



## **REQ 2022 – Notaries**

*This document contains provisional questions which will be featured in the REQ for Notaries for the year 2022. This document should be utilised by subject persons to initiate the gathering of the necessary information required to ensure timely and accurate submission of the 2022 REQ. Questions presented in this document may be subject to change should the FIAU deem it necessary. The 2022 REQ submission is only considered valid when submitted through the FIAU CASPAR portal and upon payment confirmation.*

# Subject Person Information

## Q1

Subject persons are required, for each of the questions included in this questionnaire, to choose the answer option that is best suited to the subject person. 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 the actual situation within the subject person's operations. In the text box, you can formulate general remarks on the subject person's operation. Please note that these general remarks are not taken into account in the initial automated analysis of the answers submitted. The answers submitted are subject to quality checks by the FIAU from time to time, and therefore it is essential to provide a true and fair reflection of the current situation.

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or choose one of:

- Not Applicable

## Subject Person Information (24.Individuals)

## Q2

Please indicate the total number of employees expressed in full time equivalents ("FTEs") working for you as at the end of the prior calendar year.

*Employment in full-time equivalent ("FTE") is a conversion method used to measure the number of employees according to the number of hours worked. When using FTE, a full-time employee working a 40 hour week is equivalent to 1, whereas a person who works 20 hours per week is equivalent to 0.5. Self employed should be included in the FTEs calculation.*

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or choose one of:

- Not Applicable
- Not Available

## Subject Person Information (26.Individuals)

### Q3

How many years of experience do you have in this industry?

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*Choose only one option:*

- 10 or more years
- Between 5-9 years
- Between 3-4 years
- Between 1-2 years
- Less than 1 year



# Governance / Organization

## Governance / Organization (14.Individuals)

Have you been subject to any of the following in the last five (5) years either in Malta or abroad:

<p><b>Q1</b></p> <p>a) regulatory enforcement actions criminal investigations for ML / FT or any other financial crime</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul>
<p><b>Q2</b></p> <p>b) subject to negative news reports</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul>

## Governance / Organization (15.5)

**Q3**

Is there any pending litigation or regulatory enforcement action related to AML or Sanctions?

*Choose only one option:*

- ◆ Yes
- ◆ No

## Governance / Organization (15.75)

**Q4**

If 'Yes' please explain.

## Governance / Organization (16.Individuals)

### Q5

Have you outsourced the carrying out of any applicable AML / CFT obligations?

*Outsourcing refers to outsourced activities directly relating to the entity's relevant activity / relevant financial business and in the connection with its AML/CFT obligations. Chapter 6 - Outsourcing of the IP provides guidance to subject persons on what activities constitute outsourcing, the extent of outsourcing allowed and the conditions to which outsourcing should be subject. Outsourcing of a function / activity, e.g. internal audit function, that is not directly connected with the entity's AML / CFT obligations do not fall within the "obligations" referred to. Furthermore activities such as external training do not fall within the said the meaning of "obligations".*

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Choose only one option:

- Yes
- No

## Governance / Organization (16.5.Individuals)

### Q6

Please specify the obligations that are being outsourced.

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Choose more than one option:

- Business Risk Assessment
- Customer Risk Assessment
- Customer Due Diligence
- On-going Monitoring
- Record Keeping
- Policies and Procedures

or choose one of:

- Not Applicable

## Governance / Organization (22.Individuals)

**Q7**

How often did you receive training on AML / CFT issues in the prior calendar year?

*The term 'training' includes any means through which the subject person sought to increase the awareness of its governing body on AML / CFT, including changes to the legal framework and information on possible trends and typologies on how the subject person may be abused for ML / FT. It does not include any statistical reporting or case-specific information linked to the subject person's own activity*

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Choose only one option:

- ◆ Half yearly
- ◆ Annually
- ◆ None
- ◆ Monthly
- ◆ Quarterly

or choose one of:

- ◆ Not Applicable



# Policies and Procedures

## Policies and Procedures (1.Individuals)

### Q1

Do you have written AML / CFT policies and procedures?

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*Choose only one option:*

- Yes
- No
- Follow policies and procedures compiled by representative body

## Policies and Procedures (4.Individuals)

### Q2

Do the policies and procedures require you to assess risks associated with the funding of terrorism?

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*Choose only one option:*

- Yes
- No

## Policies and Procedures (5.Individuals)

### Q3

How frequently do you review and / or update the AML / CFT written policies and procedures?

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*Choose only one option:*

- As Needed
- Monthly
- Quarterly
- Annually
- Between 1-3 years
- Every 3 or more years

## Policies and Procedures (7.Individuals)

**Q4**

Do your policies and 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 the commencement of service?

*The interpretation of Beneficial Owners should be applied in accordance with the PMLFTR and the guidance in the Implementing Procedures. With respect to trusts reference to beneficial owner should extend to settlor / protector / trustee / beneficiaries / any other natural person actually exercising effective control over the trust. Regulation 2(1) of the PMLFTR defines a PEP as a natural person who is or has been entrusted with a prominent public function, other than middle ranking or more junior officials. The Government Gazette no. 20,602 published on 6 April, 2021 provides an exhaustive list of public functions that are considered to be prominent public functions and would therefore render the holder thereof a PEP.*

*Regulation 11(8) of the PMLFTR defines the term "family members" as including:*

- (i) the spouse, or a person considered to be equivalent to a spouse;*
- (ii) the children and their spouses, or persons considered to be equivalent to a spouse; and*
- (iii) the parents.*

*The list of 'family members' is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered to be similar to those under the indicative list in the PMLFTR. Regulation 11(8) also defines the term "close associates" as:*

- (i) a natural person known to have joint beneficial ownership of a body corporate or any other form of legal arrangement, or any other close business relations, with that politically exposed person;*
- (ii) a natural person who has sole beneficial ownership of a body corporate or any other form of legal arrangement that is known to have been established for the benefit of that politically exposed person.*

*Regulation 11 (5) of the PMLFTR states that: Subject persons shall ensure that the risk management procedures maintained in accordance with Regulation 5(5)(a) are conducive to determine whether a customer or a beneficial owner is a politically exposed person, and when undertaking occasional transactions for, or establishing or continuing business relationships with politically exposed persons shall:*

- (a) require the approval of senior management;*
- (b) take adequate measures to establish the source of wealth and source of funds; and*
- (c) conduct enhanced ongoing monitoring of such business relationships.*

Choose only one option:

- Yes
- No

## Policies and Procedures (10.Individuals)

**Q5**

Do you, in line with your policies and procedures, carry out an assessment to determine jurisdictions that pose a high ML / FT risk?

Choose only one option:

- No
- Yes



## Policies and Procedures (13.Individuals)

### Q6

Do you have policies and procedures which detail the procedure for the reporting of suspicious transactions to the FIAU?

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*Choose only one option:*

- Yes
- No

## Policies and Procedures (13.25.Individuals)

### Q7

Do you have policies and procedures in place which enable you to flag sanctioned individuals / entities?

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*Choose only one option:*

- Yes
- No

## Policies and Procedures (13.5.Individuals)

### Q8

Do you have policies and procedures in place which enable you to flag potential instances of bribery and corruption?

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*Choose only one option:*

- Yes
- No

## Policies and Procedures (15.Individuals)

**Q9**

Do you have policies, procedures and measures to follow up on incomplete Customer Due Diligence documentation in the customer file?

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Choose only one option:

- Yes
- No

## Policies and Procedures (19.Individuals)

**Q10**

Do you have policies and procedures for dealing with customers who request transactions to be completed in unusually tight or accelerated timeframes without reasonable explanation?

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Choose only one option:

- Yes
- No

## Policies and Procedures (20.Individuals)

**Q11**

Do the policies and procedures require you to assess the AML / CFT framework of individuals or entities on whom reliance is being placed upon?

