

Guidance for the registration and use of the CASPAR platform



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1) Abbreviations

AML/CFT	Anti-money laundering / combatting funding of terrorism
CASPAR	Compliance and Supervision Platform for Assessing Risk
CSP	Corporate Service Provider
DE	Designated Employee
FAQ	Frequently asked questions
FIAU	Financial Intelligence Analysis Unit
MFSA	Malta Financial Services Authority
MGA	Malta Gaming Authority
MLRO	Money Laundering Reporting Officer
REQ	AML/CFT Risk Evaluation Questionnaire
SP	Subject Person

2) Introduction

The FIAU drafted AML/CFT Risk Evaluation Questionnaires (REQ) for each type of activity to take into account sector specific activities.

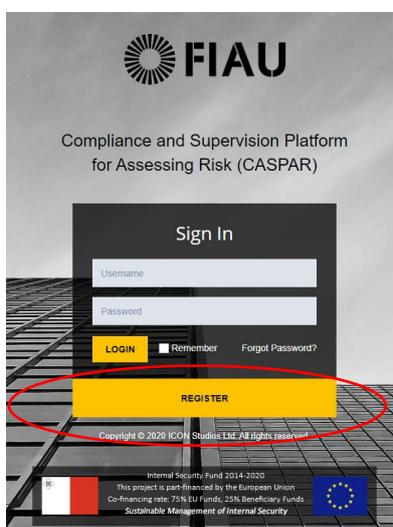
The FIAU developed a data collection tool, the Compliance and Supervision Platform for Assessing Risk (CASPAR), which is a multifunctional system that allows the Unit to gather information from multiple sources. Subject Persons must use the CASPAR system in order to submit the annual REQs. This guidance is being issued to explain the registration process to CASPAR, as well as the process for the submission of the REQ.

3) Registration to CASPAR

Is it your first time on the CASPAR platform?

- If yes, you need to do 2 steps to access it:
Step 1: First-time user registration;
Step 2: Create / Subscribe to an Existing Subject Person.

Go to <https://caspar.fiaumalta.org/> and click 'Register' to access the user registration form.



- If not, you only need to login. Go to <https://caspar.fiaumalta.org/> and input the username and password created at registration. Your username is the email address used during registration process.

The website is optimized for Google Chrome and Mozilla Firefox. Kindly note that the website is not compatible with Internet Explorer, Microsoft Edge and Safari as well as all the Apple devices, that is, Iphone, Ipad, Mac Books and IMacs.

A user account is required to access the CASPAR platform. There are three types of registrations:

A. MLRO

Appointed for a Legal Entity which is carrying out relevant financial business and/or relevant activity. This registration type should also be used by MLROs who are still awaiting approval from the MGA or MFSA.

For guidance on registration, refer to section [A. MLRO](#)

B. Designated Employee

Employee/s designated to assist the MLRO in the fulfilment of the AML/CFT duties of a Legal Entity.

For guidance on registration, refer to section [B. Designated Employee](#)

C. Sole Practitioner

Individuals who undertake any relevant financial business and/or relevant activity in their own name or under a trade name.

For guidance on registration, refer to section [C. Sole Practitioner](#)

A. MLRO

This type of registration should be used by the appointed MLROs of legal entities, interim MLROs as well as by MLROs who are still awaiting approval from the MGA or MFSA.

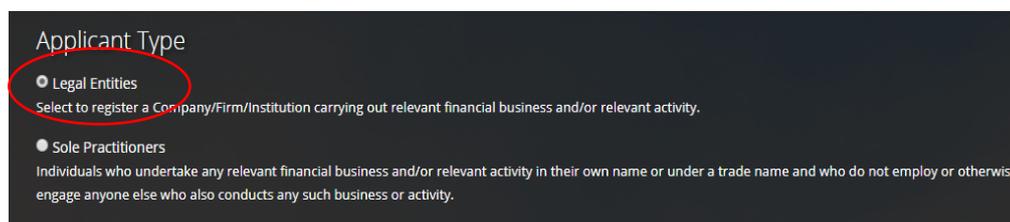
Upon successful registration, a MLRO is given the following rights:

- Creation of a Subject Person;
- Editing of details of the Subject Person;
- Approval of a Designated Employee (DE);
- Online compilation and submission of REQ;
- Payment of applicable fee relating to REQ submissions.

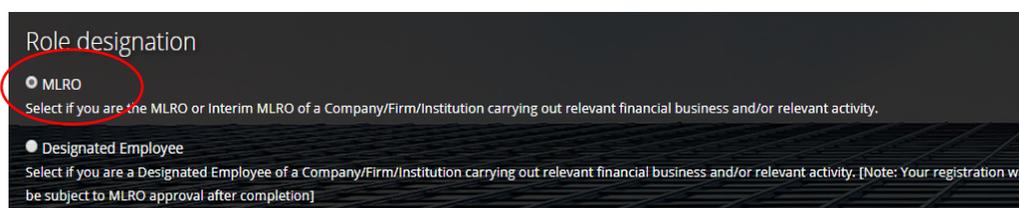
Step 1: First-time Registration of User

The steps indicated hereunder should be followed to complete the successful registration of a user:

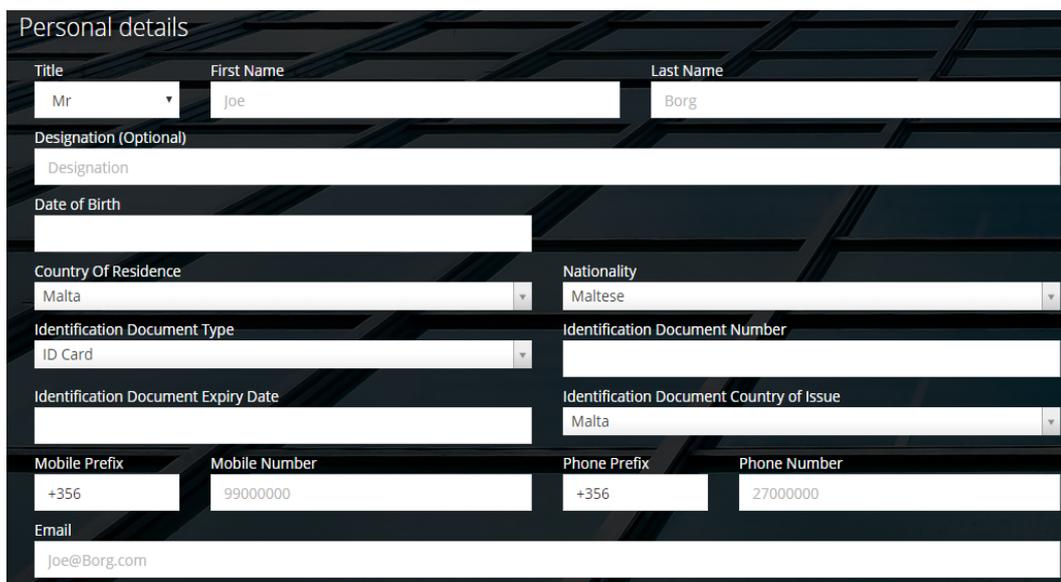
- 1) Select 'Legal Entities' in the Applicant Type section.



- 2) Select 'MLRO' as Role Designation.



- 3) Complete the registration form by inserting personal details in the respective fields and note that the email address provided, will be your username to login to CASPAR.



Personal details

Title: Mr | First Name: Joe | Last Name: Borg

Designation (Optional): Designation

Date of Birth: [Empty field]

Country Of Residence: Malta | Nationality: Maltese

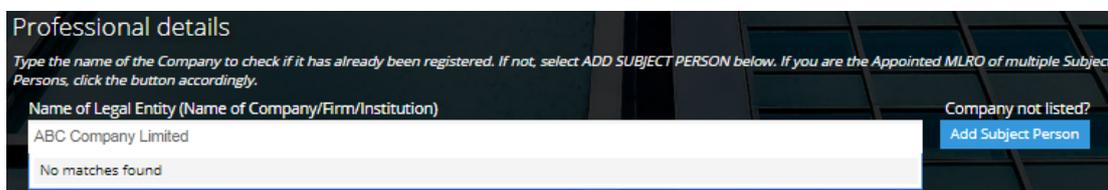
Identification Document Type: ID Card | Identification Document Number: [Empty field]

Identification Document Expiry Date: [Empty field] | Identification Document Country of Issue: Malta

Mobile Prefix: +356 | Mobile Number: 99000000 | Phone Prefix: +356 | Phone Number: 27000000

Email: joe@Borg.com

- 4) CASPAR maintains a list of all registered Subject Persons. Insert three consecutive letters of the name of the Legal Entity in the section Professional Details. If the Subject Person has already been created on CASPAR, the name of the Subject Person as registered, will appear in this field. In this case, select the Subject Person from the dropdown menu.



Professional details

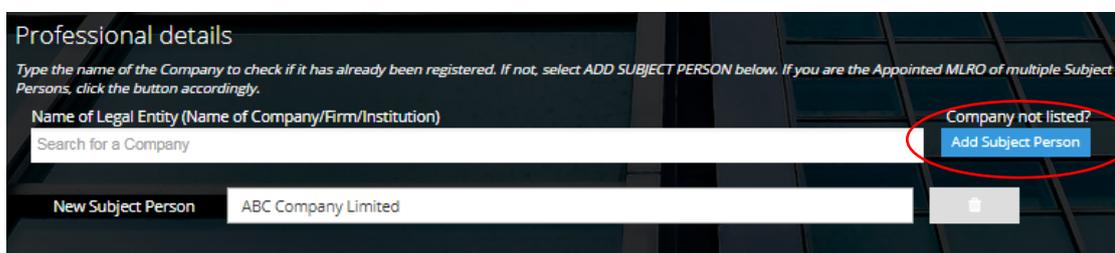
Type the name of the Company to check if it has already been registered. If not, select ADD SUBJECT PERSON below. If you are the Appointed MLRO of multiple Subject Persons, click the button accordingly.

Name of Legal Entity (Name of Company/Firm/Institution): ABC Company Limited

Company not listed? Add Subject Person

No matches found

If the name of the Subject Person does not feature, click on 'Add Subject Person' and insert the name of the Legal Entity.



Professional details

Type the name of the Company to check if it has already been registered. If not, select ADD SUBJECT PERSON below. If you are the Appointed MLRO of multiple Subject Persons, click the button accordingly.

Name of Legal Entity (Name of Company/Firm/Institution): Search for a Company

Company not listed? Add Subject Person

New Subject Person: ABC Company Limited

If you are the appointed MLRO for more than one legal entity, repeat this step for each additional Subject Person.

The creation of a user in CASPAR requires the approval of FIAU. The name of the legal entity / entities entered in this section will solely be used by FIAU during the approval of the user. After receipt of approval, the user must carry out an additional step to create / subscribe to a Subject Person – Refer to guidance in [Step 2](#).

- 5) Create a password which will be used to access your personal account and note that the selected password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Once you have completed the form, click 'Register'.

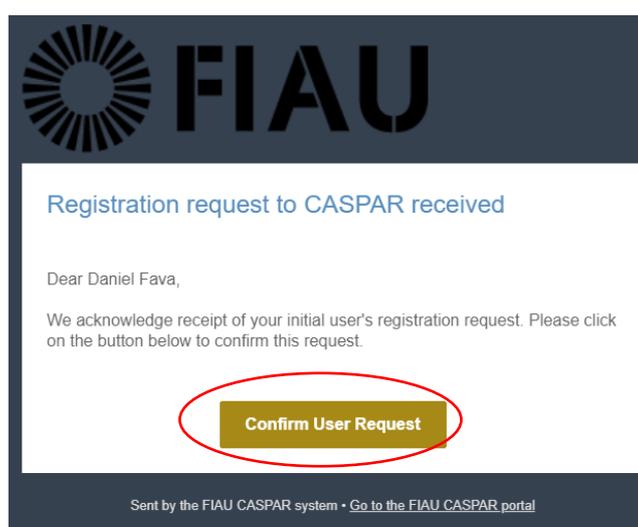


The screenshot shows a registration form titled "Login details". It contains two input fields: "Password (min. 8 characters)" and "Confirm Password", both with masked characters. Below the password field, a message states "Password needs to have a minimum length of 8 characters". A "Back to Login" link is on the left. On the right, a note says "Your login to the system will be your e-mail address, as entered above." A yellow "REGISTER" button is circled in red.

- 6) The following screen will appear, acknowledging the submission of the Registration Form.



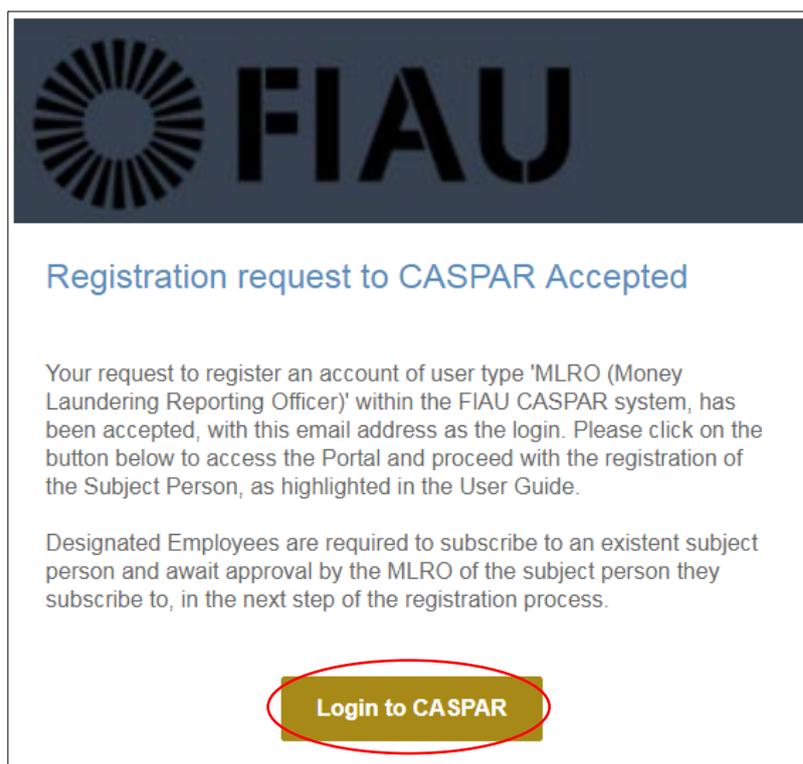
- 7) An automated email is transmitted to the email address provided at registration. This email features a link required to complete this first step of the registration process. Click on 'Confirm User Request' to confirm the email address or copy and paste the URL into your web browser.



- 8) This next screen confirms that the email address has been verified and that your registration request will be submitted to the FIAU for approval. An email will be submitted once this request is reviewed by FIAU.



- 9) Upon receipt of email confirming approval of the user's registration, click on 'Login to CASPAR' and login to the newly created account by inserting the email address and password selected upon the initial user's registration process. You may wish to contact Compliance at the FIAU for clarification purposes and further guidance, should your initial user's registration be rejected.



Step 2: Creation / Subscribing to a Subject Person

Upon launch of CASPAR, the system will hold no data on the Subject Persons and hence, all records are to be created anew.

A one-time registration should be carried out to create the entity's record, and allow users to subscribe to same.

Was the Subject Person created on CASPAR?

- **No** - You need to create the Subject Person by completing a one-time registration form. Refer to guidance in [Creation of a Subject Person](#)
- **Yes** - You only need to subscribe to an existing Subject Person. Refer to guidance in [Subscribing to an Existing Subject Person](#)

How do I know whether a Subject Person is created?

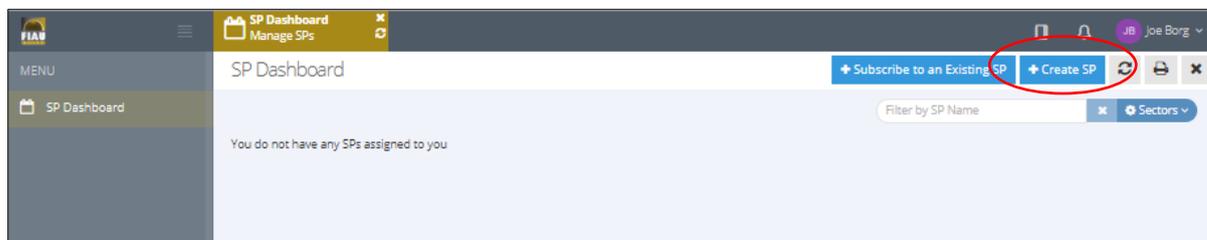
In the initial registration form, you were required to input the name of the Legal Entity. If the name of the entity appeared in a list, the legal entity is already created on CASPAR and you may go to ['Subscribing to a Subject Person'](#). On the other hand, if you had to click on 'Add Subject Person', an additional step has to be completed to create the Subject Person on CASPAR ([Creation of a Subject Person](#)).

