



**Financial Intelligence Analysis Unit**  
Risk Evaluation Questionnaire

**Financial Sector**  
**Collective Investment Schemes**

*The questions included in this document should not be considered as final and may be subject to amendments.*

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.

In the text box, 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.

<b>1</b>	<b>Subject Person Information</b>	Topic
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1.01	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]
1.02	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
1.03	Has your entity undergone significant changes in its management and control structure during the prior calendar year?	No / Yes

<b>2</b>	<b>Governance / Organization</b>	Topic
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2.01	When was the current MLRO appointed?	More than 5 years / Between 3-5 years / Between 1-2 years / Less than 1 year
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	If yes, please include total number of MLRO positions held.	[Number]
2.06	How many staff members, expressed as full time employees (FTEs), are part of the AML / CFT team (if one exists)?	[Number]
2.07	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
2.08	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
2.09	Have you / has 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
2.11	b) subject of negative news reports	No / Yes
2.12	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
2.13	If Yes, please explain	[Fretext]

2.14	Is there any pending litigation or regulatory enforcement action related to AML or Sanctions?	No / Yes
2.15	If Yes, please explain	[Freertext]
2.16	Have you / Has 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)
2.17	If "Yes", please specify the obligations that are being outsourced.	[Freertext]
2.18	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
2.19	If yes, please indicate the official full name of the service provider.	[Freertext]
2.20	Are any of the above-mentioned functions outsourced to service providers situated in a non-EU or non-EEA jurisdiction?	No / Yes
2.21	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
2.22	Does the MLRO have a direct reporting line to the Board of Directors	No / Yes
2.23	Does the MLRO have sufficient seniority and command to carry out his/her duties effectively	No / Yes

<b>3</b>	<b>Business Risk Assessment</b>	Topic
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3.01	Have you / has 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
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
3.04	Did the Business Risk Assessment conducted take into account the risks and controls related to:	
3.05	a) your / your entity's customers	No / Yes / Not Applicable
3.06	b) the products and services offered by you / your entity and the transaction risk exposure through same	No / Yes / Not Applicable
3.07	c) specific countries or geographical areas	No / Yes / Not Applicable
3.08	d) the distribution channels	No / Yes / Not Applicable
3.09	Did the Business Risk Assessment conducted take into account the results of the SNRA and NRA?	No / Yes
3.10	Has the Business Risk Assessment been approved by senior management (including directors and partners) of your entity?	No / Yes
3.11	Did you / your entity review and / or update the business risk assessment in the prior calendar year?	No / Yes

<b>4</b>	<b>Customer Acceptance and Risk Assessment</b>	Topic
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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
4.02	If yes, is there a documented Customer Risk Assessment methodology?	No / Yes
4.03	Please indicate, for all your customers where a business relationship is formed, whether you / your entity collects the following:	
4.04	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
4.05	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
4.06	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 only when risk is high / Yes, always / Not Applicable
4.07	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 only when risk is high / Yes, always / Not Applicable
4.08	e) 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
4.09	Please indicate, for all your customers where a business relationship is formed, 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