*The PMLFTR permits subject persons to rely on the CDD measures carried out by other subject persons or by certain other third parties. A reliance arrangement can be set up between entities when those entities are servicing the same customer, or when that same customer is in contact with multiple entities to a transaction, with each entity being under a legal obligation to carry out CDD measures on the customer. Subject persons should take adequate steps to ensure that on request, the entity relied on, immediately forwards relevant copies of the identification and verification documents on the CDD measures undertaken. In this regard, subject persons should have a written formal agreement with the entity, signed by both parties, that would regulate the procedures and conditions on these requests to ensure that the data is made available immediately.*

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Choose only one option:

- Never
- Yes in some instances
- Yes in all instances

or choose one of:

- Not Applicable

## Policies and Procedures (34.Individuals)

### Q12

Do you have policies and procedures in place which enable you to flag possible tax evasion, tax fraud, aggressive tax planning or other tax-related crimes

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*Choose only one option:*

- Yes
- No

## Customer Acceptance and Risk Assessment (46)

### Q13

Do the policies and procedures require for each customer to be asked if they are acting on behalf of someone else?

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*Choose only one option:*

- Yes
- No

## Customer Acceptance and Risk Assessment (51)

### Q14

Do the policies and procedures require Enhanced Due Diligence to be applied where the customer and/or beneficial owner is a PEP?

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*Choose only one option:*

- Yes, always
- No
- Yes, when risk is not low
- Yes, only when risk is high

# Business Risk Assessment

## Business Risk Assessment (1)

### Q1

Has the Business Risk Assessment been carried out and documented?

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*Choose only one option:*

- Yes
- No

## Business Risk Assessment (2.Individuals)

### Q2

What is your most recent inherent risk scoring or rating for ML/FT in the Business Risk Assessment?

*Inherent risk is the risk a subject person is exposed to prior to adopting and applying any mitigating measures, policies, controls and procedures. Likelihood and impact will lead to the determination of the level of inherent risk a subject person is exposed to. Subject persons who have a numerical scoring mechanism should align the score to the rating in the answers. For example, if you adopt a scoring mechanism from 1-10; 1-3 should be considered as low, 4-6 as medium, 7-8 as high and 9-10 as very high.*

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*Choose only one option:*

- Very High
- High
- Medium
- Low

*or choose one of:*

- Not Applicable

## Business Risk Assessment (3.Individuals)

**Q3**

What is your most recent Business Risk Assessment residual risk scoring/rating for ML/FT?

*Residual risk is the level of risk left after applying the mitigating measures, policies, controls and procedures to the level of inherent risk identified. Level of inherent Risk - Mitigating Measures = Level of Residual Risk. Subject persons who have a numerical scoring mechanism should align the score to the rating in the answers. For example, if you adopt a scoring mechanism from 1-10; 1-3 should be considered as low, 4-6 as medium, 7-8 as high and 9-10 as very high.*

Choose only one option:

- Very High
- High
- Medium
- Low

**Business Risk Assessment (4.Individuals)**

Did the Business Risk Assessment take into account the risks and controls of:

<p><b>Q4</b> a) the customers</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q5</b> b) the products and services offered by you and the transaction risk exposure through same</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q6</b> c) specific countries or geographical areas</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>
<p><b>Q7</b> d) distribution channels</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>

**Business Risk Assessment (7)**

**Q8**

Did the Business Risk Assessment take into account the results of the Supra National Risk Assessment (SNRA) and the National Risk Assessment (NRA)?

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*Choose only one option:*

- Yes
- No

**Business Risk Assessment (9.Individuals)****Q9**

Did you review and/or update the Business Risk Assessment in the prior calendar year?

*The 'Not Applicable' option should only be selected by subject persons who, during the year under review, were not operative and resultantly there was no rationale for a review of the BRA to be carried out.*

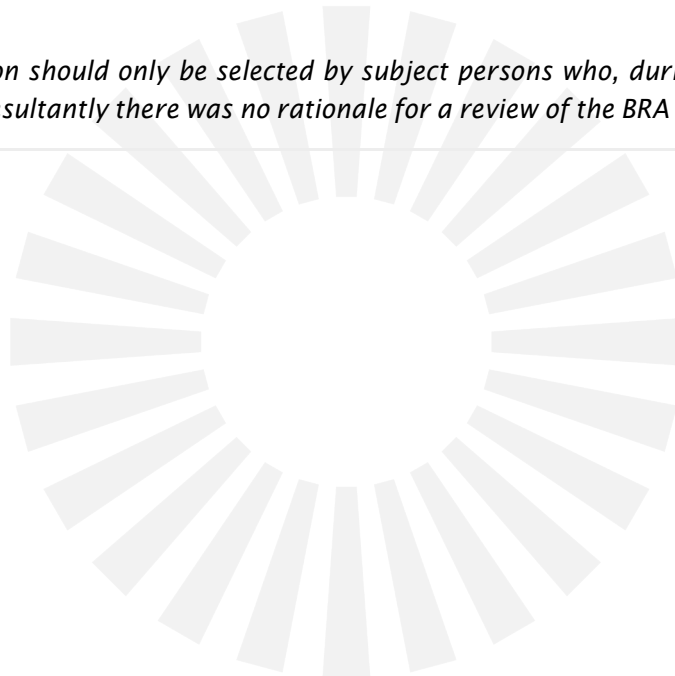
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*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable



# Customer Acceptance and Risk Assessment

## Customer Acceptance and Risk Assessment (1.Notaries + REA)

### Q1

Is a Customer Risk Assessment performed?

*The 'Not Applicable' option should be only selected by subject persons who, during the year under review, were not operative.*

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*Choose only one option:*

- No
- Yes sometimes
- Yes most of the times
- Yes, always

*or choose one of:*

- Not Applicable

## Customer Acceptance and Risk Assessment (1.5.Notaries + REA)

### Q2

If yes, is there a documented Customer Risk Assessment methodology?

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*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

## Customer Acceptance and Risk Assessment (5)

### Q3

Do you perform / update a customer risk assessment prior to the publication of a deed of sale?

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*Choose only one option:*

- No
- Yes most of the time
- Yes always

## Customer Acceptance and Risk Assessment (7)

For occasional transactions, please indicate whether the following is collected:

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<p><b>Q4</b></p> <p>a) Identification and verification information (for both natural and legal persons and BOs of legal persons) as set out in Section 4 of the Implementing Procedures.</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ No</li> <li>◆ Yes - when risk is not low</li> <li>◆ Yes - only when risk is high</li> <li>◆ Yes - always</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q5</b></p> <p>b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring that persons are duly authorised in writing</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes - always</li> <li>◆ No</li> <li>◆ Yes - when risk is not low</li> <li>◆ Yes - only when risk is high</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q6</b></p> <p>c) Information on the PEP status of the customer and of the beneficial owner, where applicable.</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ No</li> <li>◆ Yes - when risk is not low</li> <li>◆ Yes - only when risk is high</li> <li>◆ Yes - always</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q7</b></p> <p>d) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover or other income streams)</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ No</li> <li>◆ Yes - when risk is not low</li> <li>◆ Yes - only when risk is high</li> <li>◆ Yes - always</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q8</b></p> <p>e) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ No</li> <li>◆ Yes - when risk is not low</li> <li>◆ Yes - only when risk is high</li> <li>◆ Yes - always</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>



## Customer Acceptance and Risk Assessment (32.Individuals)

Do you, on a risk sensitive basis, collect information on the customer's source of wealth and source of funds?

<p><b>Q9</b></p> <p>a) Purchaser</p> <p><i>Risk sensitive basis refers to the collection of information on the basis of a customer risk assessment. Subject persons should consider requiring such information when the AML/CFT risks are not low. On the other hand, with respect to occasional transactions, risk sensitive should, at the least, be interpreted to include customer risk assessments ratings that are a "High".</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• No</li> <li>• Yes when risk is not low</li> <li>• Yes but only partially</li> <li>• Yes only when risk is high</li> <li>• Yes only in part when risk is high</li> <li>• Yes</li> </ul> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q10</b></p> <p>b) Seller</p> <p><i>Risk sensitive basis refers to the collection of information on the basis of a customer risk assessment. Subject persons should consider requiring such information when the AML/CFT risks are not low. On the other hand, with respect to occasional transactions, risk sensitive should, at the least, be interpreted to include customer risk assessments ratings that are a "High".</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>• No</li> <li>• Yes when risk is not low</li> <li>• Yes but only partially</li> <li>• Yes only when risk is high</li> <li>• Yes only in part when risk is high</li> <li>• Yes</li> </ul> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>

## Customer Acceptance and Risk Assessment (49)

**Q11**

Do the policies and procedures require Enhanced Due Diligence to be applied in high risk situations?

