



REQ 2022 – Real Estate Agents – Firms/ Companies

This document contains provisional questions which will be featured in the REQ for Real Estate Agents Firms or Companies 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.

or choose one of:

- ◆ Not Applicable

Subject Person Information (24)

Q2

Please indicate the total number of employees expressed in full time equivalents ("FTEs") working for your entity 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. How is this different from the below? Employees should include persons who are directly employed by subject persons including directors and employees employed within the same group but working directly for the SP or who are self-employed persons but working for the SP

or choose one of:

- ◆ Not Applicable
- ◆ Not Available

Subject Person Information (26)

Q3

How many years of experience in the industry does the principal(s) and/or partner(s) and/or director(s) and/or senior management of your entity have?

The persons to be taken into consideration for the purpose of this question, must have either an employment relationship with the entity or are serving on the governing body of the entity (through employment), independent of whether they have an executive or non-executive role. Where there is more than one principal / partner / member of senior management, respondents are required to provide the aggregate average number of years experience in the industry. For example, if there are two partners, one having 12 years of experience and the other having 4 years of experience, the answer to this question should be 8.

Choose only one option:

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

Subject Person Information (27)**Q4**

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?

Choose only one option:

- ◆ No
- ◆ Yes

Subject Person Information (45)**Q5**

Does your entity have nominee shareholders in its ownership structure?

Nominee shareholding refers to those instances where the shares of an entity are held by a person for the benefit of another person (beneficial owner). A nominee shareholder may be an individual or a body corporate. In replying to this question, subject persons are required to consider their whole ownership structure irrespective of country of incorporation or jurisdiction

Choose only one option:

- ◆ No
- ◆ Yes

Subject Person Information (46)

Q6

If 'Yes', what percent of the total shares are held by nominee shareholders?

Subject Person Information (47)

Q7

Has your entity undergone changes in its ownership structure during the prior calendar year?

Choose only one option:

- No
- Yes

Subject Person Information (49)

Q8

Has your entity undergone changes within its management and control structure during the prior calendar year?

"Management and control structure" refers to those bodies or individuals within the entity that either set the general direction of the entity in the pursuance of its activities (e.g. Board of Directors, Partners' Committee etc.) or that manage the entity's activities on a day-to-day basis (C-level e.g. Chief Executive officer, Chief Financial officer, Managing Partners etc.) and who require the approval, prior to appointment, of the MFSA or MGA, respectively. "Control structures" refer to the entity's governance structures and their related setup and should exclude control structures established for the day-to-day operations of the entity. "Significant changes in its management and control structure" means any change to the governing body or to the management of the Company which change has to be notified to and/or requires the prior approval of the Malta Financial Services Authority or the Malta Gaming Authority as the case may be, where applicable.

Choose only one option:

- No
- Yes

Governance / Organization

Governance / Organization (3)

Q1

When was the current MLRO appointed?

Choose only one option:

- Less than 1 year ago
- Between 1-2 years ago
- Between 3-5 years ago
- More than 5 years ago

Governance / Organization (4)

Q2

How many years of experience does the MLRO have in AML / CFT?

Choose only one option:

- Less than 1 year
- Between 1-2 years
- Between 3-5 years
- More than 5 years

Governance / Organization (5)

Q3

Is the MLRO responsible for areas other than AML / CFT?

Choose only one option:

- Yes
- No

Governance / Organization (6)

Q4

Does the MLRO also hold MLRO positions with other entities?

Choose only one option:

- Yes
- No

Governance / Organization (7)**Q5**

Please include the total number of MLRO positions held with other entities, excluding the reporting entity.

Governance / Organization (8)**Q6**

How many staff members expressed in full time employees (FTEs) are part of the AML / CFT team (if one exists)?

"AML / CFT team" refers to individual/s who are part of an organised setup within the entity whose responsibilities include the assistance / execution, in part or in whole, of the entity's obligations arising from the PMLFTR and IPs and the entity's policies and procedures. Employment in full-time equivalent 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. The reported number should exclude the MLRO

or choose one of:

- Not Applicable
- Not Available

Governance / Organization (10)

Q7

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.)?

