Monthly / Quarterly / Half yearly / Annually / Between 1-3 years / Every 3 or more years / As needed / No reviews performed / Not Applicable
7.05	When was the last independent audit performed in regards to you / your entity's compliance with the AML / CFT regulations?	Less than 1 year ago / Between 1 -2 years ago / More than 2 years ago / Never / Not Applicable



7.06	What was the overall result of the last audit (relating to AML / CFT) carried out?	Satisfactory / Satisfactory but improvements required / Unsatisfactory / No audits carried out / Not Applicable
7.07	How many "high risk" audit issues were identified in the latest audit report (relating to AML / CFT)?	[Number] / Not Available / Not Applicable
7.08	How many "high risk" audit issues are currently open (relating to AML / CFT)?	[Number] / Not Available / Not Applicable
7.09	When was the last time the monitoring system was independently tested?	Between 1-2 years ago / Less than 1 year ago / More than 2 years ago / Never before / Not Applicable
7.10	If you / your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the Group), have you / your entity defined a policy or procedure for testing the quality of the outsourced tasks?	No / Yes / Not Applicable
7.11	Where applicable, when was the last time that you / your entity formally assessed the quality of the services provided to you by your outsourced service provider (within and outside the group) which are located in a EU / EEA jurisdiction (including Malta)?	Within the last 3 months / Within the last 6 months / Within the last 12 months / Within the last 2 years / Within the last 3 years / Over 3 years ago / Never / Not Applicable
7.12	Where applicable, when was the last time that you / your entity formally assessed the quality of the services provided to you by your outsourced service provider (within and outside the group) which are located in a non-EU / EEA jurisdiction?	Within the last 3 months / Within the last 6 months / Within the last 12 months / Within the last 2 years / Within the last 3 years / Over 3 years ago / Never / Not Applicable
7.13	Does your entity carry out reviews of its agents / distributors to assess the application of your entity's AML / CFT policies and procedures?	No / Yes / Not Applicable
7.14	If "yes", how regular are reviews carried out?	Monthly / Quarterly / Half yearly / Annually / Between 1 - 3 years / Every 3 or more years / As needed / Not Applicable

# 8 Reporting

8.01	How many STRs were submitted to the FIAU during the prior calendar year?	[Number] / Not Available
8.02	Please list the number of alerts generated as a result of unusual activity or transactions during the prior calendar year?	[Number] / Not Available
8.03	How many internal suspicious reports were raised during the prior calendar year?	[Number] / Not Available
8.04	From the internal reports raised in the prior calendar year, how many cases are still open?	[Number] / Not Available / Not Applicable
8.05	How many internal suspicious reports were not reported to FIAU after investigation ("closed") during the prior calendar year?	[Number] / Not Available
8.06	Were records of all "internal reports" raised during the prior calendar year and the analysis conducted thereon maintained by you / your entity?	No / No measures relating to internal reporting or alerts are in place / No internal reports submitted / Only internal reports maintained / Yes, internal report & analysis maintained
8.07	In those instances where an STR was not submitted to the FIAU, were the reasons and analysis documented on file?	No internal reports submitted / Reasons are not documented / Yes, most of the time / Yes, reasons are always retained



18.08	Did your entity file any reports with the FIAU on any payment service providers for repeatedly not providing the necessary information on the payer and / or payee?	No / Yes / Not Applicable
18 09	How many requests for information from the Maltese authorities did you / your entity receive about any of your customers during the prior calendar year?	[Number] / Not Available

# 9 AML / CFT Training

9.01	How often do you and / or any relevant staff attend AML / CFT training?	Every 3 or more years / Between 1-3 years / Annually / Monthly / Quarterly / As needed but at least annually / Not Applicable
9.02	Have you and / or relevant staff from your entity attended or received training in the prior calendar year, in relation to specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)?	No / Yes / Not Applicable
9.03	Please provide the % of staff within the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[%] / Not Available / Not Applicable
9.04	Please provide the % of staff outside the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[%] / Not Available / Not Applicable
9.05	Please provide the % of board members / partners that received AML / CFT training throughout the prior calendar year.	[%] / Not Available
9.06	Is your entity's training program uniformly applied to all staff carrying out a relevant activity / relevant financial business (including directors and partners) equally, or is it differentiated according to their duties?	Differentiated / The same for everyone / Not Applicable
	Where AML operational tasks are outsourced (within or outside the Group), have the outsourced provider's staff directly servicing your entity, received training during the prior calendar year in relation to:	
9.07	a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)	No / Yes / Not Applicable
	b) your / your entity's AML / CFT policies and procedures	No / Yes / Not Applicable
9.08	Where tasks relating to AML / CFT compliance are outsourced (within or outside the Group), what % of the provider's staff directly servicing you / your entity, received training on AML / CFT throughout the prior year?	[%] / Not Available / Not Applicable
9.09	Where applicable, when was the last time that you / your entity verified that your outsourced service provider's staff received training on Maltese AML / CFT regulations and on you / your entity's AML / CFT policies and procedures?	Last year / Two years ago / Three years ago / More than three years ago / Never / Not Applicable
9.10	Does your entity provide AML / CFT training to agents to ensure that agents have an adequate understanding of relevant ML / FT risks and of the AML / CFT policies and procedures they are to apply?	No / Yes / Not Applicable