Still not sure? Go to ['Subscribing to a Subject Person'](#).

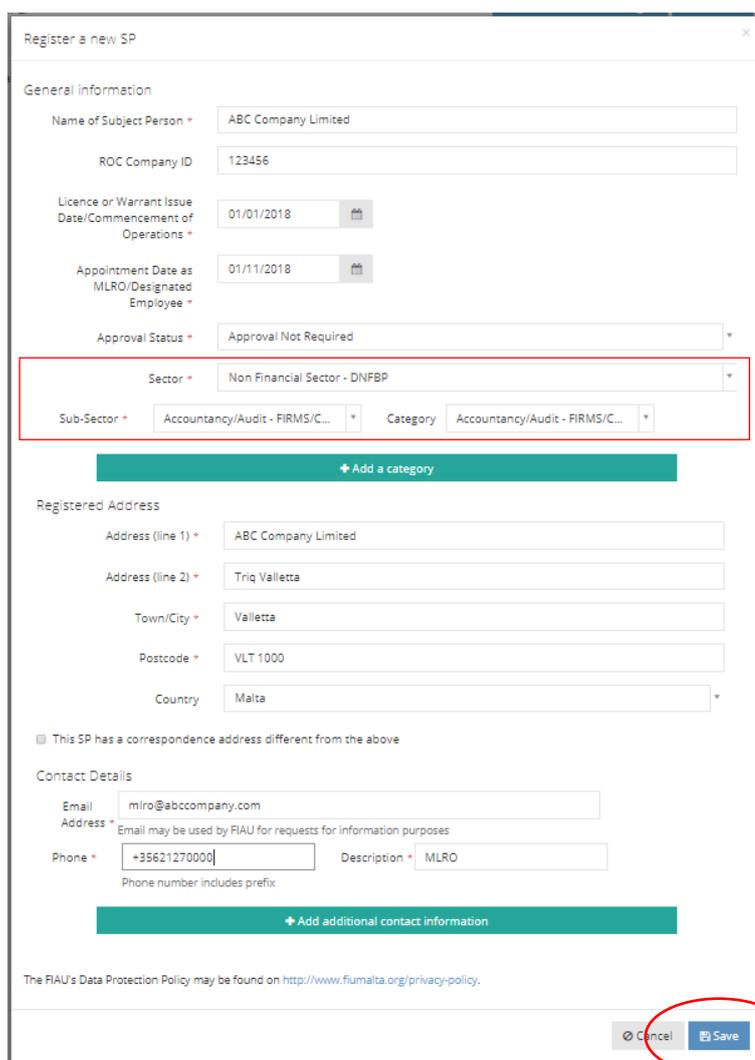
Creation of a Subject Person (Legal Entity)

If the Subject Person is not yet created on CASPAR, a one-time registration is required as follows:

- 1) Login to CASPAR. Click on '+ Create SP' on the top right-hand side of the screen.

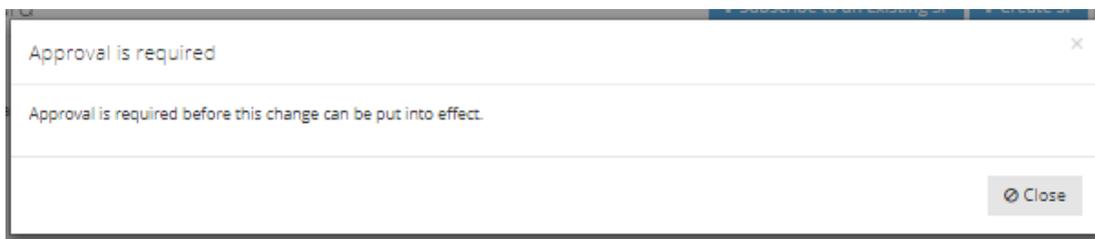


- 2) Complete the required fields as shown below and click the 'Save' button.

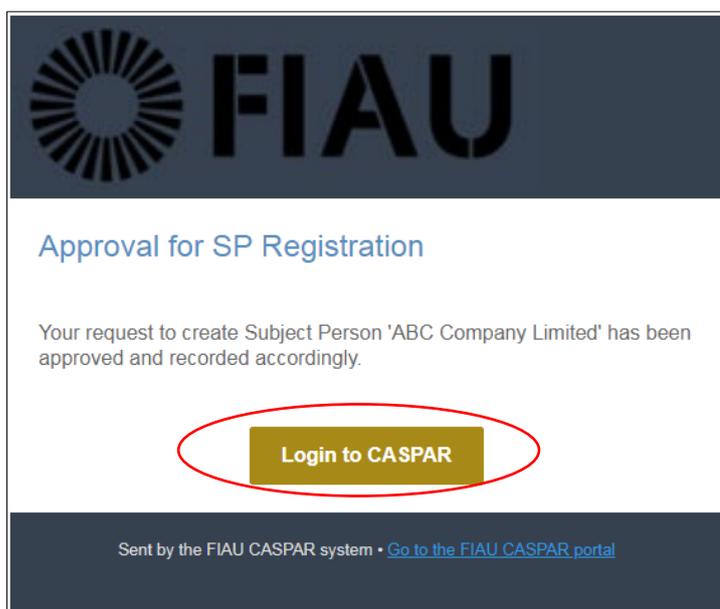
A screenshot of the 'Register a new SP' form. The form is divided into several sections: 'General information', 'Registered Address', and 'Contact Details'. The 'General information' section includes fields for 'Name of Subject Person' (ABC Company Limited), 'ROC Company ID' (123456), 'Licence or Warrant Issue Date/Commencement of Operations' (01/01/2018), 'Appointment Date as MLRO/Designated Employee' (01/11/2018), and 'Approval Status' (Approval Not Required). The 'Sector' dropdown is set to 'Non Financial Sector - DNFBP', and the 'Sub-Sector' and 'Category' dropdowns are both set to 'Accountancy/Audit - FIRMS/C...'. A green button '+ Add a category' is located below these dropdowns. The 'Registered Address' section includes fields for 'Address (line 1)' (ABC Company Limited), 'Address (line 2)' (Triq Valletta), 'Town/City' (Valletta), 'Postcode' (VLT 1000), and 'Country' (Malta). There is a checkbox 'This SP has a correspondence address different from the above' which is unchecked. The 'Contact Details' section includes fields for 'Email' (m1ro@abccompany.com), 'Address' (with a note 'Email may be used by FIAU for requests for information purposes'), 'Phone' (+35621270000), and 'Description' (MLRO). A green button '+ Add additional contact information' is located below these fields. At the bottom right, there are 'Cancel' and 'Save' buttons, with the 'Save' button circled in red.

Kindly refer to [Section 4](#) for further guidance on the selection of the relevant sector, sub-sector/s and category/ies

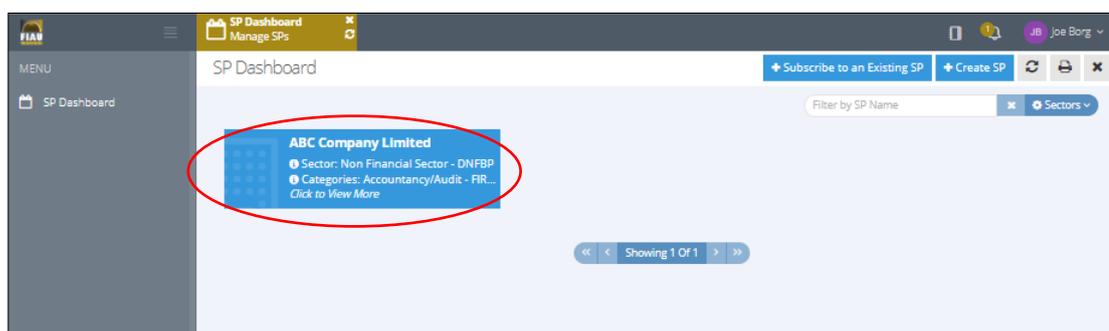
- 3) The creation of the Subject Person requires the approval of the FIAU. Click 'Close' and await FIAU approval.



- 4) Once this request has been approved/rejected, a notification will be transmitted to the email address provided at registration.



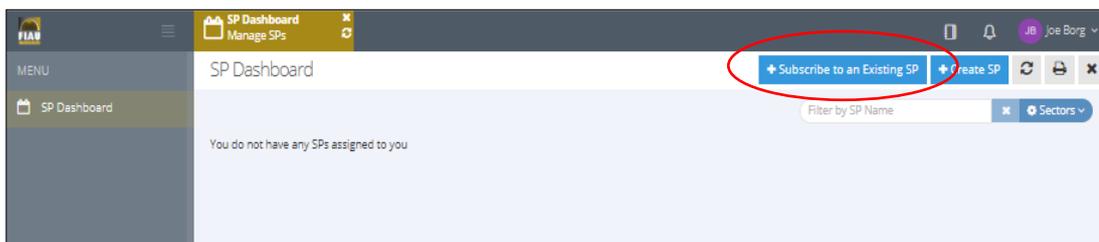
- 5) Upon receipt of FIAU approval, login to CASPAR and the Subject Person will appear as a tile on the user's 'SP Dashboard' as follows:



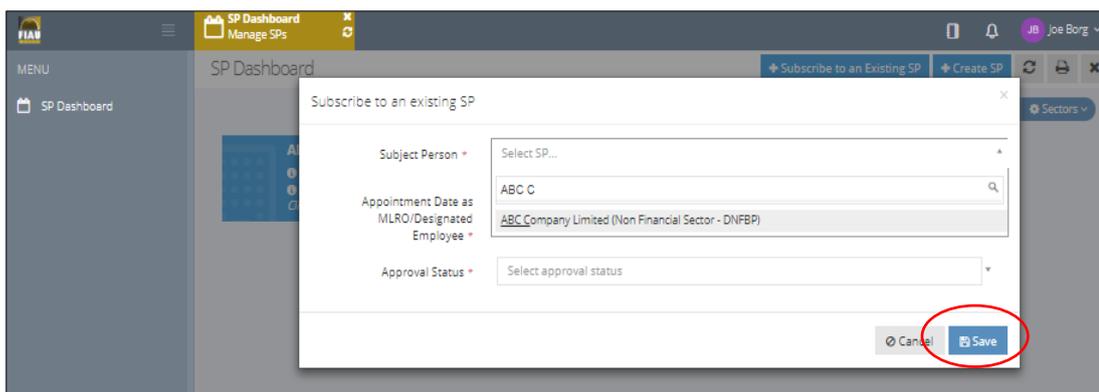
Subscribing to an existing Subject Person

The steps indicated hereunder should be followed to subscribe to an existing Subject Person previously created in CASPAR:

- 1) Login to CASPAR. Click on '+ Subscribe to an existing SP' on the top right-hand side of the screen.

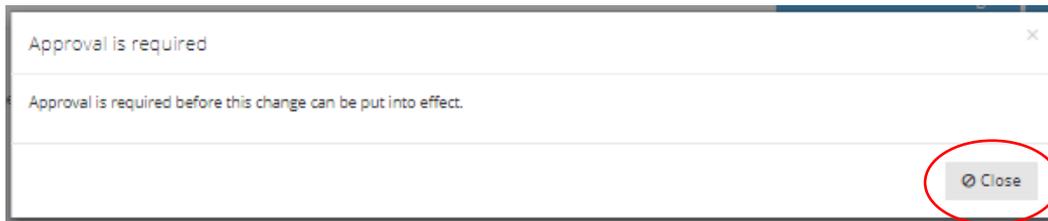


- 2) Insert three consecutive letters of the name of the Subject Person and select same from the dropdown menu. Complete the additional fields and press 'Save'.

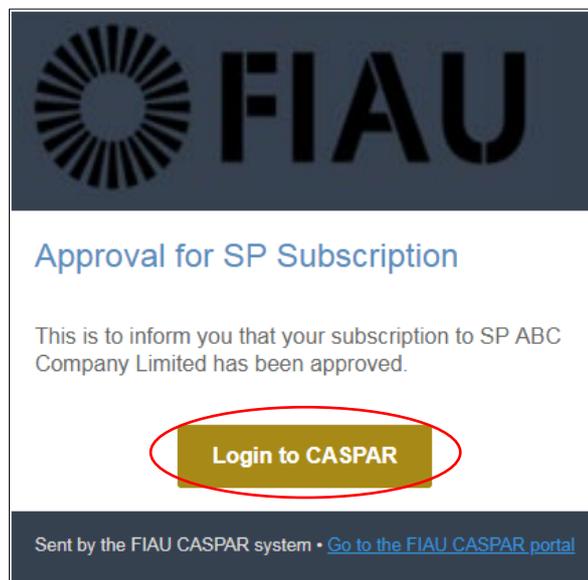


If the Subject Person does not feature on the list, this would signify that the Subject Person was not previously registered on CASPAR. Refer to the guidance section '[Creation of a Subject Person](#)' for instructions on how to create a Subject Person on the system.

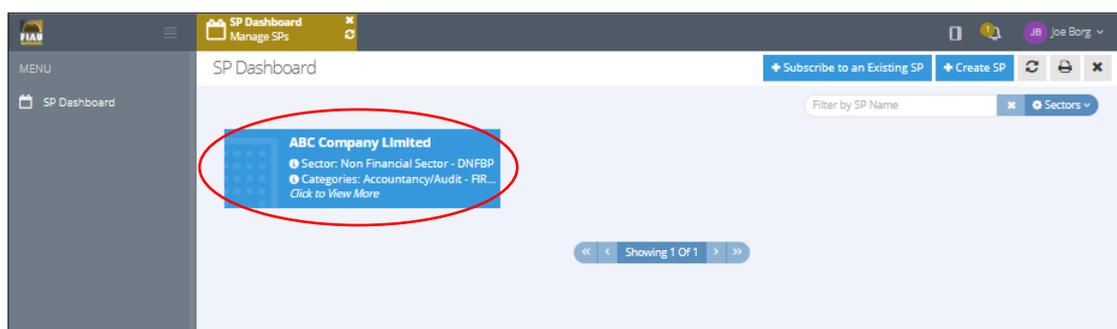
- 3) The subscription to a Subject Person requires the approval of the FIAU. Click 'Close' and await FIAU approval.



- 4) Once this request has been approved/rejected, a notification will be transmitted to the email address provided at registration.



- 5) Upon receipt of FIAU approval, login to CASPAR and the Subject Person will appear on the user's 'SP Dashboard' as follows:



Approval of a Designated Employee

This section applies only to MLROs who wish to appoint a Designated Employee to assist him/her in the carrying out of their AML / CFT duties.

The appointment of a Designated Employee involves the following steps:

1. *The Designated Employee/s must first register as a user on CASPAR;*
2. *The Designated Employee must then subscribe to an Existing Subject Person;*
3. *The MLRO approves the subscription to the Subject Person.*

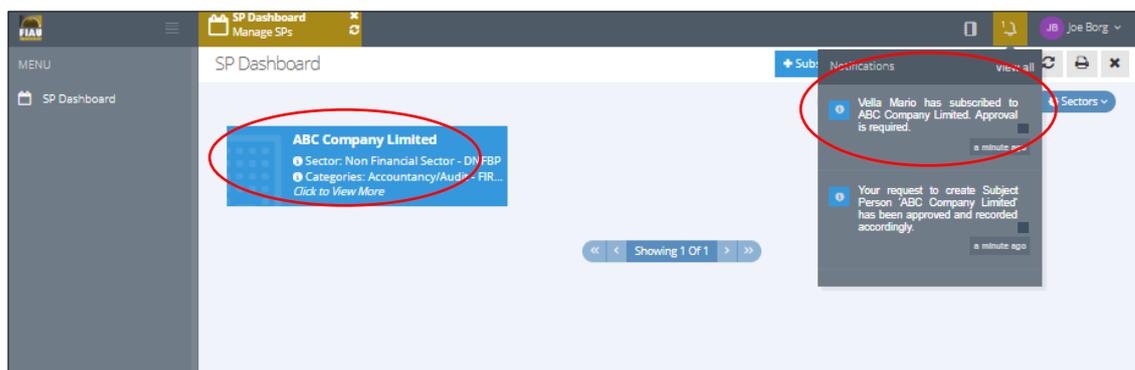
Step 1 and Step 2 should be undertaken by the Designated Employee, as explained under [Section B. 'Designated Employee'](#).

Following the successful registration of the Designated Employee on CASPAR and his/her request to subscribe to a Subject Person, the MLRO must review and approve / reject this request. This section explains the steps which must be undertaken by the MLRO.

