



Financial Intelligence Analysis Unit
Risk Evaluation Questionnaire

Financial Sector
e-Money Issuers

The questions included should not be considered as final and may be subject to amendments.

General remarks from the subject person:

As indicated in the Guidance for Completion of the Anti-Money Laundering and Countering the Financing of Terrorism Risk Evaluation Questionnaire, sole practitioners and entities should, for each of the questions included in this questionnaire, choose the answer option that is best suited to them / their internal organization.

The FIAU acknowledges that the answer options defined by it do not always fully capture the actual situation within each subject person. When choosing from the answer options available, it is therefore important to select an option that is a true reflection of your actual situation / the actual situation within your entity and that can be justified later on.

In the text box, you can formulate general remarks on the answers submitted by you / your entity. Please note that these general remarks are not taken into account in the initial, automated analysis of your / your entity's answers.

1 Subject Person Information Topic

1.01	Please indicate the total number of employees (including partners, executive directors, associates and staff), expressed in full time equivalents ("FTEs"), working for you / your entity as at the end of the prior calendar year.	[Number]
1.02	How many years experience in this industry do you / does the principal(s) and / or partners and / or director(s) and / or senior management of your entity have?	10 or more years / Between 5-9 years / Between 3-4 years / Between 1-2 years / Less than 1 year
1.03	Does the ownership structure of your entity include one or more of the following: foundation and / or trust and / or partnership and / or direct or indirect holding through bearer shares?	No / Yes
1.04	Does your entity have nominee shareholders in its ownership structure?	No / Yes
1.05	If "Yes", what percent of the total shares are held by nominee shareholders?	[Decimal]
1.06	Has your entity undergone changes in its ownership structure during the prior calendar year?	No / Yes
1.07	Has your entity undergone significant changes in its management and control structure during the prior calendar year?	No / Yes

2 Governance / Organization Topic

2.01	How many agents / distributors did your entity have at the end of the prior calendar year?	[Number]
2.02	Has your entity terminated any agency / distributor relationship due to AML / CFT issues during the prior calendar year?	No / Yes
2.03	When was the current MLRO appointed?	More than 5 years / Between 3-5 years / Between 1-2 years / Less than 1 year
2.04	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
2.05	Is the MLRO responsible for areas other than AML / CFT?	No / Yes
2.06	Does the MLRO also hold MLRO positions with other entities?	No / Yes
2.07	If yes, please include total number of MLRO positions held.	[Number]
2.08	How many staff members, expressed as full time employees (FTEs), are part of the AML / CFT team (if one exists)?	[Number]
2.09	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
2.10	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

2.11	Have you / has your entity, MLRO, Compliance Officer, senior management, partners, directors, BOs, and / or shareholders (as applicable) been subject to any of the following in the last five (5) years either in Malta or abroad:	
2.12	a) regulatory enforcement actions, criminal investigations for ML / FT or any other financial crime	No / Yes
2.13	b) subject of negative news reports	No / Yes
2.14	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
2.15	If Yes, please explain	[Freetext]
2.16	Is there any pending litigation or regulatory enforcement action related to AML or Sanctions?	No / Yes
2.17	If Yes, please explain	[Freetext]
2.18	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)
2.19	If "Yes", please specify the obligations that are being outsourced.	[Freetext]
2.20	Have you made use of any of the exceptions provided in Section 5.1.2 of the Implementing Procedures - Part I providing for the Money Laundering Reporting Officer to be carried out by someone other than one of your officers?	No / Yes
2.21	If yes, please indicate the official full name of the service provider.	[Freetext]
2.22	How often has the Board or equivalent body, received a presentation on AML / CFT issues in the prior calendar year?	Monthly / Quarterly / Half yearly / Annually / None
2.23	Does the MLRO have a direct reporting line to the Board of Directors	No / Yes
2.24	Does the MLRO have sufficient seniority and command to carry out his/her duties effectively	No / Yes

3	Business Risk Assessment	Topic
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3.01	Have you / has your entity performed a Business Risk Assessment?	No / Yes
3.02	What is your / your entity's most recent Business Risk Assessment inherent risk scoring / rating for ML / FT risk?	Very High / High / Medium / Low
3.03	What is your / your entity's most recent Business Risk Assessment residual risk scoring / rating for ML / FT risk?	Very High / High / Medium / Low
3.04	Did the Business Risk Assessment conducted take into account the risks and controls related to:	
3.05	a) your / your entity's customers	No / Yes / Not Applicable
3.06	b) the products and services offered by you / your entity and the transaction risk exposure through same	No / Yes / Not Applicable
3.07	c) specific countries or geographical areas	No / Yes / Not Applicable
3.08	d) the distribution channels	No / Yes / Not Applicable
3.09	Did the Business Risk Assessment conducted take into account the results of the SNRA and NRA?	No / Yes
3.10	Has the Business Risk Assessment been approved by senior management (including directors and partners) of your entity?	No / Yes
3.11	Did you / your entity review and / or update the business risk assessment in the prior calendar year?	No / Yes

4	Customer Acceptance and Risk Assessment	Topic
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4.01	Do you / does your entity perform a customer risk assessment ("CRA") prior to the acceptance and approval of customers?	No / Yes sometimes / Yes most of the times / Yes, always
4.02	If yes, is there a documented Customer Risk Assessment methodology?	No / Yes
4.03	Please indicate, for all your customers where an occasional transaction is carried out, whether you / your entity collects the following:	
4.04	a) Identification and verification information (for both natural and legal persons and BOs of legal persons) including: name, nationality / country of incorporation or registration, country of residence, registered office or main place of business	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.05	b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring person is authorised in writing	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.06	c) Information on the PEP status of the customer and, where applicable of the beneficial owner	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable

