



**Financial Intelligence Analysis Unit**  
Risk Evaluation Questionnaire

Virtual Financial Assets Sector  
**Virtual Financial Assets Agents (VFA Agents)**

*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 | How many agents did your entity have at the end of the prior calendar year?   | [Number]   |
| 2.02 | When was the current MLRO appointed?  | More than 5 years / Between 3-5 years / Between 1-2 years / Less than 1 year |
| 2.03 | 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 |
| 2.04 | Is the MLRO responsible for areas other than AML / CFT?   | No / Yes   |
| 2.05 | Does the MLRO also hold MLRO positions with other entities?   | No / Yes   |
| 2.06 | If yes, please include total number of MLRO positions held.   | [Number]   |
| 2.07 | How many staff members, expressed as full time employees (FTEs), are part of the AML / CFT team (if one exists)?  | [Number]   |
| 2.08 | 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   |
| 2.09 | 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   |
| 2.10 | Have you / has your entity, MLRO, Compliance Officer, senior management, partners, directors, BOs, and / or shareholders (as applicable) been subject to any of the following in the last five (5) years either in Malta or abroad:   |  |

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| 2.11 | a) regulatory enforcement actions, criminal investigations for ML / FT or any other financial crime   | No / Yes   |
| 2.12 | b) subject of negative news reports   | No / Yes   |
| 2.13 | In the past five (5) years, have any employees (including directors and partners) been disciplined for non-compliance with the AML / CFT policies within your entity? | No / Yes   |
| 2.14 | If Yes, please explain  | [Freertext]  |
| 2.15 | Is there any pending litigation or regulatory enforcement action related to AML or Sanctions?   | No / Yes   |
| 2.16 | If Yes, please explain  | [Freertext]  |
| 2.17 | Have you / Has your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the group)?   | No / Yes (within Group) / Yes (outside Group) / Yes (within and outside Group) |
| 2.18 | If "Yes", please specify the obligations that are being outsourced.   | [Freertext]  |
| 2.19 | Does the MLRO have a direct reporting line to the Board of Directors  | No / Yes   |
| 2.20 | Does the MLRO have sufficient seniority and command to carry out his/her duties effectively   | No / Yes   |

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| <b>3</b> | <b>Business Risk Assessment</b> | Topic |
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| 3.01 | Have you / has your entity performed a Business Risk Assessment?   | No / Yes                        |
| 3.02 | What is your / your entity's most recent Business Risk Assessment inherent risk scoring / rating for ML / FT risk?     | Very High / High / Medium / Low |
| 3.03 | What is your / your entity's most recent Business Risk Assessment residual risk scoring / rating for ML / FT risk?     | Very High / High / Medium / Low |
| 3.04 | Did the Business Risk Assessment conducted take into account the risks and controls related to:                        |                                 |
| 3.05 | a) your / your entity's customers  | No / Yes / Not Applicable       |
| 3.06 | b) the products and services offered by you / your entity and the transaction risk exposure through same               | No / Yes / Not Applicable       |
| 3.07 | c) specific countries or geographical areas  | No / Yes / Not Applicable       |
| 3.08 | d) the distribution channels   | No / Yes / Not Applicable       |
| 3.09 | Did the Business Risk Assessment conducted take into account the results of the SNRA?                                  | 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 | Do you / Does your entity review and / or update the business risk assessment on a 6 month basis?                      | No / Yes                        |

