



Financial Intelligence Analysis Unit Risk Evaluation Questionnaire

Gaming Sector Remote Gaming Operators

The questions included 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.

1 Subject Person Information

Topic

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	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
1.04	Does your entity have nominee shareholders in its ownership structure?	No / Yes
1.05	If "Yes", what percent of the total shares are held by nominee shareholders?	[Decimal]
1.06	Has your entity undergone changes in its ownership structure during the prior calendar year?	No / Yes
1.07	Has your entity undergone significant changes in its management and control structure during the prior calendar year?	No / Yes

2 Governance / Organization

Topic

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	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
2.10	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:	
2.11	a) regulatory enforcement actions, criminal investigations for ML / FT or any other financial crime	No / Yes
2.12	b) subject of negative news reports	No / Yes
2.13	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
2.14	If Yes, please explain	[Freertext]
2.15	Is there any pending litigation or regulatory enforcement action related to AML or Sanctions?	No / Yes
2.16	If Yes, please explain	[Freertext]
2.17	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)
2.18	If "Yes", please specify the obligations that are being outsourced.	[Freertext]
2.19	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
2.20	If yes, please indicate the official full name of the service provider.	[Freertext]
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

3	Business Risk Assessment	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	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	e) the funding methods that your entity intends to accept	No / Yes / Not Applicable
3.10	Did the Business Risk Assessment conducted take into account the results of the SNRA and NRA?	No / Yes
3.11	Has the Business Risk Assessment been approved by senior management (including directors and partners) of your entity?	No / Yes
3.12	Did you / your entity review and / or update the business risk assessment in the prior calendar year?	No / Yes

4	Customer Acceptance and Risk Assessment	Topic
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4.01	Do you/ does your entity perform a Customer Risk Assessment?	No / Yes
4.02	If yes, is there a documented Customer Risk Assessment methodology?	No / Yes
4.03	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
4.04	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