"AML / CFT team" refers to the staff members other than the MLRO. "Roles and responsibilities" relate to those responsibilities which are part of the first line of defence in the three lines of defence model. This may include front office, back office responsibilities but excludes compliance and risk management roles

Choose only one option:

- ◆ Yes
- ◆ No

or choose one of:

- ◆ Not Applicable

Governance / Organization (12)**Q8**

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?

The term "Partner" refers to a person who is part of the ownership structure of the entity. It does not refer to commercial relationships that the entity may engage in the ordinary course of its business with other business associates / affiliates

Choose only one option:

- ◆ Yes
- ◆ No

or choose one of:

- ◆ Not Applicable

Governance / Organization (14)

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:

<p>Q9</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"> ◆ Yes ◆ No
<p>Q10</p> <p>b) subject to negative news reports or other adverse media</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> ◆ Yes ◆ No

Governance / Organization (15)

Q11

In the past five (5) years, were any employees (including directors and partners) disciplined for non-compliance with the AML / CFT policies?

Choose only one option:

- ◆ Yes
- ◆ No

Governance / Organization (15.25)

Q12

If 'Yes' please explain.

Governance / Organization (15.5)

Q13

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

Choose only one option:

- Yes
- No

Governance / Organization (15.75)

Q14

If 'Yes' please explain.

Governance / Organization (16)

Q15

Has your entity outsourced the carrying out of any applicable AML / CFT obligations (within or outside the group)?

Outsourcing refers to outsourced activities directly relating to the entity's relevant activity / relevant financial business and in 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". The term "group" refers to a parent undertaking and all its subsidiary undertakings. Respondents whose AML / CFT obligations are, in whole or in part, undertaken by an entity forming part of its group should, irrespective of the legal and commercial arrangements in place, select the "Yes" option.

Choose only one option:

- No
- Yes (within Group)
- Yes (outside Group)
- Yes (within and outside Group)

Governance / Organization (16.5)

Q16

Please specify the obligations that are being outsourced.

Governance / Organization (22)**Q17**

How often has the Board or equivalent body within the entity received 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

Choose only one option:

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

or choose one of:

- ◆ Not Applicable

Governance / Organization (24)**Q18**

Does the MLRO have a direct reporting line to the Board of Directors?

Choose only one option:

- ◆ Yes
- ◆ No

Governance / Organization (25)

Q19

Does the MLRO have sufficient seniority and command to carry out duties effectively?

Choose only one option:

- ◆ Yes
- ◆ No



Policies and Procedures

Policies and Procedures (1)

Q1

Does your entity have written AML / CFT policies and procedures?

Choose only one option:

- Yes
- No

Policies and Procedures (4)

Q2

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

Choose only one option:

- Yes
- No

Policies and Procedures (5)

Q3

How frequently does your entity review and / or update the entity's AML / CFT written policies and procedures?

Choose only one option:

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

Policies and Procedures (7)

Q4

Does your entity's 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 (8.5.REA.Firms)

Q5

Does your entity's policies and procedures require senior management's approval to service PEPs or their family members / close associates?

Choose only one option:

- Yes
- No
- We do not offer services to PEPs

Policies and Procedures (10)

Q6

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

Choose only one option:

- Yes
- No

Policies and Procedures (13)

Q7

Does your entity have policies and procedures which detail the procedure for reporting of suspicious transactions to the FIAU?

Choose only one option:

- Yes
- No

Policies and Procedures (13.25)

Q8

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

Choose only one option:

- Yes
- No

Policies and Procedures (13.5)

Q9

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

Choose only one option:

- ◆ Yes
- ◆ No

Policies and Procedures (15)**Q10**

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

Choose only one option:

- ◆ Yes
- ◆ No

Policies and Procedures (19)**Q11**

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

Choose only one option:

- ◆ Yes
- ◆ No

Policies and Procedures (20)

Q12

Do the policies and procedures require your entity 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.