10	Record Keeping	
10.01	Do you / your entity have policies and procedures in place providing for compliance with the record keeping obligations arising from the PMLFTR?	No / Yes
10.02	Upon request by the FIAU, are you / your entity in a position to retrieve the requested customer records / or investigative records within the established deadlines?  *If you / your entity received reminders or requested extensions for deadlines imposed by the FIAU, do not mark as [yes, always].	No / Depending on the request / Yes always / Yes most of the time

# 11 Products and Services

Please indicate which activities were performed in the prior calendar year, and indicate the total volume (number of transactions) and value ( $\mathfrak{E}$ ) of each (multiple activities possible):

	T	,
11.01	Currency exchange services:	
	a) Number of transactions	[Number] / Not Available / Not Applicable
	b) Value of transactions	[€] / Not Available / Not Applicable
11.02	Money remittance:	
	a) Number of transactions	[Number] / Not Available / Not Applicable
	b) Value of transactions	[€] / Not Available / Not Applicable
11.03	Are there restrictions imposed by your entity on the geographical distribution of the money remittance services?	No / Yes / Not Applicable
11.04	Are there restrictions imposed by your entity on the value of the transactions relating to money remittance?	No / Yes / Not Applicable
11.05	If yes, please specify the amount of the restriction.	[€] / Not Applicable
11.06	If yes, please specify the period of time over which this restriction applies.	Daily / Weekly / Monthly / Annual / Other / Not Applicable
11.07	Acquisition of payment transactions:	
	a) Number of transactions	[Number] / Not Available / Not Applicable
	b) Value of transactions	[€] / Not Available / Not Applicable
11.08	Execution of payment transactions:	
	a) Number of transactions	[Number] / Not Available / Not Applicable
•		



	b) Value of transactions	$[f{\epsilon}]$ / Not Available / Not Applicable
11.09	Payment Initiation Services:	
	a) Number of transactions	[Number] / Not Available / Not Applicable
	b) Value of transactions	[€] / Not Available / Not Applicable
11.10	Issuance of electronic money:	
	a) Number of transactions	[Number] / Not Available / Not Applicable
	b) Value of transactions	[€] / Not Available / Not Applicable
11.11	Do the e-money products offered allow for reloading (i.e. the ability to add more value to the product after the initial issuing of e-money by the issuer)?	No / Yes / Not Applicable
11.12	If yes, what is the maximum amount that can be reloaded?	[€] / Not Applicable
11.13	What is the maximum transaction limit applicable to e-money products provided by your entity?	[€] / Not Applicable
11.14	Can the e-money products be pre-paid by the user (payer) or by third party on behalf of or in favour of the payer?	No / Yes / Not Applicable

### Virtual IBANs

11.15	Does your entity offer virtual IBANs?	No / Yes
11.16	If "Yes", how many virtual IBANs were issued in the prior calendar year?	[Number] / Not Available / Not Applicable
11.17	Please indicate the total value of incoming transactions received through virtual IBANs.	[€] / Not Available / Not Applicable
11.18	Please indicate the total value of outgoing transactions remitted through virtual IBANs.	[€] / Not Available / Not Applicable
11.19	Of the total number of virtual IBANs issued in the prior calendar, how many were issued:	
	a) to your customers for their personal use	[Number] / Not Available / Not Applicable
	b) to your customers for third party use	[Number] / Not Available / Not Applicable
11.20	If virtual IBANs were issued to customers for third party use, was CDD carried out on the third parties?	No / Yes / Not Applicable