4.07	d) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover, other income streams)	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.08	e) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.09	Please indicate, for all your customers where a business relationship is formed, whether you / your entity collects the following:	
4.10	a) Identification and verification information (for both natural and legal persons and BOs of legal persons) including: name, nationality / country of incorporation or registration, country of residence, registered office or main place of business	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.11	b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring person is authorised in writing	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.12	c) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover, other income streams)	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.13	d) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.14	e) Information on the PEP status of the customer and, where applicable of the beneficial owner	No / Yes when risk is not low / Yes only when risk is high / Yes, always / Not Applicable
4.15	Please indicate, for all your customers where a business relationship is formed, whether you / your entity collects information on actual or expected activity (including cash flows) with respect to size, frequency and geographical distribution.	No / Yes, when risk is not low / Yes, only when risk is high / Yes, always
4.16	Do policies and procedures specify hierarchical authorisation levels within your entity to, on a risk basis, accept a customer or approve a transaction?	No / Yes
4.17	Did you / your entity acquire new clients through an introducer/s in the prior calendar year?	No / Yes
4.18	If "yes", please indicate the number of introducers used during the prior calendar year.	[Number]
4.19	In the case where an introducer was used, was due diligence performed on the introducer?	Never / Yes in some instances / Yes in all instances
4.20	Does your entity establish the identity of its agents / distributors?	No / Yes
4.21	Are the following verification measures used during the onboarding of non-face-to-face customers:	
4.22	a) Verification on the basis of documents	No / Yes
4.23	b) Use of video conferencing tools	No / Yes
4.24	c) Use of identity verification software	No / Yes
4.25	d) Verification through the use of commercial electronic data providers	No / Yes
4.26	e) Use of e-IDs	No / Yes
4.27	f) Verification of Identity Platforms	No / Yes
4.28	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
4.29	What kind of measures Do you / does your entity make use of to determine the PEP status of a customer (beneficial owner/s)?	
4.30	a) Rely on publicly available information	No / Yes
4.31	b) Obtain information directly from the customer or BO	No / Yes
4.32	c) Use commercial databases	No / Yes
4.33	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
4.34	If variation in the timing of due diligence is permitted as indicated above, what pre-determined triggering criteria is applied?	
4.35	a) Transaction, customer activity threshold	No / Yes / Not Applicable
4.36	b) Pre-determined time frame	No / Yes / Not Applicable
4.37	c) Prior to completion of service provided	No / Yes / Not Applicable
4.38	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
4.40	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
4.41	Where customer due diligence cannot be completed at the onboarding stage, do the policies and procedures require you / your entity to consider whether there is a need to file an STR with the FIAU and only proceed with the cancellation / termination of the business relationship once it is determined that there is no suspicion justifying the filing of an STR?	No / Yes
4.42	Do policies and procedures require due diligence (including customer risk assessment) to be repeated when there are doubts about the completeness, reliability or accuracy on priorly obtained customer identification information, data or documentation?	No / Yes

4.43	Do the policies and procedures require you to revise your customer risk assessment should the customer be evasive or not cooperative to provide the requested information and / or documentation?	No / Yes
4.44	Does your entity have controls that allow it to disable the product until it is satisfied that the customers pose no threat of suspicious activity?	No / Yes
4.45	Are customer identification measures applied each time the payer accesses your services and / or products through remote electronic channels of communication?	No / Yes
4.46	In case of electronic fund transfer or electronic money remittance or the purchase of any other service/ product through electronic means, does your entity monitor the location from where services are being accessed remotely (e.g. monitor for possible different or multiple IP addresses)?	No / Yes
4.47	In cases where your entity uses an agent to market its products / services, do policies and procedure state what action needs to be taken if the agent fails to provide the originator information upon request?	No / Yes
4.48	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
4.49	How often do you / does your entity review the customer risk assessment for the following:	
4.50	a) Low risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.51	b) Medium Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.52	c) High Risk Customers	Immediately upon material change / Less than 1 year / Annually / Every 2-3 years / More than every 3 years / Never
4.53	Do policies and procedures require your entity to obtain an understanding of high value / high risk transactions, as well as obtain related supporting documentation and revise the CRA, if required?	No / Yes
4.54	Do policies and procedures require the performance of periodic reviews on customer due diligence information and / or documentation, on the basis of customer risk rating?	No / Yes
4.55	Does the CDD and / or monitoring system identify frequent changes in the customer's identification data, such as home address, IP address or linked bank accounts?	No / Yes
4.56	Do policies and procedures require your entity to understand the rationale and the source of funding of transactions happening in the context of an occasional transaction on a risk sensitive basis?	No / Yes

5	De-Risking Controls	Topic
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5.01	Did you / your entity undertake any de-risking practices in the past years?	No / Yes
5.02	If de-risking was carried out, which risk and category of customers have been reduced?	[Freetext]
5.03	How many clients/relationships were terminated due to de-risking process?	[number]
5.04	What was the reason for the de-risking exercise?	[Freetext]

6	Ongoing Monitoring / Transaction Scrutiny	Topic
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6.01	Do you/your entity monitor transactions?	No / Yes
6.02	Is your entity's process / system for monitoring transactions fully automated, partially automated or manual?	Fully automated / Partially automated / Manual
6.03	Is your monitoring system able to detect the expiry of due diligence documentation and any conflicting information in relation to customer data?	Yes / No
6.04	Do you have a document which contains the methodology for transaction monitoring?	No / Yes
6.05	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
6.06	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
6.07	Where your entity provides payment services, are these services made available online?	No / Yes
6.08	Where your entity provides payment services, are all PSP related systems fully automated?	No / Yes
6.09	Does your monitoring system utilise any of these techniques to monitor customer activity?	No / Profiling Techniques / Rule-based criteria / Both
6.10	How often are the criteria and rules utilised by the monitoring system reviewed and updated?	Twice or more within a year / Annually / Less frequent than annually / Never

