



Financial Intelligence Analysis Unit
Risk Evaluation Questionnaire

Designated Non Financial Businesses and Professions Sector (DNFBPs)
Trustees and Fiduciaries

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	How many staff members, expressed as full time employees (FTEs), are part of the AML / CFT team (if one exists)?	[Number]
2.04	Is any of the AML / CFT team staff responsible for other roles and responsibilities not attributable to AML / CFT (e.g. front office, back office, etc.)?	No / Yes
2.05	Do you / does your entity implement appropriate procedures (including obtaining a police conduct or equivalent upon hiring) and assess the conduct and integrity of employees (including partners and directors) handling relevant financial business or relevant activity?	No / Yes
2.06	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:	
2.07	a) regulatory enforcement actions, criminal investigations for ML / FT or any other financial crime	No / Yes
2.08	b) subject of negative news reports	No / Yes
2.09	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

2.10	If Yes, please explain	[Freetext]
2.11	Is there any pending litigation or regulatory enforcement action related to AML or Sanctions?	No / Yes
2.12	If Yes, please explain	[Freetext]
2.13	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)
2.14	If "Yes", please specify the obligations that are being outsourced.	[Freetext]
2.15	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
2.16	Does the MLRO have a direct reporting line to the Board of Directors	No / Yes
2.17	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 an occasional transaction is carried out, 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 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
4.07	d) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover, other income streams)	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.08	e) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.09	Please indicate, for all your customers where a business relationship is formed, whether you / your entity collects the following:	
4.10	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
4.11	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
4.12	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
4.13	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

4.14	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
4.15	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
4.16	Please indicate whether for all your customers or depending on risk, you / your entity collects the following:	
4.17	a) Nature and extent of the beneficial interest/s held	No / Only for high risk / Yes
4.18	b) Any other person exercising ultimate control over the trust	No / Only for high risk / Yes
4.19	Please indicate whether for all your customers or depending on risk, you / your entity performs due diligence (identification and verification where possible) on the following:	
4.20	a) The settlor(s)	No / Only for high risk / Yes/ N/A option
4.21	b) The protector(s)	No / Only for high risk / Yes/ N/A option
4.22	c) The beneficiary(ies) and any UBOs (should the beneficiary be a legal person)	No / Only for high risk / Yes/ N/A option
4.23	Did you / your entity acquire new clients through an introducer/s in the prior calendar year?	No / Yes
4.24	If "yes", please indicate the number of introducers used during the prior calendar year.	[Number]
4.25	In the case where an introducer was used, was due diligence performed on the introducer?	Never / Yes in some instances / Yes in all instances
4.26	Are the following verification measures used during the onboarding of non-face-to-face customers:	
4.27	a) Verification on the basis of documents	No / Yes
4.28	b) Use of video conferencing tools	No / Yes
4.29	c) Use of identity verification software	No / Yes
4.30	d) Verification through the use of commercial electronic data providers	No / Yes
4.31	e) Use of e-IDs	No / Yes
4.32	f) Verification of Identity Platforms	No / Yes
4.33	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
4.34	What kind of measures Do you / does your entity make use of to determine the PEP status of a customer (beneficial owner/s)?	
4.35	a) Rely on publicly available information	No / Yes
4.36	b) Obtain information directly from the customer or BO	No / Yes
4.37	c) Use commercial databases	No / Yes
4.38	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
4.39	If variation in the timing of due diligence is permitted as indicated above, what pre-determined triggering criteria is applied?	
4.40	a) Transaction, customer activity threshold	No / Yes / Not Applicable
4.41	b) Pre-determined time frame	No / Yes / Not Applicable
4.42	c) Prior to completion of service provided	No / Yes / Not Applicable
4.43	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
4.44	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
4.45	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
4.46	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
4.47	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
4.48	How often do you / does your entity review the customer risk assessment for the following:	
4.49	a) Low risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.50	b) Medium Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never

4.51	c) High Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.52	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
4.53	Do policies and procedures require due diligence to be applied when there is a change in ownership structure and beneficiaries?	No / Yes

