



## **REQ 2022 – Service Providers licensed under Retirement Pensions Act**

*This document contains provisional questions which will be featured in the REQ for Service Providers licensed under Retirement Pensions Act for the year 2022. This document should be utilized 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 organized 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 defense in the three lines of defense 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><b>Q9</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>Q10</b></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"> <li>◆ Yes</li> <li>◆ No</li> </ul>

## 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 (6)

**Q4**

Do your entity's policies and procedures allow for the refund of premium, contributions upon policy, scheme cancellation or policy surrender to an account other than the source of original funding?

Choose only one option:

- ◆ Yes, except in those instances where funds cannot be remitted back to the original source
- ◆ No
- ◆ Yes, always

## Policies and Procedures (7)

**Q5**

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 (7.5)

### Q6

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, on an ongoing basis (in line with the ongoing monitoring obligations)?

*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)

**Q7**

Does your entity's policies and procedures require senior management's approval to provide services to, or otherwise to continue business relationships with, or having involvement of PEPs or their family members / close associates?

---

*Choose only one option:*

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

**Policies and Procedures (10)****Q8**

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)****Q9**

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)**

**Q10**

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)****Q11**

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 (14)****Q12**

Does your entity have policies and procedures to identify, analyses, and escalate transactions over given thresholds, and where applicable, report suspicious transactions to the MLRO?

---

*Choose only one option:*

- Yes
- No

**Policies and Procedures (15)****Q13**

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 (16)

### Q14

Does your entity's policies and procedures define the instances and actions, to be undertaken to impose limitations on transaction, customer activity, caps and/or other restrictions on its customers?

---

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

## Policies and Procedures (19)

### Q15

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)

**Q16**

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)****Q17**

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 (24)**

**Q18**

Do policies and procedures require your entity to assess the AML / CFT framework of intermediaries who process customer payments on behalf of your entity?

---

*Choose only one option:*

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

**Policies and Procedures (33)****Q19**

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)****Q20**

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)**

## Q21

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)

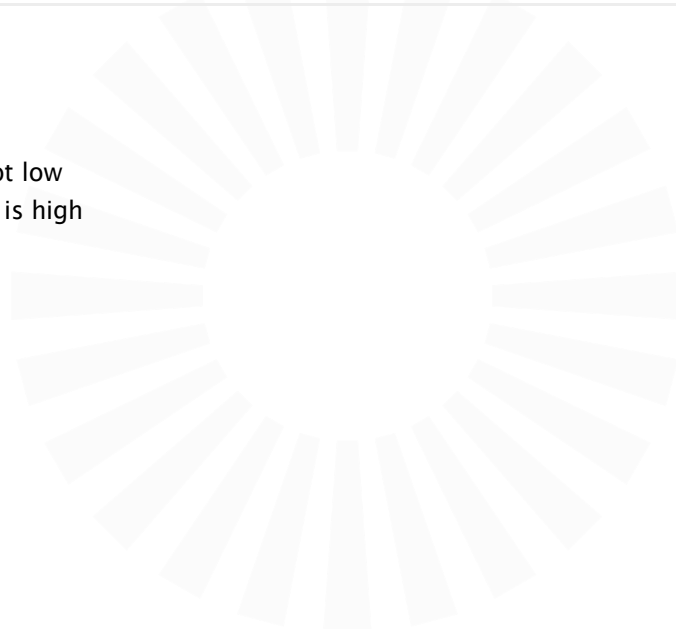
### Q22

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><b>Q4</b> a) the entity's 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 or services offered by the entity</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)?

---

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)

### Q1

Does your entity perform a Customer Risk Assessment prior to the acceptance and approval of customers?

*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)

### 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><b>Q3</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>Q4</b></p> <p>b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring that persons are duly authorized 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>Q5</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>Q6</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>Q7</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 (12)

Where business relationships are formed, please indicate whether the following is collected:

<p><b>Q8</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>Q9</b></p> <p>b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring that persons are duly authorized in writing</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>Q10</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>Q11</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>Q12</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 (33)

### Q13

Where a business relationship is formed, please indicate whether information on actual or expected activity (including cash flows) is collected, in respect to size, frequency and geographical distribution.