4.10	Do you /Does your entity verify the source of funds prior to approving a customer's placement of funds for investment?	No / Yes, only for high risk / Yes
4.11	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
4.12	Are the following verification measures used during the onboarding of non-face-to-face customers:	
4.13	a) Verification on the basis of documents	No / Yes
4.14	b) Use of video conferencing tools	No / Yes
4.15	c) Use of identity verification software	No / Yes
4.16	d) Verification through the use of commercial electronic data providers	No / Yes
4.17	e) Use of e-IDs	No / Yes
4.18	f) Verification of Identity Platforms	No / Yes
4.19	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
4.20	What kind of measures Do you / does your entity make use of to determine the PEP status of a customer (beneficial owner/s)?	
4.21	a) Rely on publicly available information	No / Yes
4.22	b) Obtain information directly from the customer or BO	No / Yes
4.23	c) Use commercial databases	No / Yes
4.24	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
4.25	If variation in the timing of due diligence is permitted as indicated above, what pre-determined triggering criteria is applied?	
4.26	a) Transaction, customer activity threshold	No / Yes / Not Applicable
4.27	b) Pre-determined time frame	No / Yes / Not Applicable
4.28	c) Prior to completion of service provided	No / Yes / Not Applicable
4.29	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
4.30	In instances where customer due diligence cannot be completed, do your policies and procedures require you/ your entity to submit an STR with the FIAU?	No / Yes, except where CDD can be delayed as per IPs / Yes
4.31	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
4.32	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 an 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 an STR?	No / Yes
4.33	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
4.34	Does your entity have the ability to block, suspend or otherwise limit the services provided to customers when there are AML / CFT concerns?	No / Yes
4.35	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
4.36	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
4.37	How often do you / does your entity review the customer risk assessment for the following:	
4.38	a) Low risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.39	b) Medium Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.40	c) High Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.41	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
4.42	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 De-Risking Controls		Topic
5.01	Did you / your entity undertake any de-risking practices in the past years?	No / Yes
5.02	If de-risking was carried out, which risk and category of customers have been reduced?	[Freetext]
5.03	How many clients/relationships were terminated due to de-risking process?	[number]
5.04	What was the reason for the de-risking exercise?	[Freetext]
6 Ongoing Monitoring / Transaction Scrutiny		Topic
6.01	Do you/your entity monitor transactions?	No / Yes
6.02	Is your entity's process / system for monitoring transactions fully automated, partially automated or manual?	Fully automated / Partially automated / Manual
6.03	Is your monitoring system able to detect the expiry of due diligence documentation and any conflicting information in relation to customer data?	Yes / No
6.04	Do you have a document which contains the methodology for transaction monitoring?	No / Yes
6.05	Does your monitoring system utilise any of these techniques to monitor customer activity?	No / Profiling Techniques / Rule-based criteria / Both
6.06	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
6.07	Are customers' transactions monitored in real-time, post-event or a combination of both?	Combination of both / Post-event / Real-time
6.08	Are there customer transactions that are not screened by the monitoring system?	No / Yes
6.09	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.	[Freetext]
6.10	What is the average time allowed (in days) to clear any transaction monitoring alerts?	[Number]
6.11	Does your entity have an expected transaction profile for every customer?	No / Not always / Yes
6.12	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 for business relationships only / Yes for occasional transactions only / Yes for both
6.13	Do you / does 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
6.14	Is the monitoring system based on:	[Matrix]
6.15	a) The characteristics of the products and services offered	No / Yes / Not Applicable
6.16	b) The characteristics of the customers	No / Yes / Not Applicable
6.17	c) The characteristics of the relevant countries and geographical areas	No / Yes / Not Applicable
6.18	d) The characteristics of the distribution channels used	No / Yes / Not Applicable
6.19	e) The payment method used by the customer	No / Yes / Not Applicable
6.20	f) Other factors	No / Yes / Not Applicable
6.21	If the monitoring system is based on "Other factors", please provide a description of the factors.	[Freetext]
6.22	How many alerts (related to AML/CFT) were generated by the monitoring system during the prior calendar year?	[Number]
6.23	How many alerts took longer than 90 days to be actioned?	[number]
6.24	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
6.25	If "Other", please specify the jurisdiction list utilised by your entity.	[Freetext]
6.26	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]
6.27	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]
6.28	Is your entity aware of any of its customers whose assets were frozen (due to AML / CFT considerations) in any jurisdiction?	No / Yes
6.29	Does your monitoring system:	[Matrix]
6.30	a) Establish the source of funds and destination of capital gains / location of settlement, ensuring that the investment profile and settlement location are in-line with the customer profile	No / Yes / Not Applicable

6.31	b) Identify occurrences of customers transferring funds in excess of those required for the investment	No / Yes / Not Applicable
6.32	c) Identify occurrences of the customer asking to repurchase or redeem a long-term investment within a short period after the initial investment or before the payout date, without a clear rationale, in particular where this results in financial loss or payment of high transaction fees	No / Yes / Not Applicable
6.33	d) Identify occurrences of the customer requesting the repeated purchase and sale of shares within a short period of time without an obvious strategy or economic rationale	No / Yes / Not Applicable
6.34	e) monitor for investment funds originating from or capital gains being paid out to an unidentified third party	No / Yes / Not Applicable
6.35	f) monitor for multiple investment accounts linked to same persons	No / Yes / Not Applicable
6.36	g) monitor for transactions which appear to be undertaken in a manner to avoid applicable transaction monitoring / reporting thresholds	No / Yes / Not Applicable
6.37	Does your entity regularly check if there are any changes to beneficial owners of an investment account, where applicable, as part of its ongoing monitoring obligations?	No / Yes
6.38	Does the entity, on a risk sensitive basis, perform ongoing monitoring to establish the reasons for an unusual increase in activity?	No / Yes