*Subject persons are required to establish the variables and risk parameters, in line with its risk appetite and as applied in the customer risk assessment, to identify and determine those instances and circumstances that result in a "higher risk situation". This should be appropriately documented in the entity's policies and procedures. Further to the above, Regulation 11 of the PMLFTR requires the application of EDD in relation to the following situations: a) In relation to activities or services that are determined by the FIAU to represent a high risk of ML / FT, having taken into consideration the findings of any national risk assessment and any other relevant factors, as may be deemed appropriate; b) Where, on the basis of the risk assessment carried out in accordance with Regulation 5(1) of the PMLFTR, the subject person determines that an occasional transaction, a business relationship or any transaction represents a high risk of ML / FT; c) When dealing with natural or legal persons established in a non-reputable jurisdiction as defined in Regulation 2(1) of the PMLFTR, other than branches or majority-owned subsidiaries which comply with group-wide policies and procedures, as required under Regulation 6 of the PMLFTR, in relation to such branches or majority-owned subsidiaries EDD is to be applied when these present a high risk of ML / FT.*

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Choose only one option:

- Yes
- No

## Customer Acceptance and Risk Assessment (55)

Are the following verification measures used during the onboarding of non-face-to-face customers:

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<p><b>Q12</b></p> <p>a) Verification on the basis of documents</p> <p><i>Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q13</b></p> <p>b) Use of video conferencing tools</p> <p><i>Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q14</b></p> <p>c) Use of identity verification software</p> <p><i>Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q15</b></p> <p>d) Verification through the use of commercial electronic data providers</p> <p><i>Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.</i></p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p>or choose one of:</p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>

<p><b>Q16</b></p> <p>e) Use of e-IDs</p> <p><i>Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.</i></p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q17</b></p> <p>f) Verification through the use of Identity Platforms</p> <p><i>Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.</i></p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>

## Customer Acceptance and Risk Assessment (61)

### Q18

Are customers and/or beneficial owners subject to adverse media screening at onboarding?

*Choose only one option:*

- ◆ Yes
- ◆ No

## Customer Acceptance and Risk Assessment (64)

What measures are utilised to determine the PEP status of a customer and, where applicable, their beneficial owners?

<p><b>Q19</b> a) Rely on publicly available information</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul>
<p><b>Q20</b> b) Obtain information directly from the customer and/or, where applicable, beneficial owner</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul>
<p><b>Q21</b> c) Use commercial databases</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul>

## Customer Acceptance and Risk Assessment (67)

### Q22

Do the policies and procedures allow for a variation of the timing of Customer Due Diligence for lower risk customers, and where Simplified Due Diligence may be applied?

*Choose only one option:*

- ◆ Yes
- ◆ No

## Customer Acceptance and Risk Assessment (68)

If variation in the timing of Customer Due Diligence is permitted as indicated above, what pre-determined triggering criteria is applied?

<p><b>Q23</b> a) Transaction customer activity threshold</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q24</b> b) Pre-determined time frame</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<p><b>Q25</b> c) Prior to completion of service provided</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>

## Customer Acceptance and Risk Assessment (69.5.REA + Notaries)

### Q26

When due diligence is not collected in its entirety, but the transaction is considered complete, do the customer files include a documented justification and formal approval of the exception as provided in Regulation 8 of the PMLFTR?

*Choose only one option:*

- Yes
- No

## Customer Acceptance and Risk Assessment (70)

**Q27**

Do policies and procedures require the consideration of the submission of an STR with the FIAU, in instances where the Customer Due Diligence cannot be completed in its entirety?

*The Implementing Procedures require subject persons to consider terminating the business relationship / the carrying out of an occasional transaction when CDD cannot be completed only after taking into consideration whether an STR needs to be filed. Section 4.7 of the Implementing Procedures provides further guidance on subject persons' obligations on this matter.*

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Choose only one option:

- No
- Yes
- Yes, except where CDD can be delayed as per the Implementing Procedures

**Customer Acceptance and Risk Assessment (73)****Q28**

Do the 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?

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Choose only one option:

- Yes
- No

**Customer Acceptance and Risk Assessment (76)****Q29**

Do the policies and procedures require a revision of a Customer Risk Assessment should the customer be evasive, or not cooperative to provide the requested information and / or documentation?

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Choose only one option:

- Yes
- No

**Customer Acceptance and Risk Assessment (77)**

**Q30**

How many customers were refused at onboarding, initially or upon conduct of Customer Risk Assessment or provide services to, for AML / CFT reasons during the prior calendar year?

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*or choose one of:*

- ◆ Not Available





# Risk Assessment

## Risk Assessment (1)

### Q1

Is additional information requested, when unexplained changes in financial arrangements occur?

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*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

## Risk Assessment (3)

### Q2

During the prior calendar year, how many potential customers were refused servicing or onboarding since they fell outside the ML / FT risk appetite?

---

*or choose one of:*

- Not Applicable
- Not Available

## Risk Assessment (4)

### Q3

How many contracts, for the sale or purchase of property or lease, were not concluded for AML / CFT related reasons during the prior calendar year?

---

*or choose one of:*

- Not Applicable
- Not Available

# Internal Audit / Independent Testing

## Internal Audit / Independent Testing (1)

### Q1

Given the size and nature of the business, was an officer appointed at management level to monitor the day-to-day implementation of AML / CFT measures, policies, controls and procedures?

*Where the subject person is a sole practitioner and the appointed officer is themselves, they may choose to select the option "No, MLRO has taken this role"*

---

*Choose only one option:*

- No, the MLRO has taken this role
- Yes, another officer at management level appointed
- Considered but not required
- Not Considered

## Internal Audit / Independent Testing (12.Individuals)

### Q2

When was the last time that you formally assessed the quality of the services provided to you by your outsourced service provider?

---

*Choose only one option:*

- 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

*or choose one of:*

- Not Applicable

# Reporting

## Reporting (1.Individuals)

### Q1

Do you have policies and procedures defining the process of the reporting of suspicious activity or transactions?

*The subject person's policies and procedures are required to address both internal and external reporting.*

Choose only one option:

- Yes
- No

## Reporting (2)

### Q2

How many Suspicious Transaction Reports (STRs), and/or Suspicious Activity Reports (SARs), were submitted to the FIAU during the previous calendar year?

---

or choose one of:

- Not Available

## Reporting (3)

### Q3

Please list the number of alerts generated as a result of unusual activity or transactions during the prior calendar year.

*Alerts refer to instances of unusual activity that is highlighted by the systems or employees. This should therefore include your answer to question "How many alerts were generated by the monitoring system during the prior calendar year?"*

---

or choose one of:

- Not Available

## Reporting (4)

**Q4**

How many internal suspicious reports were raised during the previous calendar year?

*The figure reported should include all those reports escalated to the MLRO for determination as to whether an STR should be filed with the FIAU. It is not limited to those internal reports linked to the alerts generated through transaction monitoring and subsequently escalated to the MLRO.*

---

or choose one of:

- Not Available

**Reporting (5)****Q5**

From the internal reports raised in the previous calendar year, how many cases are still open?

*An internal report is considered as still open, when the MLRO has not yet concluded as to whether an STR is to be filed with the FIAU, or otherwise. The 'Not Applicable' answer is only to be used when the subject person replied '0' to the question: How many internal suspicious reports were raised during the prior calendar year?*

---

or choose one of:

- Not Applicable
- Not Available

**Reporting (9.Individuals)**

**Q6**

Were there any internal reports or alerts drawn up during the prior calendar year which did not instigate a Suspicious Transaction Report (STR)?

Choose only one option:

- No, none instigated STRs
- Yes, less than 10
- Yes, more than 10
- No, all instigated STRs

or choose one of:

- Not Applicable
- Not Available

## Reporting (10.Individuals)

**Q7**

Did you maintain records of all internal reports raised during the prior calendar year, and the analysis conducted thereon?

