

Financial Intelligence Analysis Unit
 Risk Evaluation Questionnaire

 Designated Non Financial Businesses and Professions Sector
 Real Estate

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 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. [Text]

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.

1 Subject Person Information

1.01	Please select the legal formation of your entity.	Public Limited Company / Private Limited Company / Civil Partnership / Commercial Partnership / Self-employed / 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 and agencies in other EU / EEA countries?	No / Yes
1.12	Does your entity have any subsidiaries, branches, affiliates, representative offices and agencies 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 and agencies are situated.	[Text]
1.14	Does your entity have any subsidiaries, branches, affiliates, representative offices and agencies 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	Has your entity undergone changes in its ownership structure during the prior calendar year?	No / Yes
1.20	Has your entity undergone significant changes in its management and control structure during the prior calendar year?	No / Yes
1.21	Please ATTACH a copy of the ownership and control structure of your entity (optional).	File Upload / Not Applicable

2	Governance / Organization
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2.01	When was the current MLRO appointed?	More than 2 years ago / Between 1-2 years ago / Less than 1 year ago
2.02	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
2.03	How many staff members, expressed as FTEs, are part of the AML / CFT team (if one exists)?	[Number] / Not Available / Not Applicable
2.04	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

2.05	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
2.06	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:	
	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
2.07	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
2.08	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)
2.09	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
2.10	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 Business Risk Assessment

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
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
3.04	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
	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
4.02	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
	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
4.03	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
	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	Do you on a risk sensitive basis collect information on a customer's source of wealth and source of funds?	No / Yes when risk is not low / Yes but only partially / Yes only when risk is high / Yes only in part when risk is high / Yes
4.05	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
4.06	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	Do your / your entity's policies and procedures require you to ask each customer if they are acting on behalf of someone else?	No / Yes
4.10	Do you / your entity's policies and procedures require enhanced due diligence to be applied in higher risk situations?	No / Yes
4.11	Do your / your entity's policies and procedures require enhanced due diligence to be applied where the customer or beneficial owner is a PEP?	No / Yes when risk is not low / Yes only when risk is high / Yes, always
4.12	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
	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
4.13	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



	What kind of measures do you / your entity make use of to determine the PEP status of a customer (beneficial owner/s)?	
4.14	a) Rely on publicly available information	No / Yes
	b) Obtain information directly from the customer or BO	No / Yes
	c) Use commercial databases	No / Yes
4.15	Do policies and procedures allow for a variation of the timing of due diligence for lower risk customers and where SDD may be applied?	No / Yes
	If variation in the timing of due diligence is permitted as indicated above, what pre-determined triggering criteria is applied?	
4.16	a) Transaction, customer activity threshold	No / Yes / Not Applicable
	b) Pre-determined time frame	No / Yes / Not Applicable
	c) Prior to completion of service provided	No / Yes / Not Applicable
4.17	Save for the application and variation in timing under SDD (as per your / your entity's policies and procedures), when due diligence is not complete but activity has begun or is complete, do the customer files include a documented justification and formal approval of the exception?	No / Yes
4.18	Where customer due diligence cannot be completed, 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 / service, once it is determined that there is no suspicion justifying the filing of a STR?	No / Yes, except where CDD can be delayed as per IPs / Yes
4.19	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
4.20	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
4.21	How often do you / your entity review the customer risk assessment?	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never / Not Applicable
4.22	When a business relationship is established, do policies and procedures require due diligence to be applied when there is a change in ownership structure of a legal entity?	No / Yes / Not Applicable

5	Ongoing Monitoring / Transaction Scrutiny
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5.01	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
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5.02	Do you / does your entity request additional information, when there are unexplained changes in financing arrangements?	No / Yes / Not Applicable
5.03	Do you / does your entity scrutinise transactions undertaken which are not consistent with any previous knowledge of the customer, its business and its risk profile?	No / Yes depending on risk / Yes always / Not Applicable
5.04	Are you or your entity aware of any of your customers whose assets were frozen, confiscated or seized?	No / Yes / Not Applicable
5.05	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
5.06	How many contracts for the sale or purchase of property or lease contracts were not concluded for AML / CFT related reasons during the prior calendar year?	[Number] / Not Available / Not Applicable
5.07	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

