



Financial Intelligence Analysis Unit
Risk Evaluation Questionnaire

Financial Sector
Retirement Scheme Administrators

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.

1	Subject Person Information	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	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
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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	[Freertext]
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	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
2.19	Does the MLRO have a direct reporting line to the Board of Directors	No / Yes
2.20	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 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

4	Customer Acceptance and Risk Assessment	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 policies and procedures specify hierarchical authorisation levels within your entity to, on a risk basis, accept a customer or approve a transaction?	No / Yes

4.11	Did you / your entity acquire new clients through an introducer/s in the prior calendar year?	No / Yes
4.12	If "yes", please indicate the number of introducers used during the prior calendar year.	[Number]
4.13	In the case where an introducer was used, was due diligence performed on the introducer?	Never / Yes in some instances / Yes in all instances
4.14	Where applicable and on a risk basis, does the subject person undertake due diligence on the beneficiary/s to the policy / scheme / funds in accordance to the requirements of 4.6.1 (ii) of the IPs?	No / Yes
4.15	Do you / does your entity apply, depending on the risk, EDD measures where the source of premium payment / contribution is different to the policy holder?	No / Yes
4.16	When a customer makes use of the "free-look" / "cooling-off" period, is an assessment undertaken, on a risk basis, to determine whether the cancellation gives rise to suspicion about the transaction and whether submitting an STR would be appropriate?	No / Yes
4.17	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
4.18	What kind of measures Do you / does your entity make use of to determine the PEP status of a customer (beneficial owner/s)?	
4.19	a) Rely on publicly available information	No / Yes
4.20	b) Obtain information directly from the customer or BO	No / Yes
4.21	c) Use commercial databases	No / Yes
4.22	Does your entity apply identity fraud checks to ensure that the customer / policy holder is who they claim to be?	No / Yes
4.23	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
4.24	If variation in the timing of due diligence is permitted as indicated above, what pre-determined triggering criteria is applied?	
4.25	a) Transaction, customer activity threshold	No / Yes / Not Applicable
4.26	b) Pre-determined time frame	No / Yes / Not Applicable
4.27	c) Prior to completion of service provided	No / Yes / Not Applicable
4.28	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
4.29	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
4.30	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
4.31	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
4.32	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
4.33	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
4.34	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
4.35	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
4.36	How often do you / does your entity review the customer risk assessment for the following:	
4.37	a) Low risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.38	b) Medium Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.39	c) High Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.40	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
4.41	Do policies and procedures require the performance of periodic reviews on customer due diligence information and / or documentation, on the basis of customer risk rating?	No / Yes
4.42	Does your entity carry out checks, on a risk basis, to determine whether changes to the beneficiaries of a policy / scheme / fund / claim were made following the opening of the policy?	No / Yes

4.43	If "no", please explain.	No / Yes
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5	De-Risking Controls	Topic
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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
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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:	
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	Does the monitoring system in place:	
6.24	a) identify whether policies / retirement schemes / retirement plans opened by seemingly different customers are destined to be paid out to the same beneficiary	No / Yes / Not Applicable
6.25	b) monitor for payments from unidentified third parties	No / Yes / Not Applicable
6.26	c) monitor for multiple policies / retirement schemes / retirement plans linked to same persons	No / Yes / Not Applicable
6.27	d) monitor for payments made from the same person to different holders	No / Yes / Not Applicable
6.28	Does your entity screen / monitor for unusual use of the product, for example:	
6.29	a) Frequent and unexplained surrenders, especially when the refund is done to different bank accounts	No / Yes / Not Applicable
6.30	b) The customer makes frequent or unexpected use of "free look" provisions / "cooling-off" periods	No / Yes / Not Applicable
6.31	c) The customer incurs a high cost by seeking early termination of a product	No / Yes / Not Applicable

6.32	d) The customer transfers the contract to an apparently unrelated third party	No / Yes / Not Applicable
6.33	e) The customer's request to change or increase the sum insured and / or the premium / contribution payment are unusual or excessive	No / Yes / Not Applicable
6.34	f) The customer changes the beneficiary clause and nominates an apparently unrelated third party	No / Yes / Not Applicable
6.35	g) Significant and unexplained geographic distance between residence or business location of the customer and the location where the product sale took place (or the location of the insurer's representative)	No / Yes / Not Applicable
6.36	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
6.37	If "Other", please specify the jurisdiction list utilised by your entity.	[Freertext]
6.38	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]
6.39	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]
6.40	Is your entity aware of any of its customers whose assets were frozen (due to AML / CFT considerations) in any jurisdiction?	No / Yes