Choose only one option:

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

or choose one of:

- ◆ Not Applicable

Policies and Procedures (21)**Q13**

Does your entity have policies and procedures in place to assess the AML / CFT compliance framework of your entity's intermediaries, agents and/or introducers?

Choose only one option:

- ◆ Yes
- ◆ No

or choose one of:

- ◆ Not Applicable

Policies and Procedures (33)

Q14

Does your entity have internal whistleblowing procedures?

Subject persons are to ascertain whether under the Protection of the Whistleblower Act, they are obliged to have any such policies and procedures. If this is not the case, then the subject person is to select the 'Not Applicable' option

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Policies and Procedures (34)

Q15

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

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (46)

Q16

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

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (51)

Q17

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

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?

Choose only one option:

- Yes
- No

Business Risk Assessment (2)

Q2

What is your entity's 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.

Choose only one option:

- Very High
- High
- Medium
- Low

or choose one of:

- Not Applicable

Business Risk Assessment (3)

Q3

What is your entity's most recent residual risk scoring or rating for ML/FT in the Business Risk Assessment?

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)

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

<p>Q4 a) the entity's customers</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> ◆ Yes ◆ No
<p>Q5 b) the products or services offered by the entity</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> ◆ Yes ◆ No
<p>Q6 c) specific countries or geographical areas</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> ◆ Yes ◆ No
<p>Q7 d) distribution channels</p>	<p>Choose only one option:</p> <ul style="list-style-type: none"> ◆ Yes ◆ No

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)?

Choose only one option:

- ◆ Yes
- ◆ No

Business Risk Assessment (8)**Q9**

Has the Business Risk Assessment been approved by the Board of Directors or equivalent management body of your entity?

'Senior management' differs according to the type of setup of the entity. It intends to capture individual(s):
a) who are responsible for taking strategic decisions that fundamentally effect the business operations or general direction of that entity; and

b) who exercise executive control over the daily or regular affairs of the entity through a senior management position.

This also includes individuals at C-level who have executive functions or are otherwise responsible for the management of the entity, such as executive directors, chief executive officers (CEOs) and chief financial officers (CFOs), and (if applicable) who require the approval, prior to appointment, of the MFSA or MGA, respectively.

Choose only one option:

- ◆ Yes
- ◆ No

Business Risk Assessment (9)**Q10**

Did your entity 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.

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.

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?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (7)

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

<p>Q3</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"> ◆ No ◆ Yes - when risk is not low ◆ Yes - only when risk is high ◆ Yes - always <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q4</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"> ◆ Yes - always ◆ No ◆ Yes - when risk is not low ◆ Yes - only when risk is high <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q5</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"> ◆ Yes - always ◆ No ◆ Yes - when risk is not low ◆ Yes - only when risk is high <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q6</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"> ◆ No ◆ Yes - when risk is not low ◆ Yes - only when risk is high ◆ Yes - always <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q7</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"> ◆ No ◆ Yes - when risk is not low ◆ Yes - only when risk is high ◆ Yes - always <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable

Customer Acceptance and Risk Assessment (32)

Does your entity, on a risk sensitive basis, collect information on the customer's source of wealth and source of funds?

<p>Q8</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"> ◆ No ◆ Yes when risk is not low ◆ Yes but only partially ◆ Yes only when risk is high ◆ Yes only in part when risk is high ◆ Yes <p>or choose one of:</p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q9</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"> ◆ No ◆ Yes when risk is not low ◆ Yes but only partially ◆ Yes only when risk is high ◆ Yes only in part when risk is high ◆ Yes <p>or choose one of:</p> <ul style="list-style-type: none"> ◆ Not Applicable

Customer Acceptance and Risk Assessment (39)

Q10

Were new clients acquired through an introducer/s in the prior calendar year?