*This question refers to information that may be collected, on a risk basis, by a subject person in order to understand the customer's business and strengthen its customer risk assessment. Geographical distribution refers to the jurisdictions where or through which the customer carries out its operations (customers, suppliers, place of management) and undertakes its financial activity (money flows).*

---

Choose only one option:

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

or choose one of:

- ◆ Not Applicable

## Customer Acceptance and Risk Assessment (38)

### Q14

Do policies and procedures specify hierarchical authorization levels within your entity to accept a customer, or approve a transaction, on a risk basis?

*The application of 'hierarchical authorization' levels refer to both customers accepted at on-boarding stage and resulting from changes in customer risk assessment throughout the business relationship.*

---

Choose only one option:

- ◆ Yes
- ◆ No

## Customer Acceptance and Risk Assessment (39)

**Q15**

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)****Q16**

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)**

**Q17**

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 (47)

**Q18**

Does the subject person carry out Customer Due Diligence on the beneficiary(ies) to the policy, scheme and/or funds, as per Section 4.6.1(ii) of the Implementing Procedures?

*Section 4.6.1 (ii) of The Implementing Procedures detail exceptions relating to the timing of due diligence procedures in relation to the long-term insurance business. The Implementing Procedures require subject persons to in addition to identifying and verifying customer's identity and where applicable that of the beneficial owner, it requires that customer due diligence is carried out on the beneficiaries of long-term insurance policies: (a) when the beneficiaries are specifically named natural person legal entities or arrangements, subject persons have to identify these beneficiaries; (b) when the beneficiaries are designated by characteristics, class or other means, subject persons have to obtain sufficient information about those beneficiaries to be able to identify them at the time of pay-out; (c) when the beneficiaries assign any of their rights vested under the policy, subject persons have to identify the natural persons, legal entities or arrangements receiving for their benefit the value of the policy assigned at the time of becoming aware of the assignment; and (d) verify the identity of the beneficiaries at the time of pay-out. In view of the fact that this question is not relevant to Insurance Managers, respondents should select the "Not Applicable" option in their response.*

---

Choose only one option:

- ◆ Yes
- ◆ No

or choose one of:

- ◆ Not Applicable

## Customer Acceptance and Risk Assessment (49)

### Q19

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 (52)

### Q20

Are Enhanced Due Diligence measures applied when the source of premium payment and/or contribution is different to the policy holder?

*In view of the fact that this question is not relevant to Insurance Managers, respondents should select the "Not Applicable" option in their response*

---

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

## Customer Acceptance and Risk Assessment (54)

## Q21

Is an assessment undertaken to determine whether the cancellation gives rise to a suspicion about the transaction and whether submitting an STR would be required when a customer makes use of the "free-look"/"cooling-off" period?

*The 'free look' or 'cooling off' is the period of time during which the buyer of a life insurance policy may cancel the purchase withdrawing from the transaction at no expense. During this period, the contract holder can decide whether or not to keep the insurance policy; if they are not satisfied and wish to cancel, the policy purchaser can receive a full refund. This question is not relevant to Insurance Managers, respondents should select the "Not Applicable" option in their response*

---

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

## Customer Acceptance and Risk Assessment (61)

### Q22

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 utilized to determine the PEP status of a customer and, where applicable, their beneficial owners?

<p><b>Q23</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>Q24</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>Q25</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 (66)

### Q26

Are measures applied to identity fraud checks to ensure that the customer / policy holder is who they claim to be?

*Choose only one option:*

- ◆ Yes
- ◆ No

## Customer Acceptance and Risk Assessment (67)

### Q27

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>Q28</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>Q29</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>Q30</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)

### Q31

When Customer Due Diligence is not collected in its entirety, but activity has begun or is complete, do the customer files include a documented justification and formal approval of the exception as provided in Regulation 8 of the PMLFTR?

*Section 4.6 of the Implementing Procedures provides guidance on the timing of due diligence procedures that subject persons are required to adopt.*

*Choose only one option:*

- ◆ Yes
- ◆ No

## Customer Acceptance and Risk Assessment (70)

**Q32**

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)

**Q33**

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 (74)

**Q34**

Does your entity have the ability to block, suspend, or otherwise limit the services provided to customers when there are AML/CFT concerns?