7	Policies and Procedures	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 your entity's policies and procedures allow for the refund of premium / contributions upon policy / scheme cancellation or policy surrender to an account other than the source of original funding?	No / Yes always / Yes, except in those instances where funds cannot be remitted back to the original source
7.05	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
7.06	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
7.07	Does your entity have policies and procedures regarding the reporting of suspicious transactions to the FIAU?	No / Yes
7.08	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
7.09	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes
7.10	Do your entity's policies and procedures define the instances and the actions, where applicable, to be undertaken to impose limitations on transaction / customer activity, caps and / or other restrictions on its customers?	No / Yes
7.11	Do you / does your entity have procedures for dealing with customers who request transactions to be completed in unusually tight or accelerated timeframes without reasonable explanation?	No / Yes
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 intermediaries / agents / introducers?	No / Yes
7.14	Do policies and procedures require you / your entity to assess the AML / CFT framework of intermediaries who process customer payments on behalf of your entity?	Never / Yes in some instances / Yes in all instances
7.15	Does your entity have internal whistleblowing procedures?	No / Yes
7.16	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
7.17	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
7.18	Do you / does your entity's policies and procedures require enhanced due diligence to be applied in higher risk situations?	No / Yes
7.19	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

8	Internal Audit / Independent Testing	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

9	Reporting	Topic
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9.01	How many STRs were submitted to the FIAU during the prior calendar year?	[Number]
9.02	How many internal suspicious reports were raised during the prior calendar year?	[Number]
9.03	From the internal reports raised in the prior calendar year, how many cases are still open?	[Number]
9.04	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]
9.05	How many internal suspicious reports were not reported to FIAU after investigation ("closed") during the prior calendar year?	[Number]
9.06	Were records of all "internal reports" raised during the prior calendar year and the analysis conducted thereon maintained by you / your entity?	No / No measures relating to internal reporting or alerts are in place / No internal reports submitted / Only internal reports maintained / Yes, internal report & analysis maintained
9.07	In those instances where an STR was not submitted to the FIAU, were the reasons and analysis documented on file?	No internal reports submitted / Reasons are not documented / Yes, most of the time / Yes, reasons are always retained
9.08	How many requests for information from the Maltese authorities did you / your entity receive about any of your customers during the prior calendar year?	[Number]

10	AML / CFT Training	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 that received AML / CFT training in the prior calendar year.	[Decimal]
10.05	Please provide the % of staff within the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]

10.06	Please provide the % of staff outside the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]
10.07	Please provide the % of board members / partners that received AML / CFT training throughout the prior calendar year.	[Decimal]
10.08	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
10.09	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:	
10.10	a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)	No / Yes / Not Applicable
10.11	b) your / your entity's AML / CFT policies and procedures	No / Yes / Not Applicable
10.12	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]
10.13	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
10.14	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
10.15	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
10.16	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

11	Record Keeping	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

12	Products and Services	Topic
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12.01	Total gross premium / contribution (€) from long-term business policies.	[Currency amount]
12.02	Total number (#) of retirement scheme / plans / funds.	[Number]
12.03	Pension fund management product: a) total number of active long-term business policies	[Number]
12.04	b) total gross premium / contributions for active long-term business policies	[Currency amount]
12.05	Did your entity / the entity you manage, during the prior calendar year, cease to offer specific long-term business products due to exposure to higher AML / CFT Risk?	No / Yes
12.06	Do any of the long-term business insurance products offered by your entity or the entity you manage, allow for easy access to funds (e.g. partial withdrawal or early surrender at any time with limited charges or fees)?	No / Yes
12.07	Do any of the long-term business insurance products offered by your entity allow for:	
12.08	a) high-value premium / contribution payments	No / Yes
12.09	b) overpayments	No / Yes
12.10	c) large volumes of lower value premium payments	No / Yes
12.11	Do the long-term business insurance products offered by your entity impose, where applicable, a restriction / limit on the total investment value of the product?	No / Yes
12.12	Do the long-term business insurance products offered by your entity impose, where applicable, a restriction on the term when the policy can be surrendered?	No / Yes
12.13	Do the long-term business insurance products offered by your entity or the entity you manage include, where applicable, the surrender values in the product / policy contracts?	No / Yes
12.14	Does your entity or the entity you manage offer long-term business tailor-made products, whereby the customer may dictate the underlying investment or portfolio composition?	No / Yes

12.15	Does your entity or the entity you manage offer long-term business insurance products that are funded in part or in whole by an employer through employer contributions and / or deductions made from employee salaries?	No / Yes
12.16	Does your entity or the entity you manage offer long term insurance products with a short term maturity period?	No / Yes

13	De-Risking Inherent Risk	Topic
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13.01	Have you experienced being de-risked during the previous calendar year?	No / Yes
13.02	If yes, provide details of the de-risking	[Freetext]
13.03	From which market where you de-risked? [Freetext]	[Freetext]