*The internal reporting procedures of a subject person should set out the steps to be followed when one of its employees knows or suspects that a person, or a transaction is connected to ML / FT. The procedures should clearly state that when an employee has any such information, they are to report the matter to the MLRO without delay. Internal reports should be submitted in writing, preferably using a standard template, together with all relevant information and documentation available to the employee, so as to assist the MLRO to determine how best to proceed. Following the receipt of an internal STR, the MLRO may conclude, for justifiable reasons that the report does not give rise to knowledge or suspicion of money laundering. In such cases, the MLRO should keep a copy of the internal STR together with the rationale of why the report did not warrant a submission to the FIAU. It is the MLRO's responsibility to consider internal reports of ML and decide if there is sufficient grounds for suspicion to file an STR.*

Choose only one option:

- 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

## Reporting (11)

**Q8**

In those instances where a Suspicious Transaction Report (STR) was not submitted to the FIAU, were the reasons and analysis of non-submission documented on file?

---

*Choose only one option:*

- No internal reports submitted
- Reasons are not documented
- Yes, most of the time
- Yes, reasons are always retained

*or choose one of:*

- Not Applicable

**Reporting (13.Individuals)****Q9**

How many requests for information from Maltese authorities did you receive about any of your customers during the prior calendar year?

*The term 'Maltese authorities' refers to: Financial Intelligence Analysis Unit (FIAU), Malta Financial Services Authority (MFSA), Malta Gaming Authority (MGA), The Malta Police Force, Sanctions Monitoring Board (SMB) and the Asset Recovery Bureau. Reference to customers is made with respect to current clients (active or inactive) and customers who you no longer service*

---

*or choose one of:*

- Not Available

# AML / CFT Training

## AML / CFT Training (1.Individuals)

### Q1

How often do you attend AML / CFT related training?

*AML / CFT related training makes reference Maltese regulations, including in relation to the PMLA, PMLFTR and Implementing Procedures*

---

*Choose only one option:*

- Monthly
- Quarterly
- Annually
- Between 1-3 years
- More than 3 years
- As needed but at least annually

## AML / CFT Training (4.Individuals)

### Q2

Please provide the % of staff that completed AML / CFT training throughout the prior calendar year.

*"Staff" refers to employees, and other company officials whose duties include the handling of either relevant financial business or relevant activity (as defined in the PMLFTR), irrespective of their level of seniority. 'Not applicable' option should be chosen in instances where staff is not employed within the subject person's operations.*

---

*or choose one of:*

- Not Applicable
- Not Available

## AML / CFT Training (7)

**Q3**

Is the training program uniformly applied to all staff equally, or is it differentiated according to their duties?

*Not applicable' option should be chosen in instances where staff is not employed within the subject person's operations.*

*Choose only one option:*

- ◆ Tailor made, depending on the duties of the employees
- ◆ The same for all employees

*or choose one of:*

- ◆ Not Applicable

**AML / CFT Training (8)**

Where AML / CFT operational tasks are being outsourced, have the outsourced provider's staff, received training during the previous calendar year in relation to:

<p><b>Q4</b></p> <p>a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs)</p> <p><i>Outsourced providers staff makes reference to the individuals directly involved in assisting the subject person with AML / CFT measures</i></p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q5</b></p> <p>b) AML / CFT policies and procedures relating to the subject person</p> <p><i>Outsourced providers staff makes reference to the individuals directly involved in assisting the subject person with AML / CFT measures</i></p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Yes</li> <li>◆ No</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>

**AML / CFT Training (16)**



**Q6**

Are all employees, who are new to their job function, required to take AML/CFT training within a specified timeframe?

*Not applicable' option should be chosen in instances where staff is not employed within the subject person's operations.*

---

*Choose only one option:*

- ◆ No
- ◆ Yes within 1 month
- ◆ Yes within 3 months
- ◆ Yes within 6 months
- ◆ Yes within 1 year

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

**AML / CFT Training (20.Individuals)****Q7**

How many hours of AML/CFT related training have you attended in the prior calendar year?

---

*or choose one of:*

- ◆ Not Applicable

# Record Keeping

## Record Keeping (1.Individuals)

### Q1

Do you have policies and procedures in place to comply with the record keeping obligations arising from the PMLFTR?

*Chapter 9 - Recordkeeping Procedures of the IPs states that subject persons must have procedures in place and apply the same, so as to ensure that the following records are maintained:*

- a) records of the actions taken to adopt and implement the risk-based approach;*
- b) the CDD information and documents obtained for identification and verification of identity purposes;*
- c) records containing details relating to the business relationship that is formed and all transactions carried out in the course of a business relationship or an occasional transaction;*

*Subject persons should also retain the following records required as evidence of compliance with the PMLFTR and for statistical purposes:*

- a) internal reports made to the MLRO;*
  - b) a record of any written determinations made by the MLRO and the designated employee, including the reasons for not filing an STR with the FIAU;*
  - c) STRs made by the subject person to the FIAU and any follow-up submissions made in connection thereto;*
  - d) a record of AML / CFT training attended by sole practitioners / provided to employees;*
  - e) records of conduct certificates or other documentation obtained in carrying out employee screening;*
  - f) records of any outsourcing agreements entered into and other documentation that provides evidence of the subject person's adherence to its obligations under Chapter 6 of these Implementing Procedures, Part I;*
  - g) records of any reliance agreements entered into and of any related assessments undertaken on the other subject person or third party in terms; and*
  - h) other important records, including: any reports by the MLRO, records of consideration of those reports made to senior management and of any action taken as a consequence thereof, records of any internal audit reports or assessments dealing with AML / CFT issues, and any other records that are necessary to demonstrate compliance with the obligations under the PMLA, the PMLFTR and any Implementing Procedures. Subject persons are required to maintain records for a period of 5 years, however in specific cases subject persons may be requested to retain their records for longer periods.*
- The 5 year retention period commences from the date on which the business relationship is terminated or the occasional transaction is carried out*

Choose only one option:

- Yes
- No

## Record Keeping (2.Individuals)

## Q2

Upon request from the FIAU or any Supervisory Authority, are you in a position to retrieve the requested information within the requested deadline?

*Requested information refers to information on customer records, transaction records, evidence of investigations carried out, etc.*

*If you received reminders or requested extensions for deadlines imposed by the FIAU do not mark as [yes always].*

---

*Choose only one option:*

- ◆ Depending on the request
- ◆ No
- ◆ Yes, always
- ◆ Yes, most of the time



# Products and Services

## Products and Services (DNFBPs) (22)

*Please answer the following questions in relation to the activities performed during the prior calendar year.*

### Q1

Buying and selling of real property or business entities

---

*or choose one of:*

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (23)

*Please answer the following questions in relation to the activities performed during the prior calendar year.*

### Q2

Managing money securities or assets on behalf of clients by way of investment (i.e.: excluding client accounts)

*This question specifically refers to the number of customers from whom, in the prior calendar year, the subject person received and / or held monies, securities or assets in order to manage on behalf of the customer*

---

*or choose one of:*

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (24)

*Please answer the following questions in relation to the activities performed during the prior calendar year.*

**Q3**

Opening or management of bank, savings or securities accounts

---

or choose one of:

- Not Applicable
- Not Available

**Products and Services (DNFBPs) (25)**

*Please answer the following questions in relation to the activities performed during the prior calendar year.*

**Q4**

Creation, operation or management of companies, trusts, foundations or similar structures, including organization of contributions / funding for the creation, operation, or management of the same

---

or choose one of:

- Not Applicable
- Not Available

**Products and Services (DNFBPs) (36. Notaries)****Q5**

How many purchase and sale contracts did you publish where the consideration (excluding 10% deposit) was paid through the buyer's own or third party funds (i.e. not financed by a bank loan)?

---

**Products and Services (DNFBPs) (37. Notaries)**

**Q6**

How many purchase and sale contracts did you publish where the consideration (excluding 10% deposit) was financed through a loan issued through a non-EU/EEA financial / credit institution?

---



or choose one of:

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (38.Notaries)

**Q7**

How many purchase and sale contracts did you publish where the consideration (excluding 10% deposit) was financed through loans or other means of finance other than those issued by a regulated financial / credit institution?

---



or choose one of:

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (39.Notaries)

**Q8**

State the number of contracts you published, where the property has a sale value of up to €449,999?

*Reference to property should be taken to mean immovable property. Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded. Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

---



or choose one of:

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (40.Notaries)

### Q9

State the number of contracts you published, where the property has a sale value between €450,000 and €1,999,999?