Choose only one option:

- Yes
- No

## Customer Acceptance and Risk Assessment (76)

**Q35**

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)****Q36**

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

**Customer Acceptance and Risk Assessment (84)****Q37**

Is the Customer Risk Assessment reviewed and (if necessary) updated in the event that there are changes to the customer's business model ownership structure or service provided?

---

*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 (85)**

How often is the Customer Risk Assessment reviewed for the following:

<p><b>Q38</b> a) Low risk Customers</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Immediately upon material change</li> <li>◆ Annually</li> <li>◆ Every 2-3 years</li> <li>◆ More than every 3 years</li> <li>◆ Never</li> <li>◆ Less than 1 year</li> <li>◆ Trigger event based</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q39</b> b) Medium Risk Customers</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Immediately upon material change</li> <li>◆ Annually</li> <li>◆ Every 2-3 years</li> <li>◆ More than every 3 years</li> <li>◆ Never</li> <li>◆ Less than 1 year</li> </ul> <p><i>or choose one of:</i></p> <ul style="list-style-type: none"> <li>◆ Not Applicable</li> </ul>
<p><b>Q40</b> c) High Risk Customers</p>	<p><i>Choose only one option:</i></p> <ul style="list-style-type: none"> <li>◆ Immediately upon material change</li> <li>◆ Annually</li> <li>◆ Every 2-3 years</li> <li>◆ More than every 3 years</li> <li>◆ Never</li> <li>◆ Less than 1 year</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 (86)

**Q41**

Do the policies and procedures require the performance of periodic reviews on Customer Due Diligence information, and/or documentation on the basis of customer risk rating, where a business relationship is present?

*Periodic reviews are part of ongoing monitoring which is an obligation in respect to business relationships.*

---

*Choose only one option:*

- ◆ Yes
- ◆ No

*or choose one of:*

- ◆ Not Applicable

## Customer Acceptance and Risk Assessment (92)

**Q42**

Does your entity carry out checks to determine whether changes to the beneficiaries of a policy / scheme / fund / claim were made following the opening of the policy?

*Choose only one option:*

- ◆ Yes
- ◆ No

# De-Risking Controls

## De-Risking Controls (1)

### Q1

Were any de-risking practices undertaken in the past year?

*A de-risking practice is the process of terminating or restricting business relationships with particular categories of customers to avoid, rather than manage risk*

---

Choose only one option:

- Yes
- No

## De-Risking Controls (2)

### Q2

Which risk and category of customers have had their provisions of services ceased or terminated due to the de-risking practice?

---

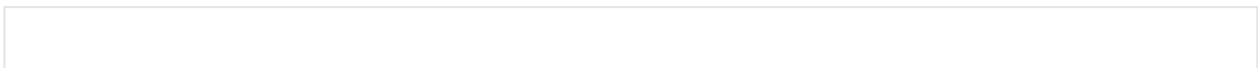


## De-Risking Controls (3)

### Q3

How many clients and/or relationships were terminated due to de-risking practices?

---



## De-Risking Controls (4)

**Q4**

What was the reason for the de-risking exercise?

---



# Ongoing Monitoring / Transaction Scrutiny

## Ongoing Monitoring / Transaction Scrutiny (0.25)

### Q1

Does your entity monitor transactions?

*Monitoring system refers to the system utilized by the entity to screen transactions as specified in IPs. Unless otherwise stated, the monitoring system refers to both manual and automated systems.*

---

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Available

## Ongoing Monitoring / Transaction Scrutiny (0.5)

### Q2

Does your entity have a methodology for transaction monitoring which is documented in writing, where a business relationship is present?

---

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Available

## Ongoing Monitoring / Transaction Scrutiny (1)

Where a business relationship is established, how frequently are the customers and/or related parties subject to a review and update of information?