<b>7</b>	<b>Policies and Procedures</b>	Topic
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7.01	Do you / does your entity have written AML / CFT policies and procedures?	No / Yes
7.02	Do policies and procedures require you / your entity to assess risks associated with funding of terrorism?	No / Yes
7.03	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
7.04	Do you / does 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 and on an ongoing basis in line with the ongoing monitoring obligations?	No / Yes
7.05	Do you / does 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
7.06	Do your entity's policies and procedures allow payments to be effected to third parties other than the original investor?	No / Yes
7.07	Are any lock-up periods or other restrictions on redemptions applicable to the collective investment scheme or, where applicable, any of its sub-funds?	No / Yes
7.08	Does your entity have policies and procedures regarding the reporting of suspicious transactions to the FIAU?	No / Yes
7.09	Do you / does 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
7.10	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes
7.11	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
7.12	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
7.13	Do you / does your entity have policies and procedures in place to assess the AML / CFT compliance framework of your transfer agents (if applicable)?	No / Yes
7.14	Do your entity's policies and procedures:	[Matrix]
7.15	a) Define controls and processes for the collection and testing of information regarding the investment rationale of the investor to ensure it has clear economic purpose	No / Yes / Not Applicable
7.16	b) Set out a clear reimbursement process in situations when a customer provides funds in excess of those required for the investment, or when a customer closes an investment account	No / Yes / Not Applicable
7.17	c) Set out the terms by which a customer qualifies for redemption possibilities as per investment agreement	No / Yes / Not Applicable
7.18	Does your entity have internal whistleblowing procedures?	No / Yes
7.19	Do you have policies and procedures in place which enable the entity to flag possible tax evasion, tax fraud, aggressive tax planning or other tax-related crimes	No / Yes
7.20	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
7.21	Do you / does your entity's policies and procedures require enhanced due diligence to be applied in higher risk situations?	No / Yes

7.22	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
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<b>8</b>	<b>Internal Audit / Independent Testing</b>	Topic
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8.01	Have you / has 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
8.02	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
8.03	Have you / has 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
8.04	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
8.05	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
8.06	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
8.07	How many "high risk" audit issues were identified in the latest audit report (relating to AML / CFT)?	[Number]
8.08	How many "high risk" audit issues are currently open (relating to AML / CFT)?	[Number]
8.09	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
8.10	If you / your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the Group), Have you / has your entity defined a policy or procedure for testing the quality of the outsourced tasks?	No / Yes
8.11	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
8.12	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

<b>9</b>	<b>Reporting</b>	Topic
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9.01	How many STRs were submitted to the FIAU during the prior calendar year?	[Number]
9.02	Please list the number of alerts generated as a result of unusual activity or transactions during the prior calendar year?	[Number]
9.03	How many internal suspicious reports were raised during the prior calendar year?	[Number]
9.04	From the internal reports raised in the prior calendar year, how many cases are still open?	[Number]
9.05	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]
9.06	How many internal suspicious reports were not reported to FIAU after investigation ("closed") during the prior calendar year?	[Number]
9.07	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
9.08	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
9.09	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]

<b>10</b>	<b>AML / CFT Training</b>	Topic
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10.01	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
10.02	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

10.03	How many hours of AML/CFT related training has the MLRO attended in the past 12 months?	[Number]
10.04	Please provide the % of staff within the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]
10.05	Please provide the % of staff outside the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]
10.06	Please provide the % of board members / partners that received AML / CFT training throughout the prior calendar year.	[Decimal]
10.07	Is your entity's training program uniformly applied to all AML/CFT staff (including directors and partners) equally, or is it differentiated according to their duties?	Differentiated / The same for everyone
10.08	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:	
10.09	a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)	No / Yes / Not Applicable
10.10	b) your / your entity's AML / CFT policies and procedures	No / Yes / Not Applicable
10.11	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?	[Decimal]
10.12	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
10.13	Does your entity provide AML / CFT training to brokers / agents / intermediaries who are established in Malta / EU / EEA, to ensure that they have an adequate understanding of relevant ML / FT risks and on the AML / CFT policies and procedures mandated by your entity?	No / Yes
10.14	Does your entity provide AML / CFT training to non-EU / EEA brokers / agents / intermediaries to ensure that they have an adequate understanding of relevant ML / FT risks and on the AML / CFT policies and procedures mandated by your entity?	No / Yes
10.15	Are all employees who are new to their job function required to take AML/CFT training within a specified timeframe?	No /Yes within 1 month/ Yes within 3 months /Yes within 6 months/ Yes within 1 year