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	Where business relationships are established, how frequently does your entity review and update the information held in the files on customers and BOs that are assessed as high risk (or higher)?	As necessary but at least annually / Annually / Every 18 months / Every 2-3 years / More than every 3 years / Never
6.04	Where business relationships are established, how frequently does your entity review and update the information held in the files on customers and BOs that are not assessed as high risk (or higher)?	As necessary but at least annually / Annually / Every 2-3 years / More than every 3 years / Never
6.05	Do you / does your entity verify the legitimacy of the business or economic reasons for the structure you are / your entity is asked to set up and / or manage?	No / Yes
6.06	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
6.07	Are you or is your entity aware of any of your customers whose assets were frozen, confiscated or seized (due to AML/CFT considerations)?	No / Yes
6.08	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]
6.09	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]

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 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	Does your entity have policies and procedures regarding the reporting of suspicious transactions to the FIAU?	No / Yes
7.07	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes
7.08	In case of business relationships, do your / does your entity's policies and procedures require you to:	
7.09	a) systematically monitor, on a risk basis, customer activity, deals, or transactions	No / Yes / Not Applicable
7.10	b) perform a more detailed review when unusual activity / transactions are detected	No / Yes / Not Applicable

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	Does your entity have internal whistleblowing procedures?	No / Yes
7.15	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
7.16	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
7.17	Do you / does your entity's policies and procedures require enhanced due diligence to be applied in higher risk situations?	No / Yes
7.18	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	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
8.10	Where applicable, when was the last time that you / your entity formally assessed the quality of the services provided to you by your outsourced service provider (within and outside the group) which are located in a EU / EEA jurisdiction (including Malta)?	Within the last 3 months / Within the last 6 months / Within the last 12 months / Within the last 2 years / Within the last 3 years / Over 3 years ago / Never / Not Applicable
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 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	Do you / does your entity have policies and procedures regarding the reporting of suspicious activity or transactions?	No / Yes
9.02	How many STRs were submitted to the FIAU during the prior calendar year?	[Number]
9.03	How many internal suspicious reports were raised during the prior calendar year?	[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	Were there any "internal reports" or "alerts", received during prior calendar year, which were analysed by the MLRO but did not instigate an STR?	No measures relating to internal reporting or alerts are in place / Yes less than 10 / Yes more than 10 / No, all instigated STRs
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	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]
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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 board members / partners that received AML / CFT training throughout the prior calendar year.	[Decimal]
10.05	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
10.06	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:	
10.07	a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)	No / Yes / Not Applicable
10.08	b) your / your entity's AML / CFT policies and procedures	No / Yes / Not Applicable
10.09	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]
10.10	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
10.11	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	How many trusts did your entity act as trustee / fiduciary for during the period calendar year?	[Number]
12.02	List the total value (€) of the assets held under trust as of end of prior calendar year	[Currency amount]
12.03	List the number of customers for which your entity provided fiduciary services	[Number]
12.04	List the number of customers for which your entity provided trustee services	[Number]
12.05	List the number of foundations for which your entity acted as an administrator	[Number]
12.06	a) List the number of trusts for which your entity acted as a trustee during the prior calendar year	[Number]
12.07	b) List the total value (€) of the assets held under management as at the end of the prior calendar year	[Currency amount]
12.08	a) List the number of trusts for which your entity acted as a fiduciary during the prior calendar year	[Number]
12.09	b) List the total value (€) of the assets held under management as at the end of the prior calendar year	[Currency amount]
12.10	a) List the number of foundations that you administered during the prior calendar year	[Number]
12.11	b) List the total value (€) of the assets held under management as at the end of the prior calendar year	[Currency amount]
12.12	a) List the number of qualified person appointments during the prior calendar year	[Number]
12.13	b) List the total value (€) of the assets (represented by the trusts where there were qualified person appointments referred to above) held under trust or under management as at the end of the prior calendar year	[Currency amount]