6.11	Are customers' transactions monitored in real-time, post-event or a combination of both?	Combination of both / Post-event / Real-time
6.12	Are there customer transactions that are not screened by the monitoring system?	No / Yes
6.13	In the case where not all payments and / or transactions are screened by the monitoring system, please list the type of payments and / or transactions not screened.	[Freertext]
6.14	What is the average time allowed (in days) to clear any transaction monitoring alerts?	[Number]
6.15	Does your entity have an expected transaction profile for every customer?	No / Not always / Yes
6.16	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
6.17	Do you / does your entity, when carrying out an occasional transaction, have measures in place to scrutinize transactions that are not consistent with the available information on the customer?	No / Yes
6.18	Is the monitoring system based on:	
6.19	a) The characteristics of the products and services offered	No / Yes / Not Applicable
6.20	b) The characteristics of the customers	No / Yes / Not Applicable
6.21	c) The characteristics of the relevant countries and geographical areas	No / Yes / Not Applicable
6.22	d) The characteristics of the distribution channels used	No / Yes / Not Applicable
6.23	e) The payment method used by the customer	No / Yes / Not Applicable
6.24	f) Other factors	No / Yes / Not Applicable
6.25	If the monitoring system is based on "Other factors", please provide a description of the factors.	[Freertext]
6.26	Does your entity have systems in place to detect instances where services and / or products may be accessed by persons other than the customer?	No / Yes
6.27	How many alerts (related to AML/CFT) were generated by the monitoring system during the prior calendar year?	[Number]
6.28	Of the total alerts generated by the monitoring system, how many resulted in internal investigations during the prior calendar year?	[Number]
6.29	How many alerts took longer than 90 days to be actioned?	[number]
6.30	Does the monitoring system in place identify linked transactions?	No / Yes
6.31	Does the monitoring system in place identify whether transactions from different customers are destined for the same payee?	No / Yes
6.32	Does the monitoring system in place establish from where funds are being remitted and where funds are being received?	No / Yes
6.33	Does the monitoring system identify discrepancies between submitted and detected information, for example, between submitted country of origin information and the electronically detected IP address?	No / Yes
6.34	Does the monitoring system compare data submitted with data held on other business relationships and identify patterns such as the same funding instrument or the same contact details?	No / Yes
6.35	Please tick any of the jurisdiction lists provided against which the monitoring system screens transactions.	FATF list / EU list / Top 20 jurisdictions featured in the Basel Index / Other / None / Not Applicable
6.36	If "Other", please specify the jurisdiction list utilised by your entity.	[Freertext]
6.37	Does the system identify unusual use of the service, such as customers sending or receiving money to or from themselves or sending funds immediately upon receiving them?	No / Yes
6.38	Does the monitoring system detect incoming fund transfers which have missing or incomplete information on the payer and / or payee?	No / Yes
6.39	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]
6.40	Does your entity consider whether transactions carried out through agents have an unusual pattern when comparing one with the other?	No / Yes
6.41	How many fund transfers with missing or incomplete information did your entity detect in the prior calendar year?	[Number]
6.42	How many of these transfer of funds did your entity suspend or refuse to execute?	[Number]
6.43	Did your entity terminate any relationship with a payment service provider in the prior calendar year, due to the provider repeatedly failing to provide the necessary information on the payer and / or payee?	No / Yes
6.44	How many potential customers did you / your entity refuse to onboard or service during the prior calendar year, because the ML / FT risk presented fell outside your / your entity's risk appetite?	[Number]
6.45	Is your entity aware of any of its customers whose assets were frozen (due to AML / CFT considerations) in any jurisdiction?	No / Yes

7	Policies and Procedures	Topic
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7.01	Do you / does your entity have written AML / CFT policies and procedures?	No / Yes
7.02	Do policies and procedures require you / your entity to assess risks associated with funding of terrorism?	No / Yes
7.03	How frequently do you / does your entity review and, where necessary, update your AML / CFT written policies and procedures?	As needed / Monthly / Quarterly / Annually / Between 1-3 years / Every 3 or more years
7.04	Do 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 and procedures to identify, analyse and escalate transactions over given thresholds and where applicable report suspicious transactions to the MLRO?	No / Yes
7.08	Do you / does your entity have policies, procedures and measures to follow up on incomplete documentation from the customer file?	No / Yes
7.09	Do your entity's policies and procedures define the instances and the actions, where applicable, to be undertaken to impose limitations on transaction / customer activity, caps and / or other restrictions on its customers?	No / Yes
7.10	Do you / does your entity have procedures for dealing with customers who request transactions to be completed in unusually tight or accelerated timeframes without reasonable explanation?	No / Yes
7.11	Do policies and procedures require you / your entity to assess the AML / CFT framework of individuals / entities on whom reliance is being placed?	Never / Yes in some instances / Yes in all instances / Not Applicable
7.12	Do you / does your entity have policies and procedures in place to assess the AML / CFT compliance framework of your intermediaries / brokers / agents / respondents / introducers?	No / Yes
7.13	Do your entity's policies and procedures require you to perform a more detailed review when unusual activity / transactions are detected?	No / Yes
7.14	Does your entity have documented policies and procedures to follow up about the identity of the payee in the case where the customer is reluctant in providing information or has little information about the payee?	No / Yes
7.15	Does your entity have internal whistleblowing procedures?	No / Yes
7.16	Do you have policies and procedures in place which enable the entity to flag possible tax evasion, tax fraud, aggressive tax planning or other tax-related crimes	No / Yes
7.17	Do your / your entity's policies and procedures require you to ask each customer if they are acting on behalf of someone else?	No / Yes
7.18	Do you / does your entity's policies and procedures require enhanced due diligence to be applied in higher risk situations?	No / Yes
7.19	Do your / your entity's policies and procedures require enhanced due diligence to be applied where the customer or beneficial owner is a PEP?	No / Yes when risk is not low / Yes only when risk is high / Yes, always