Prenai	d Card	¢

11.21	Please indicate the total number of prepaid cards issued by your entity during the prior calendar year.	[Number] / Not Available / Not Applicable
11.22	Please indicate the total number of reloadable prepaid cards issued during the prior calendar year.	[Number] / Not Available / Not Applicable
11.23	Please indicate the total number of non-reloadable prepaid cards issued during the prior calendar year.	[Number] / Not Available / Not Applicable

#### Loans

11.24	Did your entity have a loan portfolio, as at the end of the prior calendar year?	No / Yes
11.25	As per your entity's internal policies, what is the maximum value of any single facility that can be granted by your entity?	[€] / Not Applicable
11.26	Please indicate the total volume and value of incoming transactions relating to loans in the prior calendar year:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
11.27	Please indicate the total number of loans issued during the prior year: Volume (number of loans)	[Number] / Not Available / Not Applicable
11.28	Please indicate the total value of loans granted during the period calendar year: Value	[€] / Not Available / Not Applicable
11.29	Please indicate the total number of loans which were secured against the value of assets in other jurisdictions, as at the end of the prior calendar year.	[Number] / Not Available / Not Applicable
11.30	Please indicate the total value of loans which were secured against the value of assets in non-EU / EEA jurisdictions, as at the end of the prior calendar year.	[€] / Not Available / Not Applicable

## Correspondent activity

11.31	Please indicate the total volume and value of incoming transactions relating to correspondent activity in the prior calendar year:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
11.32	Please indicate the total number of accounts held by respondents with your entity (referred to also as VOSTRO account).	[Number] / Not Available / Not Applicable



	·	
11.33	Does your entity allow for correspondent activity relationships to include the opening of payable-through accounts?	No / Yes / Not Applicable
11.34	How many new correspondent accounts were opened during the prior calendar year?	[Number] / Not Available
11.35	Could the accounts placed at the disposal of your respondent as listed above be used by other respondent banks / financial entities that have a direct relationship with the respondent but not with the correspondent (commonly referred to as 'nesting' or downstream correspondent activity), which means that your entity (correspondent) is indirectly providing services to other banks / financial entities that are not the respondent?	No / Yes
11.36	Of the correspondent relationships, how many of the respondents are based in EU / EEA jurisdictions?	[Number] / Not Available
11.37	Of the correspondent relationships, how many of the respondents are based in non-EU / EEA jurisdictions?	[Number] / Not Available
11.38	Of the correspondent relationships, how many of the respondents are based in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or jurisdictions featuring in the top 20 countries of the Basel Index?	[Number] / Not Available
11.39	Has your entity introduced new products in the prior calendar year?	No / Yes
11.40	Does your entity offer products or services that permit the exchange of cash for a negotiable instrument?	No / Yes
11.41	Are the products designed specifically to restrict its use by merchants dealing in goods and services that are associated with a high risk of financial crime?	No / Yes
11.42	Is cash accepted as a funding method?	No / Yes
11.43	Can funds standing to the credit of the customer be withdrawn as cash?	No / Yes

# 12 Customers

\*Customer is defined as natural persons or legal persons with whom the entity has a business, professional, or commercial relationship.

12.01	Please list the total number of customers with whom your entity had an active business relationship as at the end of the prior calendar year.	[Number] / Not Available
12.02	Please list the total number of customer relationships closed / terminated during the prior calendar year.	[Number] / Not Available
112 03	Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.	[Number] / Not Available
12.04	Please list the total number of new customers onboarded during the prior calendar year.	[Number] / Not Available

#### **Customer Type**



12.05	For each instance noted below, please state the total expressed as a % of the total customers as at the end of the prior calendar year:	
	a) Natural persons	[%] / Not Available
	b) Legal persons	[%] / Not Available
	c) Customers with an ownership structure that includes offshore vehicles, trusts, or other legal arrangements including bearer shares and nominee shareholding	[%] / Not Available
	d) Customers with an ownership structure that includes foundations, charities or other not- for-profit entities	[%] / Not Available
12.06	Please list the number of customers (natural persons) and / or BOs that have benefited from residence or citizenship by investment schemes, or are applicants / prospective applicants for such schemes.	[Number] / Not Available
	Of the total number of customers, please specify:	
	a) % of customers scored / rated as "High Risk"	[%] / Not Available
12.07	b) % of customers scored / rated as "Medium High Risk"	[%] / Not Available
12.07	c) % of customers scored / rated as "Medium Risk"	[%] / Not Available
	d) % of customers scored / rated as "Low Medium Risk"	[%] / Not Available
	e) % of customers scored / rates as "Low Risk"	[%] / Not Available
12.08	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
12.09	If "Yes", please specify any additional risk rating.	[Text] / Not Applicable
12.10	Please specify the corresponding % of customers of the risk rating stated above.	[%] / Not Available / Not Applicable
12.11	Do you / does your entity have customers (legal entities) which are shell companies?	No / Yes / Not Available
12.12	Do you / does your entity have express trusts with an unexplained nature of classes of beneficiaries and acting as trustees of such a trust?	No / Yes / Not Available
12.13	Do you / does your entity have customers for which management is vested in a representative or an agent (i.e. where you deal primarily with a third party and not the customer directly)?	No / Yes / Not Available
12.14	Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).	[Number] / Not Available