6	Policies and Procedures
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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	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes / Not Applicable
6.08	In case of business relationships, do your / your entity's policies and procedures require you to:	
	a) systematically monitor, on a risk basis, customer activity, deals, or transactions	No / Yes / Not Applicable

	b) perform a more detailed review when unusual activity / transactions are detected	No / Yes / Not Applicable
6.09	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
6.10	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
6.11	Do you / does your entity have policies and procedures in place to assess the AML / CFT compliance framework of your intermediaries / agents / introducers?	No / Yes / Not Applicable
6.12	Does your entity have internal whistleblowing procedures?	No / Yes / Not Applicable

7	Internal Audit / Independent Testing
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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	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
7.10	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

7.11	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 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
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8 Reporting

8.01	Do you / does your entity have policies and procedures regarding the reporting of suspicious activity or transactions?	No / Yes
8.02	Please list the number of alerts / transactions you / your entity investigated as a result of unusual activity or transactions during the prior calendar year?	[Number] / Not Available / Not Applicable
8.03	Were there any "internal reports" or "alerts", received during prior calendar year, which were analysed by the MLRO but did not instigate a STR?	No measures relating to internal reporting or alerts are in place / Yes less than 10 / Yes more than 10 / No, all instigated STRs / Not Available / Not Applicable
8.04	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
8.05	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 that received AML / CFT training in the prior calendar year.	[%] / Not Available / Not Applicable
9.04	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:	
	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
9.05	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

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

Buying and selling of property. Please provide the following information based on your business in the prior calendar year:

11.01	How many promise of sale agreements relating to purchase and sale contracts did you / your entity publish / acted as agent for, where the deposit was paid in cash exceeding €15,000?	[Number] / Not Available / Not Applicable
11.02	How many purchase and sale contracts (i.e. excluding promise of sale agreements) did you / your entity publish / acted as agent where the consideration was paid entirely in cash?	[Number] / Not Available / Not Applicable
11.03	How many purchase and sale contracts did you / your entity publish / acted as agent where the consideration was partially paid in cash sums exceeding €50,000?	[Number] / Not Available / Not Applicable
11.04	How many promise of sale agreements relating to purchase and sale contracts did you / your entity publish / acted as agent for, where the deposit was paid through the buyer's own or third party funds?	[Number] / Not Available / Not Applicable
11.05	How many purchase and sale contracts did you / your entity publish / acted as agent where the consideration (excluding 10% deposit) was paid through the buyer's own or third party funds (i.e. not financed by a bank loan)?	[Number] / Not Available / Not Applicable
11.06	How many purchase and sale contracts did you / your entity publish / acted as agent where the consideration (excluding 10% deposit) was financed through a loan issued through a non-EU / EEA financial / credit institution?	[Number] / Not Available / Not Applicable
11.07	How many purchase and sale contracts did you / your entity publish / acted as agent where the consideration (excluding 10% deposit) was financed through loans or other means of finance other than those issued by a regulated financial / credit institution?	[Number] / Not Available / Not Applicable
11.08	How many contracts did you / your entity publish / acted as agent for, which involved property with a sale value of up to € 450,000?	[Number] / Not Available / Not Applicable
11.09	How many contracts did you / your entity publish / acted as an agent for, which involved property with a sale value of € 450,000 up to € 2,000,000?	[Number] / Not Available / Not Applicable
11.10	How many contracts did you / your entity publish / acted as an agent for, which involved property with a sale value of over € 2,000,000?	[Number] / Not Available / Not Applicable
11.11	Out of the total number of contracts of sale published / acted as an agent for during the last calendar year whereby the value of the property exceeded €2,000,000, please indicate the number of contracts where the purchaser(s) was / were solely natural persons.	[Number] / Not Available / Not Applicable