12.14	For how many trusts does your entity act as trustee where the value of the assets settled on trust does not exceed EUR 1 million?	[Number]
12.15	For how many trusts does your entity act as trustee where the value of the assets settled on trust is between EUR 1 million and EUR 5 million?	[Number]
12.16	For how many trusts does your entity acts as trustee where the value of the assets settled on trust exceeds EUR 5 million?	[Number]
12.17	What is the highest value of the assets settled on trust where your entity acts as trustee?	[Currency amount]
12.18	What is the total number of properties held on trust where your entity acts as trustee?	[Number]
12.19	What is the total value of the properties held on trust where your entity acts as trustee?	[Currency amount]
12.20	What is the total number of bank accounts held on trust where your entity acts as trustee?	[Number]
12.21	What is the total value of bank accounts held on trust where your entity acts as trustee?	[Currency amount]
12.22	What is the total number of securities held on trust where your entity acts as trustee?	[Number]
12.23	What is the total value of securities held on trust where your entity acts as trustee?	[Currency amount]
12.24	How many foundations does your entity administer where the total value of the assets of the foundation does not exceed EUR 1 million?	[Number]
12.25	How many foundations does your entity administer where the total value of the assets of the foundation is between EUR 1 million and EUR 5 million?	[Number]
12.26	How many foundations does your entity administer where the total value of the assets of the foundation exceeds EUR 5 million?	[Number]
12.27	What is the highest value of the assets of the foundation which your entity administers?	[Currency amount]

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	[Freertext]
13.03	From which market where you de-risked? [Freertext]	[Freertext]

14	Customers	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	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]
14.05	b) Legal persons	[Decimal]
14.06	c) Customers with an ownership structure that includes offshore vehicles, trusts, or other legal arrangements including bearer shares and nominee shareholding	[Decimal]
14.07	d) Customers with an ownership structure that includes foundations, charities or other not-for-profit entities	[Decimal]
14.08	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]
14.09	Of the total number of customers, please specify: a) % of customers scored / rated as "High Risk"	[Decimal]
14.10	b) % of customers scored / rated as "Medium High Risk"	[Decimal]
14.11	c) % of customers scored / rated as "Medium Risk"	[Decimal]
14.12	d) % of customers scored / rated as "Low Medium Risk"	[Decimal]
14.13	e) % of customers scored / rates as "Low Risk"	[Decimal]
14.14	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
14.15	If "Yes", please specify any additional risk rating.	[Freertext]
14.16	If "Yes" Please specify the corresponding % of customers of the risk rating stated above.	[Decimal]
14.17	Do you / does your entity have customers (including BOs, directors) who have been convicted of a criminal offence that could have potentially generated proceeds?	No / Yes

14.18	Do you / does your entity hold funds on trust, or in another fiduciary capacity for customers through a client account?	No / Yes
14.19	Do you / does your entity have customers that act as holding companies with subsidiaries or investments in non-EU / EEA jurisdictions?	No / Yes
14.20	Do you / does your entity have customers (legal entities) which are shell companies?	No / Yes
14.21	Do you / does your entity have customers who raised capital through Initial Coin Offerings (ICOs), Securitized Coin Offerings (SCOs) and / or crowdfunding?	No / Yes
14.22	Do you / does your entity have express trusts with an unexplained nature of classes of beneficiaries and acting as trustees of such a trust?	No / Yes
14.23	Please list the number of customers that are foundations, charities or other not-for-profit entities.	[Number]
14.24	Please list the number of customers that operate cash intensive businesses.	[Number]
14.25	Please list the number of customers that held virtual financial assets or carried out transactions (receipts or payments) through the use of virtual financial assets during the prior calendar year.	[Number]
14.26	Please list the number of customers that are VFA agents or VFA licence holders or are in the process of obtaining a VFA licence.	[Number]
14.27	To the best of your knowledge, do you / does your entity have customers with no address or multiple addresses without any legitimate reasons?	No / Yes
14.28	Do any of your customers use financial intermediaries located 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
14.29	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
14.30	Please list the number of customers whereby the independent audit opinion expressed in the last financial statements is either a qualified opinion, an adverse opinion or a disclaimer of opinion.	[Number]
14.31	Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).	[Number]
14.32	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]
14.33	Please list the number of customers who operate cash intensive businesses.	[Number]
14.34	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
14.35	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
14.36	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]
14.37	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]
14.38	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]
14.39	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[Decimal]
14.40	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions	[Decimal]
14.41	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

