



**Financial Intelligence Analysis Unit**  
Risk Evaluation Questionnaire

Gaming Sector  
Remote Gaming Operators

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	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
1.10	Does your entity have any subsidiaries, branches, affiliates, representative offices and agencies in other EU / EEA countries?	No / Yes
1.11	Does your entity have any subsidiaries, branches, affiliates, representative offices and agencies in non-EU / EEA countries?	No / Yes
1.12	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] / Not Applicable
1.13	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
1.14	If your answer to the above question was "YES", please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable
1.15	Does your entity, or other related entity within your Group, own and / or manage a land-based gambling operation/s.	No / Yes
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	Does your entity have nominee shareholders in its ownership structure?	No / Yes
1.18	If "Yes", what percent of the total shares are held by nominee shareholders?	[%] / Not Applicable
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

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	Is the MLRO responsible for areas other than AML / CFT?	No / Yes
2.04	Does the MLRO also hold MLRO positions with other entities?	No / Yes
2.05	How many staff members, expressed as FTEs, are part of the AML / CFT team (if one exists)?	[Number] / Not Available / Not Applicable

2.06	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
2.07	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
2.08	Where applicable, when you / your entity outsource tasks (within or outside the group) connected to a relevant activity / relevant financial business, do your policies and procedures require that your outsourced service provider screens related employees to assess their conduct and integrity?	No / Yes / Not Applicable
2.09	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
2.10	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
2.11	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)
2.12	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
2.13	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	No / Yes / Not Applicable

	c) specific countries or geographical areas	No / Yes / Not Applicable
	d) the distribution channels	No / Yes / Not Applicable
	e) the funding methods that your entity intends to accept	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	Upon or prior to reaching the €2,000 deposit threshold, does your entity perform a customer risk assessment ("CRA") prior to undertaking customer due diligence?	No / Yes most of the time / Yes always
4.02	Do policies and procedures require due diligence to be applied upon or prior to reaching of the €2,000 deposit (cumulative over 180 days) threshold?	No / Yes
	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:	
4.03	a) Nationality / country of incorporation or registration	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
	b) Country of residence, registered office or main place of business	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
	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 when risk is not low / Yes but only partially / Yes only when risk is high / Yes only in part when risk is high / Yes
	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 when risk is not low / Yes but only partially / Yes only when risk is high / Yes only in part when risk is high / Yes
	e) Information on the PEP status of the customer and, where applicable of the beneficial owner	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
4.04	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
4.05	Did you / your entity acquire new clients through an introducer/s in the prior calendar year?	No / Yes

4.06	If "yes", please indicate the number of introducers used during the prior calendar year.	[Number] / Not Available / Not Applicable
4.07	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
4.08	Do your entity's policies and procedures require EDD to be applied in high risk situations?	No / Yes
4.09	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
4.10	What kind of measures do you / your entity make use of to determine the PEP status of a customer (beneficial owner/s)?	
	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
4.11	Does your entity make use of social media as a source to obtain and / or corroborate customer information?	No / Yes
4.12	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
4.13	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 priority obtained customer identification information, data or documentation?	No / Yes
4.14	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
4.15	How many customers did your entity refuse to onboard, initially or upon conduct of customer risk assessment, or provide services to, for AML / CFT reasons during the prior calendar year?	[Number] / Not Available

4.16	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
4.17	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
4.18	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

### 5 Ongoing Monitoring / Transaction Scrutiny

5.01	Is your entity's process / system for monitoring transactions fully automated, partially automated or manual?	Fully automated / Partially automated / Manual / Not Applicable
5.02	Does your monitoring system utilise any of these techniques to monitor customer activity?	No / Profiling Techniques / Rule-based criteria / Both / Not Applicable
5.03	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
5.04	Are customers' transactions monitored in real-time, post-event or a combination of both?	Combination of both / Post-event / Real-time / Not Applicable
5.05	Are there customer transactions that are not screened by the monitoring system?	No / Yes / Not Applicable
5.06	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
5.07	Does your entity have an expected transaction profile for every customer?	No / Not always / Yes / Not Applicable
5.08	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
	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
5.09	If the monitoring system is based on "Other factors", please provide a description of the factors.	[Text] / Not Applicable