*Reference to property should be taken to mean immovable property. Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded. Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

---

or choose one of:

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (41.Notaries)

### Q10

State the number of contracts you published, where the property has a sale value exceeding €2,000,000?

*Reference to property should be taken to mean immovable property. Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded. Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

---

or choose one of:

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (43.Notaries)

**Q11**

Please specify the highest sale value of property sold through a contract you published for during the prior calendar year.

*Reference to property should be taken to mean immovable property. Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded. Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year*

---



or choose one of:

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (44)

**Q12**

Please specify the contracts or deeds carried out during the prior calendar year which involved properties in Special Designated Areas.

*Special Designated Areas ('SDAs') are defined zones where no restrictions to acquire a property apply. This means that a foreign citizen wishing to buy property in these areas can do so with equal rights to those of a Maltese citizen without the requirement of acquiring a permit in terms of Chapter 246 of the Laws of Malta.*

---



or choose one of:

- Not Applicable
- Not Available

## Products and Services (DNFBPs) (45)



**Q13**

Were there contracts or deeds from the prior calendar year which involved successive transactions relating to the same property which took place within a short period of time?

*Reference to "short period of time" should be taken to mean less than 1 year.*

---

*Choose only one option:*

- No
- Yes
- Yes in rare occasions
- Yes often

*or choose one of:*

- Not Available

## Products and Services (DNFBPs) (50)

**Q14**

Have you been engaged to act on behalf of, or represent a customer during the prior calendar year?

*Representations includes through power of attorney and /or power of representation*

---

*Choose only one option:*

- Yes
- No

## Products and Services (DNFBPs) (51)

**Q15**

Are payments from unassociated or unknown third parties accepted?

---

*Choose only one option:*

- Yes
- No

## Products and Services (DNFBPs) (52.Individuals)

*Please answer the following questions in relation to the activities that have been performed by you during the prior calendar year. Multiple activities are possible.*

**Q16**

For how many trusts did you act as trustee/fiduciary, during the period calendar year?

*Your answer to this question may differ to your reply on the number of customers for which you have provided fiduciary services below*

---

or choose one of:

- Not Applicable
- Not Available



# Customers

## Customers (29)

### Q1

Do you have any customers in the following industries?

---

*Choose more than one option:*

- ◆ Arms or Weapons dealers or manufacturers
- ◆ Car Dealers
- ◆ Import or Export Agents
- ◆ International Transportation Businesses
- ◆ Oil, Gas or Petrochemicals servicing or Technology
- ◆ Aviation Technology, Materials or Parts
- ◆ Chemical Companies
- ◆ Cash Intensive Businesses
- ◆ Maritime Transport
- ◆ Hydrocarbon Trading or Investing
- ◆ Casino
- ◆ Gaming
- ◆ Attorneys
- ◆ Lawyers acting as Formation Agents
- ◆ Precious Metals, Stones, Jewelry dealers or wholesalers
- ◆ Arts or Antiques dealers

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

## Customers (Not + RE) (1.Notaries)

*Customers are natural or legal persons with whom you have a business, professional or commercial relationship or who are involved as parties in executed purchase and sale contracts.*

**Q2**

Contracts of Sale: Please list the total number of deeds of sale of property published in the prior calendar year.

*Reference to property should be taken to mean immovable property. Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded for the purpose of this question*

---



or choose one of:

- Not Applicable
- Not Available

**Customers (Not + RE) (4)****Q3**

Other relevant activity: Please list the total number of customers to whom you provided relevant activity other than services concerning the buying and selling of real property or business entities as defined by PMLFTR.

*"Other relevant activity" shall include other services apart from the traditional buying and selling of real property or business entities as defined in Regulation 2 of the PMLFTR: a) managing of client monies, securities or other assets b) opening or management of banks, savings or securities accounts c) organisation of contributions necessary for the creation, operation or management of companies*

---



or choose one of:

- Not Applicable
- Not Available

**Customers (Not + RE) (5)****Q4**

Please list the total number of contracts where the purchasers were natural persons.

---



or choose one of:

- Not Available

## Customers (Not + RE) (6)

### Q5

Please list the total number of contracts where one or more of the purchasers were legal persons or arrangements .

*Legal persons or arrangements include trusts. Government-owned or parastatal entities should be excluded from the response to this question.*

---



or choose one of:

- Not Available

## Customers (Not + RE) (7)

*Customers refers to all the parties to the deed executed in the purchase and sale contract.*

### Q6

Characteristics of legal persons: Please list the number of customers having multi-tier ownership structures.

*Multi-tier ownership structures refer to ownership structures of legal persons where at least one of the immediate shareholders is another legal person. An example of a multi-tier ownership structure is a parent subsidiary corporate structure*

---



or choose one of:

- Not Available

## Customers (Not + RE) (8)

### Q7

Characteristics of legal persons: Please list the number of customers where the shareholding is held in fiduciary capacity.

*Customers refers to all the parties to the deed executed in the purchase and sale contract.*

---



or choose one of:

- Not Available

## Customers (Not + RE) (8.5)

**Q8**

Characteristics of legal persons: Please list the number of customers where the shareholding is held through bearer shares.

*Customers refers to all the parties to the deed executed in the purchase and sale contract.*

---



or choose one of:

- ◆ Not Applicable
- ◆ Not Available

## Customers (Not + RE) (9)

**Q9**

Characteristics of legal persons: Please list the number of customers where the shareholding is held by a legal entity or arrangement incorporated or set-up outside of Malta.

*Customers refers to all the parties to the deed executed in the purchase and sale contract.*

---



or choose one of:

- ◆ Not Available

## Customers (Not + RE) (10)

**Q10**

Characteristics of legal persons (if applicable): Please list the number of customers who are voluntary organisations (including charities, foundations and not-for-profit entities).

*Customers refers to all the parties to the deed executed in the purchase and sale contract.*

---



or choose one of:

- ◆ Not Available

## Customers (Not + RE) (11)

**Q11**

Out of the total number of contracts of sale published by you, where the value of the property exceeded €2,000,000, please indicate the number of contracts where the purchaser(s) was / were solely natural persons.

---



or choose one of:

- Not Available

**Customers (Not + RE) (24)****Q12**

Please list the number of customers and beneficial owners serviced during the prior calendar year, that benefited from residency schemes, citizenship by investment schemes, or are applicants or prospective applicants for such schemes.

*Investor citizenship schemes are often referred to as CIPs ('citizenship investment programmes'), 'citizenships for sale' or 'golden passports'. They allow foreigners to be naturalised as a citizen of a country in return for an investment, provided certain criteria are fulfilled. Investor citizenship schemes differ from investor residence ('golden visa') schemes, which aim to attract investment in exchange for residence rights in the country concerned.*

---



or choose one of:

- Not Applicable
- Not Available

**Customers (Not + RE) (25)****Q13**

How many customers did you assist in applying for the 'High Net Worth Individuals Residency Scheme' during the prior calendar year?

---



or choose one of:

- Not Available

**Customers (Not + RE) (26)**

**Q14**

How many customers did you assist in applying for AIP permits in the prior calendar year?

---

or choose one of:

- Not Applicable
- Not Available

**Customers (Not + RE) (27)****Q15**

Please list the total number of natural persons to whom you provided relevant activity, other than services concerning the buying and selling of real property or business entities as defined in the PMLFTR.

*Other relevant activities may include one or more of the following: a) managing of client money, securities or other assets, unless the activity is undertaken under a licence issued under the provisions of the Investment Services Act; b) opening or management of bank, savings or securities accounts; c) organisation of contributions necessary for the creation, operation or management of companies; d) creation, operation or management of companies, trusts, foundations or similar structures, or when acting as a trust or company service provider. Beneficial owners of customers that are legal persons should not be reported in your reply*

---

or choose one of:

- Not Available

**Customers (Not + RE) (28)**



**Q16**

Please split the total number of legal persons and arrangements (example trusts) to whom you provided relevant activity other than services concerning the buying and selling of real property or business entities as defined in the PMLFTR.