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

8.07	How many "high risk" audit issues were identified in the latest audit report (relating to AML / CFT)?	[Number]
8.08	How many "high risk" audit issues are currently open (relating to AML / CFT)?	[Number]
8.09	When was the last time the monitoring system was independently tested?	Between 1-2 years ago / Less than 1 year ago / More than 2 years ago / Never before
8.10	If you / your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the Group), Have you / has your entity defined a policy or procedure for testing the quality of the outsourced tasks?	No / Yes
8.11	Where applicable, when was the last time that you / your entity formally assessed the quality of the services provided to you by your outsourced service provider (within and outside the group) which are located in a EU / EEA jurisdiction (including Malta)?	Within the last 3 months / Within the last 6 months / Within the last 12 months / Within the last 2 years / Within the last 3 years / Over 3 years ago / Never / Not Applicable
8.12	Where applicable, when was the last time that you / your entity formally assessed the quality of the services provided to you by your outsourced service provider (within and outside the group) which are located in a non-EU / EEA jurisdiction?	Within the last 3 months / Within the last 6 months / Within the last 12 months / Within the last 2 years / Within the last 3 years / Over 3 years ago / Never / Not Applicable
8.13	Does your entity carry out reviews of its agents / distributors to assess the application of your entity's AML / CFT policies and procedures?	No / Yes
8.14	If "yes", how regular are reviews carried out?	Monthly / Quarterly / Half yearly / Annually / Between 1 - 3 years / Every 3 or more years / As needed

9	Reporting	Topic
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9.01	How many STRs were submitted to the FIAU during the prior calendar year?	[Number]
9.02	Please list the number of alerts generated as a result of unusual activity or transactions during the prior calendar year?	[Number]
9.03	How many internal suspicious reports were raised during the prior calendar year?	[Number]
9.04	From the internal reports raised in the prior calendar year, how many cases are still open?	[Number]
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	How many internal suspicious reports were not reported to FIAU after investigation ("closed") during the prior calendar year?	[Number]
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	In those instances where an STR was not submitted to the FIAU, were the reasons and analysis documented on file?	No internal reports submitted / Reasons are not documented / Yes, most of the time / Yes, reasons are always retained
9.09	Did your entity file any reports with the FIAU on any payment service providers for repeatedly not providing the necessary information on the payer and / or payee?	No / Yes
9.10	How many requests for information from the Maltese authorities did you / your entity receive about any of your customers during the prior calendar year?	[Number]

10	AML / CFT Training	Topic
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10.01	How often do you and / or any relevant staff attend AML / CFT training?	Every 3 or more years / Between 1-3 years / Annually / Monthly / Quarterly / As needed but at least annually
10.02	Have you and / or relevant staff from your entity attended or received training in the prior calendar year, in relation to specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)?	No / Yes
10.03	How many hours of AML/CFT related training has the MLRO attended in the past 12 months?	[Number]
10.04	Please provide the % of staff within the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]
10.05	Please provide the % of staff outside the AML / CFT unit that completed AML / CFT training throughout the prior calendar year.	[Decimal]
10.06	Please provide the % of board members / partners that received AML / CFT training throughout the prior calendar year.	[Decimal]
10.07	Is your entity's training program uniformly applied to all AML/CFT staff (including directors and partners) equally, or is it differentiated according to their duties?	Differentiated / The same for everyone
10.08	Where AML operational tasks are outsourced (within or outside the Group), have the outsourced provider's staff directly servicing your entity, received training during the prior calendar year in relation to:	
10.09	a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)	No / Yes / Not Applicable
10.10	b) your / your entity's AML / CFT policies and procedures	No / Yes / Not Applicable

10.11	Where tasks relating to AML / CFT compliance are outsourced (within or outside the Group), what % of the provider's staff directly servicing you / your entity, received training on AML / CFT throughout the prior year?	[Decimal]
10.12	Where applicable, when was the last time that you / your entity verified that your outsourced service provider's staff received training on Maltese AML / CFT regulations and on you / your entity's AML / CFT policies and procedures?	Last year / Two years ago / Three years ago / More than three years ago / Never
10.13	Does your entity provide AML / CFT training to agents to ensure that agents have an adequate understanding of relevant ML / FT risks and of the AML / CFT policies and procedures they are to apply?	No / Yes
10.14	Are all employees who are new to their job function required to take AML/CFT training within a specified timeframe?	No /Yes within 1 month/ Yes within 3 months /Yes within 6 months/ Yes within 1 year

11	Record Keeping	Topic
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11.01	Do you / does your entity have policies and procedures in place providing for compliance with the record keeping obligations arising from the PMLFTR?	No / Yes
11.02	Upon request from the FIAU or any relevant authority, are you / is your entity in a position to retrieve the requested customer records / or investigative records immediately? *If you / your entity received reminders or requested extensions for deadlines imposed by the FIAU, do not mark as [yes, always].	Depending on the request / No / Yes, always / Yes, most of the time