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| <b>4</b> | <b>Customer Acceptance and Risk Assessment</b> | Topic |
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| 4.01 | Do you / does your entity perform a customer risk assessment ("CRA") on the (prospective) issuer and / or prospective licensee?  | No / Yes sometimes / Yes most of the times / Yes always  |
| 4.02 | Please indicate for all your issuers, where a business relationship is formed or, or depending on the risk, only for a specific part of your issuers and / or prospective licensees, whether you / your entity collects the following: |  |
| 4.03 | (a) Nationality / country of incorporation   | No / Only for high risk / Yes / Not Applicable   |
| 4.04 | (b) Country of residence / main place of business  | No / Only for high risk / Yes / Not Applicable   |
| 4.05 | (c) Nature of business / employment  | No / Only for high risk / Yes / Not Applicable   |
| 4.06 | (d) Information on the activities (to be) carried out and on the level of income or turnover   | No / Only for high risk / Yes / Not Applicable   |
| 4.07 | (e) Information on the origin of the funds, including any VFAs, used by the customer to finance initial operations   | No / Only for high risk / Yes / Not Applicable   |
| 4.08 | (f) the assets which will be accepted or transacted in by the (prospective) issuer and their characteristics   | No / Only for high risk / Yes / Not Applicable   |
| 4.09 | (g) Information on the overall wealth of the customers   | No / Only for high risk / Yes / Not Applicable   |
| 4.10 | (h) Information on the expected frequency, the geographical distribution and or size of the transactions and cash flows  | No / Only for high risk / Yes / Not Applicable   |
| 4.11 | (i) PEP status   | No / Only for high risk / Yes / Not Applicable   |
| 4.12 | When is the customer due diligence performed on the licence holder and / or issuer?  | Prior to the submission of the whitepaper and / or licence application / Following the submission of the whitepaper and / or licence application / Other |
| 4.13 | If "Other", please specify.  | [Freertext]  |

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| 4.14 | Did you / your entity acquire new clients through an introducer/s in the prior calendar year?   | No / Yes   |
| 4.15 | If "yes", please indicate the number of introducers used during the prior calendar year.  | [Number]   |
| 4.16 | In the case where an introducer was used, was due diligence performed on the introducer?  | Never / Yes in some instances / Yes in all instances   |
| 4.17 | Do you / does your entity screen customers and, where applicable, their beneficial owners against sanction lists, PEP lists and to see whether they were the subject of adverse media at onboarding?  | No / Yes   |
| 4.18 | What kind of measures Do you / does your entity make use of to determine the PEP status of a customer (beneficial owner/s)?   |  |
| 4.19 | a) Rely on publicly available information   | No / Yes   |
| 4.20 | b) Obtain information directly from the customer or BO  | No / Yes   |
| 4.21 | c) Use commercial databases   | No / Yes   |
| 4.22 | Does your entity accept (prospective) issuers and / or prospective licensees which allow their customers to:  |  |
| 4.23 | (a) Make use of privacy coins   | No / Yes   |
| 4.24 | (b) Transfer VFAs from non-custodial wallets  | No / Yes   |
| 4.25 | (c) Transfer VFAs which have passed through mixers, tumblers etc  | No / Yes   |
| 4.26 | (d) Make use of unverifiable IP addresses or otherwise obscure their location   | No / Yes   |
| 4.27 | Does your entity accept service issuers who do not impose any capping on the amounts invested by acquirers of their VFA?  | No / Yes   |
| 4.28 | 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   |
| 4.29 | If variation in the timing of due diligence is permitted as indicated above, what pre-determined triggering criteria is applied?  |  |
| 4.30 | a) Transaction, customer activity threshold   | No / Yes / Not Applicable  |
| 4.31 | b) Pre-determined time frame  | No / Yes / Not Applicable  |
| 4.32 | c) Prior to completion of service provided  | No / Yes / Not Applicable  |
| 4.33 | 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   |
| 4.34 | 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   |
| 4.35 | When making use of any of the exceptions provided for under Regulation 8 of the PMLFTR, do the customer files include a written justification for the exception and formal approval of the exception?   | No / Yes   |
| 4.36 | 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   |
| 4.37 | 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  |
| 4.38 | How often do you / does your entity review the customer risk assessment for the following:  |  |
| 4.39 | a) Low risk Customers   | Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never |
| 4.40 | b) Medium Risk Customers  | Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never |
| 4.41 | c) High Risk Customers  | Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never |
| 4.42 | Are any of the customers providing / have any of the customers provided inconsistent / misleading / false information or information which is difficult to verify?  | No / Yes   |