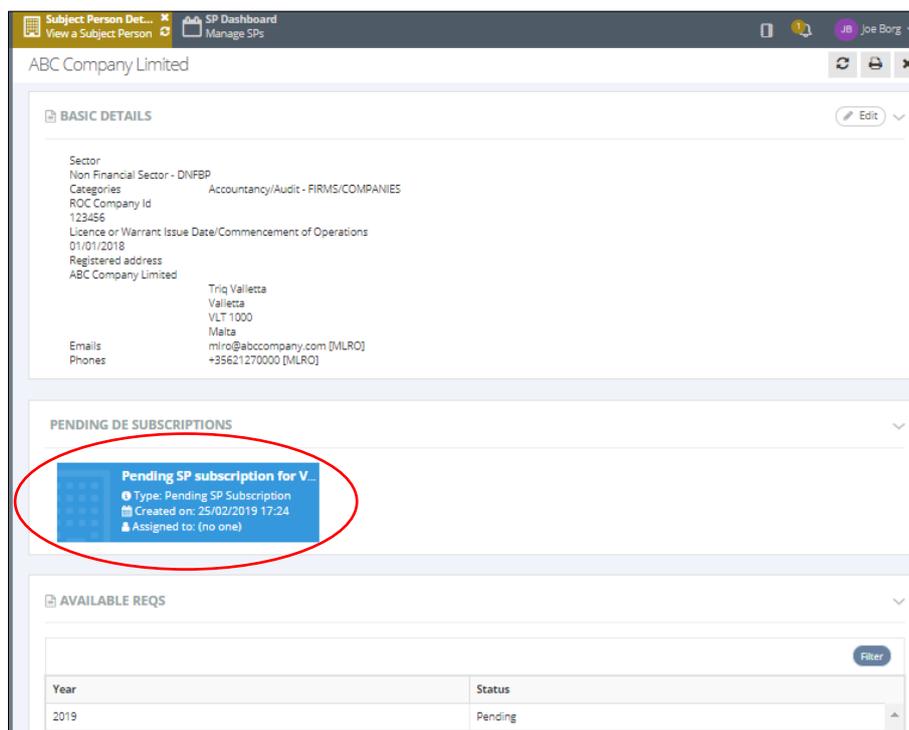
Kindly note that while Designated Employees may complete the REQs, submission and payment may only be affected by the MLRO.

The following steps must be undertaken by the MLRO in order to approve the subscription of a Designated Employee to a Subject Person:

- 1) Login to CASPAR. A notification will appear on the top right-hand side of the screen. Click on the Subject Person.



2) Click again on the information shown under the header 'Pending DE Subscriptions'.



3) Review the information and click 'Approve' / 'Reject'.



The subscription of the Designated Employee to the Subject Person requires the ultimate approval of the FIAU. Once it is approved by the FIAU, the Designated Employee will receive an email notification to this effect and may access the Subject Person from the 'SP Dashboard'.

B. Designated Employee

This role type should be used by employee/s designated to assist the MLRO in the fulfilment of the AML/CFT duties of a Legal Entity.

Upon successful registration, a Designated Employee is given the following rights:

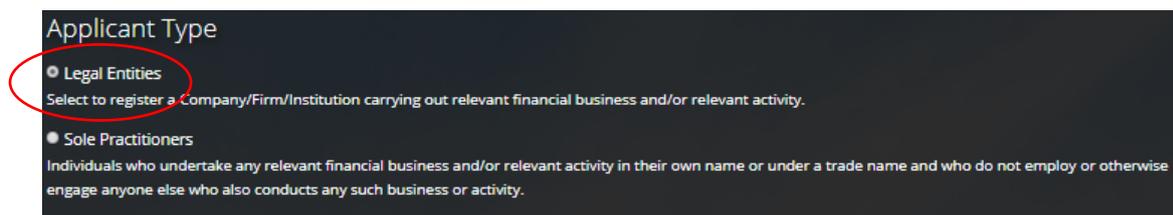
- Editing of details of the Subject Person;
- Online compilation of REQ.

Kindly note that submission of the REQ and the related payment may only be carried out by the MLRO.

Step 1: First-time Registration of User

The following steps must be followed to complete the successful registration of a user:

- 1) Select 'Legal entities' in Applicant Type section.

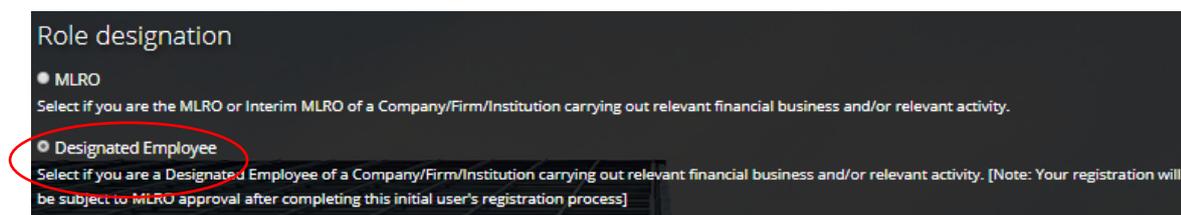


Applicant Type

Legal Entities
Select to register a Company/Firm/Institution carrying out relevant financial business and/or relevant activity.

Sole Practitioners
Individuals who undertake any relevant financial business and/or relevant activity in their own name or under a trade name and who do not employ or otherwise engage anyone else who also conducts any such business or activity.

- 2) Select 'Designated Employee' role designation.



Role designation

MLRO
Select if you are the MLRO or Interim MLRO of a Company/Firm/Institution carrying out relevant financial business and/or relevant activity.

Designated Employee
Select if you are a Designated Employee of a Company/Firm/Institution carrying out relevant financial business and/or relevant activity. [Note: Your registration will be subject to MLRO approval after completing this initial user's registration process]

- 3) Complete the registration form by inserting personal details in the respective fields and note that the email address provided, will be your username to login to CASPAR.

The screenshot shows a registration form titled 'Personal details'. The form contains the following fields and values:

Title	Mr	First Name	Joe	Last Name	Borg
Designation (Optional)	Designation				
Date of Birth	Date of Birth				
Country Of Residence	Malta	Nationality	Maltese		
Identification Document Type	ID Card	Identification Document Number	Identification Document Number		
Identification Document Expiry Date	Identification Document Expiry Date		Identification Document Country of Issue	Malta	
Mobile Prefix	+356	Mobile Number	99000000	Phone Prefix	+356
				Phone Number	27000000
Email	joe@Borg.com				

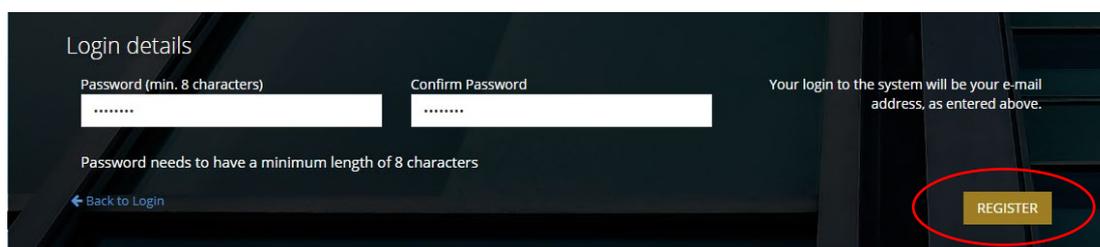
- 4) CASPAR maintains a list of all registered Subject Persons. Insert three consecutive letters of the name of the Legal Entity in the section Professional Details and select the Subject Person from the dropdown menu. If the name of the Subject Person does not appear in the list, contact the appointed MLRO who would yet be required to register the Subject Person on CASPAR.

If you are the Designated Employee for more than one Subject Person, this step should be repeated for each Subject Person by clicking on 'Add Subject Person' button.

The screenshot shows the 'Professional details' section of the registration form. It includes a note: "Note: The Company name will appear in the search field below only upon completion of the MLRO's registration process." Below the note is a search field labeled "Name of Legal Entity (Name of Company/Firm/Institution)" with the text "ABC C" entered. A dropdown menu is open, showing "ABC Company Limited" as a selected option. The text "Login details" is visible at the bottom left of the form area.

The creation of a user in CASPAR requires the approval of the FIAU. The name of the legal entity / entities entered in this section will solely be used by the FIAU during the approval of the user. After receipt of approval, the user must carry out an additional step to subscribe to a Subject Person – Refer to guidance in [Step 2: Subscribing to an Existing Subject Person](#).

- 5) Create a password that will be used to access your personal account and note that the selected password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Once you have completed the form, click 'Register'.

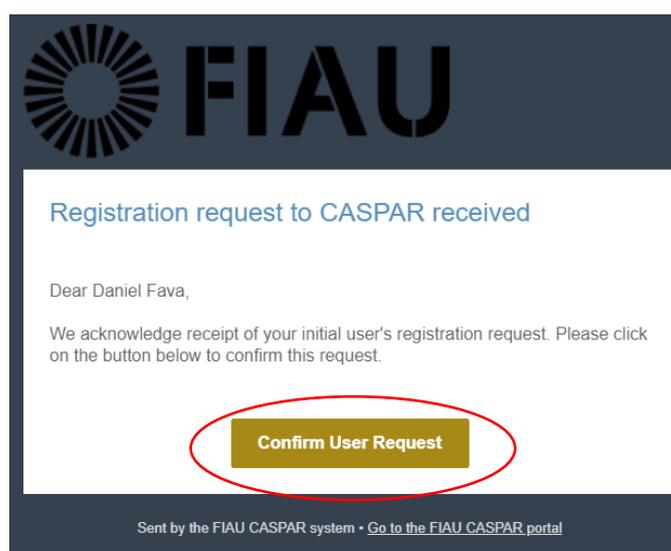


The screenshot shows a registration form titled "Login details". It contains two input fields: "Password (min. 8 characters)" and "Confirm Password", both with masked characters. Below the password fields is a note: "Password needs to have a minimum length of 8 characters". To the right, there is a text instruction: "Your login to the system will be your e-mail address, as entered above." At the bottom left, there is a link "Back to Login". At the bottom right, there is a yellow button labeled "REGISTER" which is circled in red.

- 6) The following screen will appear, acknowledging the submission of the Registration Form.



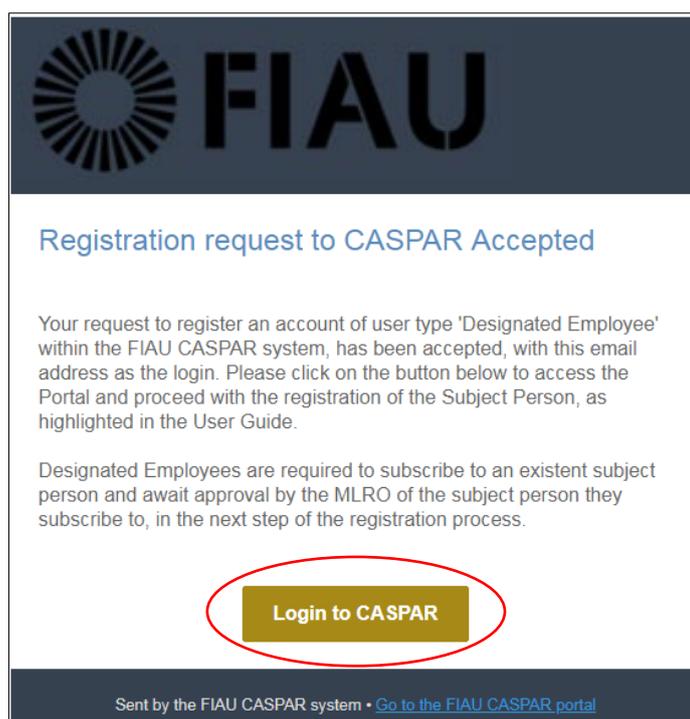
- 7) An automated email is transmitted to the email address provided at registration. The email includes a link required to complete this first step of the registration process. Click on 'Confirm User Request' to confirm the email address or copy and paste the URL into your web browser.



- 8) This next screen confirms that the email address has been verified and that your registration request was submitted to the FIAU for approval. An email will be transmitted once this request is reviewed by FIAU.



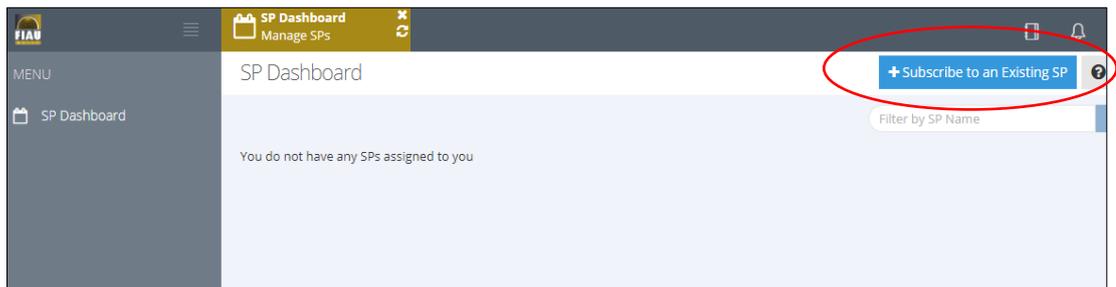
- 9) Upon receipt of email confirming approval of the user's registration, click on 'Login to CASPAR' and login to the newly created account by inserting the email address and password selected upon the initial user's registration process. You may wish to contact Compliance at the FIAU for clarification purposes and further guidance, should your initial user's registration be rejected.



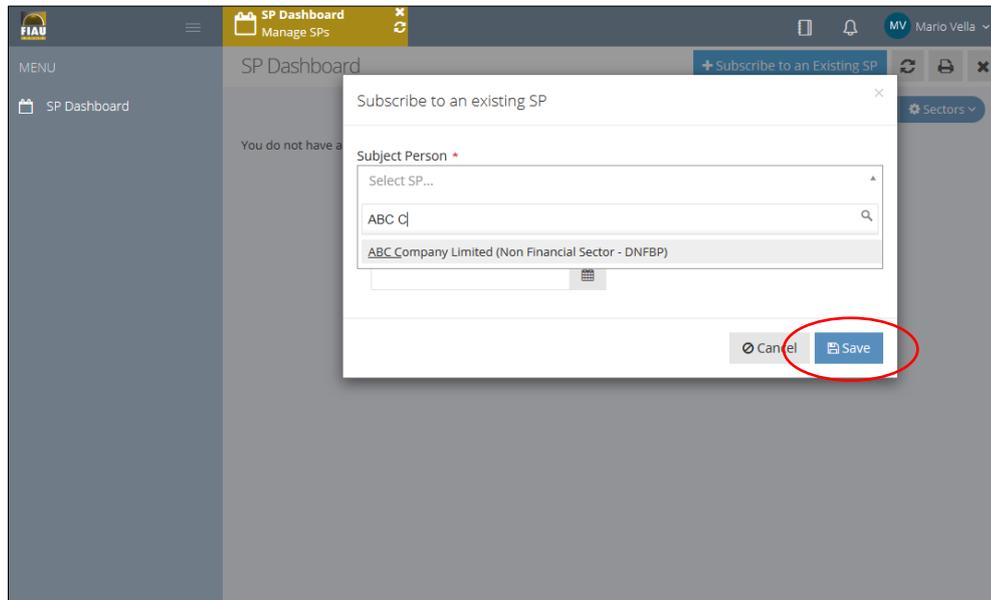
Step 2: Subscribing to an existing Subject Person

Following the successful user registration on CASPAR, you are now required to subscribe to an existing Subject Person to be able to complete its REQ, as follows:

- 1) Login to CASPAR. Click on '+ Subscribe to an Existing SP' on the top right-hand side of the screen.

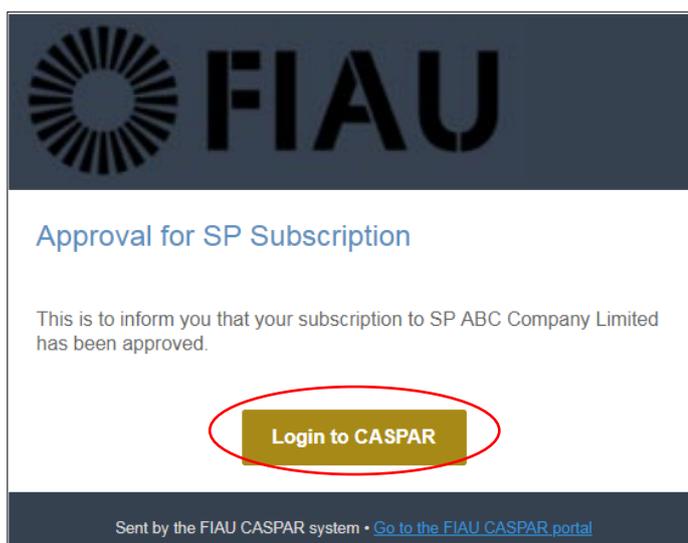


- 2) Insert three consecutive letters of the name of the Subject Person and select the Subject Person from the dropdown menu. Insert your appointment date and press 'Save'.



- 3) The subscription to a Subject Person requires the following approvals:
 - a. The approval by the appointed MLRO of the Subject Person (*MLROs should refer to guidance in section [‘Approval of a Designated Employee’](#)*); and
 - b. FIAU approval.