12.15	Please list the number of customers who are operating in dual use products (as designated by your policies and procedures), or separately as per SL 365.12.	[Number] / Not Available
12.16	If applicable and in relation to the last two questions, please list the industries and products.	[Text] / Not Applicable
12.17	Please list the number of customers who operate cash intensive businesses.	[Number] / Not Available
12.18	Please list the number of customers who operate as Money or Value Transfer Services (MVTS) providers.	[Number] / Not Available
12.19	For how many relationships is the beneficial owner unknown, because of the application of SDD?	[Number] / Not Available
12.20	What is the value of the relationships where the beneficial owner is unknown, because of the application of SDD?	[€] / Not Available / Not Applicable
12.21	Do you / does your entity have customers whose spending or transactional behaviour makes it difficult to establish 'normal', or expected patterns of behaviour?	No / Yes / Not Available

# Politically Exposed Persons ("PEPs")

stas defined in Regulation 2 of the PMLFTR

	Please provide the following information based on your / your entity's customers and beneficial owners that are PEPs as at end of prior calendar year:	
12.14	Of the total number of customers who are natural persons, how many were PEPs (including family family members and close associates) as at the end of the prior calendar year?	[Number] / Not Available
	Of the total number of customers who are legal entities, how many of their BOs were PEPs (including family family members and close associates) as at the end of the prior calendar year?	[Number] / Not Available
12.15	Please provide a breakdown of the total number of PEPs in your / your entity's customer base as at the end of the prior calendar year:	
12.15	a) % of Maltese PEPs (including BOs)	[%] / Not Available
	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[%] / Not Available
	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions	[%] / Not Available
12.16	Does your entity have, as at the end of the prior calendar year, PEPs who obtained their PEP status from a jurisdiction listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes / Not Available
12.17	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

**Funding Methods** 



	Please indicate the total number and value of incoming and outgoing payment transactions carried out on behalf of your customers during the prior calendar year via the following methods:	
12.18	Bank transfers (EU, EEA or other reputable jurisdictions):	
	a) Number of incoming payment transactions	[Number] / Not Available / Not Applicable
	b) Number of outgoing payment transactions	[Number] / Not Available / Not Applicable
	c) Value of incoming payment transactions	[€] / Not Available / Not Applicable
	d) Value of outgoing payment transactions	[€] / Not Available / Not Applicable
12.19	Debit / credit cards (issued by an institution licensed in the EU, EEA or other reputable jurisdiction):	
	a) Number of incoming payment transactions	[Number] / Not Available / Not Applicable
	b) Number of outgoing payment transactions	[Number] / Not Available / Not Applicable
	c) Value of incoming payment transactions	[€] / Not Available / Not Applicable
	d) Value of outgoing payment transactions	[€] / Not Available / Not Applicable
12.20	Prepaid cards / vouchers:	
	a) Number of incoming payment transactions	[Number] / Not Available / Not Applicable
	b) Number of outgoing payment transactions	[Number] / Not Available / Not Applicable
	c) Value of incoming payment transactions	[€] / Not Available / Not Applicable
	d) Value of outgoing payment transactions	[€] / Not Available / Not Applicable
12.21	Cash:	
	a) Number of incoming payment transactions	[Number] / Not Available / Not Applicable
	b) Number of outgoing payment transactions	[Number] / Not Available / Not Applicable
	c) Value of incoming payment transactions	[€] / Not Available / Not Applicable
	d) Value of outgoing payment transactions	[€] / Not Available / Not Applicable