12	Products and Services	Topic
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12.01	Please indicate which activities were performed in the prior calendar year, and indicate the total volume (number of transactions) and value (€) of each (multiple activities possible):	
12.02	Currency exchange services: a) Number of transactions	[Number]
12.03	b) Value of transactions	[Currency amount]
12.04	Money Remittance: a) Number of transactions	[Number]
12.05	b) Value of transactions	[Currency amount]
12.06	Are there restrictions imposed by your entity on the geographical distribution of the money remittance services?	No / Yes
12.07	Are there restrictions imposed by your entity on the value of the transactions relating to money remittance?	No / Yes
12.08	If yes, please specify the amount of the restriction.	[Currency amount]
12.09	If yes, please specify the period of time over which this restriction applies.	Daily / Weekly / Monthly / Annual / Other
12.10	Acquisition of Payment Transactions: a) Number of transactions	[Number]
12.11	b) Value of transactions	[Currency Amount]
12.12	Execution of Payment Transactions: a) Number of transactions	[Number]
12.13	b) Value of transactions	[Currency Amount]
12.14	Payment Initiation Services: a) Number of transactions	[Number]
12.15	b) Value of transactions	[Currency Amount]
12.16	Electronic Money: a) Number of transactions	[Number]
12.17	b) Value of transactions	[Currency amount]
12.18	Do the e-money products offered allow for reloading (i.e. the ability to add more value to the product after the initial issuing of e-money by the issuer)?	No / Yes
12.19	If yes, what is the maximum amount that can be reloaded?	[Currency Amount]
12.20	What is the maximum transaction limit applicable to e-money products provided by your entity?	[Currency Amount]
12.21	Can the e-money products be pre-paid by the user (payer) or by third party on behalf of or in favour of the payer?	No / Yes
12.22	Please indicate the total number of prepaid cards issued by your entity during the prior calendar year.	[Number]
12.23	Please indicate the total number of reloadable prepaid cards issued during the prior calendar year.	[Number]
12.24	Please indicate the total number of non-reloadable prepaid cards issued during the prior calendar year.	[Number]
12.25	Did your entity have a loan portfolio, as at the end of the prior calendar year?	No / Yes

12.26	As per your entity's internal policies, what is the maximum value of any single facility that can be granted by your entity?	[Currency Amount]
12.27	Please indicate the total volume and value of incoming transactions relating to loans in the prior calendar year: a) Volume (number of transactions)	[Number]
12.28	b) Value	[Currency Amount]
12.29	Please indicate the total number of loans issued during the prior year: Volume (number of loans)	[Number]
12.30	Please indicate the total value of loans granted during the period calendar year: Value	[Currency Amount]
12.31	Please indicate the total number of loans which were secured against the value of assets in other jurisdictions, as at the end of the prior calendar year.	[Number]
12.32	Please indicate the total value of loans which were secured against the value of assets in non-EU / EEA jurisdictions, as at the end of the prior calendar year.	[Currency Amount]
12.33	Is your entity a BIC-holder authorised by a national competent authority (e.g. Central Bank of Malta) to provide IBAN-identifiable accounts?	Yes / No
12.34	If "Yes": Please indicate the number of active regular IBAN accounts as at the end of the prior calendar year.	[Number]
12.35	If "Yes": Please indicate the number of customers with IBAN accounts as at the end of the prior calendar year.	[Number]
12.36	If "Yes": Does your entity also provide the facility to its customers to generate and map a range of Virtual IBANs against a regular IBAN-identifiable account held in their name?	Yes / No
12.37	If "Yes": Please indicate the number of customers which availed of this facility as at the end of the prior calendar year?	[Number]
12.38	Of the total number of customers, how many customers availed of the facility: For personal use?	[Number]
12.39	Of the total number of customers, how many customers availed of the facility: For third party use?	[Number]
12.40	If "Yes": Please indicate the number of active virtual IBAN accounts as at the end of the prior calendar year	[Number]
12.41	If "Yes": Does the facility enable collection of funds, collection of payments or both?	Yes, Collection of Funds only/ Yes, Collection of Payment only/ Yes, Both
12.42	If "No": Is your entity taking active steps to start offering IBAN accounts?	Yes / No
12.43	If "Yes": What progress has been made on this front and when is the anticipated go-to-market date? (open-ended)	[Freetext]
12.44	Does your entity offer its clients virtual IBAN accounts which are mapped against a pooled IBAN-identifiable account in the name of your entity held with another institution?	Yes / No
12.45	If "Yes": At which institutions and jurisdictions are the pooled IBAN accounts held?	[Freetext]
12.46	If "Yes": Please indicate the number of unique customers which availed of this facility as at the end of the prior calendar year?	[Number]
12.47	If "Yes": Please indicate the number of active virtual IBAN accounts as at the end of the prior calendar year. [Numeric]	[Number]
12.48	If "Yes": Does the facility enable collection of funds, payments or both? [Collection / Payments / Both]	Yes, Collection of Funds only/ Yes, Collection of Payment only/ Yes, Both
12.49	If "No": Is your entity taking active steps to start offering virtual IBAN accounts? [Y/N]	Yes / No
12.50	If "Yes": What progress has been made on this front and when is the anticipated go-to-market date? (open-ended)	[Freetext]
12.51	Please indicate the total volume and value of incoming transactions relating to correspondent activity in the prior calendar year: a) Volume (number of transactions)	[Number]
12.52	b) Value	[Currency amount]
12.53	Please indicate the total number of accounts held by respondents with your entity (referred to also as VOSTRO account).	[Number]
12.54	Does your entity allow for correspondent activity relationships to include the opening of payable-through accounts?	No / Yes
12.55	How many new correspondent accounts were opened during the prior calendar year?	[Number]
12.56	Could the accounts placed at the disposal of your respondent as listed above be used by other respondent banks / financial entities that have a direct relationship with the respondent but not with the correspondent (commonly referred to as 'nesting' or downstream correspondent activity), which means that your entity (correspondent) is indirectly providing services to other banks / financial entities that are not the respondent?	No / Yes
12.57	Of the correspondent relationships, how many of the respondents are based in EU / EEA jurisdictions?	[Number]
12.58	Of the correspondent relationships, how many of the respondents are based in non-EU / EEA jurisdictions?	[Number]
12.59	Of the correspondent relationships, how many of the respondents are based in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or jurisdictions featuring in the top 20 countries of the Basel Index?	[Number]