Once final approval from the FIAU is obtained, an email will be transmitted to the email address provided at registration.



- 4) Upon receipt of FIAU approval, login to CASPAR and the Subject Person will appear on the ‘SP Dashboard’ as follows.



C. Sole Practitioner

This registration type should be used by individuals who undertake any relevant financial business and/or relevant activity directly in their own name or under a trade name.

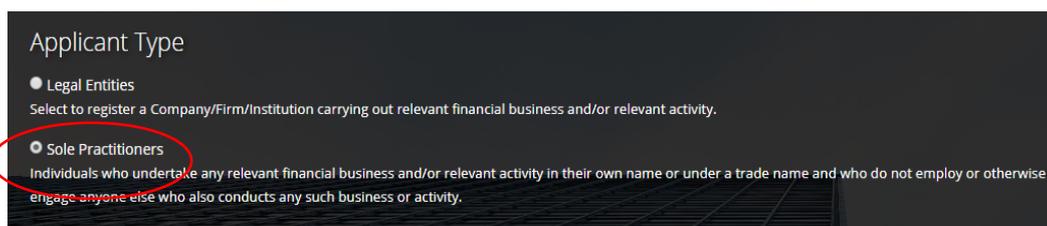
Upon successful registration, a Sole Practitioner will have the following rights:

- Creation of a Subject Person;
- Editing of details of the Subject Person;
- Compilation and submission of REQ;
- Payment of applicable fees related to REQ submissions.

Step 1: First-time registration of user

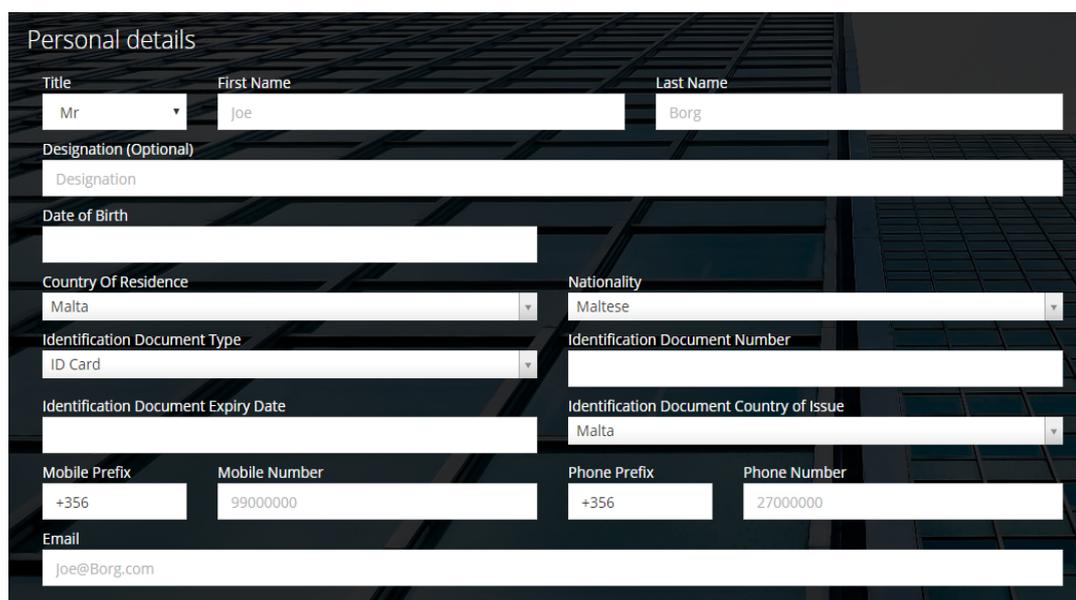
The steps indicated hereunder should be followed to complete the successful registration of a user:

- 1) Select 'Sole Practitioners' in the Applicant Type section.



The screenshot shows the 'Applicant Type' selection screen. There are two radio button options: 'Legal Entities' and 'Sole Practitioners'. The 'Sole Practitioners' option is selected and circled in red. Below each option is a brief description of the applicant type.

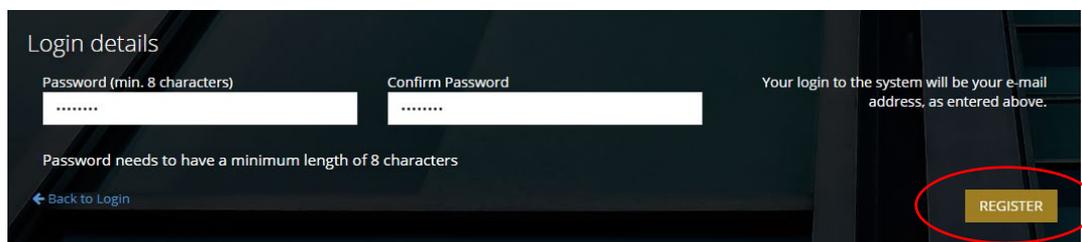
- 2) Complete the registration form by entering the personal details in the respective fields and note that the email address provided, will be your username to login to CASPAR.



The screenshot shows the 'Personal details' registration form. The fields are filled out as follows:

Title	First Name	Last Name	
Mr	Joe	Borg	
Designation (Optional) Designation			
Date of Birth			
Country Of Residence Malta	Nationality Maltese		
Identification Document Type ID Card	Identification Document Number		
Identification Document Expiry Date	Identification Document Country of Issue Malta		
Mobile Prefix +356	Mobile Number 99000000	Phone Prefix +356	Phone Number 27000000
Email Joe@Borg.com			

- 3) Create a password that will be used to access your personal account. The password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Once you have completed the form, click 'Register'.

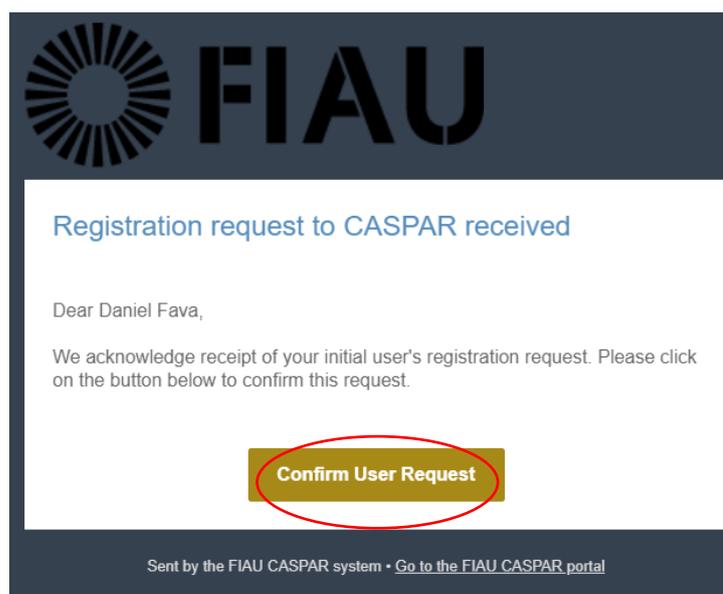


The screenshot shows a registration form titled "Login details". It features two input fields: "Password (min. 8 characters)" and "Confirm Password", both containing masked characters. Below the password field, a note states "Password needs to have a minimum length of 8 characters". A "Back to Login" link is on the left. On the right, a note says "Your login to the system will be your e-mail address, as entered above." A yellow "REGISTER" button is circled in red in the bottom right corner.

- 4) The following screen will appear, acknowledging the submission of the Registration Form.



- 5) An automated email is transmitted to the e-mail address provided at registration. This email includes a link required to complete this first step of the registration process. Click on 'Confirm User Request' to confirm the email address.



- 6) This next screen confirms that the email address has been verified and that your registration request will be submitted to the FIAU for approval. An email will be submitted once this request is reviewed by the FIAU.



- 7) Upon receipt of email confirming approval of the user's registration, click on 'Login to CASPAR' and login to the newly created account by inserting the email address and password selected upon the initial user's registration process. You may wish to contact Compliance at the FIAU for clarification and further guidance, should your initial user's registration be rejected.



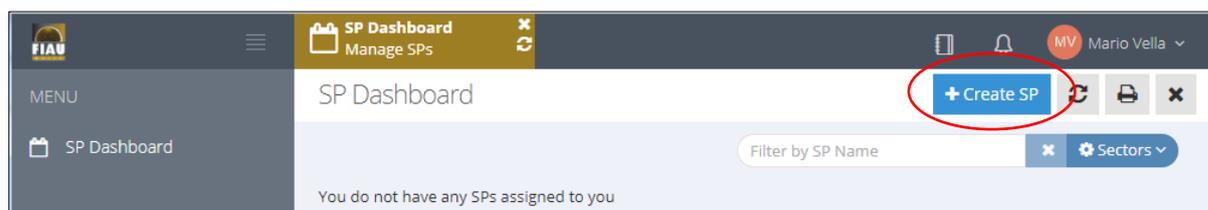
Step 2: Creation of a Subject Person

Upon launch of CASPAR, the system will hold no data on the Subject Persons and hence, all records are to be created anew.

A one-time registration form must be completed to create the sole practitioner's Subject Person record and allow the user to subscribe to same.

The steps indicated hereunder must be followed to complete the successful registration of a Subject Person:

- 1) Login to CASPAR. Click on '+ Create SP' on the top right-hand side of the screen.



- 2) Complete the required fields as shown below and click 'Save' button.

General Information

Name of Subject Person * ACC Company Limited

Licence or Warrant Issue Date/Commencement of Operations * 01/01/2018

Sector * Non Financial Sector - DNFBP

Sub-Sector * Accountancy/Audit - INDIVIDU... Category Accountancy/Audit - INDIVIDU...

+ Add a category

Registered Address

Address (line 1) * ACC Company Limited

Address (line 2) * Triq Valletta

Town/City * Valletta

Postcode * VLT 1000

Country * Malta

This SP has a correspondence address different from the above

Contact Details

Email Address * email@acccompany.com

Phone * +35621210000 Designation * Sole Practitioner

Phone number includes prefix

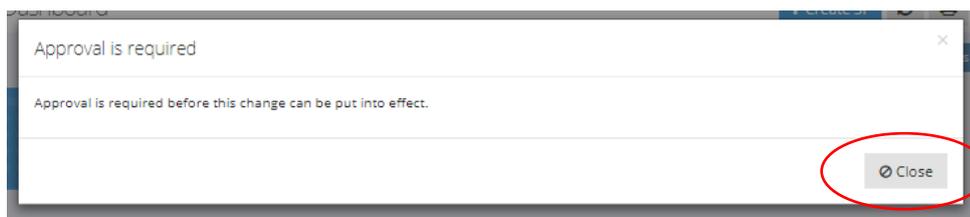
+ Add additional contact information

The FIAU's Data Protection Policy may be found on <http://www.fiumalta.org/privacy-policy>.

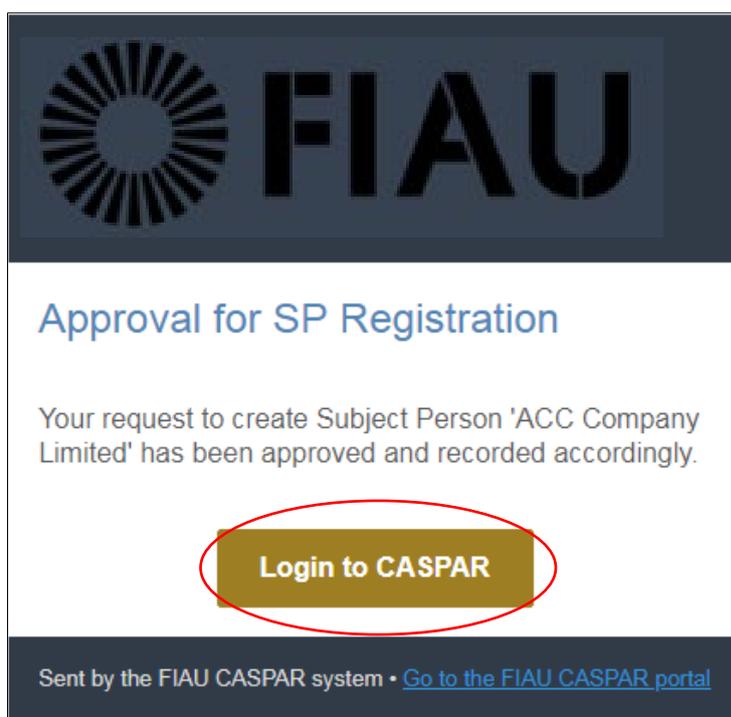
Cancel Save

Kindly refer to [Section 4](#) for further guidance on the selection of the relevant sector, sub-sector/s and category/ies

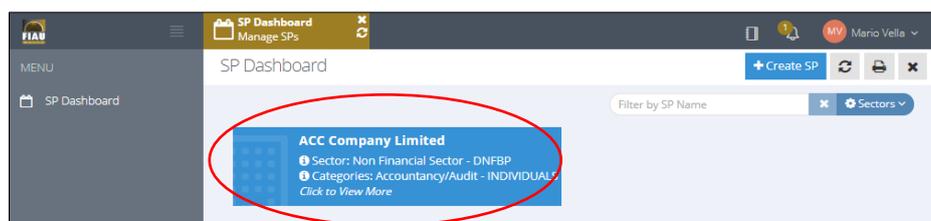
- 3) The creation of a Sole Practitioner as a Subject Person requires the approval of the FIAU. Click 'Close' and await FIAU approval.



- 4) Once this request has been approved/rejected, a notification will be submitted to the email address provided at registration. Upon receipt of FIAU approval, click on 'Login to CASPAR' and login to your account by entering the email address used during registration and the password created.



- 5) Following the approval of a Subject Person, login to CASPAR and the Subject Person will appear on the user's 'SP Dashboard' as follows.



4) Sectors, sub-sectors, categories

During the registration of a Subject Person, the user is required to input the sector, sub-sector and category in which the Subject Person operates.

The tables shown below list the sectors, sub-sectors and categories for each relevant financial business and relevant financial activity as per Regulation 2 of the Prevention of Money Laundering and Funding of Terrorism Regulations (PMLFTR 2017).

Subject Persons which carry out multiple activities falling under different sub-sectors and categories, should specify the different sub-sectors / categories by clicking the '+ Add Category' button.

The screenshot shows a web form titled "Register a new SP". The form is divided into several sections: "General information", "Registered Address", and "Contact Details". The "General information" section includes fields for "Name of Subject Person" (ABC Company Limited), "ROC Company ID" (123456), "Licence or Warrant Issue Date/Commencement of Operations" (01/01/2018), "Appointment Date as MLRO/Designated Employee" (01/11/2018), and "Approval Status" (Approval Not Required). The "Sector" dropdown is set to "Non Financial Sector - DNFBP". Below the "Sector" field, the "Sub-Sector" and "Category" dropdowns are both set to "Accountancy/Audit - FIRMS/C...". A green button labeled "+ Add a category" is located below the "Sub-Sector" and "Category" fields. The "Registered Address" section includes fields for "Address (line 1)", "Address (line 2)", "Town/City", "Postcode", and "Country". The "Contact Details" section includes fields for "Email", "Address", "Phone", and "Description". A green button labeled "+ Add additional contact information" is located below the "Phone" field. At the bottom of the form, there are "Cancel" and "Save" buttons.

Do you operate in the Financial Sector? If yes, take note of the following:

Kindly note that the following two sub-sectors should **ONLY** be chosen in the following cases:

- **Financial Sector offering CSP** – legal entities which carry out any activity falling under the Financial Sector and also act as CSP (ex: a company which offers both investment services and CSP services).
- **Financial Sector offering trustee services** - legal entities which carry out any activity falling under the Financial Sector and also offer trustee services (ex: a credit institution which offers trustee services).