14.42	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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15	Geography	Topic
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15.01	What percentage of your / your entity's total customers are resident or otherwise incorporated or their principal place of business is in Malta?	[Decimal]
15.02	What percentage of your / your entity's total customers are foreign and resident or otherwise incorporated or their principal place of business is in an EU or EEA jurisdiction outside Malta?	[Decimal]
15.03	What percentage of your / your entity's total customers are foreign and resident, or otherwise incorporated or their principal place of business, in a non-EU / EEA jurisdiction?	[Decimal]
15.04	Did you / your entity have customers, based on the prior calendar year, who are resident or otherwise incorporated or their principal place of business is in a jurisdiction 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
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	Do any of your customers provide goods / services (main markets) in or to, a jurisdiction listed in the FATF Lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes
15.07	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
15.08	What % of your / your entity's customers' BOs are resident in Malta?	[Decimal]
15.09	What % of your / your entity's customers' BOs are foreign and resident in an EU or EEA jurisdiction outside Malta?	[Decimal]
15.10	What % of your / your entity's customers' BOs are foreign and resident in a non-EU / EEA member state jurisdiction?	[Decimal]
15.11	Did you / your entity's customers, based on the prior calendar year, have BOs who 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 the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes
15.12	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
15.13	What volume and amount of payouts were made to beneficiaries based in Malta: a) Total volume (#)	[Number]

15.14	b) Total value (€)	[Currency amount]
15.15	What volume and amount of payouts were made to beneficiaries based in EU / EEA jurisdiction: a) Total volume (#)	[Number]
15.16	b) Total value (€)	[Currency amount]
15.17	What volume and amount of payouts were made to beneficiaries based in non-EU / EEA jurisdiction: a) Total volume (#)	[Number]
15.18	b) Total value (€)	[Currency amount]
15.19	What volume and amount of payouts were made to beneficiaries based in non-EU / EEA jurisdiction: a) Total volume (#)	[Number]
15.20	b) Total value (€)	[Currency amount]
15.21	Please list the number of foundations within your customer base that: a) pay out to beneficiaries of the foundations that are located in Malta	[Number]
15.22	b) pay out to beneficiaries of the foundations that are located in EU / EEA jurisdictions	[Number]
15.23	c) pay out to beneficiaries of the foundations that are located in non-EU / EEA jurisdictions	[Number]
15.24	d) pay out to beneficiaries of the foundations that are located in jurisdictions 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	[Number]
15.25	Please list the number of foundations within your customer base that: a) the assets held on trust are located in Malta	[Decimal]
15.26	b) the assets held on trust are located in EU / EEA jurisdictions	[Decimal]
15.27	c) the assets held on trust are located in non-EU / EEA jurisdictions	[Decimal]
15.28	d) the assets held on trust are located in jurisdictions 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]
15.29	If assets held on trust 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
15.30	Where your entity holds shares in a fiduciary capacity in a foundation, please indicate the % shares held in foundations whose assets are located in: a) Malta	[Decimal]
15.31	b) EU / EEA jurisdictions	[Decimal]
15.32	c) non-EU / EEA jurisdictions	[Decimal]
15.33	d) jurisdictions 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]
15.34	If assets held on trust 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

16	Interface / Distribution Channels	Topic
16.01	Of the total number of customers, what % were onboarded or serviced on a non-face-to-face basis in the prior calendar year?	[Decimal]
16.02	Of those customers, who are legal persons and who were onboarded / serviced on a non-face-to-face basis in the prior calendar year, indicate whether the majority are incorporated in Malta, within EU / EEA or outside EU / EEA?	Majority of non-face-to-face customers are incorporated in Malta / Majority of non-face-to-face customers are incorporated within EU or EEA / Majority of non-face-to-face customers are incorporated outside EU or EEA

16.03	Of those customers who are natural persons and who were onboarded / serviced on a non-face-to-face basis in the prior calendar year, indicate whether the majority of customers are resident in Malta, within EU / EEA or outside EU / EEA?	Majority of non-face-to-face customers are incorporated in Malta / Majority of non-face-to-face customers are incorporated within EU or EEA / Majority of non-face-to-face customers are incorporated outside EU or EEA
16.04	Did you / your entity on-board or service new clients introduced by agents or intermediaries, in the prior calendar year?	No / Yes
16.05	What % of customers were onboarded during the prior calendar year where a reliance arrangement was in place in terms of Regulation 12 of the PMLFTR?	[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