The term introducer refers to an individual / entity that introduces a customer/s to a subject person. The introducer does not represent or act on behalf of the customer. The relationship between an introducer and the subject person may or may not be governed by an agreement. The subject person may remunerate (e.g. commission/finders fee) for their service. An official or an employee of the subject person is not an introducer. Furthermore, group entities that introduce customers to other entities within the same group are not to be considered as introducers.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (43)**Q11**

If yes, please indicate the number of introducers used during the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Customer Acceptance and Risk Assessment (44)

Q12

In the case where an introducer was used, was Customer Due Diligence performed on the introducer?

The term introducer refers to an individual / entity that introduces a customer/s to a subject person. The introducer does not represent or act on behalf of the customer. The relationship between an introducer and the subject person may or may not be governed by an agreement. The subject person may remunerate (e.g. commission/finders fee) for their service. An official or an employee of the subject person is not an introducer. Furthermore, group entities that introduce customers to other entities within the same group are not to be considered as introducers.

Choose only one option:

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

or choose one of:

- Not Applicable
- Not Available

Customer Acceptance and Risk Assessment (49)

Q13

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.

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:

<p>Q14</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"> ◆ Yes ◆ No <p>or choose one of:</p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q15</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"> ◆ Yes ◆ No <p>or choose one of:</p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q16</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"> ◆ Yes ◆ No <p>or choose one of:</p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q17</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"> ◆ Yes ◆ No <p>or choose one of:</p> <ul style="list-style-type: none"> ◆ Not Applicable

<p>Q18</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"> ◆ Yes ◆ No <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q19</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"> ◆ Yes ◆ No <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable

Customer Acceptance and Risk Assessment (61)

Q20

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>Q21 a) Rely on publicly available information</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> ◆ Yes ◆ No
<p>Q22 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"> ◆ Yes ◆ No
<p>Q23 c) Use commercial databases</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> ◆ Yes ◆ No

Customer Acceptance and Risk Assessment (67)

Q24

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>Q25 a) Transaction customer activity threshold</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> ◆ Yes ◆ No <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q26 b) Pre-determined time frame</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> ◆ Yes ◆ No <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q27 c) Prior to completion of service provided</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> ◆ Yes ◆ No <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable

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

Q28

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)

Q29

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.

Choose only one option:

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

Customer Acceptance and Risk Assessment (73)**Q30**

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?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (76)**Q31**

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?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (77)

Q32

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?

or choose one of:

- ◆ Not Available



Risk Assessment

Risk Assessment (1)

Q1

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

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 (0.5)

Q1

When was the last internal audit performed, in regards to compliance with the AML/CFT regulations?

Regulation 5(5)(d) of the PMLFTR provides that "every subject person shall implement, where appropriate with regard to the size and nature of the business, an independent audit function to test the internal measures, policies, controls and procedures". Section 3.4 of the Implementing Procedures explain that the subject person need not create an internal audit function, but it is possible for the subject person to engage an external consultant, independent of the subject person to evaluate the adequacy of the same. This task may also be assigned internally to a person other than the MLRO, or anyone else involved in the implementation or operation of the subject person's AML / CFT compliance programme.

Choose only one option:

- ◆ Never
- ◆ During the prior calendar year
- ◆ Between 1 and 2 years
- ◆ Between 2 and 3 years
- ◆ More than three years ago

Internal Audit / Independent Testing (0.75)

Q2

In the last internal audit, was compliance with the AML/CFT regulations subject to a review?

Choose only one option:

- ◆ Yes
- ◆ No

Internal Audit / Independent Testing (1)

Q3

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 (3)

Q4

Given the size and nature of the business, was an independent audit function appointed to test the AML / CFT measures, policies, controls and procedures?