12.60	Has your entity introduced new products in the prior calendar year?	No / Yes
12.61	Does your entity offer products or services that permit the exchange of cash for a negotiable instrument?	No / Yes
12.62	Are the products designed specifically to restrict its use by merchants dealing in goods and services that are associated with a high risk of financial crime?	No / Yes
12.63	Is cash accepted as a funding method?	No / Yes
12.64	Can funds standing to the credit of the customer be withdrawn as cash?	No / Yes

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

14	Customers	Topic
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14.01	Please list the total number of customers with whom your entity had an active business relationship as at the end of the prior calendar year.	[Number]
14.02	Please list the total number of customer relationships closed / terminated during the prior calendar year.	[Number]
14.03	Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.	[Number]
14.04	Please list the total number of new customers onboarded during the prior calendar year.	[Number]
14.05	Do you have any customers in the following industries?	<ul style="list-style-type: none"> - Casino/Gaming - Attorneys/Lawyers acting as Formation Agents - Precious Metals, Stones, Jewelry dealers or wholesalers - Arts/Antiques dealers - Oil/Gas/Petrochemicals servicing/Technology - Aviation Technology/materials/parts - Chemical Companies - Cash Intensive Businesses - Maritime Transport - Hydrocarbon Trading/Investing - Arms/Weapons dealers/Manufacturers - Car dealers - Import/Export Agents - International transportation Businesses
14.06	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) Natural persons	[Decimal]
14.07	b) Legal persons	[Decimal]
14.08	c) Customers with an ownership structure that includes offshore vehicles, trusts, or other legal arrangements including bearer shares and nominee shareholding	[Decimal]
14.09	d) Customers with an ownership structure that includes foundations, charities or other not-for-profit entities	[Decimal]
14.10	Please list the number of customers (natural persons) and / or BOs that have benefited from residence or citizenship by investment schemes, or are applicants / prospective applicants for such schemes.	[Number]
14.11	Of the total number of customers, please specify: a) % of customers scored / rated as "High Risk"	[Decimal]
14.12	b) % of customers scored / rated as "Medium High Risk"	[Decimal]
14.13	c) % of customers scored / rated as "Medium Risk"	[Decimal]
14.14	d) % of customers scored / rated as "Low Medium Risk"	[Decimal]
14.15	e) % of customers scored / rates as "Low Risk"	[Decimal]
14.16	Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?	No / Yes
14.17	If "Yes", please specify any additional risk rating.	[Freertext]
14.18	If "Yes" Please specify the corresponding % of customers of the risk rating stated above.	[Decimal]
14.19	Do you / does your entity have customers (legal entities) which are shell companies?	No / Yes

14.20	Do you / does your entity have express trusts with an unexplained nature of classes of beneficiaries and acting as trustees of such a trust?	No / Yes
14.21	Do you / does your entity have customers for which management is vested in a representative or an agent (i.e. where you deal primarily with a third party and not the customer directly)?	No / Yes
14.22	Please list the number of customers who are operating in high-risk industries (as designated by your policies and procedures).	[Number]
14.23	Please list the number of customers who are operating in dual use products (as designated by your policies and procedures), or separately as per SL 365.12.	[Number]
14.24	Please list the number of customers who operate cash intensive businesses.	[Number]
14.25	Please list the number of customers who operate as Money or Value Transfer Services (MVTs) providers.	[Number]
14.26	For how many relationships is the beneficial owner unknown, because of the application of SDD?	[Number]
14.27	What is the value of the relationships where the beneficial owner is unknown, because of the application of SDD?	[Currency amount]
14.28	Do you / does your entity have customers whose spending or transactional behaviour makes it difficult to establish 'normal', or expected patterns of behaviour?	No / Yes
14.29	Of the total number of customers who are natural persons, how many were PEPs (including family members and close associates) as at the end of the prior calendar year?	[Number]
14.30	Of the total number of customers who are legal entities, how many of their BOs were PEPs (including family members and close associates) as at the end of the prior calendar year?	[Number]
14.31	Please provide a breakdown of the total number of PEPs in your / your entity's customer base as at the end of the prior calendar year: a) % of Maltese PEPs (including BOs)	[Decimal]
14.32	b) % of PEPs (including BOs) from EU or EEA jurisdictions (other than Malta)	[Decimal]
14.33	c) % of PEPs (including BOs) from non-EU / EEA jurisdictions	[Decimal]
14.34	Do you / does your entity have, as at the end of the prior calendar year, PEPs from jurisdictions listed in the FATF lists and / or in the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes
14.35	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
14.36	Please indicate the total number and value of incoming and outgoing payment transactions carried out on behalf of your customers during the prior calendar year via the following methods:	
14.37	Bank transfers (EU, EEA or other reputable jurisdictions): a) Number of incoming payment transactions	[Number]
14.38	b) Number of outgoing payment transactions	[Number]
14.39	c) Value of incoming payment transactions	[Currency amount]
14.40	d) Value of outgoing payment transactions	[Currency amount]
14.41	Debit / credit cards (issued by an institution licensed in the EU, EEA or other reputable jurisdiction): a) Number of incoming payment transactions	[Number]
14.42	b) Number of outgoing payment transactions	[Number]
14.43	c) Value of incoming payment transactions	[Currency amount]
14.44	d) Value of outgoing payment transactions	[Currency amount]
14.45	Prepaid cards / vouchers: a) Number of incoming payment transactions	[Number]
14.46	b) Number of outgoing payment transactions	[Number]
14.47	c) Value of incoming payment transactions	[Currency amount]
14.48	d) Value of outgoing payment transactions	[Currency amount]
14.49	Cash: a) Number of incoming payment transactions	[Number]
14.50	b) Number of outgoing payment transactions	[Number]
14.51	c) Value of incoming payment transactions	[Currency amount]