4.05	Please indicate, for all your customers where a business relationship is formed or, depending on the risk, only for a specific part of your customers, whether you / your entity collects the following:	
4.06	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
4.07	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
4.08	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
4.09	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
4.10	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
4.11	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	Did you / your entity acquire new clients through an introducer/s in the prior calendar year?	No / Yes
4.13	If "yes", please indicate the number of introducers used during the prior calendar year.	[Number]
4.14	In the case where an introducer was used, was due diligence performed on the introducer?	Never / Yes in some instances / Yes in all instances
4.15	Are the following verification measures used during the onboarding of non-face-to-face customers:	
4.16	a) Verification on the basis of documents	No / Yes
4.17	b) Use of video conferencing tools	No / Yes
4.18	c) Use of identity verification software	No / Yes
4.19	d) Verification through the use of commercial electronic data providers	No / Yes
4.20	e) Use of e-IDs	No / Yes
4.21	f) Verification of Identity Platforms	No / Yes
4.22	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
4.23	What kind of measures do you / does your entity make use of to determine the PEP status of a customer (beneficial owner/s)?	
4.24	a) Rely on publicly available information	No / Yes
4.25	b) Obtain information directly from the customer or BO	No / Yes
4.26	c) Use commercial databases	No / Yes
4.27	Does your PEP screening process allow for fuzzy logic/matching technology?	No / Yes / Not Applicable
4.28	Does your entity make use of social media as a source to obtain and / or corroborate customer information?	No / Yes
4.29	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
4.30	Do policies and procedures require due diligence (including customer risk assessment) to be repeated when there are doubts about the completeness, reliability or accuracy on priorly obtained customer identification information, data or documentation?	No / Yes
4.31	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
4.32	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]
4.33	Does your entity have controls that allow it to disable the product until it is satisfied that the customers pose no threat of suspicious activity?	No / Yes
4.34	How often do you / does your entity review the customer risk assessment for the following:	
4.35	a) Low risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.36	b) Medium Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.37	c) High Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.38	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	Topic
5.01	Do you/your entity monitor transactions?	No / Yes
5.02	Is your entity's process / system for monitoring transactions fully automated, partially automated or manual?	Fully automated / Partially automated / Manual
5.03	Do you have a document which contains the methodology for transaction monitoring?	No / Yes
5.04	Does your monitoring system utilise any of these techniques to monitor customer activity?	No / Profiling Techniques / Rule-based criteria / Both
5.05	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
5.06	Are customers' transactions monitored in real-time, post-event or a combination of both?	Combination of both / Post-event / Real-time
5.07	Are there customer transactions that are not screened by the monitoring system?	No / Yes
5.08	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]
5.09	What is the average time allowed (in days) to clear any transaction monitoring alerts?	[Number]
5.10	Does your entity have an expected transaction profile for every customer?	No / Not always / Yes
5.11	Is the monitoring system based on:	
5.12	a) The characteristics of the products and services offered	No / Yes / Not Applicable
5.13	b) The characteristics of the customers	No / Yes / Not Applicable
5.14	c) The characteristics of the relevant countries and geographical areas	No / Yes / Not Applicable
5.15	d) The characteristics of the distribution channels used	No / Yes / Not Applicable
5.16	e) The payment method used by the customer	No / Yes / Not Applicable
5.17	f) Other factors	No / Yes / Not Applicable
5.18	If the monitoring system is based on "Other factors", please provide a description of the factors.	[Freetext]
5.19	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
5.20	How many alerts (related to AML/CFT) were generated by the monitoring system during the prior calendar year?	[Number]
5.21	Of the total alerts generated by the monitoring system, how many resulted in internal investigations during the prior calendar year?	[Number]
5.22	How many alerts took longer than 90 days to be actioned?	[number]
5.23	Does the monitoring system identify discrepancies between submitted and detected information, for example, between submitted country of origin information and the electronically detected IP address?	No / Yes
5.24	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
5.25	If "Other", please specify the jurisdiction list utilised by your entity.	[Freetext]
5.26	Is your entity's monitoring system able to detect or does it have alerts and scenarios to detect high spenders?	No / Yes
5.27	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
5.28	Does your entity have measures in place to detect the opening of multiple accounts by the same player?	No / Yes
5.29	Does your entity have measures in place to detect any conflicting information in relation to customer data?	No / Yes
5.30	Does your entity have measures in place to be able to detect collusion between players?	No / Yes
5.31	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
5.32	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]
5.33	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]
5.34	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]

5.35	Is your entity aware of any of its customers whose assets were frozen (due to AML / CFT considerations) in any jurisdiction?	No / Yes
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6	Policies and Procedures	Topic
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6.01	Do you / does 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 / 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
6.05	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
6.06	Does your entity have policies and procedures regarding the reporting of suspicious transactions to the FIAU?	No / Yes
6.07	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
6.08	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes
6.09	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
6.10	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
6.11	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
6.12	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
6.13	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
6.14	Do your entity's policies and procedures require you to perform a more detailed review when unusual activity / transactions are detected?	No / Yes
6.15	Does your entity have internal whistleblowing procedures?	No / Yes

7	Internal Audit / Independent Testing	Topic
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7.01	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
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 / 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
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
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
7.07	How many "high risk" audit issues were identified in the latest audit report (relating to AML / CFT)?	[Number]
7.08	How many "high risk" audit issues are currently open (relating to AML / CFT)?	[Number]
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
7.10	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

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	Topic
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8.01	How many STRs were submitted to the FIAU during the prior calendar year?	[Number]
8.02	Please list the number of alerts generated as a result of unusual activity or transactions during the prior calendar year?	[Number]
8.03	How many internal suspicious reports were raised during the prior calendar year?	[Number]
8.04	From the internal reports raised in the prior calendar year, how many cases are still open?	[Number]
8.05	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]
8.06	How many internal suspicious reports were not reported to FIAU after investigation ("closed") during the prior calendar year?	[Number]
8.07	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
8.08	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
8.09	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]