The PMLFTR requires subject persons to consider whether, given the size and nature of their business, the conduct of ongoing monitoring on one's own measures, policies, controls and procedures needs to be strengthened through:

*(a) the appointment of an officer at management level whose duties are to include monitoring of the day-to-day implementation of the measures, policies, controls and procedures adopted by the subject person; and
(b) the implementation of an independent audit function to test the said internal measures, policies, controls and procedures from time to time.*

The latter need not necessarily result in the creation of an internal audit function, since it is possible for the subject person to engage an external consultant independent of the subject person to evaluate the adequacy of its internal controls, policies and procedures. Alternatively, the subject person may assign this task internally to a person other than the MLRO or anyone else involved in the implementation or operation of the subject person's AML / CFT compliance programme

Choose only one option:

- ◆ Yes, independent officer at management level
- ◆ Yes, external consultant
- ◆ Yes, internal audit function

or choose one of:

- ◆ Not Applicable

Internal Audit / Independent Testing (4)

Q5

What is the frequency of audits carried out by the independent audit function?

Choose only one option:

- ◆ Quarterly
- ◆ Half yearly
- ◆ Annually
- ◆ Between 1-3 years
- ◆ Every 3 or more years
- ◆ As needed
- ◆ No reviews performed

or choose one of:

- ◆ Not Applicable

Internal Audit / Independent Testing (6)**Q6**

What was the overall result of the last audit carried out?

The overall result should consider the compliance with AML / CFT regulations

Choose only one option:

- ◆ Satisfactory
- ◆ Satisfactory but improvements required
- ◆ Unsatisfactory

or choose one of:

- ◆ Not Applicable

Internal Audit / Independent Testing (7)**Q7**

How many "high risk" audit issues were identified in the latest audit report?

The audit issues should consider the compliance with AML / CFT regulations

"High risk" audit issues' indicate that there are weaknesses in the process that present risk exposure to the subject person under review, in terms of compliance with AML / CFT regulations. The significance of these weaknesses requires attention by senior management, and makes it imperative to remediate such weaknesses.

or choose one of:

- ◆ Not Applicable
- ◆ Not Available

Internal Audit / Independent Testing (8)

Q8

How many "high risk" audit issues are currently open?

The number of audit issues currently open should consider the compliance with AML / CFT regulations

or choose one of:

- ◆ Not Applicable
- ◆ Not Available

Internal Audit / Independent Testing (10)

Q9

Was a defined policy or procedure for testing the quality of the outsourced tasks drawn up, if a third party was outsourced in carrying out any applicable AML/CFT obligations?

A third party refers to both within or outside the group.

Choose only one option:

- ◆ Yes
- ◆ No

or choose one of:

- ◆ Not Applicable

Internal Audit / Independent Testing (12)

Q10

When was the last time your entity formally assessed the quality of the services provided to your entity by your outsourced service provider, both within and outside the group?

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)

Q1

Does your entity have policies and procedures defining the process of 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)

Q6

Were there any internal reports or alerts received during the prior calendar year which were analysed by the MLRO, but did not instigate a Suspicious Transaction Report (STR)?

Subject persons are required to answer this question even if internal reports are not raised, as the subject person is a sole practitioner.

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)

Q7

Did your entity 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)**Q9**

How many requests for information from Maltese authorities did your entity 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), customers who no longer have a business relationship with the entity and those for whom an occasional transaction was carried out

or choose one of:

- ◆ Not Available

AML / CFT Training

AML / CFT Training (1)

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

Q1

How often do any relevant staff of the entity attend AML / CFT related training?

"Relevant 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. This includes:

- (a) directors;*
- (b) senior management;*
- (c) the MLRO and designated employee(s);*
- (d) compliance staff; and*
- (e) all members of staff involved in the activities of the subject person that fall within the definition of 'relevant financial business' and 'relevant activity'.*

The term 'employees' should not only refer to individuals who have a contract of employment with the subject person, but should be interpreted to also include individuals who are engaged by the subject person to carry out aspects of its business involving 'relevant activity' or 'relevant financial business' (such as temporary / contract staff / self-employed persons). The training should be relevant to the respective employees' specific responsibilities and functions within that subject person.