5.10	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
5.11	How many alerts were generated by the monitoring system during the prior calendar year?	[Number] / Not Available / Not Applicable
5.12	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
5.13	If "Other", please specify the jurisdiction list utilised by your entity.	[Text] / Not Applicable
5.14	Is your entity's monitoring system able to detect or does it have alerts and scenarios to detect high spenders?	No / Yes / Not Applicable
5.15	Is your entity's monitoring system able to detect, or does it have alerts and scenarios to detect, players whose spending patterns are disproportionate to the entity's understanding of the player's financial resources and expected transaction profile?	No / Yes / Not Applicable
5.16	Does your entity have measures in place to detect the opening of multiple accounts by the same player?	No / Yes / Not Applicable
5.17	Does your entity have measures in place to detect the expiry of due diligence documentation and any conflicting information in relation to customer data?	No / Yes / Not Applicable
5.18	Does your entity have measures in place to be able to detect collusion between players?	No / Yes / Not Applicable
5.19	Is your entity's monitoring system able to detect, or have alerts and scenarios to detect, regular customers whose spending patterns change / fluctuate or are unusual?	No / Yes / Not Applicable
5.20	What is the total number of customer accounts / business relationships blocked or suspended in view of AML / CFT concerns during the prior calendar year?	[Number] / Not Available / Not Applicable
5.21	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 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

6.05	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
6.06	Does your entity, in line with its policies and procedures, carry out an assessment to determine jurisdictions that pose a high ML / FT risk?	No / Yes
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 your entity's policies and procedures define, on a risk basis, processes and controls to identify and review customers / customer accounts which regularly change the source of payment methods into their wallet account?	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 / agents / introducers?	No / Yes / Not Applicable
6.14	Where applicable, do your policies and procedures require that safeguards are put in place to ensure that outsourced service providers (within or outside the Group) carrying out a relevant activity identify and report suspicious transactions to the MLRO?	No / Yes
6.15	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

## 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

8.08	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
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<b>9</b>	<b>AML / CFT Training</b>
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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
9.07	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
9.08	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

<b>10</b>	<b>Record Keeping</b>
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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 from the designated authority, is your entity in a position to retrieve the requested customer records / or investigative records immediately?  *If you / your entity received reminders or requested extensions for deadlines imposed by the FIAU, do not mark as [yes, always].	Depending on the request / No / Yes, always / Yes, most of the time

11 Products and Services		
	Please provide the total deposits, wagers and RTP information recorded in the prior calendar year:	
11.01	Remote (Online) gaming activities (ex.: Casino, Sportsbook, P2P, etc.):	
	a) Total value of player deposits (€)	[€] / Not Available / Not Applicable
	b) Total number of player deposits (#)	[Number] / Not Available / Not Applicable
	c) Total value wagered by players (€)	[€] / Not Available / Not Applicable
	d) Total number of wagers made by players (#)	[Number] / Not Available / Not Applicable
	e) Total percentage of winnings (RTP) for players (%)	[%] / Not Available / Not Applicable
	f) Total Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
	Please provide a breakdown of deposits, wagers and RTP information recorded in the prior calendar year:	
11.02	Gaming Vertical - Casino including live casino:	
	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
11.03	Gaming Vertical - Lotteries:	
	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
11.04	Gaming Vertical - Secondary Lotteries:	
	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
11.05	Gaming Vertical - Fixed odds betting including live betting:	
	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable

	Gaming Vertical - Pool betting including betting exchange:	
11.06	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
	Gaming Vertical - Peer to peer poker:	
11.07	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
	Gaming Vertical - Peer-to-peer bingo and other peer-to-peer games, but excluding pool betting, betting exchange and poker:	
11.08	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
	Gaming Vertical - Lottery messenger services:	
11.09	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
	Gaming Vertical - Any other gaming vertical which is not comprised within the above:	
11.10	a) Value wagered by players (€)	[€] / Not Available / Not Applicable
	b) Value of winnings (RTP) for players (€)	[€] / Not Available / Not Applicable
11.11	How many new products were offered in the prior calendar year?	[Number] / Not Available / Not Applicable

#### Transactions

11.12	What is the total number of single deposits that amounted to or exceeded €2,000 in the prior calendar year?	[Number] / Not Available
11.13	What is the total number of players that effected at least one or more single deposits amounting to €2,000 or more in the prior calendar year?	[Number] / Not Available
11.14	What is the total number of players that met the €2,000 threshold within 180 days rolling period or from the opening of the gaming account, depending on the method adopted by the subject person?	[Number] / Not Available

Please indicate the percentage of the total volume (#) and value (€) of each transaction method / activity facilitated / carried out by your entity during the prior calendar year (multiple methods/activities possible):

11.15	Activity facilitated via intermediary (e.g. Master Accounts, Agents):	
	a) What is the total percentage of player deposits made through intermediaries out of the total player deposits (i.e. % of total value)?	[%] / Not Available / Not Applicable
	b) Activity facilitated via intermediary (e.g., Master Accounts, Agents): What is the total value (€) of player deposits made through intermediaries?	[€] / Not Available / Not Applicable
11.16	What was the total value (€) of player deposits originated from EU or EEA jurisdictions in the prior calendar year?	[€] / Not Available
11.17	What percentage of the total (€) player winnings (RTP) were associated with jurisdictions listed in the FATF lists, EU lists identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index in the prior calendar year?	[%] / Not Available

**12 Customers**

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
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**Customer Type**

12.02	Of the total number of customers, please specify:	
	a) % of customers scored / rated as "High Risk"	[%] / Not Available
	b) % of customers scored / rated as "Medium High Risk"	[%] / Not Available
	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
12.03	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
12.04	If "Yes", please specify any additional risk rating.	[Text] / Not Applicable
12.05	Please specify the corresponding % of customers of the risk rating stated above.	[%] / Not Available / Not Applicable
12.06	What percentage of your entity's customers are considered VIP customers (as defined by your entity's policies and procedures)?	[%] / Not Available / Not Applicable

12.07	Please list the total number of customers, who during the prior calendar year, deposited and / or withdrew funds in their account without any gambling / gaming activity.	[Number] / Not Available
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**Politically Exposed Persons ("PEPs")***\*as defined in Regulation 2 of the PMLFTR*

12.08	Of the total number of customers who are natural persons, how many were PEPs (including family members and close associates) as at the end of the prior calendar year?	[Number] / Not Available
12.09	Of the total number of customers who are legal entities, how many of their BOs were PEPs (including family members and close associates) as at the end of the prior calendar year?	[Number] / Not Available
12.10	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
	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
	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
12.11	If your answer to the above question is positive, please select the respective jurisdictions.	Select from drop down list / Not Available / Not Applicable

**Funding Methods**

Please provide percentage of total customers who employed the following funding methods during the prior calendar year:

12.12	Bank transfers (EU, EEA or equivalent safeguards)	[Number] / Not Available / Not Applicable
12.13	Bank transfers (non-EU, non-EEA or non-equivalent safeguards)	[Number] / Not Available / Not Applicable
12.14	Debit / credit cards issued by banks (EU, EEA or equivalent safeguards, or other licensed financial institutions)	[Number] / Not Available / Not Applicable
12.15	Debit / credit cards issued by banks (Non EU, Non - EEA or equivalent safeguards, or other non-EU licensed financial institutions)	[Number] / Not Available / Not Applicable
12.16	EU or EEA-licensed payment service providers (PSPs)	[Number] / Not Available / Not Applicable
12.17	Non-EU or non-EEA-licensed payment service providers (PSPs)	[Number] / Not Available / Not Applicable
12.18	EU or EEA-licensed PSP that can be funded with cash or quasi-cash	[Number] / Not Available / Not Applicable