Relevant Financial Business

Activities (as per Regulation 2)	Sector	Sub-Sector	Category
(a) any business of banking carried on by a person or institution who is for the time being licensed, or required to be licensed, under the provisions of the Banking Act	Financial Sector	Credit Institutions	Credit Institutions
(b) any activity of a financial institution carried on by a person or institution who is for the time being licensed, or required to be licensed, under the provisions of the Financial Institutions Act	Financial Sector	Financial Institutions	Payment Service Providers; E-Money Issuers; Others: Lending, Money Brokering & Factoring.
(c) any long-term insurance business other than business of reinsurance carried on by a person or institution who is for the time being authorised, or required to be authorised, under the provisions of the Insurance Business Act	Financial Sector	Insurance & Pensions	Insurance undertakings
(d) any insurance intermediary activities carried out by an insurance intermediary or by a tied insurance intermediary related to long-term insurance business which person or institution is enrolled or required to be enrolled under the provisions of the Insurance Distribution Act, other than a natural person who is registered or enrolled and acts on behalf of a tied insurance intermediary or a person or institution enrolled as a tied insurance intermediary that does not collect premiums, or other amounts intended for the policyholder or the beneficiary	Financial Sector	Insurance & Pensions	Intermediaries –Companies; Intermediaries- Individuals; Tied Insurance Intermediaries-Companies; Tied Insurance Intermediaries-Individuals.
(e) any long term insurance business other than business of reinsurance carried on by a person in accordance with the Insurance Business (Captive Insurance Undertakings and Captive Reinsurance Undertakings) Regulations, by a cell company in accordance with the provisions of the Companies Act (Cell Companies Carrying on Business of Insurance) Regulations or by an incorporated cell company and an incorporated cell in accordance with the provisions of the Companies Act (Incorporated Cell Companies Carrying on Business of Insurance) Regulations	Financial Sector	Insurance & Pensions	Insurance undertakings

Activities (as per Regulation 2)	Sector	Sub-Sector	Category
(f) investment services carried on by a person or institution licensed or required to be licensed under the provisions of the Investment Services Act	Financial Sector	Investment Services & Securities Markets	Investment Services
(g) administration services to collective investment schemes provided by a person or institution recognised or required to be recognised under the provisions of the Investment Services Act other than administration services provided by recognised incorporated cell companies in accordance with the Companies Act (Recognised Incorporated Cell Companies) Regulations	Financial Sector	Investment Services & Securities Markets	Recognised Fund Administrators
(h) a collective investment scheme marketing its units or shares, licensed, recognised or notified, or required to be licensed, recognised or notified, under the provisions of the Investment Services Act	Financial Sector	Investment Services & Securities Markets	Collective Investment Schemes
(i) any activity other than that of a retirement scheme or a retirement fund, carried on in relation to a retirement scheme, by a person or institution licensed or required to be licensed under the provisions of the Retirement Pensions Act and for the purpose of this paragraph, "retirement scheme" and "retirement fund" shall have the same meaning as is assigned to them in the Retirement Pension Act	Financial Sector	Insurance & Pensions	Service Providers licensed under the Retirement Pensions Act
(j) any activity of a regulated market and that of a central securities depository authorised or required to be authorised under the provisions of the Financial Markets Act	Financial Sector	Investment Services & Securities Markets	Regulated Markets/Central Securities Depository
(l) activity of a VFA agent carried out by a person or institution registered or required to be registered under the provisions of the Virtual Financial Assets Act	Virtual Financial Assets Sector	VFA Agents	VFA Agents
(m) VFA services carried out by a person or institution licensed or required to be licensed under the provisions of the Virtual Financial Assets Act;	Virtual Financial Assets Sector	VFA Service Providers	VFA Service Providers
(n) issue of virtual financial assets for offer to the public in or from Malta in terms of the Virtual Financial Assets Act	Virtual Financial Assets Sector	VFA Issuers	VFA Issuers

Relevant Financial Activity

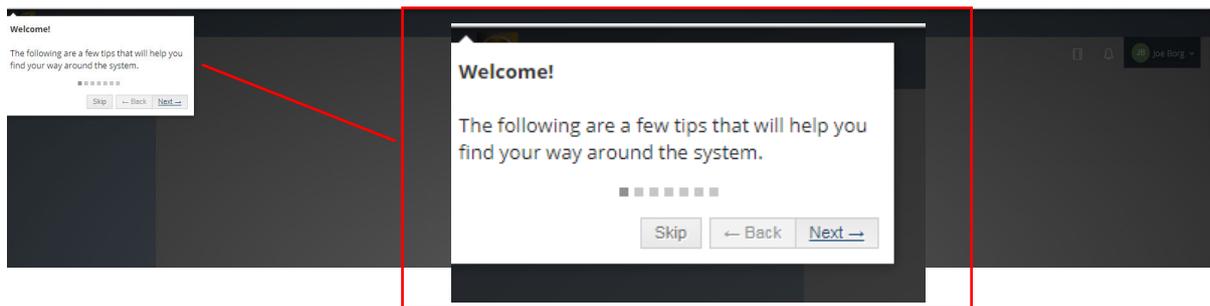
Activities (as per Regulation 2)	Sectors	Sub-sectors	Categories
(a) auditors, external accountants and tax advisors, including when acting as provided for in paragraph (c)	Non-Financial Sector	Accountancy/Audit-FIRMS/COMPANIES; Accountancy/Audit-INDIVIDUALS; Tax Advisors	Accountancy/Audit-FIRMS/COMPANIES; Accountancy/Audit-INDIVIDUALS; Tax Advisors
(b) Real Estate	Non-Financial Sector	Real Estate	Real Estate
(c) notaries and other independent legal professionals when they participate, whether by acting on behalf of and for their client in any financial or real estate transaction or by assisting in the planning or carrying out of transactions for their clients concerning the – (i) buying and selling of real property or business entities; (ii) managing of client money, securities or other assets, unless the activity is undertaken under a licence issued under the provisions of the Investment Services Act; (iii) opening or management of bank, savings or securities accounts; (iv) organisation of contributions necessary for the creation, operation or management of companies; (v) creation, operation or management of companies, trusts, foundations or similar structures, or when acting as a trust or company service provider;	Non-Financial Sector	Notaries; Advocates-FIRMS/COMPANIES; Advocates-INDIVIDUALS.	Notaries; Advocates-FIRMS/COMPANIES; Advocates- INDIVIDUALS.
(d) trust and company service providers	Non-Financial Sector	Trustees & Fiduciaries CSPs-FIRMS/COMPANIES CSPs – INDIVIDUALS	Trustees Administrators of Private Foundations CSPs-FIRMS/COMPANIES CSPs – INDIVIDUALS

Activities (as per Regulation 2)	Sectors	Sub-sectors	Categories
(e) nominee companies holding a warrant under the Malta Financial Services Authority Act and acting in relation to dissolved companies registered under the said Act	Non-Financial Sector	Trustees & Fiduciaries	Fiduciary Service Providers
(f) Casino Licensees	Gaming Sector	Land-Based Casinos	Land-Based Casinos
(g) Gaming Licensees	Gaming Sector	Remote Gaming Operators Land-Based Operators (other than Casinos)	Remote Gaming Operators Land-Based Operators (other than Casinos)

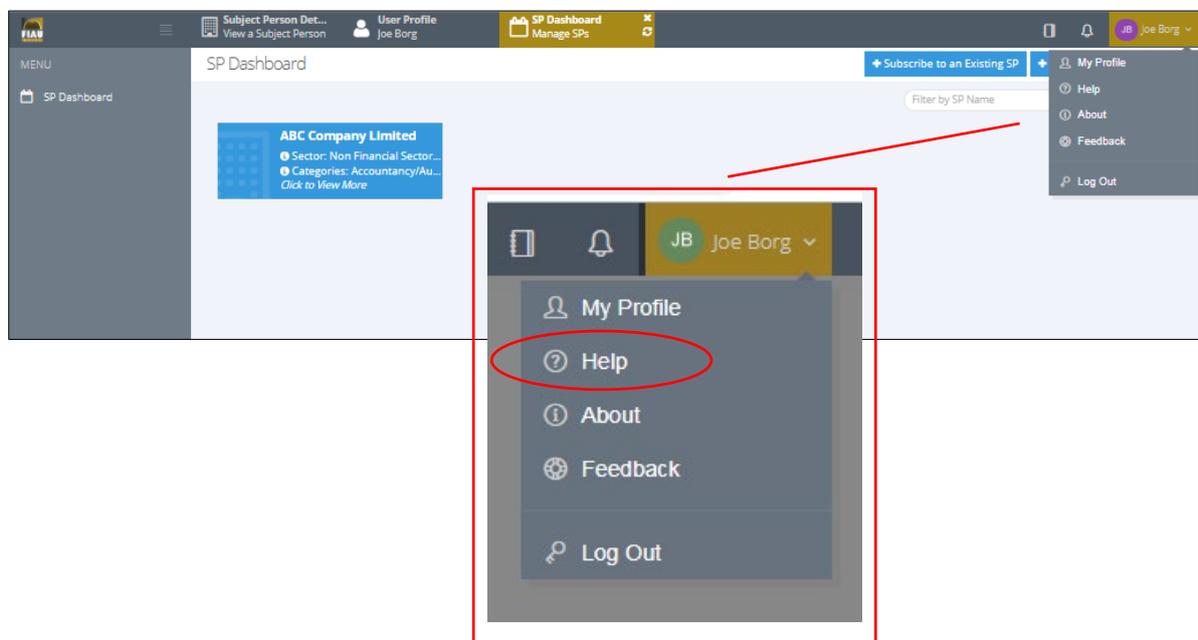
5) Other features of CASPAR

Help function

Following a successful registration process, you may access your user account on CASPAR. When logging in for the first time, you are shown a quick guide on the main features of the system through on-screen notification pop-ups.

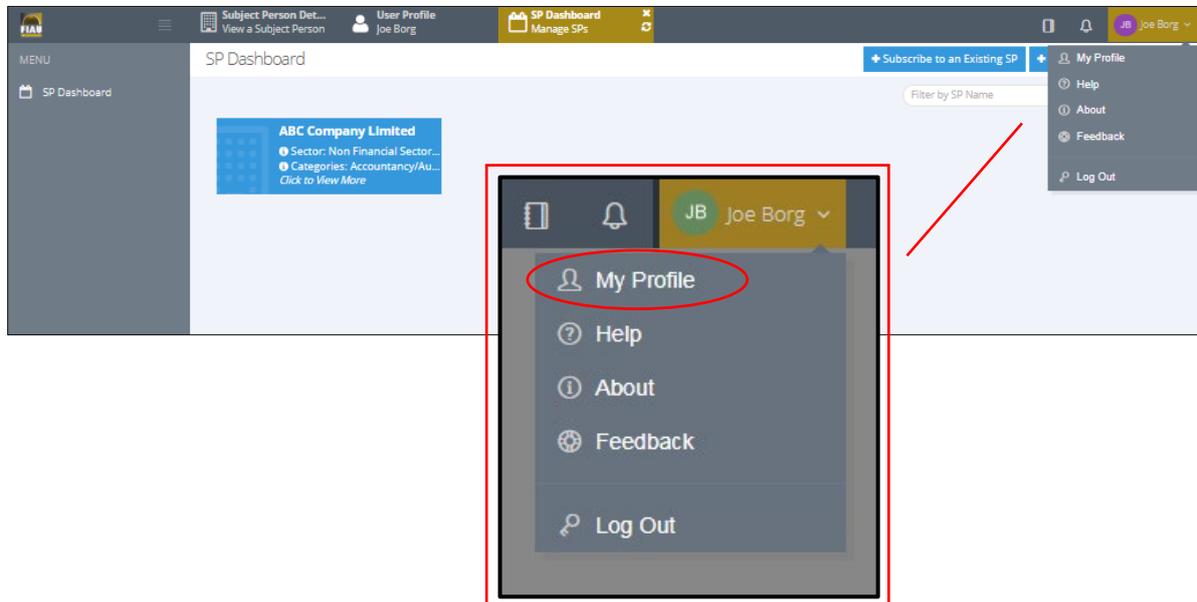


This quick guide can be accessed any time by clicking on your name on the top – right had side of the screen, and then on 'Help'.

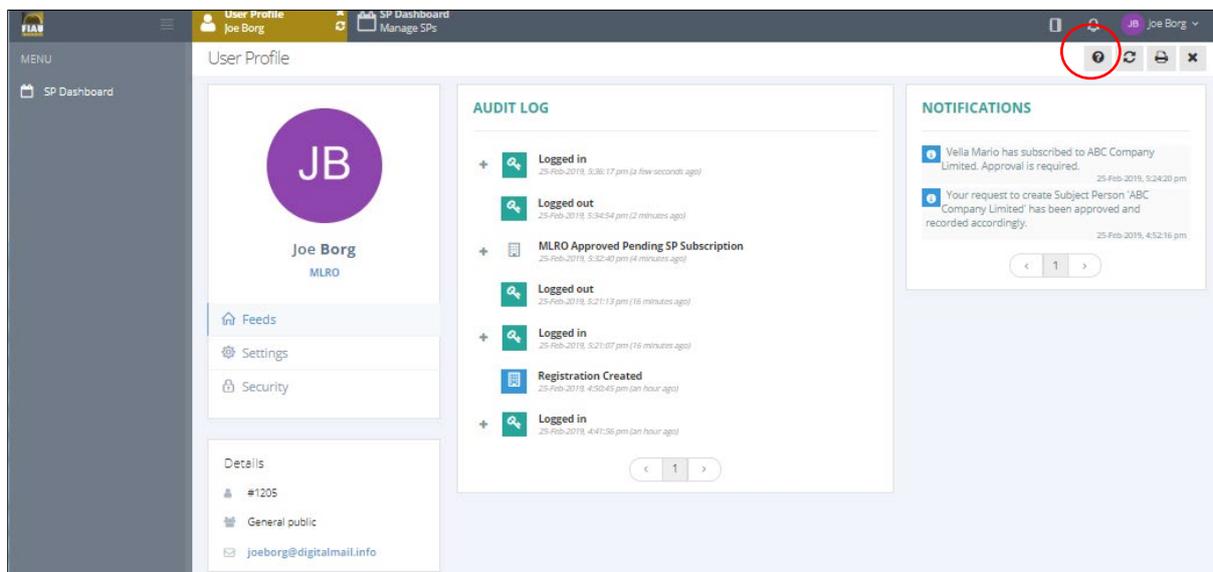


Guidance for the registration and use of the CASPAR platform

Another Help Function is available specifically on the features relating to your profile on CASPAR (e.g. settings and security). Click on your name in the top-right corner and click on 'My Profile'.



Click on the help button , to access to the Quick Profile Guide. The notification pop-ups indicate the functions available within your profile on CASPAR.



Notification screen

The CASPAR profile includes a notification function which may be accessed as follows:

Login to your account on Caspar and click on the icon on the top-right corner of the screen as shown below.

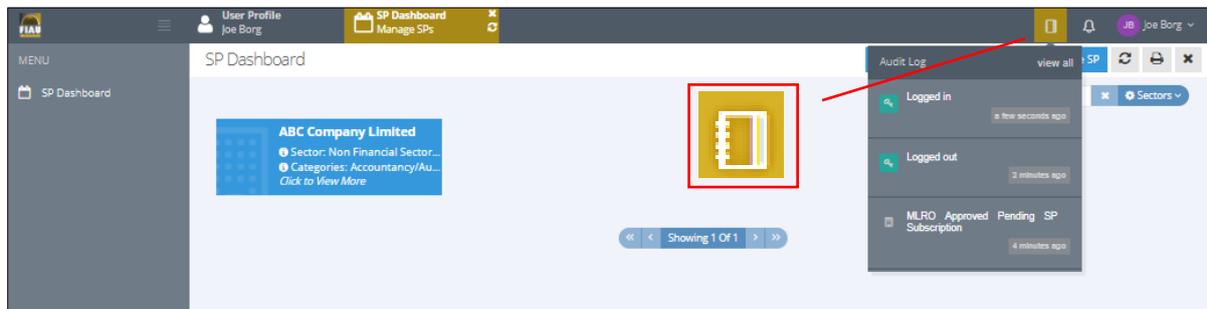
The latest notifications are shown in a pop-up window, but you can access all notifications by clicking on 'view all' at the top of this window.



Audit log

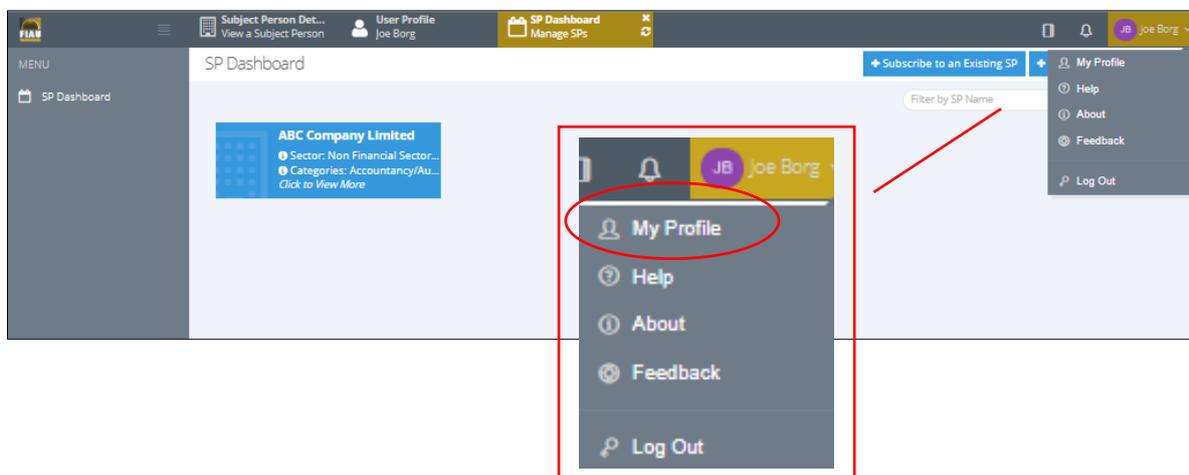
CASPAR maintains a log of all the activity undertaken by the user within the system. This may be accessed as follows:

Login to your account on CASPAR and click on the icon shown below. The latest logs are shown in a pop-up window. You can access all audit logs by clicking on 'view all' at the top of this window.