---



**Q3****a) High Risk Customers**

*The obligation to review information held on customer files is restricted to those instances where a business relationship is formed. The PMLFTR state that for a business relationship to exist it must satisfy 3 important cumulative elements:*

*a) the relationship must be of a business, professional or commercial nature between 2 or more persons;*

*b) at least one of the persons involved in the relationship must be a subject person; and*

*c) the relationship has, or is expected to have at the time when the contact is established, an element of duration.*

*The interpretation of Beneficial Owners should be applied in accordance with the PMLFTR and the guidance in the IPs. Regulation 2(1) of the PMLFTR defines a beneficial owner as:*

*a) any natural person or persons who ultimately owns or controls the customer; and / or*

*b) the natural person or persons on whose behalf a transaction or activity is being conducted. With respect to trusts and similar legal arrangements reference to beneficial owner should extend to settlor / protector / trustee / beneficiaries / any other natural person actually exercising effective control over the trust.*

*The N/A option should be only selected by subject persons who do not have business relationships but only occasional transactions*

*Choose only one option:*

- ◆ As Necessary but at least annually
- ◆ Annually
- ◆ Every 18 months
- ◆ Every 2-3 years
- ◆ More than every 3 years
- ◆ Never

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

**Q4****b) Medium Risk Customers**

*The obligation to review information held on customer files is restricted to those instances where a business relationship is formed. The PMLFTR state that for a business relationship to exist it must satisfy 3 important cumulative elements:*

- a) the relationship must be of a business, professional or commercial nature between 2 or more persons;*
- b) at least one of the persons involved in the relationship must be a subject person; and*
- c) the relationship has, or is expected to have at the time when the contact is established, an element of duration.*

*The interpretation of Beneficial Owners should be applied in accordance with the PMLFTR and the guidance in the IPs. Regulation 2(1) of the PMLFTR defines a beneficial owner as:*

- a) any natural person or persons who ultimately owns or controls the customer; and / or*
- b) the natural person or persons on whose behalf a transaction or activity is being conducted.*

*With respect to trusts and similar legal arrangements reference to beneficial owner should extend to settlor / protector / trustee / beneficiaries / any other natural person actually exercising effective control over the trust.*

*The N/A option should be only selected by subject persons who do not have business relationships but only occasional transactions*

*Choose only one option:*

- ♦ As Necessary but at least annually
- ♦ Annually
- ♦ Every 18 months
- ♦ Every 2-3 years
- ♦ More than every 3 years
- ♦ Never

*or choose one of:*

- ♦ Not Applicable
- ♦ Not Available

**Q5****c) Low Risk Customers**

*The obligation to review information held on customer files is restricted to those instances where a business relationship is formed. The PMLFTR state that for a business relationship to exist it must satisfy 3 important cumulative elements:*

- a) the relationship must be of a business, professional or commercial nature between 2 or more persons;*  
*b) at least one of the persons involved in the relationship must be a subject person; and*  
*c) the relationship has, or is expected to have at the time when the contact is established, an element of duration.*

*The interpretation of Beneficial Owners should be applied in accordance with the PMLFTR and the guidance in the IPs. Regulation 2(1) of the PMLFTR defines a beneficial owner as:*

- a) any natural person or persons who ultimately owns or controls the customer; and / or*  
*b) the natural person or persons on whose behalf a transaction or activity is being conducted.*

*With respect to trusts and similar legal arrangements reference to beneficial owner should extend to settlor / protector / trustee / beneficiaries / any other natural person actually exercising effective control over the trust.*

*The N/A option should be only selected by subject persons who do not have business relationships but only occasional transactions*

*Choose only one option:*

- ♦ As Necessary but at least annually
- ♦ Annually
- ♦ Every 18 months
- ♦ Every 2-3 years
- ♦ More than every 3 years
- ♦ Never

*or choose one of:*

- ♦ Not Applicable
- ♦ Not Available

## Ongoing Monitoring / Transaction Scrutiny (1.5)

## Q6

Does your entity have a monitoring system that is able to detect the expiry of Customer Due Diligence documentation, and any other conflicting information in relation to customer data where a business relationship is present?

*Monitoring system refers to both manual and automated systems.*

---

*Choose only one option:*

- ◆ Yes
- ◆ No

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

## Ongoing Monitoring / Transaction Scrutiny (9)

### Q7

In case of a business relationship, are processes and/or systems for monitoring transactions fully automated, partially automated or manual?