14	Customers	Topic
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14.01	Please list the total number of long-term business insurance 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 new customers onboarded during the prior calendar year.	[Number]
14.03	Do you have any customers in the following industries?	<ul style="list-style-type: none"> - Casino/Gaming - Attorneys/Lawyers acting as Formation Agents - Precious Metals, Stones, Jewelry dealers or wholesalers - Arts/Antiques dealers - Oil/Gas/Petrochemicals servicing/Technology - Aviation Technology/materials/parts - Chemical Companies - Cash Intensive Businesses - Maritime Transport - Hydrocarbon Trading/Investing - Arms/Weapons dealers/Manufacturers - Car dealers - Import/Export Agents - International transportation Businesses
14.04	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]
14.05	What number of long-term business insurance customers have an ownership structure that includes offshore vehicles or trusts or other legal arrangements including bearer shares, fiduciary deposits and foundations?	[Number]
14.06	Of the total number of long-term business insurance customers, what % are rated as: a) "High Risk"	[Decimal]
14.07	b) "Medium High Risk"	[Decimal]
14.08	c) "Medium Risk"	[Decimal]
14.09	d) "Low Medium Risk"	[Decimal]
14.10	e) "Low Risk"	[Decimal]
14.11	Does a percentage of your long-term business insurance customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
14.12	If "Yes", please specify the additional risk rating.	[Freetext]
14.13	Please specify the number of customers in the additional risk category specified in the prior question.	[Number]
14.14	What is the total number and value of long-term business insurance policies was the beneficiary of the policy a charity or other non-profit organization? a) Volume (#)	[Number]
14.15	b) Value (€)	[Currency amount]
14.16	Do you / does your entity have customers for which management is vested in a representative or an agent (i.e. where you deal primarily with a third party and not the customer directly)?	No / Yes
14.17	Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).	[Number]
14.18	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]
14.19	Please list the number of customers who operate cash intensive businesses.	[Number]
14.20	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]

14.21	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]
14.22	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]
14.23	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[Decimal]
14.24	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions	[Decimal]
14.25	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
14.26	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
14.27	What percentage of you / your entity's long-term business customers (or their BOs) which were PEPs in the prior calendar year, are from Malta?	[Decimal]
14.28	What percentage of you / your entity's long-term business customers (or their BOs) which were PEPs in the prior calendar year, are from an EU or EEA jurisdiction?	[Decimal]
14.29	What percentage of you / your entity's long-term business customers (or their BOs) which were PEPs in the prior calendar year, are from a non-EU / EEA jurisdiction?	[Decimal]
14.30	Does your entity have, based on the prior calendar year, PEPs who obtained their PEP status in a jurisdiction listed in the FATF Public Statement and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index.	No / Yes
14.31	If your 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
14.32	Please indicate the total volume (#) and value (€) of premium payments / contributions made via the following funding methods in the prior calendar year:	
14.33	Bank transfers (EU, EEA or equivalent safeguards): a) Volume (#)	[Number]
14.34	b) Value (€)	[Currency amount]
14.35	Bank transfers (non-EU, EEA or equivalent safeguards): a) Volume (#)	[Number]
14.36	b) Value (€)	[Currency amount]
14.37	Debit / credit cards issued by banks or other licensed financial institutions (EU, EEA or equivalent safeguards): a) Volume (#)	[Number]
14.38	b) Value (€)	[Currency amount]
14.39	Debit / credit cards issued by banks or other licensed financial institutions (non-EU, EEA or equivalent safeguards): a) Volume (#)	[Number]
14.40	b) Value (€)	[Currency amount]
14.41	Prepaid cards / vouchers: a) Volume (#)	[Number]
14.42	b) Value (€)	[Currency amount]
14.43	Cash: a) Volume (#)	[Number]
14.44	b) Value (€)	[Currency amount]
14.45	Internet-based, or mobile-application based, payment systems: a) Volume (#)	[Number]
14.46	b) Value (€)	[Currency amount]
14.47	Payment service providers linked to bank accounts: a) Volume (#)	[Number]
14.48	b) Value (€)	[Currency amount]

15 Geography		Topic
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	Please indicate the total transactional / payment volume (#) and value (€) for all long term business provided during the prior calendar year:	
15.07	What total volume and value of long-term insurance policy premium / contribution payments originate from domestic payees / insured persons? a) Volume (#)	[Number]
15.08	b) Value (€)	[Currency amount]
15.09	What total volume and value of long-term insurance policies / retirement scheme / pension funds are paid out to domestic-based insured-persons? a) Volume (#)	[Number]
15.10	b) Value (€)	[Currency amount]
15.11	What total volume and value of long-term insurance policy premium / contribution payments are cross border? a) Volume (#)	[Number]
15.12	b) Value (€)	[Currency amount]
15.13	What total volume and value of long term insurance policy / retirement schemes / pension funds pay-outs are made to cross border insured-persons or beneficiaries? a) Volume (#)	[Number]
15.14	b) Value (€)	[Currency amount]

16 Interface / Distribution Channels		Topic
16.01	Of the total number of customers, what percentage were onboarded face-to-face?	[Decimal]
16.02	What percentage of long-term business insurance customers were onboarded on a non-face-to-face basis (i.e. online, postal or telephone sales)?	[Decimal]
16.03	Of those onboarded on a non-face-to-face basis (as indicated above), what percentage of long-term business insurance customers were introduced by an EU or EEA or otherwise regulated broker / agent / introducer?	[Decimal]
16.04	Of those onboarded on a non-face-to-face basis (as indicated above), what percentage of long-term business insurance customers were introduced by a non-EU / EEA or otherwise un-regulated broker / agent / introducer?	[Decimal]
16.05	What percentage of long-term business insurance customers was CDD conducted by the agent / broker / introducer / TII (as a % of total)?	[Decimal]
16.06	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]
16.07	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

16.08	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]
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