12.22	Internet-based / mobile-application based payment systems (e.g. PayPal, Alipay, Apple Pay, Venmo, Google Checkout, etc.):	
	a) Number of incoming payment transactions	[Number] / Not Available / Not Applicable
	b) Number of outgoing payment transactions	[Number] / Not Available / Not Applicable
	c) Value of incoming payment transactions	[€] / Not Available / Not Applicable
	d) Value of outgoing payment transactions	[€] / Not Available / Not Applicable
12.23	Other forms of electronic money or virtual currency:	
	a) Number of incoming payment transactions	[Number] / Not Available / Not Applicable
	b) Number of outgoing payment transactions	[Number] / Not Available / Not Applicable
	c) Value of incoming payment transactions	[€] / Not Available / Not Applicable
	d) Value of outgoing payment transactions	[€] / Not Available / Not Applicable
12.24	What is the value of funds for purchasing or reloading cards at a Maltese credit / financial institution?	[€] / Not Available / Not Applicable
12.25	What is the value of transactions for purchasing or reloading cards from customer accounts at an EU or EEA credit / financial institution (other than Malta)?	[€] / Not Available / Not Applicable
12.26	What is the value of transactions for purchasing or reloading cards from customer accounts at a non-EU / EEA credit / financial institution?	[€] / Not Available / Not Applicable
12.27	What is the volume of transactions resulting in cash / cash withdrawal of electronic money where the amount redeemed exceeded € 100?	[Number] / Not Available / Not Applicable
12.28	What is the value of transactions resulting in cash / cash withdrawal of electronic money where the amount redeemed exceeded € 100?	[€] / Not Available / Not Applicable
12.29	In how many instances has a single customer purchased several e-money products from the same issuer?	[Number] / Not Available / Not Applicable
12.30	In how many instances has a single customer frequently reloaded the product or affected more than four (4) cash withdrawals with inexplicably rapid succession and without an economic rationale?	[Number] / Not Available / Not Applicable
	In cases where CDD exemption were granted / applied to customers, have the following conditions been met in order to justify the exemptions:	
	a) The payment instrument is not reloadable, or has a maximum monthly payment transactions limit of €250	No / Yes / Not Applicable



12.31	b) The maximum amount stored electronically does not exceed €250 internationally or €500 domestically	No / Yes / Not Applicable
	c) The payment instrument is used exclusively to purchase goods or services	No / Yes / Not Applicable
	d) The payment instrument cannot be funded with anonymous electronic money	No / Yes / Not Applicable
	e) The issuer carries out sufficient monitoring of the transactions or business relationship to enable the detection of unusual or suspicious transactions	No / Yes / Not Applicable

## 13 Geography

#### **Residence of Customers**

Residence refers to the customer's principal country of residence or for a legal person, the principal place of business.

Please provide the following information based on your / your entity's customers as at end of prior calendar year:

11	13 01 1	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in Malta?	[%] / Not Available / Not Applicable
	13 O2 I	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in an EU / EEA jurisdiction outside Malta?	[%] / Not Available / Not Applicable
	13 N3 I	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in a non-EU / EEA jurisdiction?	[%] / Not Available / Not Applicable
	13.04	Did your entity, based on the prior calendar year, have customers who were resident or otherwise incorporated or their principal place of business is in a jurisdiction listed in the FATF lists, EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes / Not Available
	13.05	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

#### Residence of Bos

"Beneficial owner" (BO) refers to the natural person(s) who ultimately owns or controls a customer and / or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

Please provide the following information regarding the BOs of your customers as of end of prior calendar year

13.06 What percentage of your customer's BOs are resident in Malta? [%] / Not Available / Not Applicable

What percentage of your customer's BOs are foreign and resident in an EU or EEA jurisdiction outside Malta? [%] / Not Available / Not Applicable



13.08	Please list the % of your customer's BOs who are foreign and are resident in a non-EU / EEA member state jurisdiction.	[%] / Not Available / Not Applicable
13.09	Did your entity have customers, based on the prior calendar year, whose BOs are resident in a jurisdiction listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or jurisdictions featuring in the top 20 countries of the Basel Index during the prior calendar year?	No / Yes / Not Available / Not Applicable
13.10	If your answer to the above question was "YES", please select the respective jurisdictions	Select from drop down list / Not Available / Not Applicable
	Transactions / Payments	
	Please indicate the total number and value of incoming and outgoing payment transactions carried out on behalf of your customers during the prior calendar year:  *In this context, payments only refer to transfers of funds and to transactions to and from customers. Therefore, transactions with other financial institutions should not be taken into account, unless these transactions were undertaken on behalf of customers in the context of correspondent activity.	
13.11	Incoming domestic payment transactions:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.12	Outgoing domestic payment transactions:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.13	Incoming international payment transactions:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.14	Outgoing international payment transactions:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.15	Incoming payments received from payment accounts in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index.	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable



	b) Value	[€] / Not Available / Not Applicable
13.16	Outgoing payments remitted to payment accounts in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index.	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.17	If your answer to the last four (4) questions was positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
13.18	Incoming payments coming from third countries where only one of the payment service providers is located within the EU / EEA in respect of those parts of transactions which are carried out in the EU or EEA ("one-leg transactions"):	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.19	Outgoing payments to third countries where only one of the payment service providers is located within the EU / EEA in respect of those parts of transactions which are carried out in the EU or EEA ("one-leg transactions"):	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
	Please indicate the total number and value of payment transactions during the prior calendar year, where each individual payment amounted to € 500,000 or more:  *In this context, payments only refer to transfers of funds and to transactions to and from customers. Therefore, transactions with other financial institutions should not be taken into account, unless these transactions were undertaken on behalf of customers in the context of correspondent activity.	
13.2	Incoming payments received from payment accounts in Malta:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.21	Outgoing payments remitted to payment accounts in Malta:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable



	- -	
13.22	Outgoing payments remitted to payment accounts in Malta:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.23	Outgoing payments remitted to payment accounts in EU / EEA jurisdictions:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.24	Incoming payments received from payment accounts in non-EU / EEA jurisdictions:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.25	Outgoing payments remitted to payment accounts in non-EU / EEA jurisdictions:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.26	Incoming payments received from payment accounts in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.27	Outgoing payments remitted to payment accounts in in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index:	
	a) Volume (number of transactions)	[Number] / Not Available / Not Applicable
	b) Value	[€] / Not Available / Not Applicable
13.28	If your answer to the last four (4) questions was positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
13.29	As per the risk assessment, how many customer payment service accounts are linked with domestic credit entities as at end of prior calendar year?	[Number] / Not Available / Not Applicable



113 30	As per the risk assessment, how many customer payment service accounts are linked with EU / EEA based credit entities as at end of prior calendar year?	[Number] / Not Available / Not Applicable
113 31	As per the risk assessment, how many customer payment service accounts are linked with non-EU / EEA based credit entities as at end of prior calendar year?	[Number] / Not Available / Not Applicable
13 32	As per the risk assessment, how many customer payment service accounts, as at end of prior calendar year, are linked with credit entities in a jurisdiction listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	[Number] / Not Available / Not Applicable
13.33	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

# 14 Interface / Distribution Channels

	Please provide the following information regarding your entity's customers as at end of the prior calendar year:	
14.01	Of the total number of customers, what percentage were onboarded face-to-face?	[%] / Not Available
14.02	Of the total number of customers, what percentage were onboarded on a non-face-to-face basis?	[%] / Not Available / Not Applicable
14.03	Does your entity provide any of its services through an agent or, in the case of an electronic money entity, did it appoint distributors to distribute or redeem electronic money?	No / Yes
14.04	What percentage of customers were onboarded by a domestically-based agent / operator?	[%] / Not Available
14.05	What percentage of customers were onboarded by a EU or EEA based agent / operator?	[%] / Not Available
14.06	What percentage of customers were onboarded by a non-EU / EEA based agent / operator?	[%] / Not Available
14.07	What percentage of customers were onboarded by an agent / operator situated in a jurisdiction listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	[%] / Not Available
14.08	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
14.09	How many of your entity's agents carry out relevant financial business?	[Number] / Not Available / Not Applicable
14.10	How many of your entity's agents carry out remittance services?	[Number] / Not Available / Not Applicable
14.11	Does your entity have any agents located in a jurisdiction other than Malta?	No / Yes / Not Applicable
14.12	If yes, how many of your agents are located outside of Malta?	[Number] / Not Applicable
14.13	What was the value of payment transactions carried out by the agents located outside of Malta?	[€] / Not Available / Not Applicable



14.14	What percentage of customers were provided services via electronic money distributors?	[%] / Not Available / Not Applicable
14.15	For what percentage of total customers was Customer Due Diligence carried out by an agent / distributor?	[%] / Not Available
14.16	Where a customer or a MVTS provider was represented by an agent, were there instances where this agent also represented other customers or MVTS providers?	No / Yes / Not Applicable
14.17	Were there any new delivery channels used during the prior calendar year?	No / Yes
14.18	If "yes", please specify the type of new delivery channels used.	[Text] / Not Applicable
14.19	For what percentage of total customers was Customer Due Diligence 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?	[%] / Not Available / Not Applicable