*"Fully Automated" refers to relying on automated systems that require little or no human intervention. "Partially Automated" refers to relying on automated systems requiring human intervention regularly, whilst "Manual" refers to relying on control system data, manual / scheduled reports and intensive employee intervention.*

---

*Choose only one option:*

- ◆ Fully automated
- ◆ Partially automated
- ◆ Manual

*or choose one of:*

- ◆ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (10)

**Q8**

Which techniques are utilized to monitor customer activity?

*Profiling Techniques' refers to the process of construction and application of user profiles generated through the analysis of data. This typically relates to the use of algorithms or other mathematic techniques that allow for the discovery of patterns or correlation in large quantities of data. When these patterns or correlations are used to identify or represent persons, they are referred to as profiles. 'Rule-based criteria' refers to a set of pre-established rules that are applied in a system. The monitoring system will take a pre-defined action (flag, block etc.) on any transaction / activity that meets the criteria within the rule/s.*

---

Choose only one option:

- ◆ None
- ◆ Profiling Techniques
- ◆ Rule-based Criteria
- ◆ Both

or choose one of:

- ◆ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (11)

**Q9**

How often are the criteria and rules utilized by the monitoring system reviewed and updated?

Choose only one option:

- ◆ Twice or more within a year
- ◆ Annually
- ◆ Less frequent than annually
- ◆ Never

or choose one of:

- ◆ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (12)

**Q10**

Are customers' transactions monitored in real-time, post-event or a combination of both?

---

*Choose only one option:*

- Combination of both
- Post-event
- Real-Time

*or choose one of:*

- Not Applicable

**Ongoing Monitoring / Transaction Scrutiny (14.5)**

**Q11**

What is the average time allowed (in days) to clear any transaction monitoring alerts?

---

*or choose one of:*

- Not Applicable

**Ongoing Monitoring / Transaction Scrutiny (15)**

**Q12**

Does your entity have an expected transaction profile for every customer?

*An expected transaction profile is created on the basis of information obtained at the customer onboarding stage, and throughout the business relationship in order to establish a profile of the expected activity for a particular customer.*

---

*Choose only one option:*

- No
- Not Always
- Yes

*or choose one of:*

- Not Applicable

**Ongoing Monitoring / Transaction Scrutiny (17)**

### Q13

Is additional information and/or documentation requested when transactions do not match the customer profile?

---

*Choose only one option:*

- ♦ Yes
- ♦ No

*or choose one of:*

- ♦ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (22)

### Q14

Is your entity aware if any of the customers had and/or has assets frozen, confiscated or seized (due to AML/CFT considerations)?

*For Business Relationships, the respondents are required to consider this question for both prior the establishment of the business relationship and throughout the course of the business relationship, whilst for occasional Transactions, the respondents are required to consider this question for prior to the commencement of the occasional transaction. Respondents are required to select "Yes", if any of their customers has been served a freezing order.*

---

*Choose only one option:*

- ♦ Yes
- ♦ No

*or choose one of:*

- ♦ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (23)

Is the monitoring system based on:

<p><b>Q15</b> a) The characteristics of the products and services offered</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>Q16</b> b) The characteristics of the customers</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> c) The characteristics of the relevant countries and geographical areas</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>Q18</b> d) The characteristics of the distribution channels used</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>Q19</b> e) The payment method/payment transaction used by the customer</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>Q20</b> f) Other factors</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>

Ongoing Monitoring / Transaction Scrutiny (25)



**Q21**

If the monitoring system is based on "Other factors" please provide a description of the factors.

---

or choose one of:

- ◆ Not Applicable

**Ongoing Monitoring / Transaction Scrutiny (25.5)****Q22**

Are customers and/or beneficial owners subject to periodic adverse media screening on a risk sensitive basis?

Choose only one option:

- ◆ Yes
- ◆ No

**Ongoing Monitoring / Transaction Scrutiny (27)****Q23**

How many alerts (related to AML/CFT) were generated by the monitoring system during the prior calendar year?