*Other relevant activities may include one or more of the following: a) managing of client money, securities or other assets, unless the activity is undertaken under a licence issued under the provisions of the Investment Services Act; b) opening or management of bank, savings or securities accounts; c) organisation of contributions necessary for the creation, operation or management of companies; d) creation, operation or management of companies, trusts, foundations or similar structures, or when acting as a trust or company service provider. Beneficial owners of customers that are legal persons should not be reported in your reply*

---

or choose one of:

- Not Available

**Customers (Not + RE) (29)****Q17**

Please list the % of purchase and sale contracts considered to be 'high risk'.

*The requested percentage needs to be calculated on the basis of the total number of contracts published in the prior calendar year in addition to the customers to whom other relevant services were provided. Subject persons are required carry out a customer risk assessment on the basis of their own policies and procedures.*

---

or choose one of:

- Not Available

**Customers (Not + RE) (30)**

**Q18**

Please list the % of purchase and sale contracts considered to be 'medium risk'.

*The requested percentage needs to be calculated on the basis of the total number of contracts published in the prior calendar year in addition to the customers to whom other relevant services were provided. Subject persons are required carry out a customer risk assessment on the basis of their own policies and procedures.*

---



or choose one of:

- Not Available

## Customers (Not + RE) (31)

**Q19**

Please list the % of purchase and sale contracts considered to be 'low risk'.

*The requested percentage needs to be calculated on the basis of the total number of contracts published in the prior calendar year in addition to the customers to whom other relevant services were provided. Subject persons are required carry out a customer risk assessment on the basis of their own policies and procedures.*

---



or choose one of:

- Not Available

## Customers (Not + RE) (32)

**Q20**

Does a % of your purchase and sale contracts have a risk rating outside of the categories identified in the questions above?

Choose only one option:

- Yes
- No

## Customers (Not + RE) (33)

**Q21**

Please specify the additional risk rating.

---

or choose one of:

- Not Applicable

**Customers (Not + RE) (34)****Q22**

Please specify the corresponding % of purchase and sale contracts assigned to the risk rating stated in the prior question.

---

or choose one of:

- Not Applicable
- Not Available

**Customer Type (39)****Q23**

What % of the customer base had Simplified Due Diligence applied, given that their risk was classified as low?

---

or choose one of:

- Not Available

**Customers (Others) (1.Individuals)**

**Q24**

Do you have customers (including beneficial owners and directors) who have been convicted of a criminal offence that could have potentially generated illicit proceeds?

---

*Choose only one option:*

- Yes
- No

**Customers (Others) (2.Notaries)****Q25**

Do you hold funds on trust or in another fiduciary capacity for customers through a client account, other than when holding funds in respect of a transfer of property?

---

*Choose only one option:*

- Yes
- No

**Customers (Others) (5)****Q26**

Are customers that act as holding companies with subsidiaries or investments in non-EU/EEA jurisdictions part of the customer base?

*Holding companies are typically entities that hold investments principally related to equity shares in other entities. Holding companies may also own other assets such as immovable property, intellectual property and other financial assets. Holding companies do not actively participate in the running of the day-to-day operations of the entities it holds an investment in.*

---

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Available

**Customers (Others) (18)**

**Q27**

Please list the number of customers that are cash intensive businesses.

*Cash intensive businesses are businesses by which their operations receive or depend largely on cash-based transactions such as restaurants, petrol stations, convenience stores, parking garages, etc.*

---

or choose one of:

- Not Applicable
- Not Available

**Customers (Others) (19)****Q28**

Please list the number of customers that are VFA agents or VFA licence holders or are in the process of obtaining a VFA licence.

*Respondents are requested to report the number of customers that are VFA agents or customers who hold or are in the process of applying for a VFA licence with whom you have a business, professional, or commercial relationship or who were involved as parties in executed contracts.*

---

or choose one of:

- Not Applicable
- Not Available

**PEPs (1)**

*PEPs refers to Politically Exposed Persons*

**Q29**

Of the total customer base, how many natural persons were PEPs (including family members and close associates), as at the end of the prior calendar year?

*Politically Exposed Persons or PEPS are defined in the Regulation 2 of the PMLFTR and as further designated in the Government Gazette no. 20,602 published on 6 April, 2021 [vide <https://govcms.gov.mt/en/Government/DOI/Government%20Gazette/Documents/2021/04/Government%20Gaz%206th%20April.pdf>]. In relation to those services specified above (contracts of sale published managing money securities or assets on behalf of clients by way of investment; providing trust or company services; opening or management of bank savings or securities accounts; organization of contributions/funding for the creation operation or management of companies; provision of tax advice).*

---



or choose one of:

- Not Applicable
- Not Available

**PEPs (2)****Q30**

Of the total number of customers who are legal entities, how many of their beneficial owners were PEPs (including family members and close associates) as at the end of the prior calendar year?

---



or choose one of:

- Not Applicable
- Not Available

**PEPs (3)**

From the number of PEPs in your customer base, kindly provide a breakdown of:

---

**Q31**

a) the % of Maltese PEPs (including beneficial owners), in the prior calendar year

*Regulation 2(1) of the PMLFTR defines a PEP as a natural person who is or has been entrusted with a prominent public function, other than middle ranking or more junior officials. The PMLFTR The Government Gazette no. 20,602 published on 6 April, 2021 provides an exhaustive list of public functions that are considered to be prominent public functions and would therefore render the holder thereof a PEP. Regulation 11(8) of the PMLFTR defines the term "family members" as including: (i) the spouse, or a person considered to be equivalent to a spouse; (ii) the children and their spouses, or persons considered to be equivalent to a spouse; and (iii) the parents. The list of 'family members' is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered to be similar to those under the indicative list in the PMLFTR. Regulation 11(8) also defines the term "close associates" as: (i) a natural person known to have joint beneficial ownership of a body corporate or any other form of legal arrangement, or any other close business relations, with that politically exposed person; (ii) a natural person who has sole beneficial ownership of a body corporate or any other form of legal arrangement that is known to have been established for the benefit of that politically exposed person.*

or choose one of:

- ◆ Not Available

**Q32**

b) the % of PEPs (including beneficial owners) from EU/EEA jurisdictions (other than Malta), in the prior calendar year

or choose one of:

- ◆ Not Available

<p><b>Q33</b></p> <p>c) the % of PEPs (including beneficial owners) from non-EU/EEA jurisdictions, in the prior calendar year</p>	<div data-bbox="746 98 1417 165" style="border: 1px solid black; height: 30px; width: 100%;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"><li>• Not Available</li></ul>
<p><b>Q34</b></p> <p>d) the % of PEPs (including beneficial owners) from jurisdictions listed in the FATF lists and/or, the EU lists identifying high-risk 3rd countries with strategic deficiencies, and/or the jurisdictions featuring in the top 20 countries of the Basel Index, in the prior calendar year</p> <p><i>The FATF and EU lists identifying high-risk 3rd countries may be accessed from the following link: <a href="https://fiaumalta.org/country-statements/">https://fiaumalta.org/country-statements/</a></i></p> <p><i>Whilst the top 20 countries of the Basel Index may be accessed from the following link: <a href="https://index.baselgovernance.org/ranking">https://index.baselgovernance.org/ranking</a></i></p>	<div data-bbox="746 421 1417 488" style="border: 1px solid black; height: 30px; width: 100%;"></div> <p>or choose one of:</p> <ul style="list-style-type: none"><li>• Not Available</li></ul>

PEPs (7)



**Q35**

If your answer to the above question was greater than 0, please select the respective jurisdictions.

---

*Choose more than one option:*

- ◆ Ethiopia
- ◆ Solomon Islands
- ◆ Sri Lanka
- ◆ Cape Verde
- ◆ Bahamas
- ◆ Iran
- ◆ Philippines
- ◆ South Sudan
- ◆ Turkey
- ◆ Democratic Republic of the Congo
- ◆ Madagascar
- ◆ Mauritania
- ◆ Burkina Faso
- ◆ Jordan
- ◆ Mali
- ◆ Morocco
- ◆ Myanmar
- ◆ China
- ◆ Cayman Islands
- ◆ Senegal
- ◆ Yemen
- ◆ Zimbabwe
- ◆ Haiti
- ◆ Mozambique
- ◆ Pakistan
- ◆ Panama
- ◆ Syria
- ◆ Uganda
- ◆ Jamaica
- ◆ Mauritius
- ◆ Nicaragua
- ◆ Albania
- ◆ Barbados
- ◆ Botswana
- ◆ Cambodia
- ◆ DPRK
- ◆ Ghana



*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

**Additional (Customers) (2)**

**Q36**

Please list the number of customers who are operating in high-risk industries as per your internal policies and procedures.