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| <b>5</b> | <b>De-Risking Controls</b> | 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? | [Freertext] |
| 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?                                       | [Freertext] |

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| <b>6</b> | <b>Ongoing Monitoring / Transaction Scrutiny</b> | Topic |
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| 6.01 | Do you/your entity monitor transactions?   | No / Yes  |
| 6.02 | Is your entity's process / system for monitoring transactions fully automated, partially automated or manual?  | Fully automated / Partially automated / Manual  |
| 6.03 | Is your monitoring system able to detect the expiry of due diligence documentation and any conflicting information in relation to customer data?   | Yes / No  |
| 6.04 | 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 |
| 6.05 | 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                   |
| 6.06 | 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]  |

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| <b>7</b> | <b>Policies and Procedures</b> | Topic |
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| 7.01 | Do you / does your entity have written AML / CFT policies and procedures?  | No / Yes   |
| 7.02 | Do policies and procedures require you / your entity to assess risks associated with funding of terrorism?   | No / Yes   |
| 7.03 | How frequently do you / does your entity review and, where necessary, update your AML / CFT written policies and procedures?   | As needed / Monthly / Quarterly / Annually / Between 1-3 years / Every 3 or more years |
| 7.04 | Do you / does your entity's procedures provide for measures to determine whether customers and, where applicable, their beneficial owners, are politically exposed persons (PEPs) or PEPs' family members or close associates, prior to commencement of service and on an ongoing basis in line with the ongoing monitoring obligations? | No / Yes   |
| 7.05 | Do you / does your entity's policies and procedures require senior management's approval to service or otherwise continue business relationships with, or having the involvement of, PEPs or their family members / close associates?  | No / We do not offer services to PEPs / Yes  |
| 7.06 | 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 | 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   |
| 7.09 | 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   |
| 7.10 | Do you / does your entity's policies and procedures require enhanced due diligence to be applied in higher risk situations?  | No / Yes   |
| 7.11 | Do your / your entity's policies and procedures require enhanced due diligence to be applied where the customer or beneficial owner is a PEP?  | No / Yes when risk is not low / Yes only when risk is high / Yes, always               |

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| <b>8</b> | <b>Internal Audit / Independent Testing</b> | Topic |
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| 8.01 | Have you / has your entity, given the size and nature of its business, appointed an officer at management level to monitor the day to day implementation of its AML / CFT measures, policies, controls and procedures? | No, MLRO has taken this role / Yes, other officer at management level appointed / Considered but not required / Not considered                        |
| 8.02 | What was the frequency of the reviews carried out by the appointed officer in the prior calendar year?   | Monthly / Half yearly / Annually / As needed / No reviews performed / Not Applicable  |
| 8.03 | Have you / has your entity, given the size and nature of its business, appointed an independent audit function to test its AML / CFT measures, policies, controls and procedures?                                      | Not considered / Considered but function not required / Yes, independent officer at management level / Yes, external consultant / Yes, internal audit |
| 8.04 | What is the frequency of audits carried out by the independent audit function?   | Monthly / Quarterly / Half yearly / Annually / Between 1-3 years / Every 3 or more years / As needed / No reviews performed / Not Applicable          |
| 8.05 | When was the last independent audit performed in regards to you / your entity's compliance with the AML / CFT regulations?   | Less than 1 year ago / Between 1 -2 years ago / More than 2 years ago / Never   |
| 8.06 | What was the overall result of the last audit (relating to AML / CFT) carried out?   | Satisfactory / Satisfactory but improvements required / Unsatisfactory / No audits carried out  |

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| 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 |