*The number should reflect the total number of alerts that were raised by the system and resulted in an analysis / investigation by the subject person to be able to determine whether these should be cleared or whether they should be escalated further through the filing of an internal report.*

---

or choose one of:

- ◆ Not Applicable
- ◆ Not Available

**Ongoing Monitoring / Transaction Scrutiny (31.Pensions)**

Does the monitoring system in place:

<p><b>Q24</b></p> <p>a) identify whether retirement schemes and/or retirement plans opened by seemingly different customers are destined to be paid out to the same beneficiary</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></p> <p>b) monitor for payments from unidentified third parties</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>Q26</b></p> <p>c) monitor for multiple policies / retirement schemes / retirement plans linked to same persons</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>Q27</b></p> <p>d) monitor for payments made from the same person to different holders</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>

## Ongoing Monitoring / Transaction Scrutiny (32)

Does your entity screen / monitor for unusual use of the product, for example:

<p><b>Q28</b></p> <p>a) Frequent and unexplained surrenders, especially when the refund is done to different bank accounts</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>Q29</b></p> <p>b) The customer makes frequent or unexpected use of "free look" provisions / "cooling-off" periods</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>Q30</b></p> <p>c) The customer incurs a high cost by seeking early termination of a product</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>Q31</b></p> <p>d) The customer transfers the contract to an apparently unrelated third party</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>Q32</b></p> <p>e) The customer's request to change or increase the sum insured and / or the premium / contribution payment are unusual or excessive</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>Q33</b></p> <p>f) The customer changes the beneficiary clause and nominates an apparently unrelated third party</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>

**Q34**

g) Significant and unexplained geographic distance between residence or business location of the customer and the location where the product sale took place (or the location of the insurer's representative)

*Choose only one option:*

- ◆ Yes
- ◆ No

*or choose one of:*

- ◆ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (37)

**Q35**

For which jurisdictions does the monitoring system screens transactions against?

*Choose more than one option:*

- ◆ FATF List
- ◆ EU List
- ◆ Top 20 Jurisdictions featured in the Basel Index
- ◆ Other
- ◆ None

*or choose one of:*

- ◆ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (38)

**Q36**

If "Other" is chosen in the previous question, please specify the jurisdiction list screened against.

*or choose one of:*

- ◆ Not Applicable

## Ongoing Monitoring / Transaction Scrutiny (47)

**Q37**

How many customer relationships were terminated, blocked, suspended or were otherwise, provided limited services for AML / CFT related reasons, during the prior calendar year?

---

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

**Ongoing Monitoring / Transaction Scrutiny (53)**

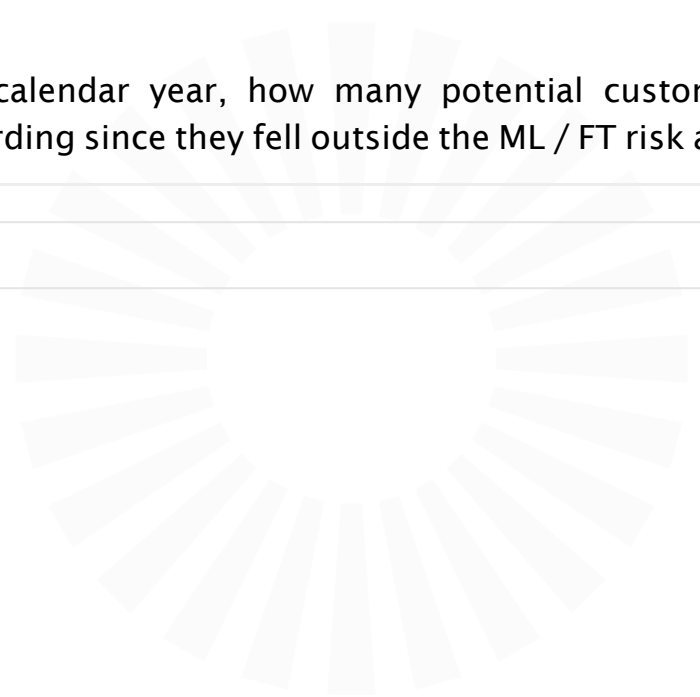
**Q38**

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



# 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 program.*

---

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 program.*

*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 (9)

### Q9

When were the most recent independent testing on the monitoring systems carried out in terms of their compliance with AML / CFT regulation?