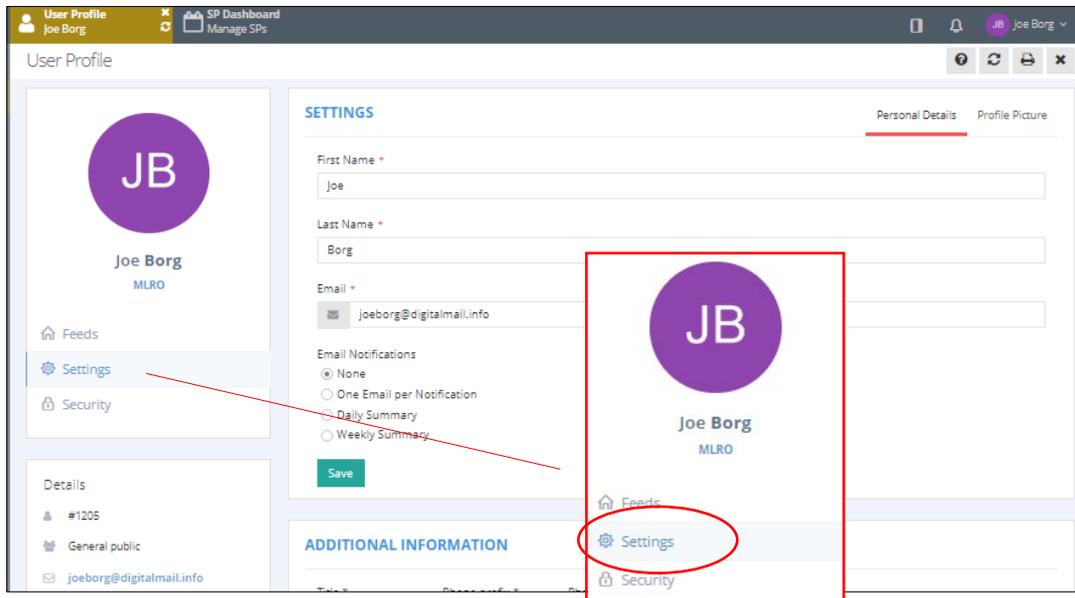


Editing of user details

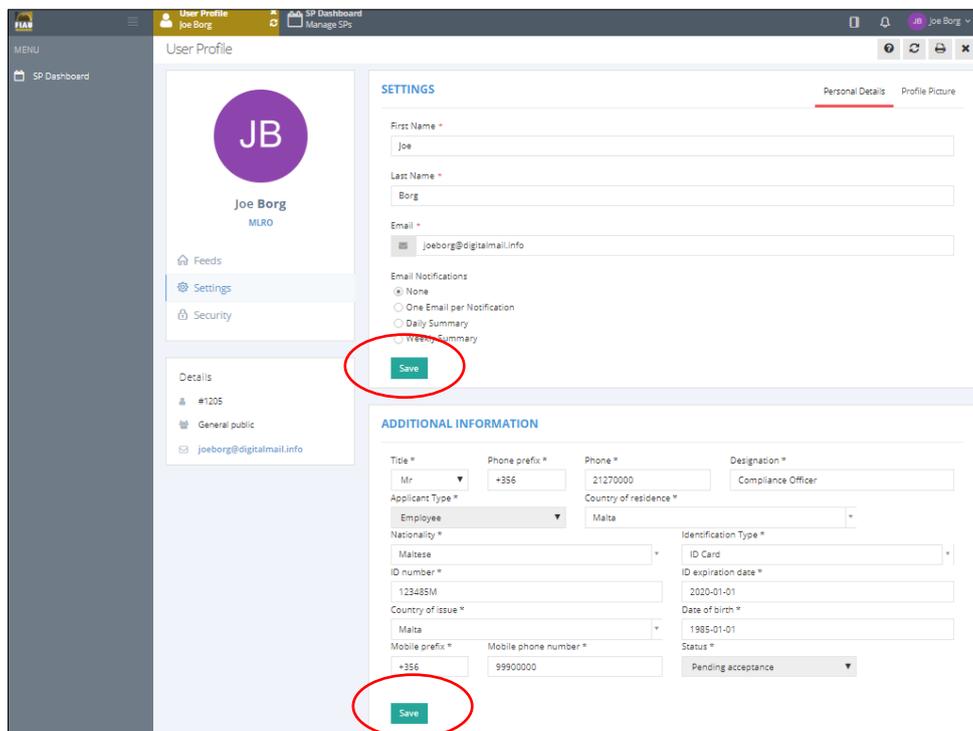
- 1) Click on your name on the top-right corner of the screen and choose 'My Profile' option.



- 2) Click on 'Settings' to view and edit the profile details, which include the personal details, profile picture, email notification settings.



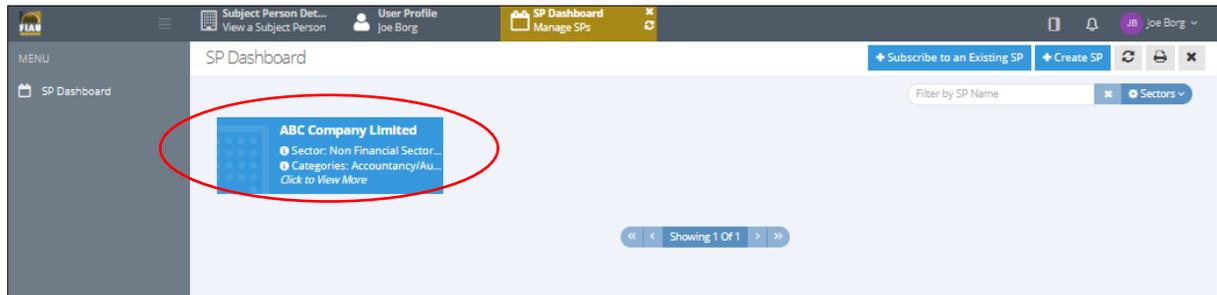
- 3) Carry out the necessary changes and press Save, in the section edited.



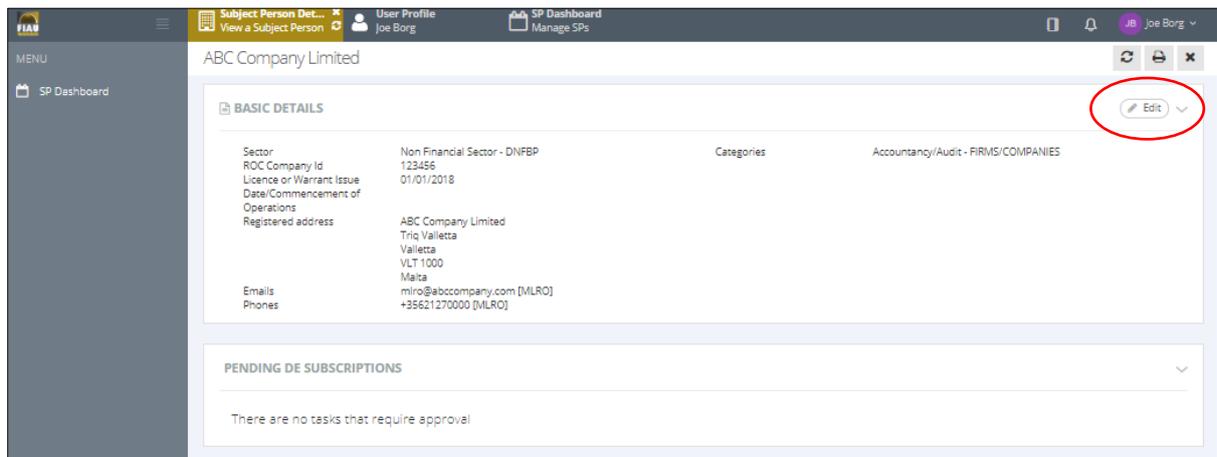
Editing of details of Subject Person

MLROs must ensure that CASPAR holds the correct details of the Subject Person. Details may be updated as follows:

- 1) Click on the Subject Person in the SP Dashboard.



- 2) Click on the 'Edit' button on the right-hand side of the screen.



- 3) You may edit all the details which were inputted when the Subject Person was initially created. Click on 'Save'.

Edit basic details

General information

Name of Subject Person *

Licence or Warrant Issue Date/Commencement of Operations *

Appointment Date as MLRO/Designated Employee *

Approval Status *

Sector *

Sub-Sector * Category

[+ Add a category](#)

Registered Address

Address (line 1) *

Address (line 2) *

Town/City *

Postcode *

Country

This SP has a correspondence address different from the above

Contact Details

Email

Address *

Phone * Description *

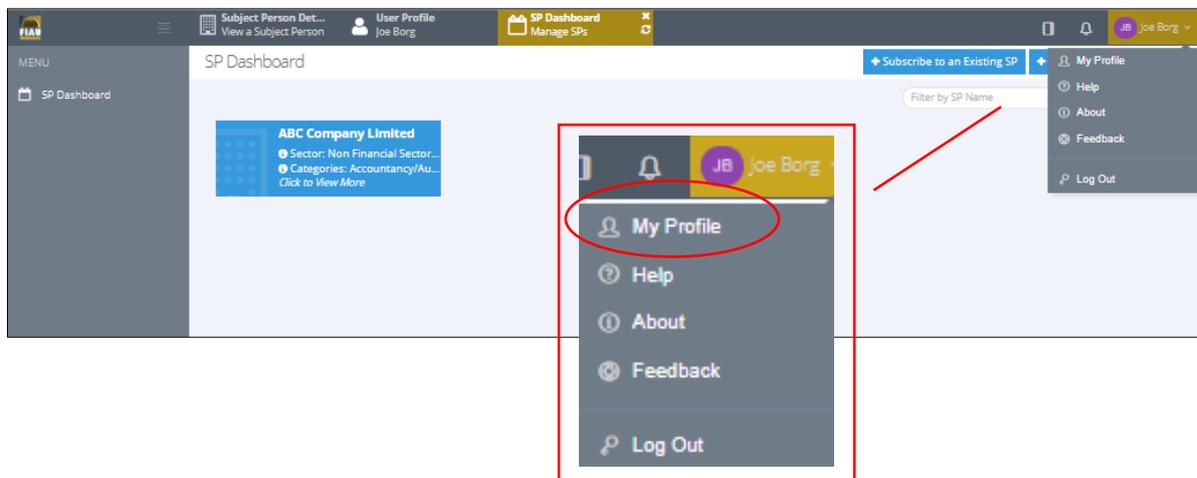
Phone number includes prefix

[+ Add additional contact information](#)

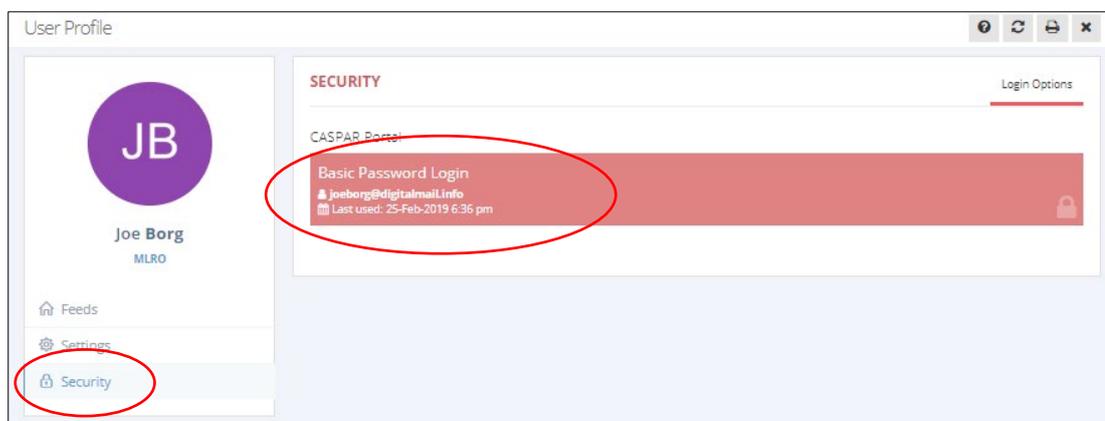
The FIAU's Data Protection Policy may be found on <http://www.fiumalta.org/privacy-policy>.

Change password function

- 1) Click on your name on the top-right corner of the screen and click on 'My Profile'.

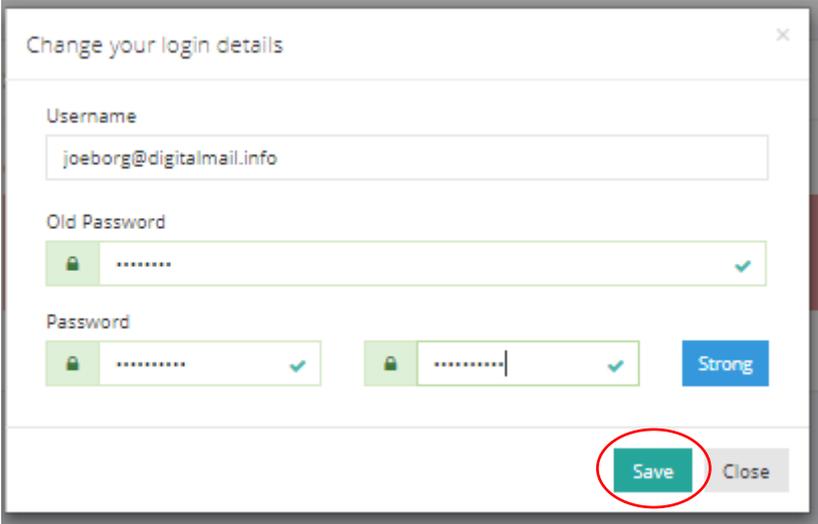


- 2) Click on 'Security' and then click on 'Basic Password Login'.



- 3) Input the current password in the 'Old Password' field and the new password in the 'Password' fields.

The new password must contain a minimum of eight characters, consisting of at least one number, one uppercase and one lowercase letter. Click on 'Save'.



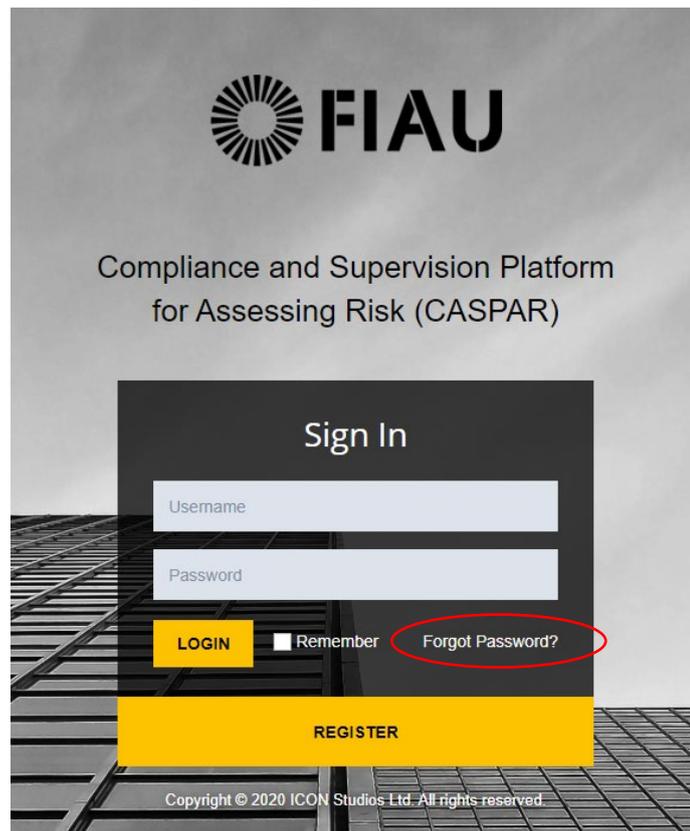
The screenshot shows a dialog box titled "Change your login details" with a close button (X) in the top right corner. The dialog contains the following fields and controls:

- Username:** A text input field containing "joeborg@digitalmail.info".
- Old Password:** A password input field with a lock icon on the left and a checkmark on the right, containing masked characters ".....".
- Password:** Two password input fields, each with a lock icon on the left and a checkmark on the right, both containing masked characters ".....". To the right of the second password field is a blue button labeled "Strong".
- Buttons:** At the bottom right, there is a green "Save" button (circled in red) and a grey "Close" button.