<b>11</b>	<b>Record Keeping</b>	Topic
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11.01	Do you / does your entity have policies and procedures in place providing for compliance with the record keeping obligations arising from the PMLFTR?	No / Yes
11.02	Upon request from the FIAU or any relevant authority, are you / 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

<b>12</b>	<b>Products and Services</b>	Topic
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12.01	Please indicate the total value of subscriptions during the prior calendar year.	[Currency amount]
12.02	Please indicate the total volume of redemptions during the prior calendar year.	[Number]
12.03	Please indicate the total value of redemptions during the prior calendar year.	[Currency amount]
12.04	What is the minimum amount which must be invested by each investor upon initial subscription?	[Currency amount]
12.05	What is the minimum amount which can be transacted by each investor subsequent to initial subscription?	[Currency amount]
12.06	What is the maximum amount, if any, that can be invested by any one investor?	[Currency amount]
12.07	What is the frequency at which redemption of units / shares may be undertaken?	Daily / Weekly / Monthly
12.08	What assets does the collective investment scheme invest in?	Financial instruments listed on regulated markets / Other collective investment schemes / Other financial instruments / Virtual Financial Assets / Immovable Property / Precious Materials / Loans / Other assets / Not Available / Not Applicable
12.09	Did your entity provide binary options in the prior calendar year?	No / Yes
12.10	Does your entity offer services, products or funds that invest in high risk industries established 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?	No / Yes

12.11	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
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<b>13</b>	<b>De-Risking Inherent Risk</b>	Topic
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13.01	Have you experienced being de-risked during the previous calendar year?	No / Yes
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<b>14</b>	<b>Customers</b>	Topic
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14.01	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]
14.02	Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.	[Number]
14.03	Please list the total number of new customers onboarded during the prior calendar year.	[Number]
14.04	What type of investors are targeted by the collective investment scheme?	Retail Investors / Professional Investors / Experienced Investors / Qualifying Investors / Extraordinary Investors / Not Applicable
14.05	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	[Decimal]
14.06	b) Legal persons	[Decimal]
14.07	c) Customers with an ownership structure that includes offshore vehicles, trusts, or other legal arrangements including bearer shares and nominee shareholding	[Decimal]
14.08	d) Customers with an ownership structure that includes foundations, charities or other not-for-profit entities	[Decimal]
14.09	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]
14.10	Of the total number of customers, please specify: a) % of customers scored / rated as "High Risk"	[Decimal]
14.11	b) % of customers scored / rated as "Medium High Risk"	[Decimal]
14.12	c) % of customers scored / rated as "Medium Risk"	[Decimal]
14.13	d) % of customers scored / rated as "Low Medium Risk"	[Decimal]
14.14	e) % of customers scored / rates as "Low Risk"	[Decimal]
14.15	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
14.16	If "Yes", please specify any additional risk rating.	[Freetext]
14.17	If "Yes" Please specify the corresponding % of customers of the risk rating stated above.	[Decimal]
14.18	For what percentage of your customer base was simplified due diligence applied given that the customer was classified as low risk?	[Decimal]
14.19	What percentage of your customers are holding units / shares on behalf of underlying investors?	[Decimal]
14.20	What percentage of the units / shares issued by the collective investment scheme as at year end were held on behalf of underlying investors?	[Decimal]
14.21	Do you / does your entity have customers that act as holding companies with subsidiaries or investments in non-EU / EEA jurisdictions?	No / Yes
14.22	Please indicate the volume (# of contracts / transactions) and value (€) of total redemptions and subscriptions carried out during the prior calendar year:	
14.23	What is the total volume and value of contracts / transactions where the customer is another legal person or arrangement? a) Volume (#)	[Number]
14.24	b) Value (€)	[Currency amount]
14.25	Please indicate the total volume (#) and value (€) of units / shares held by the following types of customers :	
14.26	What is the total volume and value of contracts / transactions where the customer is another legal person or arrangement? a) Volume (#)	[Number]