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)

Q2

Please provide the % of staff within the AML / CFT unit 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 (5)**Q3**

Please provide the % of staff outside the AML / CFT unit 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. Self-employed persons who principally work for the entity should all be included in your response. '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 (6)**Q4**

Please provide the % of board members / partners that received AML / CFT training throughout the prior calendar year.

or choose one of:

- ◆ Not Available

AML / CFT Training (7)

Q5

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>Q6</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"> ◆ Yes ◆ No <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable
<p>Q7</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"> ◆ Yes ◆ No <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> ◆ Not Applicable

AML / CFT Training (16)

Q8

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)**Q9**

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

Self-employed persons who principally work for the subject person should be considered as MLRO.

or choose one of:

- ◆ Not Applicable

Record Keeping

Record Keeping (1)

Q1

Does your entity 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)

Q2

Upon request from the FIAU or any Supervisory Authority, is your entity 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 your entity 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) (36.REA Firms)

Q1

How many purchase and sale contracts did your entity act as agent 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.REA Firms)

Q2

How many purchase and sale contracts did your entity act as agent 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.REA Firms)

Q3

How many purchase and sale contracts did your entity act as agent 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.REA Firms)

Q4

State the number of contracts where the property had a sale value of up to €449,999 for which your entity acted as an agent?

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.REA Firms)**Q5**

State the number of contracts where the property had a sale value between €450,000 and €1,999,999, for which your entity acted as an agent?

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.REA Firms)

Q6

State the number of contracts where the property has a sale value exceeding €2,000,000, for which your entity acted as an agent for?

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.REA Firms)**Q7**

Please specify the highest sale value of property sold through a contract your entity acted as an agent 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)

Q8

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)

Q9

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) (47)

Letting of property. Please provide the following information based on your business in the prior calendar year:

Q10

What was the largest rental value, annualised for a year, transacted in relation to commercial property during the prior calendar year?

Respondents are required to annualise the rent value to a full twelve month period, irrespective of the length of the rental agreement. For example if the highest monthly rental value is €12,000 and the duration of the agreement is for 24 months, then respondents are required to annualise the rent and include €144,000 in their reply. Subject persons are only required to include those rental agreements whose monthly rental value is equal to or exceeds €10,000 per month. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Products and Services (DNFBPs) (48)**Q11**

What was the largest rental value, annualised for a year, transacted in relation to residential property during the prior calendar year?

Respondents are required to annualise the rent value to a full twelve month period, irrespective of the length of the rental agreement. For example if the highest monthly rental value is €12,000 and the duration of the agreement is for 24 months, then respondents are required to annualise the rent and include €144,000 in their reply. Subject persons are only required to include those rental agreements whose monthly rental value is equal to or exceeds €10,000 per month. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Products and Services (DNFBPs) (49)

Q12

Please specify the number of contracts involving Maltese nationals who rented a residential property with a monthly rental transaction value of €10,000 or more, during the prior calendar year.

Respondents are required to include the number of all contracts whose monthly rental transaction value equal to or exceeding €10,000 irrespective of the duration of the rental agreement. For the purpose of this question, respondents should exclude persons who acquired Maltese nationality through citizenship by investment schemes.

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.REA Firms)

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 for which your entity acted as an agent 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) (3.REA Firms)

Q3

Letting Contracts: Please list the total number of property letting contracts executed for which your entity acted as an agent for in the prior calendar year.

Real estate agents are required to list the number of lease contracts where they acted the agent and where the rental value of the contract is equal to or exceeds €10,000 per month

or choose one of:

- ◆ Not Applicable
- ◆ Not Available

Customers (Not + RE) (12)

Q4

Please list the total number of natural persons for which you acted as an agent for, during the prior calendar year.

Where a party comprises multiple natural persons, they should be counted as one for the purpose of this response.

or choose one of:

- ◆ Not Applicable
- ◆ Not Available

Customers (Not + RE) (13)

Q5

Please list the total number of legal persons and partnerships for which you acted as an agent for, during the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Customers (Not + RE) (14)

Of the total number of legal persons, please list:

Q6

a) the total number of purchasers and sellers whose shareholding is held in fiduciary capacity or by a trust or issued to bearer

or choose one of:

- Not Applicable
- Not Available

Customers (Not + RE) (15)

Of the total number of legal persons, please list:

Q7

b) the total number of purchasers and sellers that are trusts, foundations, charities or associations

or choose one of:

- Not Applicable
- Not Available

Customers (Not + RE) (24)

Q8

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) (29)**Q9**

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)

Q10

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)**Q11**

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)**Q12**

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)

Q13

Please specify the additional risk rating.

or choose one of:

- Not Applicable

Customers (Not + RE) (34)

Q14

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)

Q15

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)

Q16

Does your entity 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) (18)**Q17**

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)**Q18**

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

Q19

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)

Q20

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:

Q21

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

Q22

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>Q23</p> <p>c) the % of PEPs (including beneficial owners) from non-EU/EEA jurisdictions, in the prior calendar year</p>	<input data-bbox="746 98 1417 165" type="text"/> <p>or choose one of:</p> <ul style="list-style-type: none">• Not Available
<p>Q24</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: 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</i></p>	<input data-bbox="746 421 1417 488" type="text"/> <p>or choose one of:</p> <ul style="list-style-type: none">• Not Available

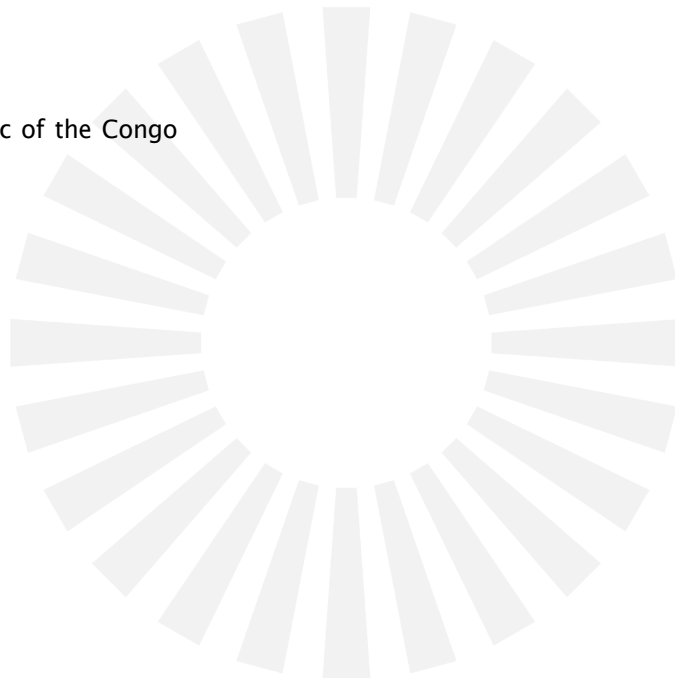
PEPs (7)

Q25

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

Choose more than one option:

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



or choose one of:

- ◆ Not Applicable
- ◆ Not Available

Additional (Customers) (2)

Q26

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)**Q27**

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

Geography

Geography (Not + RE) (1.REA Firms)

Q1

Please specify the total number of purchase and sale contracts where the buyers were resident in Malta, for which your entity acted as an agent 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.REA Firms)

Q2

Please specify the total number of purchase and sale contracts where the buyers were resident in an EU/EEA jurisdiction (excluding Malta), for which your entity acted as an agent 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.REA Firms)

Q3

Please specify the total number of purchase and sale contracts where the buyers were resident in a non-EU/EEA jurisdiction, for which your entity acted as an agent 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.REA Firms)

Q4

Please specify the total number of purchase and sale contracts where your entity acted as an agent for, 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