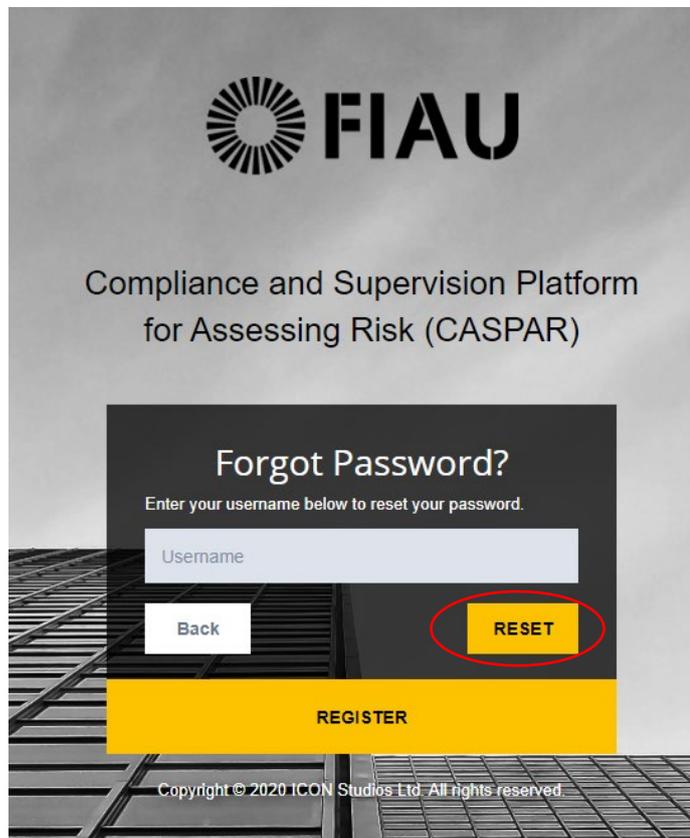
Forgot password function

If you have forgotten the password of your CASPAR account, you can reset it as follows:

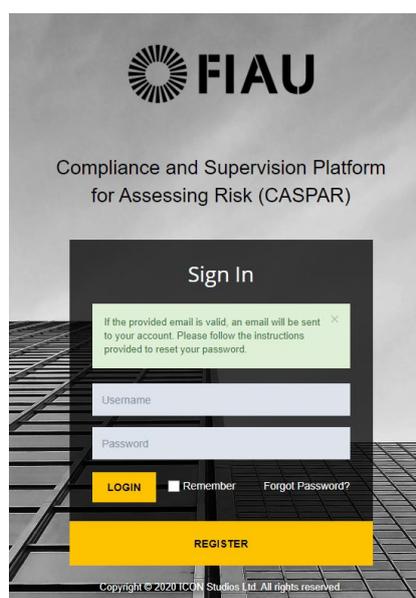
- 1) Click on the 'Forgot Password?' option in the 'Sign In' screen.



- 2) Input the username for CASPAR, which is the email address provided at registration and click on the 'Reset' button.



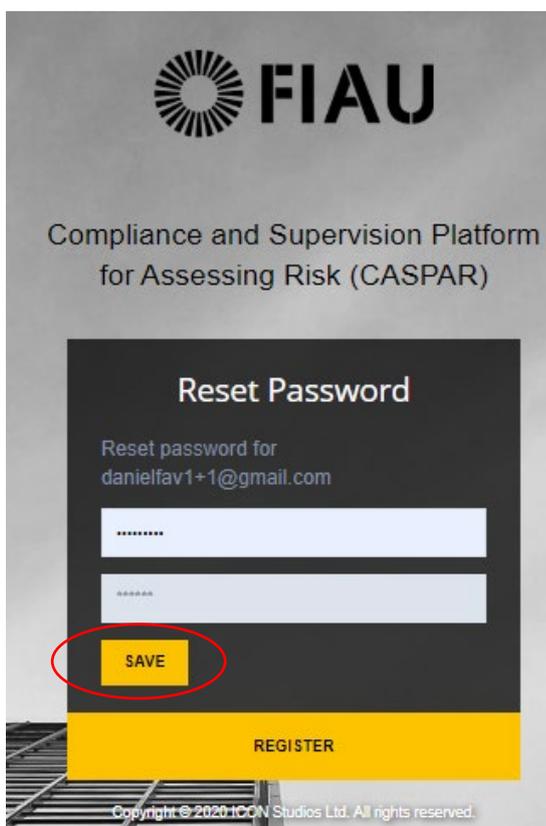
- 3) A notification saying that an email was sent to your account shows up on the screen.



- 4) Open the email and click on the 'Reset Password' button.



- 5) You will be automatically redirected to the 'Reset Password' screen. Input the new password which must contain a minimum of 8 characters, consisting of at least one number, one uppercase and one lowercase letter. Click on 'Save'.



6) Submission of REQs

Following the registration of a user account and creation / subscription to an existing Subject Person, the MLRO may submit the annual REQ.

The completion of REQs within CASPAR is split into two steps:

- 1) [Step 1: Completion of the online REQ form;](#)
- 2) [Step 2: Payment of applicable fees and submission of REQ.](#)

During the completion of the REQ, all responses are automatically and instantaneously saved on CASPAR. The responses will **not** be lost if you log out of the system.

A number of questions require the uploading of documents. Documents must be uploaded in **pdf format only** and the individual files must not exceed 10MBs.

Kindly note that Subject Persons, with multiple sub-sectors, must complete only one REQ. The questions contained within the REQ will cover all sectors.

Step 1: Completion of the online REQ form

The following are the steps which must be followed for the completion of a REQ.

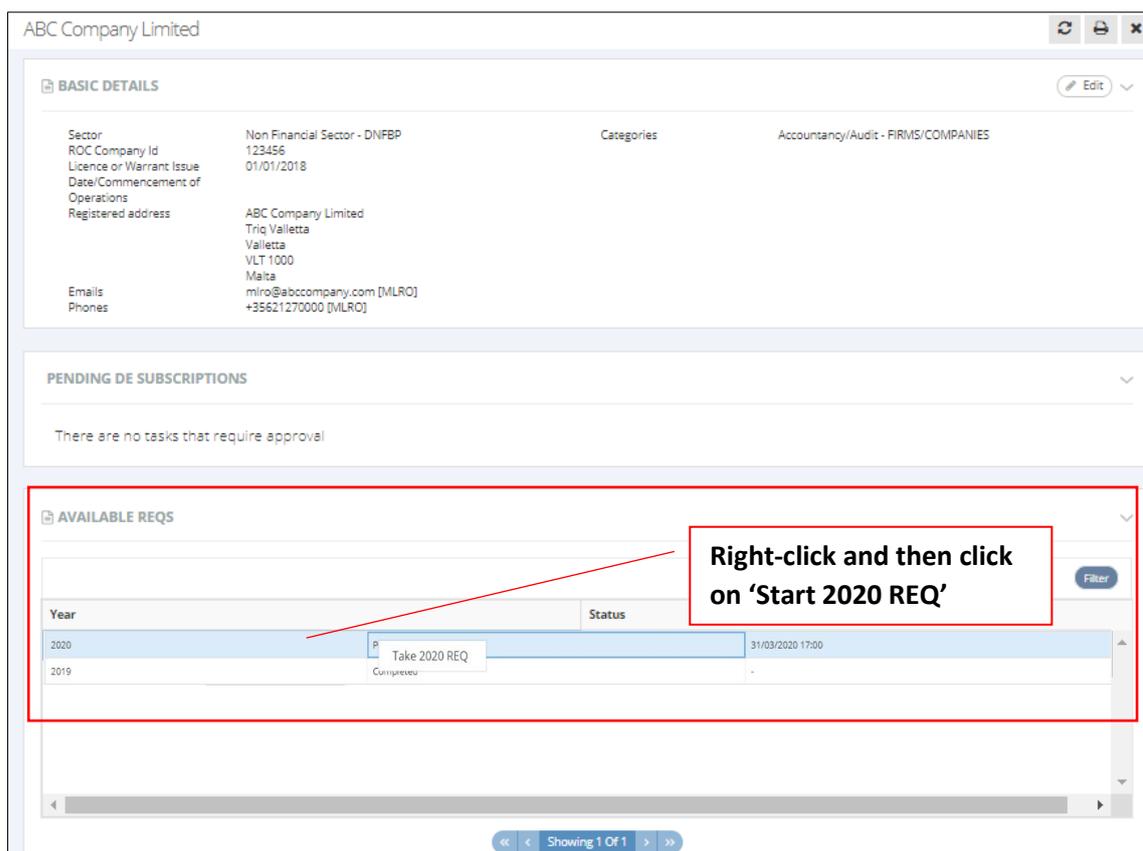
Where the same person is the appointed MLRO of multiple Subject Persons, an REQ must be submitted for each Subject Person. In view of this, the steps listed below, must be repeated for each Subject Person.

Whilst both Designated Employees and MLROs may complete the REQ, submission and payment must be solely undertaken by the MLRO.

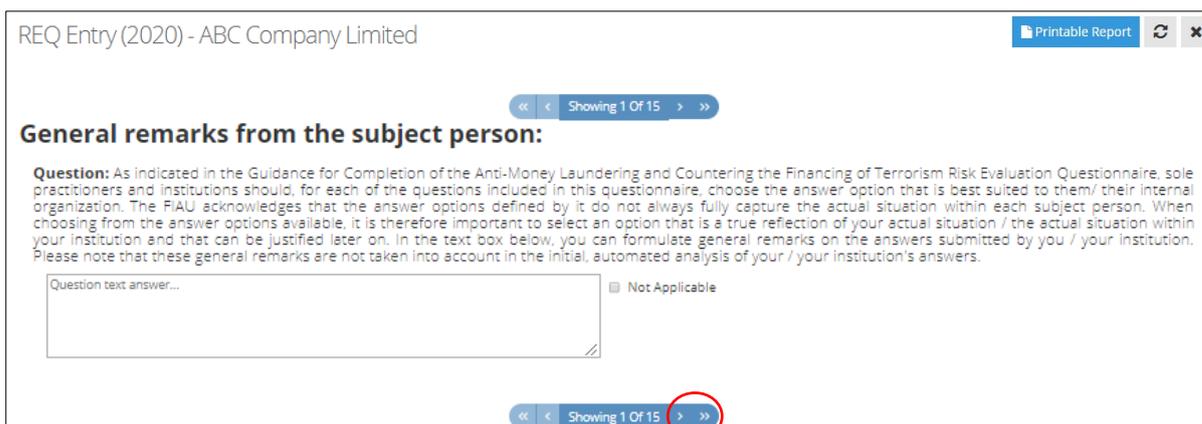
- 1) Login to the account by entering the email address used during registration and the password created.
- 2) Click on the Subject Person which appears of the SP Dashboard.



- 3) Once you click on the Subject Person to which you are assigned you will be able to view the details of that Subject Person. The section of 'Available REQs' shows the REQs which are due for submission or that were submitted. Right-click on the REQ for the year and then click on 'Start 2020 REQ'.



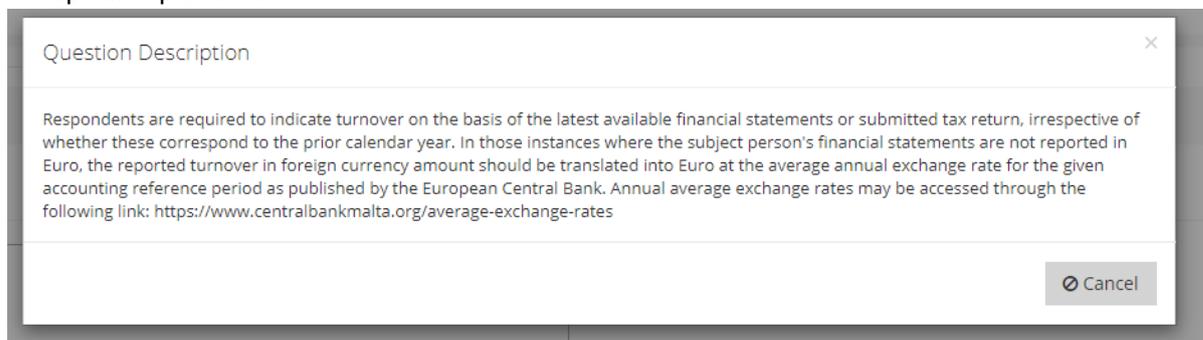
- 4) The first page of the REQ appears on screen. This section includes a 'free text box' in which MLROs may add explanatory notes to certain sections within the questionnaire. Click on the arrow on the right-hand side to proceed to the next page of the questionnaire. All sections of the questionnaire may be accessed at any time during the completion of the questionnaire.



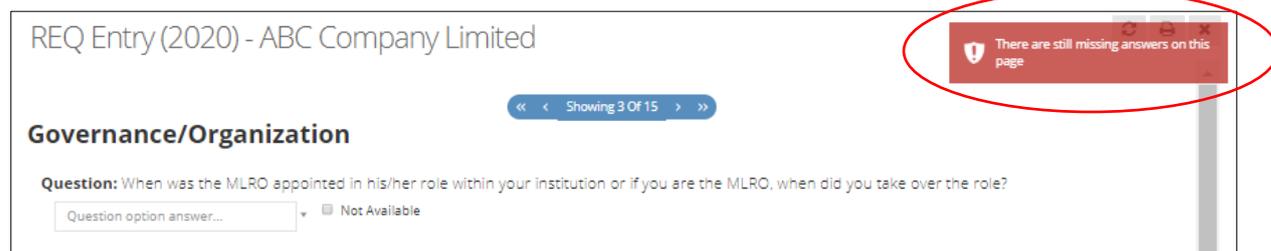
- 5) Fill all questions on the page and click on the arrows to go back and forward if you would like to skip to other pages of the REQ.



- 6) Clicking on the following sign  will open a pop up box that will provide guidance in relation to the specific question.



- 7) You may proceed to other pages of the questionnaire, even if there are unanswered questions on the current page. However, the following warning appears in the top right-hand side of the screen, to notify that certain fields within the page are not completed.



- 8) There will be questions where one or more option will be available to be ticked. Below is an example of these type of questions.



- 9) Other questions will allow only one answer to be ticked. Below is an example of these type of questions.

Guidance for the registration and use of the CASPAR platform

Did the Business Risk Assessment conducted take into account the risks and controls related to:

Q: a) your / your entity's customers	<input type="radio"/> Not Applicable	<input type="radio"/> No	<input type="radio"/> Yes
Q: b) the products and services offered by you / your entity and the transaction risk exposure through same	<input type="radio"/> No	<input type="radio"/> Yes	<input type="radio"/> Not Applicable
Q: c) specific countries or geographical areas	<input type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Not Applicable
Q: d) the distribution channels ?	<input type="radio"/> Not Applicable	<input type="radio"/> Yes	<input type="radio"/> No

10) You may print the REQ by clicking on the 'Printable Report' button located on the top right-hand side of the screen.

After pressing this button, a print preview of the report will appear on screen. You may proceed by clicking on this button . Otherwise, click on  to go back to edit the REQ.

REQ Entry (2020) - ABC Company Limited Printable Report Refresh Close

« < Showing 1 Of 15 > »

General remarks from the subject person:

Question: As indicated in the Guidance for Completion of the Anti-Money Laundering and Countering the Financing of Terrorism Risk Evaluation Questionnaire, sole practitioners and institutions 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 institution and that can be justified later on. In the text box below, you can formulate general remarks on the answers submitted by you / your institution. Please note that these general remarks are not taken into account in the initial, automated analysis of your / your institution's answers.

Question text answer... Not Applicable

« < Showing 1 Of 15 > »

Step 2: Payment of applicable fees and submission of REQ

The following are the steps which must be followed by the MLRO for the submission of a REQ and the payments of the applicable fees. Kindly note that this process may be solely undertaken by the MLRO of the Subject Person. Furthermore, all questions of the REQ must be completed prior to its submission.