*Subject persons are required to define their own list of high risk industries and products. For the purpose of responding to this question, subject persons should consider high risk industries to include: productions / trade in war related weapons, productions / trade in radioactive materials, mining, oil and gas, chemical and pharmaceutical industries and adult entertainment. In accordance with S.L. 365.12, dual-use items refer to any used or unused items, including software and technology, which can be used for both civil and military purposes, and including all goods which can be used for both non-explosive uses and for assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices.*

---

or choose one of:

- Not Available

**Additional (Customers) (3)****Q37**

Please list the number of customers who are operating in dual use items.

*In accordance with SL 365.12, dual-use items refers to any used or unused items, including software and technology, which can be used for both civil and military purposes, and including all goods which can be used for both non-explosive uses and for assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices. Dual-use items are to be considered as those designated by the Company's policies and procedures or through the SL 365.12.*

---

or choose one of:

- Not Available

**Additional (Customers) (12.Individuals)**

**Q38**

Do you have any customers that were re-domiciled or whose economic activity was transferred to a jurisdiction listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and / or the jurisdictions featuring in the top 20 countries of the Basel Index in the prior calendar year?

*The FATF and EU lists identifying high-risk 3rd countries may be accessed from the following link: <https://fiaumalta.org/country-statements/> Whilst the top 20 countries of the Basel Index may be accessed from the following link: <https://index.baselgovernance.org/ranking>*

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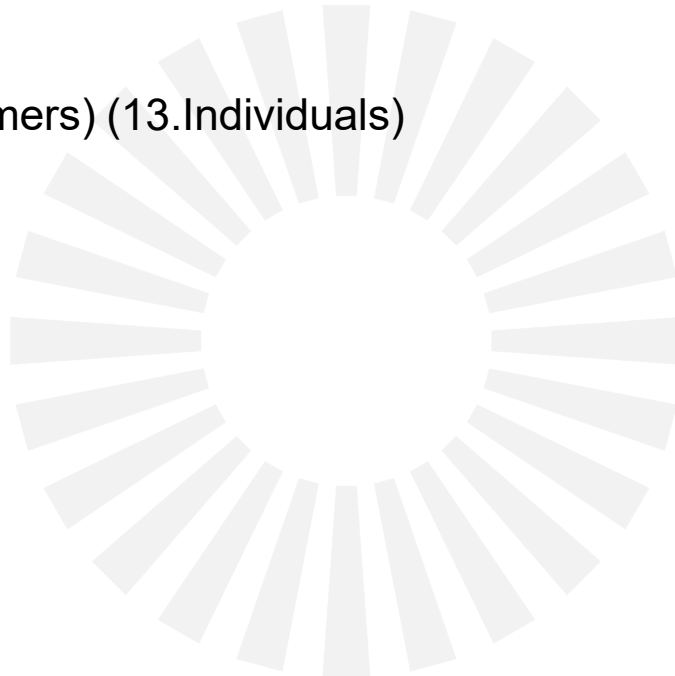
*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Available

Additional (Customers) (13.Individuals)



**Q39**

Please select the respective jurisdictions.

---

*Choose more than one option:*

- ◆ Afghanistan
- ◆ Albania
- ◆ Barbados
- ◆ Botswana
- ◆ Benin
- ◆ Cote D'Ivoire
- ◆ China
- ◆ Algeria
- ◆ Venezuela
- ◆ Myanmar (Burma)
- ◆ Sierra Leone
- ◆ Senegal
- ◆ Kenya
- ◆ Vietnam
- ◆ Angola
- ◆ Nigeria
- ◆ Yemen
- ◆ Zimbabwe
- ◆ Haiti
- ◆ Laos
- ◆ Mozambique
- ◆ Cayman Islands
- ◆ Panama
- ◆ Syria
- ◆ The Bahamas
- ◆ Trinidad and Tobago
- ◆ Uganda
- ◆ Vanuatu
- ◆ Mauritius
- ◆ Mongolia
- ◆ Nicaragua
- ◆ Pakistan
- ◆ Cambodia
- ◆ DPRK
- ◆ Ghana
- ◆ Iran
- ◆ Iraq
- ◆ Jamaica



*or choose one of:*

- ◆ Not Available

# Geography

## Geography (Not + RE) (1.Notaries)

### Q1

Please specify the total number of purchase and sale contracts published where the buyers were resident in Malta in the prior calendar year.

*Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded for the purpose of this question. Reference to buyers is made with respect to both legal and natural persons. "Residence" refers to the customer's principal country of residence or for a legal entity the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement.*

---



or choose one of:

- Not Available

## Geography (Not + RE) (2.Notaries)

### Q2

Please specify the total number of purchase and sale contracts published where the buyers were resident in an EU/EEA jurisdiction, excluding Malta, in the prior calendar year.

*Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded for the purpose of this question. Reference to buyers is made with respect to both legal and natural persons. "Residence" refers to the customer's principal country of residence or for a legal entity the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement.*

---



or choose one of:

- Not Available

## Geography (Not + RE) (3.Notaries)

**Q3**

Please specify the total number of purchase and sale contracts published where the buyers were resident in a non- EU/EEA jurisdiction, in the prior calendar year.

*Contracts relating to intra-group transfers, namely the sale of immovable property from one company to another which fall under the same group and / or in the case of a transfer of property by a company in the process of liquidation to its shareholder which do not involve transfer of cash should be excluded for the purpose of this question. Reference to buyers is made with respect to both legal and natural persons. "Residence" refers to the customer's principal country of residence or for a legal entity the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement.*

---



or choose one of:

- ◆ Not Available

## Geography (Not + RE) (4.Notaries)

**Q4**

Please specify the total number of purchase and sale contracts published whereby the buyers were resident in jurisdictions 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?

*The FATF and EU lists identifying high-risk 3rd countries may be accessed from the following link: <https://fiaumalta.org/country-statements/> Whilst the top 20 countries of the Basel Index may be accessed from the following link: <https://index.baselgovernance.org/ranking>*

---



or choose one of:

- ◆ Not Available

## Geography (Not + RE) (5)

**Q5**

If the above answer is greater than 0, please select the respective jurisdictions.

---

*Choose more than one option:*

- ◆ Albania
- ◆ Barbados
- ◆ Botswana
- ◆ Cambodia
- ◆ DPRK
- ◆ Burkina Faso
- ◆ China
- ◆ Senegal
- ◆ Yemen
- ◆ Zimbabwe
- ◆ Haiti
- ◆ Mozambique
- ◆ Cayman Islands
- ◆ Ethiopia
- ◆ Solomon Islands
- ◆ Sri Lanka
- ◆ Cape Verde
- ◆ Bahamas
- ◆ Philippines
- ◆ South Sudan
- ◆ Turkey
- ◆ Democratic Republic of the Congo
- ◆ Madagascar
- ◆ Mauritania
- ◆ Uganda
- ◆ Jordan
- ◆ Mali
- ◆ Morocco
- ◆ Myanmar
- ◆ Nicaragua
- ◆ Pakistan
- ◆ Panama
- ◆ Syria
- ◆ Ghana
- ◆ Iran
- ◆ Jamaica
- ◆ Mauritius



*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

**Residence of Other Customers (other relevant activity) (1)**

*Other relevant activity' refers to services defined as managing money, securities or assets on behalf of clients by way of investment; providing trust or company services; opening or management of bank, savings or securities accounts; organization of contributions / funding for the creation, operation or management of companies and provision of tax advice.*

## Q6

Please list the % of customers resident in Malta.

*Residence' refers to the purchaser's and seller's principal country of residence. Where the purchaser and/or seller is a legal entity, the 'residence' refers to the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement.*

---



or choose one of:

- Not Available

## Residence of Other Customers (other relevant activity) (2)

*Other relevant activity' refers to services defined as managing money, securities or assets on behalf of clients by way of investment; providing trust or company services; opening or management of bank, savings or securities accounts; organization of contributions / funding for the creation, operation or management of companies and provision of tax advice.*

## Q7

Please list the % of foreign customers resident in an EU/EEA member state jurisdiction, excluding Malta.