14.27	b) Value (€)	[Currency amount]
14.28	What is the total volume and value of contracts / transactions where the beneficiary of an investment account is a charity or other non-profit organisation? a) Volume (#)	[Number]
14.29	b) Value (€)	[Currency amount]
14.30	What is the total volume and value of contracts / transactions where the customer is a natural person whose total investment exceeds € 100K and who is resident in Malta? a) Volume (#)	[Number]
14.31	b) Value (€)	[Currency amount]
14.32	What is the total volume and value of contracts / transactions where the customer is a legal person, whose total investment exceeds € 100K and is incorporated or has its principal place of business in Malta? a) Volume (#)	[Number]
14.33	b) Value (€)	[Currency amount]
14.34	What is the total volume and value of contracts / transactions where the customers is a natural person, whose total investment exceeds € 100K and who is a resident in an EU / EEA jurisdiction (other than Malta)? a) Volume (#)	[Number]
14.35	b) Value (€)	[Currency amount]
14.36	What is the total volume and value of contracts / transactions where the customer is a legal person, whose total investment exceeds € 100K and is incorporated or has its principal place of business in an EU / EEA jurisdiction (other than Malta)? a) Volume (#)	[Number]
14.37	b) Value (€)	[Currency amount]
14.38	What is the total volume and value of contracts / transactions where the customer is a natural persons, whose total investment exceeds € 100K and who is a resident in a non-EU or non-EEA jurisdiction? a) Volume (#)	[Number]
14.39	b) Value (€)	[Currency amount]
14.40	What is the total volume and value of contracts / transactions where the customer is a legal person, whose total investment exceeds € 100K and is incorporated or has its principal place of business in a non-EU or non-EEA jurisdiction? a) Volume (#)	[Number]
14.41	b) Value (€)	[Currency amount]
14.42	If the answer to the above question is positive, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
14.43	If the answer to the above question is positive, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
14.44	What is the total volume and value of contracts / transactions where the customer is an institutional investor whose status has been verified by an EU or EEA government agency, for example a government-approved pensions scheme? a) Volume (#)	[Number]
14.45	b) Value (€)	[Currency amount]
14.46	What is the total volume and value of contracts / transactions where the customers is a foundation? a) Volume (#)	[Number]
14.47	b) Value (€)	[Currency amount]
14.48	What is the total volume and value of contracts / transactions where the customer is a Maltese government agency / body? a) Volume (#)	[Number]
14.49	b) Value (€)	[Currency amount]
14.50	What is the total volume and value of contracts / transactions where the customer is an EU or EEA government agency / body (other than a Maltese government agency / body)?a) Volume (#)	[Number]
14.51	b) Value (€)	[Currency amount]
14.52	What is the total volume and value of contracts / transactions where the customers is a non-EU or non-EEA government agency / body? a) Volume (#)	[Number]

14.53	b) Value (€)	[Currency amount]
14.54	What is the total volume and value of contracts / transactions where the customers is a government agency / body in a high risk 3rd countries with strategic deficiencies and / or jurisdictions featuring in the top 20 countries of the Basel Index? a) Volume (#)	[Number]
14.55	b) Value (€)	[Currency amount]
14.56	If the answer to the above question is positive, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
14.57	What is the total volume and value of contracts / transactions where the customer is another collective investment scheme or similar vehicle? a) Volume (#)	[Number]
14.58	b) Value (€)	[Currency amount]
14.59	Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).	[Number]
14.60	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]
14.61	Please list the number of customers who operate cash intensive businesses.	[Number]
14.62	How many nominee accounts does your entity hold?	[Number]
14.63	Was simplified due diligence applied to these nominee accounts?	No / Yes
14.64	Did you / your entity have any customers that were re-domiciled or whose economic activity was transferred to 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 in the prior calendar year?	No / Yes
14.65	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
14.66	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]
14.67	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]
14.68	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)	[Decimal]
14.69	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[Decimal]
14.70	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions	[Decimal]
14.71	Do you / does your entity have, as at the end of the prior calendar year, PEPs 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?	No / Yes
14.72	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
14.73	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)	[Decimal]
14.74	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[Decimal]
14.75	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions (other than Malta)	[Decimal]