11.12	Please specify the highest sale value of property sold through a contract you / your entity published / acted as an agent for, during the prior calendar year.	[€] / Not Available / Not Applicable
11.13	Please specify the contracts or deals carried out during the prior calendar year, which involved properties in Special Designated areas.	[Number] / Not Available / Not Applicable
11.14	Were there contracts or deals from the prior calendar year which involved successive transactions relating to the same property which took place within a short period of time?	No / Yes / Yes in rare occasions / Yes often / Not Available
11.15	Were there any contracts or deals during the prior calendar year, subsequent to which it came to your attention that the seller was declared as bankrupt or insolvent?	No / Yes in rare occasions / Yes often / Yes / Not Available

Letting of property. Please provide the following information based on your business in the prior calendar year:

11.16	What was the largest rental value, annualised for a year, transacted in relation to commercial property during the prior calendar year?	[€] / Not Available / Not Applicable
11.17	What was the largest rental value, annualised for a year, transacted in relation to residential property during the prior calendar year?	[€] / Not Available / Not Applicable
11.18	Please specify the number of contracts involving Maltese nationals who rented a residential property with a rental transaction value, annualised for a year, of €60,000 or more, during the prior calendar year.	[Number] / Not Available / Not Applicable

12 Customers

12.01	Contracts of Sale: Please list the total number of deeds of sale of property published / for which you acted as an agent in the prior calendar year.	[Number] / Not Available / Not Applicable
12.02	Letting Contracts: Please list the total number of property letting contracts executed / for which you acted as an agent for in the prior calendar year.	[Number] / Not Available / Not Applicable

Customer Type

Please split the total number of parties to the deeds of purchase and sale, for which you acted as an agent during prior calendar year into the following categories:

12.03	Please list the total number of natural persons (where a party comprises multiple natural persons, count them as one natural person).	[Number] / Not Available / Not Applicable
12.04	Please list the total number of legal persons and partnerships.	[Number] / Not Available / Not Applicable
12.05	Of the total number of legal persons, please list:	
	a) the total number of customers whose shareholding is held in fiduciary capacity or by a trust or issued to bearer	[Number] / Not Available / Not Applicable

	b) the total number of customers that are trusts, foundations, charities or associations	[Number] / Not Available / Not Applicable
12.06	Out of the total parties / customers, please list:	
	a) the % of "high risk" customers	[%] / Not Available / Not Applicable
	a) the % of "medium high risk" customers	[%] / Not Available / Not Applicable
	c) the % of "medium risk" customers	[%] / Not Available / Not Applicable
	d) the % of "low medium risk" customers	[%] / Not Available / Not Applicable
	e) the % of "low risk" customers	[%] / Not Available / Not Applicable
12.07	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
12.08	If "Yes", please specify the additional risk rating.	[Text] / Not Applicable
12.09	Please specify the corresponding % of customers of the risk rating specified in the prior question.	[%] / Not Available / Not Applicable
12.10	Please list the number of customers serviced during the last calendar year that benefited from residency schemes, citizenship by investment schemes, or are applicants / prospective applicants for such schemes.	[Number] / Not Available / Not Applicable
12.11	How many customers did you assist in applying for AIP permits in the prior calendar year?	[Number] / Not Available / Not Applicable
12.12	Do you / does your entity have customers (including BO's, directors) who have been convicted of a criminal offence that could have potentially generated proceeds?	No / Yes
12.13	Do you / does your entity hold funds on trust, or in another fiduciary capacity for customers through a client account?	No / Yes
12.14	Do you / does your entity have customers (legal entities) which are shell companies?	No / Yes / Not Available
12.15	Do you / does your entity have customers who raised capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and / or crowdfunding?	No / Yes / Not Available
12.16	Please list the number of customers that are cash intensive businesses.	[Number] / Not Available / Not Applicable
12.17	Please list the number of customers that are VFA agents or VFA license holders or are in the process of obtaining a VFA license.	[Number] / Not Available / Not Applicable
12.18	Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).	[Number] / Not Available / Not Applicable