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| <b>9</b> | <b>Reporting</b> | Topic |
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| 9.01 | How many STRs were submitted to the FIAU during the prior calendar year?  | [Number]   |
| 9.02 | How many internal suspicious reports were raised during the prior calendar year?  | [Number]   |
| 9.03 | From the internal reports raised in the prior calendar year, how many cases are still open?   | [Number]   |
| 9.04 | Do you inform the MFSA immediately when you / your entity determine that a customer / prospective customer is not a fit and proper person to hold a licence / conduct an offer to the public? | No / Yes sometimes / Yes always  |
| 9.05 | Please list the number of alerts / transactions you / your entity investigated as a result of unusual activity or transactions during the prior calendar year?                                | [Number]   |
| 9.06 | 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  |
| 9.07 | Were records of all "internal reports" raised during the prior calendar year and the analysis conducted thereon maintained by you / your entity?  | No / No measures relating to internal reporting or alerts are in place / No internal reports submitted / Only internal reports maintained / Yes, internal report & analysis maintained |
| 9.08 | 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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| <b>10</b> | <b>AML / CFT Training</b> | Topic |
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| 10.01 | How often do you and / or any relevant staff attend AML / CFT training?   | Every 3 or more years / Between 1-3 years / Annually / Monthly / Quarterly / As needed but at least annually |
| 10.02 | Have you and / or relevant staff from your entity attended or received training in the prior calendar year, in relation to specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)?                                    | No / Yes   |
| 10.03 | How many hours of AML/CFT related training has the MLRO attended in the past 12 months?   | [Number]   |
| 10.04 | Please provide the % of 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 | 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                        |

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| <b>11</b> | <b>Record Keeping</b> | Topic |
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| 11.01 | Do you / does your entity have policies and procedures in place providing for compliance with the record keeping obligations arising from the PMLFTR? | No / Yes |
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| 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 |
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| <b>12</b> | <b>De-Risking Inherent Risk</b> | Topic |
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| 12.01 | Have you experienced being de-risked during the previous calendar year? | No / Yes |
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| <b>13</b> | <b>Customers</b> | Topic |
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| 13.01 | Please list the total number of customers with whom your entity had an active business relationship as at the end of the prior calendar year.  | [Number]    |
| 13.02 | Please list the total number of customer relationships closed / terminated during the prior calendar year.   | [Number]    |
| 13.03 | Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.   | [Number]    |
| 13.04 | Please list the total number of new customers onboarded during the prior calendar year.  | [Number]    |
| 13.05 | 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]    |
| 13.06 | 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) Customers with an ownership structure that includes offshore vehicles, trusts, or other legal arrangements including bearer shares and nominee shareholding | [Decimal]   |
| 13.07 | b) Customers with an ownership structure that includes foundations, charities or other not-for-profit entities   | [Decimal]   |
| 13.08 | How many prospective licensees are you servicing?  | [Number]    |
| 13.09 | Of the total number of clients, how many offer the following services: a) Reception and Transmission of Orders   | [Number]    |
| 13.10 | b) Execution of orders on behalf of other persons  | [Number]    |
| 13.11 | c) Dealing on own account  | [Number]    |
| 13.12 | d) Portfolio Management  | [Number]    |
| 13.13 | e) Custodian or Nominee Services   | [Number]    |
| 13.14 | f) Investment Advice   | [Number]    |
| 13.15 | g) Placing of virtual financial assets   | [Number]    |
| 13.16 | h) The operation of a VFA exchange   | [Number]    |
| 13.17 | Of the total number of customers, please specify: a) % of customers scored / rated as "High Risk"  | [Decimal]   |
| 13.18 | b) % of customers scored / rated as "Medium High Risk"   | [Decimal]   |
| 13.19 | c) % of customers scored / rated as "Medium Risk"  | [Decimal]   |
| 13.20 | d) % of customers scored / rated as "Low Medium Risk"  | [Decimal]   |
| 13.21 | e) % of customers scored / rates as "Low Risk"   | [Decimal]   |
| 13.22 | Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?   | No / Yes    |
| 13.23 | If "Yes", please specify any additional risk rating.   | [Freertext] |
| 13.24 | If "Yes" Please specify the corresponding % of customers of the risk rating stated above.  | [Decimal]   |
| 13.25 | Please list the number of customers, of which you are / your entity is aware, which have not filed the financial statements of the year preceding the prior calendar year with the Malta Business Registry.  | [Number]    |
| 13.26 | 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]    |
| 13.27 | Please list the number of customers who presented any one or more of the following characteristics: a) Carried out VFA offerings with no capping per user  | [Number]    |
| 13.28 | b) Allow their customers to transact or make use of privacy coins  | [Number]    |