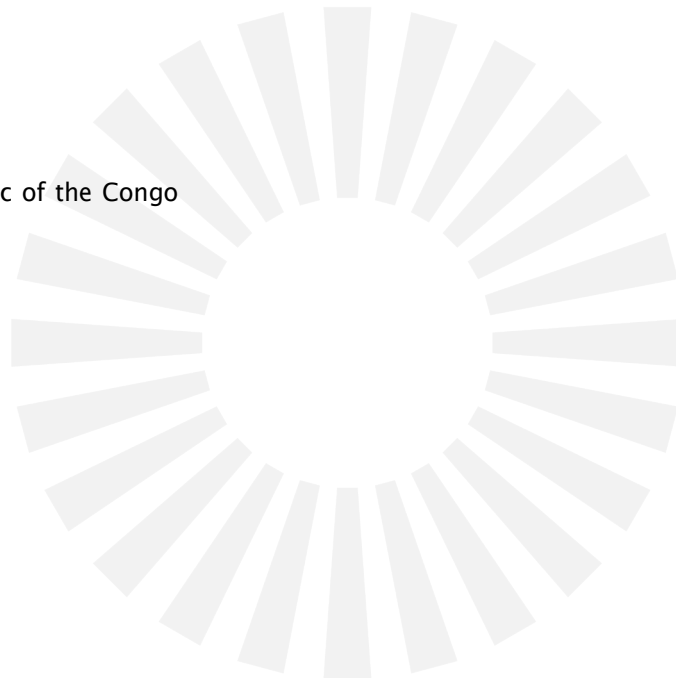
If the above answer is greater than 0, please select the respective jurisdictions.

Choose more than one option:

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

Q6

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

Q7

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

Q8

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

Q9

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)

Q10

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

Choose more than one option:

- Albania
- ♦ Barbados
- Botswana
- 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
- ♦ Haiti
- ♦ Mozambique
- ♦ Cayman Islands
- ♦ Senegal
- Uganda
- ♦ Yemen
- ♦ Zimbabwe
- ♦ Mauritius
- Nicaragua
- ♦ Pakistan
- ♦ Panama
- ♦ Syria
- ♦ Cambodia
- ♦ DPRK
- ♦ Ghana
- ♦ Iran
- Jamaica



or choose one of:

- ♦ Not Applicable
- ♦ Not Available

Interface / Distribution Channels

Interface / Distribution Channels (1.REA Firms)

Q1

Out of the total number of contracts your entity acted as agent for 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 (8)

Q3

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

Interface / Distribution Channels (21)

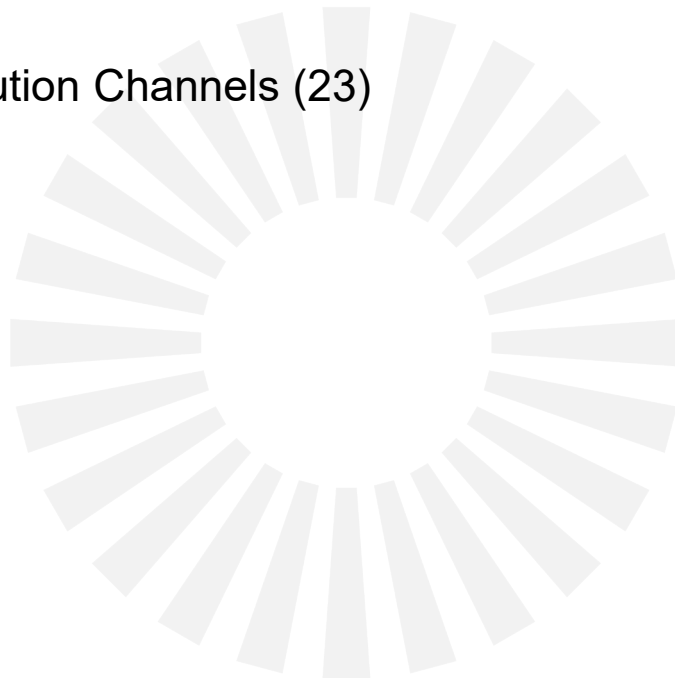
Q4

What is the % of customers that were introduced by either an agent, broker, and/or introducer from a jurisdiction listed in the FATF lists, the EU list identifying high risk 3rd countries with strategic deficiencies or the jurisdictions featuring in the top 20 countries of the Basel Index, during 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>

or choose one of:

- ◆ Not Applicable
- ◆ Not Available

Interface / Distribution Channels (23)

Q5

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

Choose more than one option:

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



or choose one of:

- Not Applicable
- Not Available