14.76	d) % of PEPs (EU, EEA, non-EU and non-EEA) from a jurisdiction listed in the FATF lists and / or EU list identifying high risk 3rd countries with strategic deficiencies and / or the top 20 countries of the Basel Index	[Decimal]
14.77	If your answer to the above question is greater than 0, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
14.78	Please indicate the total volume (#) and value (€) of funding methods used to facilitate investment activity in the prior calendar year:	
14.79	Bank transfers: a) Volume (#)	[Number]
14.80	b) Value (€)	[Currency amount]
14.81	Internet-based, or mobile-application based, payment systems or other e-money / e-wallet services (as defined by FATF): a) Volume (#)	[Number]
14.82	b) Value (€)	[Currency amount]
14.83	Bankdrafts / Cheque payments: a) Volume (#)	[Number]
14.84	b) Value (€)	[Currency amount]
14.85	Cash: a) Volume (#)	[Number]
14.86	b) Value (€)	[Currency amount]
14.87	Subscriptions in kind: a) Volume (#)	[Number]
14.88	b) Value (€)	[Currency amount]

<b>15</b>	<b>Geography</b>	Topic
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15.01	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in Malta?	[Decimal]
15.02	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in an EU / EEA jurisdiction outside Malta?	[Decimal]
15.03	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in a non-EU / EEA jurisdiction?	[Decimal]
15.04	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
15.05	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
15.06	What percentage of your customer's BOs are resident in Malta?	[Decimal]
15.07	What percentage of your customer's BOs are foreign and resident in an EU or EEA jurisdiction outside Malta?	[Decimal]
15.08	Please list the % of your customer's BOs who are foreign and are resident in a non-EU / EEA member state jurisdiction.	[Decimal]
15.09	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

15.10	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
15.11	Please indicate the total volume (#) and value (€) of investments during the prior calendar year:	
15.12	What was the total volume and value of investments linked to client domestically-held investment accounts? a) Volume (#)	[Number]
15.13	b) Value (€)	[Currency amount]
15.14	What was the total volume and value of investments made through client EU- or EEA-held accounts? a) Volume (#)	[Number]
15.15	b) Value (€)	[Currency amount]
15.16	What was the total volume and value of investments made through client non-EU or non-EEA-held accounts? a) Volume (#)	[Number]
15.17	b) Value (€)	[Currency amount]
15.18	Please indicate the total transactional / payment volume (#) and value (€) provided during the prior calendar year: *In this context, payments only refer to transfers of funds to transactions to and from customers. Transactions between banks should therefore not be taken into account. However, transactions performed in the context of correspondent activity should be included in the numbers.	
15.19	What was the total volume and value of investments made through multiple client held accounts in multiple jurisdictions? a) Volume (#)	[Number]
15.20	b) Value (€)	[Currency amount]
15.21	How many instances are there in which the customer and beneficial owner of an investment account are located in: a) Different jurisdictions	[Number]
15.22	b) Different jurisdictions with at least one being in a 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 during the prior calendar year	[Number]
15.23	Please list the percentage of investments made by the scheme: a) What percentage of the investments made by the scheme are located in Malta	[Decimal]
15.24	b) What percentage of the investments made by the scheme are located in EU / EEA jurisdictions	[Decimal]
15.25	c) What percentage of the investments made by the scheme are located in non-EU / EEA jurisdictions	[Decimal]
15.26	d) What percentage of the investments made by the scheme are located 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	[Decimal]
15.27	If any investments are located in a jurisdiction as noted in the prior question, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable

<b>16</b>	<b>Interface / Distribution Channels</b>	Topic
16.01	Of the total number of customers, what percentage were onboarded face-to-face?	[Decimal]
16.02	Of the total number of customers, what percentage were onboarded on a non-face-to-face basis?	[Decimal]
16.03	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?	[Decimal]

16.04	If your answer to the above question was greater than 0, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
16.05	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?	[Decimal]
16.06	What percentage of customers were onboarded by EU or EEA brokers / agents / introducers? [Relates to Financial Sector]	[Decimal]
16.07	What percentage of customers were onboarded by non-EU or EEA brokers / agents / introducers? [Relates to Financial Sector]	[Decimal]
16.08	What percentage of customers were onboarded via digitally enabled broker tools? [Relates to Financial Sector]	[Decimal]
16.09	Of those onboarded on a non-face-to-face basis, what percentage of customers' investment accounts are handled via sub-distributor? [Relates to Financial Sector]	[Decimal]