9	AML / CFT Training	Topic
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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
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
9.03	How many hours of AML/CFT related training has the MLRO attended in the past 12 months?	[Number]
9.04	Please provide the % of staff within the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]
9.05	Please provide the % of staff outside the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]
9.06	Please provide the % of board members / partners that received AML / CFT training throughout the prior calendar year.	[Decimal]
9.07	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
9.08	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:	
9.09	a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)	No / Yes / Not Applicable
9.10	b) your / your entity's AML / CFT policies and procedures	No / Yes / Not Applicable
9.11	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]
9.12	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
9.13	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

10	Record Keeping	Topic
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10.01	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
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10.02	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
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11	Products and Services	Topic
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11.01	Please indicate which specific activities were performed by your entity during the prior calendar year and provide the requested information for each:	
11.02	Remote (Online) gaming activities (ex.: Casino, Sportsbook, P2P, etc.): a) Total value of player deposits (€)	[Currency amount]
11.03	b) Total number of player deposits (#)	[Number]
11.04	c) Total value wagered by players (€)	[Currency amount]
11.05	d) Total number of wagers made by players (#)	[Number]
11.06	e) Total percentage of winnings (RTP) for players (%)	[Decimal]
11.07	f) Total Value of winnings (RTP) for players (€)	[Currency amount]
11.08	Gaming Vertical - Casino including live casino: a) Value wagered by players (€)	[Currency amount]
11.09	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.10	Gaming Vertical - Lotteries: a) Value wagered by players (€)	[Currency amount]
11.11	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.12	Gaming Vertical - Secondary Lotteries: a) Value wagered by players (€)	[Currency amount]
11.13	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.14	Gaming Vertical - Fixed odds betting including live betting: a) Value wagered by players (€)	[Currency amount]
11.15	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.16	Gaming Vertical - Pool betting including betting exchange: a) Value wagered by players (€)	[Currency amount]
11.17	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.18	Gaming Vertical - Peer to peer poker: a) Value wagered by players (€)	[Currency amount]
11.19	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.20	Gaming Vertical - Peer-to-peer bingo and other peer-to-peer games, but excluding pool betting, betting exchange and poker: a) Value wagered by players (€)	[Currency amount]
11.21	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.22	Gaming Vertical - Lottery messenger services: a) Value wagered by players (€)	[Currency amount]
11.23	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.24	Gaming Vertical - Any other gaming vertical which is not comprised within the above: a) Value wagered by players (€)	[Currency amount]
11.25	b) Value of winnings (RTP) for players (€)	[Currency amount]
11.26	How many new products were offered in the prior calendar year?	[Number]
11.27	What is the total number of single deposits that amounted to or exceeded €2,000 in the prior calendar year?	[Number]
11.28	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]
11.29	What is the total number of players, who met the €2,000 threshold from the opening of their gaming account, who had (at least) one transaction during the previous calendar year	[Number]
11.30	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):	
11.31	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)?	[Decimal]
11.32	b) Activity facilitated via intermediary (e.g., Master Accounts, Agents): What is the total value (€) of player deposits made through intermediaries?	[Currency amount]
11.33	What was the total value (€) of player deposits originated from EU or EEA jurisdictions in the prior calendar year?	[Currency amount]

11.34	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?	[Decimal]
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12	De-Risking Inherent Risk	Topic
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12.01	Have you experienced being de-risked during the previous calendar year?	No / Yes
12.02	If yes, provide details of the de-risking	[Freetext]
12.03	From which market where you de-risked? [Freetext]	[Freetext]