14.52	d) Value of outgoing payment transactions	[Currency amount]
14.53	Internet-based / mobile-application based payment systems (e.g. PayPal, Alipay, Apple Pay, Venmo, Google Checkout, etc.): a) Number of incoming payment transactions	[Number]
14.54	b) Number of outgoing payment transactions	[Number]
14.55	c) Value of incoming payment transactions	[Currency amount]
14.56	d) Value of outgoing payment transactions	[Currency amount]
14.57	Other forms of electronic money or virtual currency: a) Number of incoming payment transactions	[Number]
14.58	b) Number of outgoing payment transactions	[Number]
14.59	c) Value of incoming payment transactions	[Currency amount]
14.60	d) Value of outgoing payment transactions	[Currency amount]
14.61	What is the value of funds for purchasing or reloading cards at a Maltese credit / financial institution?	[Currency amount]
14.62	What is the value of transactions for purchasing or reloading cards from customer accounts at an EU or EEA credit / financial institution (other than Malta)?	[Currency amount]
14.63	What is the value of transactions for purchasing or reloading cards from customer accounts at a non-EU / EEA credit / financial institution?	[Currency amount]
14.64	What is the volume of transactions resulting in cash / cash withdrawal of electronic money where the amount redeemed exceeded € 100?	[Number]
14.65	What is the value of transactions resulting in cash / cash withdrawal of electronic money where the amount redeemed exceeded € 100?	[Currency amount]
14.66	In how many instances has a single customer purchased several e-money products from the same issuer?	[Number]
14.67	In how many instances has a single customer frequently reloaded the product or affected more than four (4) cash withdrawals with inexplicably rapid succession and without an economic rationale?	[Number]
14.68	In cases where CDD exemption were granted / applied to customers, have the following conditions been met in order to justify the exemptions:	
14.69	a) The payment instrument is not reloadable, or has a maximum monthly payment transactions limit of €250	No / Yes / Not Applicable
14.70	b) The maximum amount stored electronically does not exceed €250 internationally or €500 domestically	No / Yes / Not Applicable
14.71	c) The payment instrument is used exclusively to purchase goods or services	No / Yes / Not Applicable
14.72	d) The payment instrument cannot be funded with anonymous electronic money	No / Yes / Not Applicable
14.73	e) The issuer carries out sufficient monitoring of the transactions or business relationship to enable the detection of unusual or suspicious transactions	No / Yes / Not Applicable

15	Geography	Topic
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15.01	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in Malta?	[Decimal]
15.02	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in an EU / EEA jurisdiction outside Malta?	[Decimal]
15.03	What percentage of total customers are resident or otherwise incorporated or their principal place of business is in a non-EU / EEA jurisdiction?	[Decimal]
15.04	Did your entity, based on the prior calendar year, have customers who were resident or otherwise incorporated or their principal place of business is in a jurisdiction listed in the FATF lists, EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index?	No / Yes
15.05	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
15.06	What percentage of your customer's BOs are resident in Malta?	[Decimal]
15.07	What percentage of your customer's BOs are foreign and resident in an EU or EEA jurisdiction outside Malta?	[Decimal]

15.08	Please list the % of your customer's BOs who are foreign and are resident in a non-EU / EEA member state jurisdiction.	[Decimal]
15.09	Did your entity have customers, based on the prior calendar year, whose BOs 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 jurisdictions featuring in the top 20 countries of the Basel Index during the prior calendar year?	No / Yes
15.10	If your answer to the above question was "YES", please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
15.11	Please indicate the total number and value of incoming and outgoing payment transactions carried out on behalf of your customers during the prior calendar year: *In this context, payments only refer to transfers of funds and to transactions to and from customers. Therefore, transactions with other financial institutions should not be taken into account, unless these transactions were undertaken on behalf of customers in the context of correspondent activity.	
15.12	Incoming domestic payment transactions: a) Volume (number of transactions)	[Number]
15.13	b) Value	[Currency amount]
15.14	Outgoing domestic payment transactions: a) Volume (number of transactions)	[Number]
15.15	b) Value	[Currency amount]
15.16	Incoming international payment transactions: a) Volume (number of transactions)	[Number]
15.17	b) Value	[Currency amount]
15.18	Outgoing international payment transactions: a) Volume (number of transactions)	[Number]
15.19	b) Value	[Currency amount]
15.20	Incoming international payment transactions from payment accounts in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index: a) Volume (number of transactions)	[Number]
15.21	b) Value	[Currency amount]
15.22	Outgoing payments remitted to payment accounts in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index a) Volume (number of transactions)	[Number]
15.23	b) Value	[Currency amount]
15.24	If your answer to the last four (4) questions was positive, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
15.25	Incoming payments coming from third countries where only one of the payment service providers is located within the EU / EEA in respect of those parts of transactions which are carried out in the EU or EEA ("one-leg transactions"): a) Volume (number of transactions)	[Number]
15.26	b) Value	[Currency amount]
15.27	Outgoing payments to third countries where only one of the payment service providers is located within the EU / EEA in respect of those parts of transactions which are carried out in the EU or EEA ("one-leg transactions"): a) Volume (number of transactions)	[Number]
15.28	b) Value	[Currency amount]
15.29	Incoming payments received from payment accounts in Malta: a) Volume (number of transactions)	[Number]
15.30	b) Value	[Currency amount]