12.19	Prepaid cards / vouchers	[Number] / Not Available / Not Applicable
12.20	Virtual Financial Assets	[Number] / Not Available / Not Applicable
12.21	Internet-based payment systems (e.g., PayPal, Alipay, Apple Pay, Google Checkout, etc.) or other e-money services (as defined by FATF)	[Number] / Not Available / Not Applicable

12.22	Does your entity allow its customers to hold multiple accounts with the same brand?	No / Yes
12.23	Does your entity allow its customers to register and play on different brands which it offers?	No / Yes
12.24	Does your entity allow customers to credit their wallets through deposits (including cash) made through land-based intermediaries?	No / Yes
12.25	What is the total value of player deposits for all remote gaming activity that was facilitated through "betting syndicates" during the prior calendar year?	[€] / Not Available / Not Applicable
12.26	What are the total number of player deposits for all remote gaming activity that were facilitated through "betting syndicates" during the prior calendar year?	[Number] / Not Available / Not Applicable

### 13 Geography

#### Residence of Customers

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

13.01	What percentage of customers were resident in Malta?	[%] / Not Available
13.02	What percentage of customers were foreign and resident in an EU or EEA jurisdiction outside Malta?	[%] / Not Available
13.03	What percentage of customers were foreign and resident in a non-EU or non-EEA jurisdiction?	[%] / Not Available
13.04	Does your entity have, as at the end of the prior calendar year, customers who are resident in 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
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
13.06	Of the total number of VIP customers (as previously indicated), what percentage of VIP customers are resident in Malta?	[%] / Not Available / Not Applicable
13.07	Of the total number of VIP customers (as previously indicated), what percentage of VIP customers are resident in an EU or EEA jurisdiction other than Malta?	[%] / Not Available / Not Applicable

13.08	Of the total number of VIP customers (as previously indicated), what percentage of VIP customers are resident in a non-EU or non-EEA jurisdiction?	[%] / Not Available / Not Applicable
13.09	Does your entity have, as at the end of the prior calendar year, VIP customers who are resident in 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 / 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
13.11	What was the total number (#) of player deposits which originated from EU or EEA jurisdictions in the prior calendar year?	[Number] / Not Available
13.12	What was the total value (€) of player deposits which originated from non-EU or non-EEA jurisdictions in the prior calendar year?	[€] / Not Available
13.13	What was the total number (#) of player deposits which originated from non-EU / EEA jurisdictions in the prior calendar year?	[Number] / Not Available
13.14	What was the total value (€) of player deposits which originated from jurisdictions listed in the FATF lists, EU lists identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index during the prior calendar year?	[€] / Not Available
13.15	What was the total volume (#) of player deposits which originated from jurisdictions listed in the FATF lists, EU lists identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index during the prior calendar year?	[Number] / Not Available
13.16	If your answer to the last two questions was greater than 0, 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
14.03	What percentage of customers have not yet completed CDD (verification) since the €2,000 threshold was not exceeded?	[%] / Not Available
14.04	What percentage of non-face-to face players were onboarded via remote and automated registration on an electronic platform without third party intervention?	[%] / Not Available / Not Applicable
14.05	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



14.06	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
14.07	What percentage of customers were registered via a land-based intermediary?	[%] / Not Available / Not Applicable
14.08	How many customer master account arrangements does your entity have?	[Number] / Not Available / Not Applicable
14.09	For what percentage of total customers was CDD carried out by a third party with whom a reliance arrangement was in place in terms of Regulation 12 of the PMLFTR?	[%] / Not Available / Not Applicable
14.10	Do your entity's policies and procedures define controls and processes for managing / tracking the use of customer "wallet" facilities?	No / Yes