*Residence' refers to the purchaser's and seller's principal country of residence. Where the purchaser and/or seller is a legal entity, the 'residence' refers to the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement.*

---



or choose one of:

- Not Available

## Residence of Other Customers (other relevant activity) (3)

*Other relevant activity' refers to services defined as managing money, securities or assets on behalf of clients by way of investment; providing trust or company services; opening or management of bank, savings or securities accounts; organization of contributions / funding for the creation, operation or management of companies and provision of tax advice.*



**Q8**

Please list the % of foreign customers resident in a non-EU/EEA member state jurisdiction.

*Residence' refers to the purchaser's and seller's principal country of residence. Where the purchaser and/or seller is a legal entity, the 'residence' refers to the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement.*

---



or choose one of:

- ◆ Not Available

**Residence of Other Customers (other relevant activity) (4)**

*Other relevant activity' refers to services defined as managing money, securities or assets on behalf of clients by way of investment; providing trust or company services; opening or management of bank, savings or securities accounts; organization of contributions / funding for the creation, operation or management of companies and provision of tax advice.*

**Q9**

Please list the % of foreign customers resident in jurisdictions 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?

*Residence' refers to the purchaser's and seller's principal country of residence. Where the purchaser and/or seller is a legal entity, the 'residence' refers to the jurisdiction where it is incorporated or has its principal place of business. With respect to trusts and similar legal arrangement the country of residence should be the jurisdiction of the laws governing the trusts and / or similar legal arrangement. The FATF and EU lists identifying high-risk 3rd countries may be accessed from the following link: <https://fiaumalta.org/country-statements/> Whilst the top 20 countries of the Basel Index may be accessed from the following link: <https://index.baselgovernance.org/ranking>*

---



or choose one of:

- ◆ Not Available

**Residence of Other Customers (other relevant activity) (5)**

**Q10**

If the above answer is greater than 0, please select the respective jurisdictions.

---

*Choose more than one option:*

- ◆ Albania
- ◆ Barbados
- ◆ Botswana
- ◆ Cambodia
- ◆ DPRK
- ◆ Cape Verde
- ◆ Bahamas
- ◆ Marocco
- ◆ Democratic Republic of the Congo
- ◆ Madagascar
- ◆ Mauritania
- ◆ Ethiopia
- ◆ Solomon Islands
- ◆ Sri Lanka
- ◆ Mali
- ◆ Myanmar
- ◆ Philippines
- ◆ South Sudan
- ◆ Turkey
- ◆ China
- ◆ Burkina Faso
- ◆ Jordan
- ◆ Mozambique
- ◆ Cayman Islands
- ◆ Senegal
- ◆ Uganda
- ◆ Yemen
- ◆ Zimbabwe
- ◆ Haiti
- ◆ Nicaragua
- ◆ Pakistan
- ◆ Panama
- ◆ Syria
- ◆ Ghana
- ◆ Iran
- ◆ Jamaica
- ◆ Mauritius

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available



Residence of BO(s) of purchasers that are legal entities or arrangements (1)

*Beneficial owner(s) of purchasers and sellers that are legal entities or arrangements, refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement*

**Q11**

Please list the % of beneficial owners residing in Malta.

*The response should be compiled on the basis of all occasional transactions that were carried out in the prior calendar year and the business relationships, if applicable, as at the end of the prior calendar year.*

---

or choose one of:

- ◆ Not Available

**Residence of BO(s) of purchasers that are legal entities or arrangements (2)**

*Beneficial owner(s) of purchasers and sellers that are legal entities or arrangements, refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement*

**Q12**

Please list the % of foreign beneficial owners residing in an EU/EEA member state jurisdiction, excluding Malta.

*The response should be compiled on the basis of all occasional transactions that were carried out in the prior calendar year and the business relationships, if applicable, as at the end of the prior calendar year.*

---

or choose one of:

- ◆ Not Available

**Residence of BO(s) of purchasers that are legal entities or arrangements (3)**

*Beneficial owner(s) of purchasers and sellers that are legal entities or arrangements, refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement*

**Q13**

Please list the % of foreign beneficial owners residing in a non-EU/EEA member state jurisdiction.

*The response should be compiled on the basis of all occasional transactions that were carried out in the prior calendar year and the business relationships, if applicable, as at the end of the prior calendar year.*

---



or choose one of:

- Not Available

## Residence of BO(s) of purchasers that are legal entities or arrangements (4)

*Beneficial owner(s) of purchasers and sellers that are legal entities or arrangements, refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement*

**Q14**

Based on the prior calendar year, please list the % of beneficial owners residing in a jurisdiction listed in the FATF lists, 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?

*The response should be compiled on the basis of all occasional transactions that were carried out in the prior calendar year and the business relationships, if applicable, as at the end of the prior calendar year. The FATF and EU lists identifying high-risk 3rd countries may be accessed from the following link: <https://fiaumalta.org/country-statements/> Whilst the top 20 countries of the Basel Index may be accessed from the following link: <https://index.baselgovernance.org/ranking>*

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

## Residence of BO(s) of purchasers that are legal entities or arrangements (5)

**Q15**

If the above answer is greater than 0, please select the respective jurisdictions.

---

*Choose more than one option:*

- ◆ Albania
- ◆ Cape Verde
- ◆ Bahamas
- ◆ Democratic Republic of Congo
- ◆ Madagascar
- ◆ Mauritania
- ◆ Ethiopia
- ◆ Solomon Islands
- ◆ Sri Lanka
- ◆ Mali
- ◆ Morocco
- ◆ Myanmar
- ◆ Philippines
- ◆ South Sudan
- ◆ Turkey
- ◆ China
- ◆ Burkina Faso
- ◆ Jordan
- ◆ Senegal
- ◆ Yemen
- ◆ Zimbabwe
- ◆ Haiti
- ◆ Mozambique
- ◆ Cayman Islands
- ◆ Panama
- ◆ Syria
- ◆ Uganda
- ◆ Jamaica
- ◆ Mauritius
- ◆ Nicaragua
- ◆ Pakistan
- ◆ Barbados
- ◆ Botswana
- ◆ Cambodia
- ◆ DPRK
- ◆ Ghana
- ◆ Iran



*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

# Interface / Distribution Channels

## Interface / Distribution Channels (1.Notaries)

### Q1

Out of the total number of contracts published in the prior calendar year, how many involved one or more purchasers (natural person) that were represented by another person through a power of attorney?

*Purchasers refers to the individual parties to the contract. For example if a contract has 2 parties considered as purchasers (example a married couple), these should be counted as 2 for the purpose of this question.*

---

## Interface / Distribution Channels (2)

### Q2

Out of the total number of persons indicated in the question above, how many of these purchasers did not have a Maltese nationality and/or residence?

---

## Interface / Distribution Channels (3)

### Q3

Out of the total number of customers to which you provided other services, how many of these were onboarded or serviced without having been first met on a face-to-face basis?

*"Other services" refers to: managing money, securities or assets on behalf of clients by way of investment; providing trust or services; opening or management of bank, savings or securities accounts; organization of contributions / funding for the creation, operation, or management of companies and provision of tax advice. Subject persons are to categorise those instances where he / she met the customer's agent as a face-to-face relationship. An agent means a person or entity who has an agreement with a subject person in order to provide services or products to the subject person's customers.*

---

## Interface / Distribution Channels (8)

**Q4**

What % of customers were onboarded during the prior calendar year, where a reliance arrangement was in place in terms of Regulation 12 of the PMLFTR?

*Third parties may be used by a subject person during the onboarding process of its customers. Some examples of how third parties may be used include: a) reliance on the CDD measures of another subject person or third party; b) use of third party software to carry out some aspects of identity verification; c) outsourcing any part of identity verification to a third party. A third party refers to a natural person that is not in the direct employment of the entity or to a legal person that is not connected to the subject person either as part of the same group or through common beneficial owners*

---

or choose one of:

- Not Applicable
- Not Available