13	Customers	Topic
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13.01	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]
13.02	Please list the total number of the customers with whom your entity has an active business relationship, have transacted in the (last 6 months of the) previous calendar year?	[Percentage]
13.03	Please list the total number of customer relationships closed / terminated during the prior calendar year.	[Number]
13.04	Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.	[Number]
13.05	Please list the total number of new customers onboarded during the prior calendar year.	[Number]
13.06	Of the total number of customers, please specify: a) % of customers scored / rated as "High Risk"	[Decimal]
13.07	b) % of customers scored / rated as "Medium High Risk"	[Decimal]
13.08	c) % of customers scored / rated as "Medium Risk"	[Decimal]
13.09	d) % of customers scored / rated as "Low Medium Risk"	[Decimal]
13.10	e) % of customers scored / rates as "Low Risk"	[Decimal]
13.11	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
13.12	If "Yes", please specify any additional risk rating.	[Freetext]
13.13	If "Yes" Please specify the corresponding % of customers of the risk rating stated above.	[Decimal]
13.14	What percentage of your entity's customers are considered VIP customers (as defined by your entity's policies and procedures)?	[Decimal]
13.15	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]
13.16	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]
13.17	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]
13.18	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[Decimal]
13.19	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions	[Decimal]
13.20	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
13.21	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
13.22	Please provide the total customers who employed the following funding methods in the prior calendar year: Bank transfers (EU, EEA or equivalent safeguards)	[Number]
13.23	Bank transfers (non-EU, non-EEA or non-equivalent safeguards)	[Number]

13.24	Debit / credit cards issued by banks (EU, EEA or equivalent safeguards, or other licensed financial institutions)	[Number]
13.25	Debit / credit cards issued by banks (Non EU, Non - EEA or equivalent safeguards, or other non-EU licensed financial institutions)	[Number]
13.26	EU or EEA-licensed payment service providers (PSPs)	[Number]
13.27	Non-EU or non-EEA-licensed payment service providers (PSPs)	[Number]
13.28	EU or EEA-licensed PSP that can be funded with cash or quasi-cash	[Number]
13.29	Prepaid cards / vouchers	[Number]
13.30	Virtual Financial Assets	[Number]
13.31	Internet-based payment systems (e.g., PayPal, Alipay, Apple Pay, Google Checkout, etc.) or other e-money services (as defined by FATF)	[Number]
13.32	Does your entity allow its customers to hold multiple accounts with the same brand?	No / Yes
13.33	Does your entity allow its customers to register and play on different brands which it offers?	No / Yes
13.34	Does your entity allow customers to credit their wallets through deposits (including cash) made through land-based intermediaries?	No / Yes
13.35	What is the total value of player deposits for all remote gaming activity that was facilitated through "betting syndicates" during the prior calendar year?	[Currency amount]
13.36	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]

14 Geography		Topic
14.01	What percentage of customers were resident in Malta?	[Decimal]
14.02	What percentage of customers were foreign and resident in an EU or EEA jurisdiction outside Malta?	[Decimal]
14.03	What percentage of customers were foreign and resident in a non-EU or non-EEA jurisdiction?	[Decimal]
14.04	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
14.05	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
14.06	Of the total number of VIP customers (as previously indicated), what percentage of VIP customers are resident in Malta?	[Decimal]
14.07	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?	[Decimal]
14.08	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?	[Decimal]
14.09	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
14.10	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
14.11	What was the total value (€) of player deposits which originated from EU or EEA jurisdictions in the prior calendar year?	[Currency amount]

14.12	What was the total number (#) of player deposits which originated from EU or EEA jurisdictions in the prior calendar year?	[Number]
14.13	What was the total value (€) of player deposits which originated from non-EU or non-EEA jurisdictions in the prior calendar year?	[Currency amount]
14.14	What was the total number (#) of player deposits which originated from non-EU / EEA jurisdictions in the prior calendar year?	[Number]
14.15	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?	[Currency amount]
14.16	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]
14.17	If your answer to the last two questions 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

15	Interface / Distribution Channels	Topic
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15.010	Of the total number of customers, what percentage were onboarded face-to-face?	[Decimal]
15.020	Of the total number of customers, what percentage were onboarded on a non-face-to-face basis?	[Decimal]
15.030	What percentage of customers have not yet completed CDD (verification) since the €2,000 threshold was not exceeded?	[Decimal]
15.040	What percentage of non-face-to face players were onboarded via remote and automated registration on an electronic platform without third party intervention?	[Decimal]
15.050	What percentage of customers were registered via a land-based intermediary?	[Decimal]
15.060	How many customer master account arrangements does your entity have?	[Number]
15.070	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?	[Decimal]
15.080	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]
15.090	Do your entity's policies and procedures define controls and processes for managing / tracking the use of customer "wallet" facilities?	No / Yes