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| 13.29 | c) Allow customers to transfer VFAs from non-custodian wallets  | [Number]  |
| 13.30 | d) Allow customers to transfer VFAs which have passed through mixers, tumblers, etc   | [Number]  |
| 13.31 | e) Allow customers to make use of unverifiable IP Addresses or otherwise obscure their location   | [Number]  |
| 13.32 | Do any of your customers accept payments through the following funding methods:   | Matrix  |
| 13.33 | a) Prepaid cards  | No / Yes / Not Available  |
| 13.34 | b) Crypto-backed credit cards   | No / Yes / Not Available  |
| 13.35 | c) Funds transferred from institutions that are located in non-EU / EEA jurisdictions   | No / Yes / Not Available  |
| 13.36 | Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).  | [Number]  |
| 13.37 | Of the total number of customers who are natural persons, how many were PEPs (including family members and close associates) as at the end of the prior calendar year?  | [Number]  |
| 13.38 | 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]  |
| 13.39 | Please provide a breakdown of the total number of PEPs in your / your entity's customer base as at the end of the prior calendar year: a) % of Maltese PEPs (including BOs)   | [Decimal]   |
| 13.40 | b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)  | [Decimal]   |
| 13.41 | c) % of PEPs (including BOs) from non-EU / EEA jurisdictions  | [Decimal]   |
| 13.42 | Do you / does your entity have, as at the end of the prior calendar year, PEPs from jurisdictions listed in the FATF lists and / or in the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index? | No / Yes  |
| 13.43 | If your answer to the above question was "YES", please select the respective jurisdictions.   | Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable |

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| <b>14</b> | <b>Geography</b> | Topic |
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| 14.01 | What percentage of your / your entity's total customers are resident or otherwise incorporated or their principal place of business is in Malta?   | [Decimal]   |
| 14.02 | 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]   |
| 14.03 | 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]   |
| 14.04 | 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  |
| 14.05 | If your answer to the above question was "YES", please select the respective jurisdictions.  | Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable |
| 14.06 | 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  |

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| 14.07 | 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 |
| 14.08 | How many of your total customers market their services in Malta?  | [Number]  |
| 14.09 | How many of your total customers market their services in EU / EEA?   | [Number]  |
| 14.10 | How many of your total customers market their services in non-EU / EEA?   | [Number]  |
| 14.11 | What % of your / your entity's customers' BOs are resident in Malta?  | [Decimal]   |
| 14.12 | What % of your / your entity's customers' BOs are foreign and resident in an EU or EEA jurisdiction outside Malta?  | [Decimal]   |
| 14.13 | What % of your / your entity's customers' BOs are foreign and resident in a non-EU / EEA member state jurisdiction?   | [Decimal]   |
| 14.14 | 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  |
| 14.15 | If your answer to the above question was "YES", please select the respective jurisdictions.   | Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable |

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| <b>15</b> | <b>Interface / Distribution Channels</b> | Topic |
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| 15.01 | Of the total number of customers, what % were onboarded or serviced on a non-face-to-face basis in the prior calendar year?   | [Decimal]   |
| 15.02 | 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 |
| 15.03 | Does your entity have any reliance agreements in place in terms of Regulation 12 of the PMLFTR?   | No / Yes  |
| 15.04 | If reliance was placed on third parties, where are the third parties located?   | Malta / EU / Non-EU   |
| 15.05 | If reliance is placed on third parties, do the third parties carry out relevant financial business (or equivalent activities) or relevant activity (or equivalent)?   | Relevant financial business (or equivalent activities) / Relevant activity (or equivalent)  |