PEPs

Politically Exposed Persons or PEPS are defined in the 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 the end of the prior calendar year:

12.19	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:	
	a) % of Maltese PEPs (including BOs)	[%] / Not Available / Not Applicable
	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[%] / Not Available / Not Applicable
	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions	[%] / Not Available / Not Applicable
	d) % of PEPs (including BOs) from jurisdictions listed in the FATF lists and / or in 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 / Not Applicable
12.20	If your answer to the above question is positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

13 Geography**Residence of Purchasers**

In relation to the number of contracts of sale published / involved in, please provide the following information only on the purchasers to a contract:

13.01	Please specify the total number of purchase and sale contracts published / acted as an agent for, whereby the buyers were resident in Malta.	[Number] / Not Available
13.02	Please specify the total number of purchase and sale contracts published / acted as an agent for, where the buyers were resident in an EU / EEA member state jurisdiction, outside of Malta.	[Number] / Not Available
13.03	Please specify the total number of purchase and sale contracts published / acted as an agent for, whereby the buyers were resident in a non-EU / EEA member state jurisdiction.	[Number] / Not Available
13.04	Please specify the total number of purchase and sale contracts published / acted as an agent for, whereby the buyers were resident in jurisdictions 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?	[Number] / Not Available
13.05	If your answer to the above question was positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

Residence of Beneficial Owner(s) of purchasers that are legal entities or arrangements

"Beneficial owner" 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 on the BOs of the purchasers that were legal entities or arrangements:

13.06	Please list the % of BOs residing in Malta.	[%] / Not Available
13.07	Please list the % of foreign BOs residing in a non-Maltese EU or EEA member state jurisdiction.	[%] / Not Available
13.08	Please list the % of foreign BOs residing in a non-EU or non-EEA member state jurisdiction.	[%] / Not Available
13.09	Did you / your entity have, based on the prior calendar year, BOs residing 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?	No / Yes / Not Available
13.10	If your answer to the above question was positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

14 Interface / Distribution Channels

14.01	Out of the total number of contracts published in the prior calendar year, how many involved one or more purchasers (natural person) that were represented by another person through a power of attorney?	[Number] / Not Available
14.02	Of the total number of customers, what % were onboarded or serviced on a non-face-to-face basis in the prior calendar year?	[%] / Not Available / Not Applicable
14.03	Of those customers, who are legal persons and who were onboarded / serviced on a non-face-to-face basis in the prior calendar year, indicate whether the majority are incorporated in Malta, within EU / EEA or outside EU / EEA?	Majority of non-face-to-face customers are incorporated in Malta / Majority of non-face-to-face customers are incorporated within EU/EEA / Majority of non-face-to-face customers are incorporated outside EU/EEA / Not Available / Not Applicable
14.04	Of those customers who are natural persons and who were onboarded / serviced on a non-face-to-face basis in the prior calendar year, indicate whether the majority of customers are resident in Malta, within EU / EEA or outside EU / EEA?	Majority of non-face-to-face customers are resident in Malta / Majority of non-face-to-face customers are resident within EU/EEA / Majority of non-face-to-face customers are resident outside EU/EEA / Not Available / Not Applicable
14.05	Did you / your entity on-board or service new clients introduced by agents or intermediaries, in the prior calendar year?	No / Yes
14.06	What % of customers were onboarded during the prior calendar year where a reliance arrangement was in place in terms of Regulation 12 of the PMLFTR?	[%] / Not Available / Not Applicable
14.07	What % of customers were introduced by an agent / broker / introducer from 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 / Not Applicable



14.08	If your answer to the above question was greater than 0, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
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