15.31	Outgoing payments remitted to payment accounts in Malta: a) Volume (number of transactions)	[Number]
15.32	b) Value	[Currency amount]
15.33	Incoming payments received from payment accounts in EU / EEA jurisdictions (other than Malta): a) Volume (number of transactions)	[Number]
15.34	b) Value	[Currency amount]
15.35	Outgoing payments remitted to payment accounts in EU / EEA jurisdictions (Other than Malta): a) Volume (number of transactions)	[Number]
15.36	b) Value	[Currency amount]
15.37	Incoming payments received from payment accounts in non-EU/EEA jurisdictions: a) Volume (number of transactions)	[Number]
15.38	b) Value	[Currency amount]
15.39	Outgoing payments remitted to payment accounts in non-EU/EEA jurisdictions: a) Volume (number of transactions)	[Number]
15.40	b) Value	[Currency amount]
15.41	Incoming payments received from payment accounts in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index a) Volume (number of transactions)	[Number]
15.42	b) Value	[Currency amount]
15.43	Outgoing payments remitted to payment accounts in jurisdictions listed in the FATF lists and / or the EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index: a) Volume (number of transactions)	[Number]
15.44	b) Value	[Currency amount]
15.45	If your answer to the last four (4) questions was positive, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
15.46	As per the risk assessment, how many customer payment service accounts are linked with domestic credit entities as at end of prior calendar year?	[Number]
15.47	As per the risk assessment, how many customer payment service accounts are linked with EU / EEA based credit entities as at end of prior calendar year?	[Number]
15.48	As per the risk assessment, how many customer payment service accounts are linked with non-EU / EEA based credit entities as at end of prior calendar year?	[Number]
15.49	As per the risk assessment, how many customer payment service accounts, as at end of prior calendar year, are linked with credit entities 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?	[Number]
15.50	If your answer to the above question was positive, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable

16	Interface / Distribution Channels	Topic
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16.01	Of the total number of customers, what percentage were onboarded face-to-face?	[Decimal]
16.02	Of the total number of customers, what percentage were onboarded on a non-face-to-face basis?	[Decimal]
16.03	Does your entity provide any of its services through an agent or, in the case of an electronic money entity, did it appoint distributors to distribute or redeem electronic money?	No / Yes

16.04	What percentage of customers were onboarded by a domestically-based agent / operator? [Relates to Financial Sector]	[Decimal]
16.05	What percentage of customers were onboarded by a EU or EEA based agent / operator? [Relates to Financial Sector]	[Decimal]
16.06	What percentage of customers were onboarded by a non-EU / EEA based agent / operator? [Relates to Financial Sector]	[Decimal]
16.07	What percentage of customers were onboarded by an agent / operator situated 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? [Relates to Financial Sector]	[Decimal]
16.08	If your answer to the above question was positive, please select the respective jurisdictions.	Afghanistan / Albania / Algeria / Angola / Benin / Barbados / Bangladesh / Botswana / Cayman Islands / Cambodia / China / Cote D'Ivoire / Ghana / Haiti / Iran / Jamaica / Kenya / Laos / Macao Sar China / Mauritius / Mozambique / Myanmar / Nicaragua / Nigeria / Pakistan / Panama / Qatar / Sierra Leone / Senegal / Syria / The Bahamas / Turkey / Trinidad and Tobago / Uganda / United Arab Emirates / Uzbekistan / Venezuela / Vietnam / Yemen / Zimbabwe / Democratic People's Republic of Korea / Not Available / Not Applicable
16.09	How many of your entity's agents carry out relevant financial business? [Relates to Financial Sector]	[Number]
16.10	How many of your entity's agents carry out remittance services? [Relates to Financial Sector]	[Number]
16.11	Does your entity have any agents located in a jurisdiction other than Malta? [Relates to Financial Sector]	No / Yes
16.12	If yes, how many of your agents are located outside of Malta?	[Number]
16.13	What was the value of payment transactions carried out by the agents located outside of Malta?	[Number]
16.14	What percentage of customers were provided services via electronic money distributors? [Relates to Financial Sector]	[Decimal]
16.15	For what percentage of total customers was Customer Due Diligence carried out by an agent / distributor?	[Decimal]
16.16	Where a customer or a MVTs provider was represented by an agent, were there instances where this agent also represented other customers or MVTs providers?	No / Yes
16.17	Were there any new delivery channels used during the prior calendar year?	No / Yes
16.18	If "yes", please specify the type of new delivery channels used.	[Freetext]
16.19	For what percentage of total customers was Customer Due Diligence carried out by another subject person / third party on the basis of a reliance agreement between your entity and the other subject person / third party?	[Decimal]