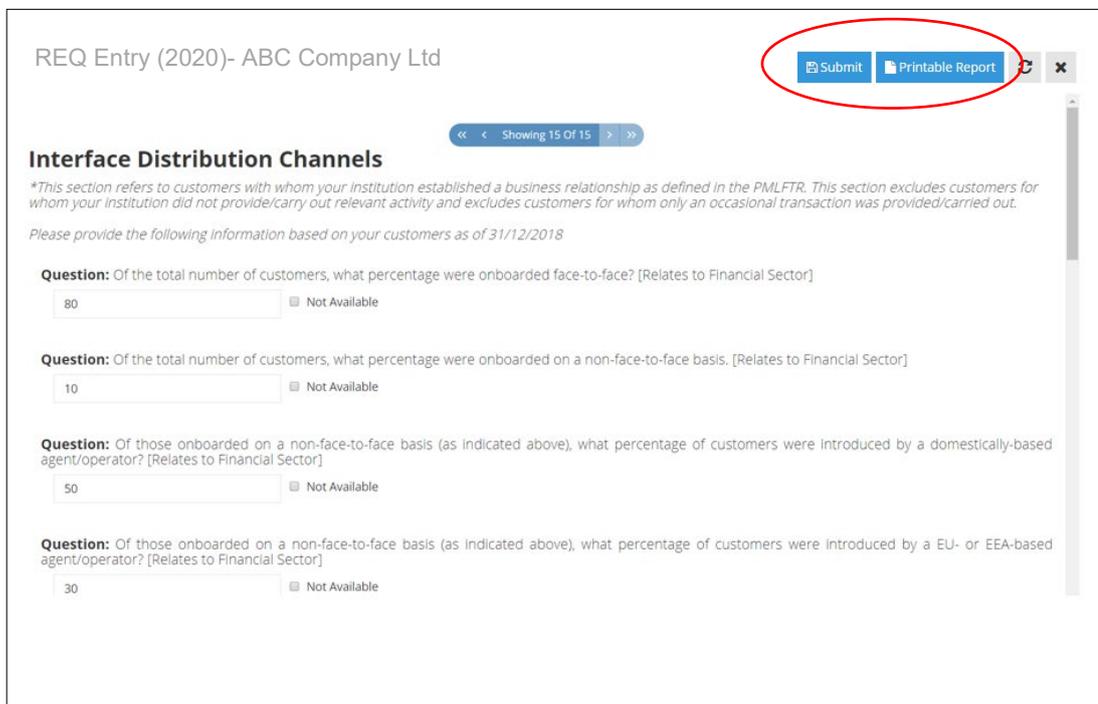
In the case of legal entities, the REQ must be reviewed by another individual, prior to its submission (Refer to Step 4 below).

Kindly note that following the declaration, the user is not permitted to edit the content of the REQ. In view of this, we recommend the MLRO thoroughly reviews the responses provided prior to proceeding to the declaration of the REQ. Following submission, the REQ will be accessible through the CASPAR platform for viewing purposes only.

Where the same person is the appointed MLRO of multiple Subject Persons, a REQ and payment must be submitted for each Subject Person. In view of this, the steps listed below, must be repeated for each Subject Person.

The deadlines for the REQ can be found on the FIAU website or by accessing the following link (<https://fiaumalta.org/news/2021-risk-evaluation-questionnaires/>)

- 1) Following the completion of the REQ, go to the last page and press 'Proceed to Declaration' which is located on the top right-hand side of the screen. You may print the completed REQ by clicking on the 'Printable Report' button located on the top right-hand side of the screen. A print preview of the report will appear on the screen. Click on  to print the report. The REQ may also be printed after its submission.



REQ Entry (2020)- ABC Company Ltd

Submit Printable Report

Showing 15 Of 15

Interface Distribution Channels

**This section refers to customers with whom your institution established a business relationship as defined in the PMLFTR. This section excludes customers for whom your institution did not provide/carry out relevant activity and excludes customers for whom only an occasional transaction was provided/carried out.*

Please provide the following information based on your customers as of 31/12/2018

Question: Of the total number of customers, what percentage were onboarded face-to-face? [Relates to Financial Sector]

80 Not Available

Question: Of the total number of customers, what percentage were onboarded on a non-face-to-face basis. [Relates to Financial Sector]

10 Not Available

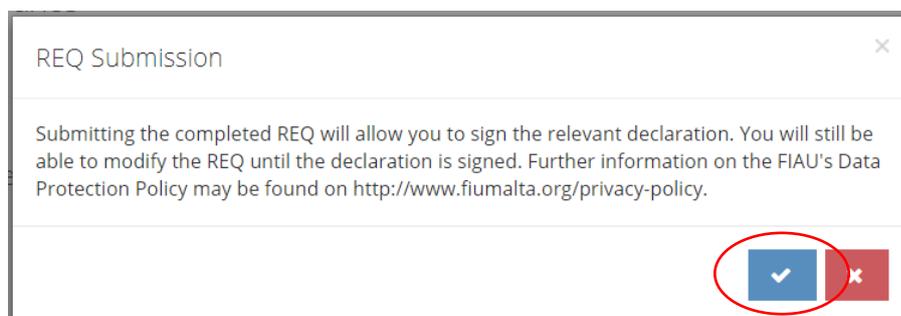
Question: Of those onboarded on a non-face-to-face basis (as indicated above), what percentage of customers were introduced by a domestically-based agent/operator? [Relates to Financial Sector]

50 Not Available

Question: Of those onboarded on a non-face-to-face basis (as indicated above), what percentage of customers were introduced by a EU- or EEA-based agent/operator? [Relates to Financial Sector]

30 Not Available

- 2) The following window will appear. Click on the marked sign.

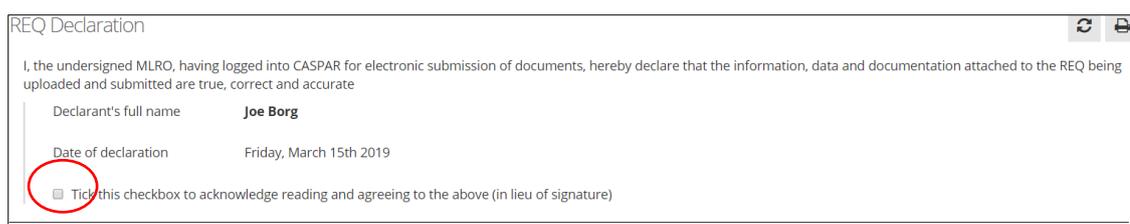


REQ Submission

Submitting the completed REQ will allow you to sign the relevant declaration. You will still be able to modify the REQ until the declaration is signed. Further information on the FIAU's Data Protection Policy may be found on <http://www.fiumalta.org/privacy-policy>.

OK Cancel

- 3) Read carefully the declaration and tick the box acknowledging reading and agreeing with the content of the declaration.



REQ Declaration

I, the undersigned MLRO, having logged into CASPAR for electronic submission of documents, hereby declare that the information, data and documentation attached to the REQ being uploaded and submitted are true, correct and accurate

Declarant's full name **Joe Borg**

Date of declaration Friday, March 15th 2019

Tick this checkbox to acknowledge reading and agreeing to the above (in lieu of signature)

- 4) MLROs of legal entities must also complete the following additional declaration. Input the required information on the reviewer of the REQ and tick the box acknowledging that you have read and agreed with the content of the declaration. Then press 'I Declare' to payment.

Furthermore, I declare that the REQ has been reviewed by the under-mentioned person, who has confirmed contents of this report.

Reviewer's full name *

Reviewer's designation *

Reviewer's phone number *

Reviewer's e-mail *

Date of review *

Tick this checkbox to acknowledge reading and agreeing to the above (in lieu of signature)

- 5) Input the card details in the appropriate fields. Then click on 'Submit Secure Payment'. (Please note that no invoice will be generated)

Online Payment

Order Total:
€ 50.00

Payment Method

Card Number

Please enter the embossed number on the front side of the card

Expiry
01 ▼ 2020 ▼

CVV

(Use the last 3 digits found on the back of your card)

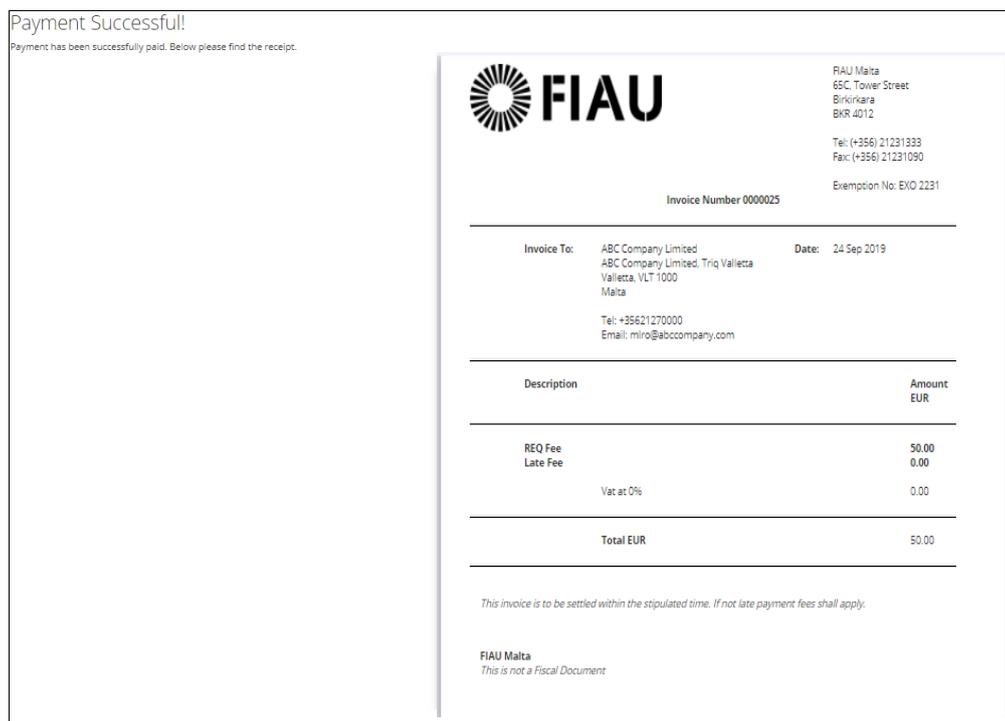
Card Holder Name

Please enter the card holder name as shown on the card

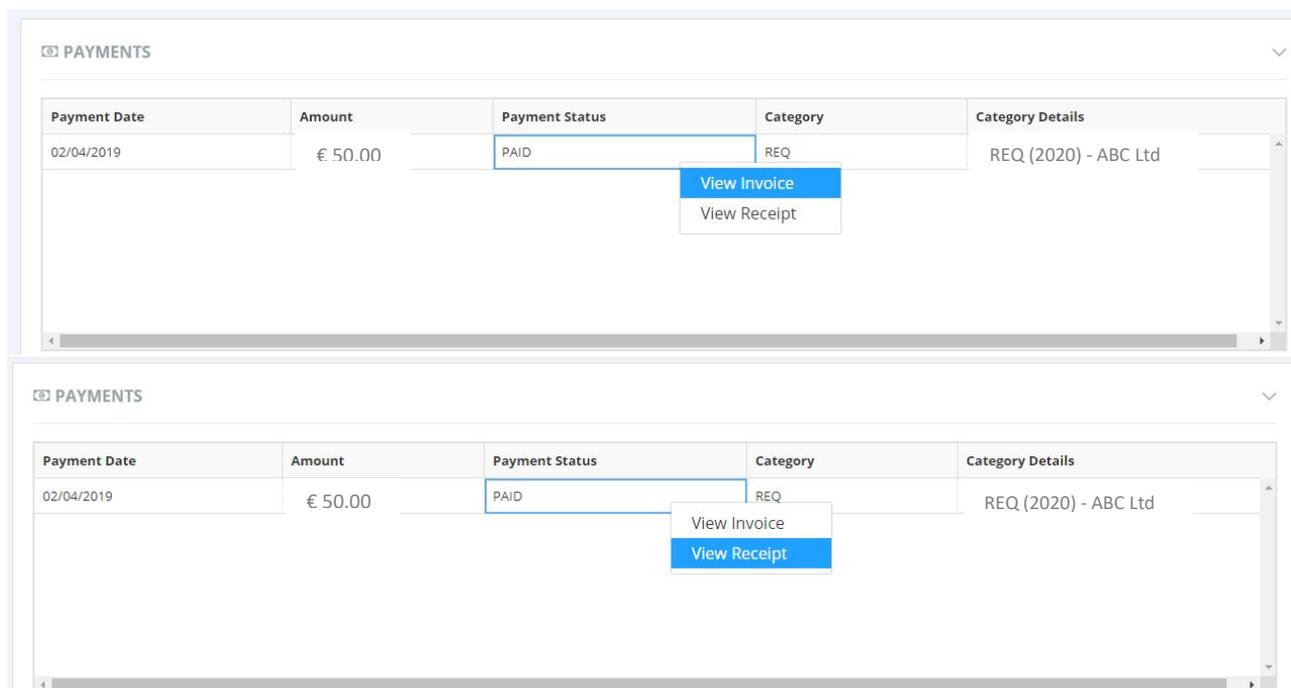
Payment session will expire in 19:15

By proceeding to pay, you hereby confirm that you understand that cancellatio

- 6) A notification appears stating that payment was successfully effected. A receipt for the payment submitted is generated. Click on the 'Print' button  to print the receipt.



- 7) The invoice/receipt can be viewed and printed following the submission of the payment. This can be done through the following steps:
1. Click on the name of the subject person
 2. Scroll down to the 'Payments' section (as seen below)
 3. Right-click on payment status 'PAID' and select view invoice/receipt



7) Frequently Asked Questions

This Frequently Asked Questions (FAQ) document provides more information about the registration to the Compliance and Supervision Platform for Assessing Risk (CASPAR) and the submission of the AML/CFT Risk Evaluation Questionnaire (REQ) through this platform. Please review this FAQ document to learn more.

1. I am no longer a Subject Person – what do I need to do?

If your business has ceased operating, or if your business no longer undertakes relevant activity and / or relevant financial business, you must submit a request to be removed from the CASPAR database. This can be done by contacting the FIAU via email on caspar@fiaumalta.org.

2. Do I need to advise FIAU of changes to my details?

Yes. Changes to the personal details must be affected directly in CASPAR. Refer to Section [‘Editing of user details’](#).

3. Do I need to advise FIAU of changes to the details of the Subject Person?

Yes, the FIAU must be informed of changes to the Subject Person details. Changes must be affected directly in CASPAR. Refer to Section [‘Editing of details of Subject Persons’](#).

4. What do I do if I receive notification that my enrolment was not approved?

The reason for the rejection will be included in the email notification. If further clarifications are required, you may contact the FIAU on caspar@fiaumalta.org.

5. How long does enrolment take?

Enrolment is split in two stages:

- a. Creation of a personal user in CASPAR
- b. Creation / Subscription to a Subject Person

A registration form must be completed for each stage. The completion of the respective forms is a short process and takes only a couple of minutes. However, since the approval of the FIAU is required at each stage, enrolment process may take a number of hours / days.

6. I successfully managed to register on CASPAR, however as soon as I am logging in, the buttons to create or subscribe to a Subject Person are not showing.

You may be using Internet Explorer. Kindly note that CASPAR is not compatible with this browser. The website is optimized for Google Chrome and Mozilla Firefox.

7. I am an MLRO, however I am still awaiting approval of my appointment by the relevant Authority. May I register on the CASPAR platform?

Yes. You must register on CASPAR under the designation type ‘MLRO’. Refer to guidance in [A. MLRO](#).

8. My company is in the process of identifying a MLRO. How should I register on CASPAR?

The Company must appoint an interim MLRO. The interim MLRO should register as a user on CASPAR, and then subscribe to the Subject Person - refer to guidance in [A. MLRO](#). If the MLRO changes, the FIAU must be informed in due time by email and the newly appointed MLRO must repeat the registration process.

9. I am the appointed MLRO of multiple Subject Persons. I have already registered on CASPAR and subscribed to one entity – how should I subscribe to additional entities?

You may use your current user account on CASPAR to subscribe to / create additional Subject Persons. Login to your account on CASPAR and refer to guidance [Step 2: Creation / Subscribing to a Subject Person](#). Kindly note that a REQ must be submitted for each Subject Person.

10. I am an MLRO, and I have erroneously rejected the request of a Designated Employee to subscribe to an Existing Subject Person. What happens next?

The Designated Employee should repeat the process of subscribing to a Subject Person. You will receive a new request to approve the subscription.

11. I am the MLRO of a Subject Person, but I will be resigning since I am leaving the entity. Another person will take the role of MLRO. What should be done?

You should follow the obligations under the IPs for resignation/appointment of the MLRO (IP Section 5.1.3). Furthermore, your user must be deactivated. This can be done by contacting the FIAU via email on caspar@fiaumalta.org. The newly appointed MLRO must first register as a user on CASPAR and then subscribe to the Subject Person. Guidance on registration as a MLRO is available in section [A.MLRO](#).

12. I am encountering difficulties in the registration process or in the submission of REQ. Who may I contact?

The User Guide provides a wealth of information on CASPAR. However, if you still have any unanswered questions, you can contact FIAU on caspar@fiaumalta.org.

13. Question: My entity operates under 2 licenses falling under different sub-sectors and we previously filed separate Annual Compliance Report (ACR) for each sub-sector. Are we required to complete one REQ for each sub-sector?

No. Only one REQ needs to be submitted per Subject Person. This REQ will incorporate all the questions applicable to both sub-sectors. This will be based on the sub-sectors selected by the user during the one-time registration of the Subject Person on CASPAR.

14. How long does it take to complete and submit a REQ?

The REQ requires the inputting of various data which requires time to be compiled and filled in. We urge you to commence the completion of the REQ as soon as possible. Penalties apply for the late filing.