*Choose only one option:*

- ◆ Between 1-2 years ago
- ◆ Less than 1 year ago
- ◆ More than 2 years ago
- ◆ Never before

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

## Internal Audit / Independent Testing (10)

### Q10

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)

### Q11

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 analyzed 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 internal reports submitted
- ◆ Only internal reports maintained
- ◆ Yes, internal report & analysis maintained
- ◆ No
- ◆ No measures relating to internal reporting or alerts are in place

## 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><b>Q6</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>Q7</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 (12)

**Q8**

Does your entity provide AML / CFT training to brokers, agents and/or intermediaries (established in Malta, EU/EEA), to ensure that they have an adequate understanding of relevant ML / FT risks, and on the AML / CFT policies and procedures mandated by your entity?

---

*Choose only one option:*

- Yes
- No

**AML / CFT Training (13)**

**Q9**

Does your entity provide AML / CFT training to brokers, agents and/or intermediaries (established in non-EU/EEA), to ensure that they have an adequate understanding of relevant ML / FT risks, and on the AML / CFT policies and procedures mandated by your entity?

---

*Choose only one option:*

- Yes
- No

*or choose one of:*

- Not Applicable

**AML / CFT Training (16)**

**Q10**

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)**

**Q11**

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 (Insurance and Pensions) (27.Pensions)

### Q1

During the prior calendar year, did your entity cease to offer services to any of its customers due to exposures to higher ML/FT risks.

*Respondents that are insurance managers should select the 'Not Applicable' option in their response.*

---

*Choose only one option:*

- ◆ Yes
- ◆ No

## Products and Services (Insurance and Pensions) (31.Pensions)

### Q2

Does your entity impose a restriction and/or limit on the total investment value of the pension product?

---

*Choose only one option:*

- ◆ Yes
- ◆ No

*or choose one of:*

- ◆ Not Applicable

## Products and Services (Insurance and Pensions) (40.Pensions)

### Q3

Has your entity terminated any terms of business with financial advisors due to ML/FT concerns?

---

*Choose only one option:*

- ◆ Yes
- ◆ No

*or choose one of:*

- ◆ Not Applicable
- ◆ Not Available

## Products and Services (Insurance and Pensions) (41.Pensions)

**Q4**

What are your entity's withdrawal formats?

---

*Choose only one option:*

- ♦ Lump-sum
- ♦ Regular Income
- ♦ Both

*or choose one of:*

- ♦ Not Available

**Products and Services (Insurance and Pensions) (42.Pensions)****Q5**

What was the total value (€) of withdrawals affected in the previous calendar year?

---

*or choose one of:*

- ♦ Not Available

**Products and Services (Insurance and Pensions) (43.Pensions)****Q6**

What was the total value (€) of withdrawals affected to the same beneficiary account?

---

*or choose one of:*

- ♦ Not Available

**Products and Services (Insurance and Pensions) (44.Pensions)**

**Q7**

What was the value (€) of withdrawals affect to third party accounts?

or choose one of:

- Not Available

## Products and Services (Insurance and Pensions) (45.Pensions)

**Q8**

Please indicate the total value (€) of assets under management, as at the end of the previous calendar year.

or choose one of:

- Not Available

## Products and Services (Insurance and Pensions) (46.Pensions)

How many new applications were processed in the previous calendar year?

<p><b>Q9</b></p> <p>(a) volume (#) (number of applications)</p>	<input type="text"/> or choose one of: <ul style="list-style-type: none"> <li>• Not Available</li> </ul>
<p><b>Q10</b></p> <p>(b) value (€)</p>	<input type="text"/> or choose one of: <ul style="list-style-type: none"> <li>• Not Available</li> </ul>

## Products and Services (Insurance and Pensions) (47.Pensions)



**Q11**

Does your entity allow its customers to finance their new pension schemes with 'in specie' transfers?

*Transferring an asset 'in specie' means to transfer the ownership of that asset from one person/company/entity to another person/company/entity in its current form, that is without the need to convert the asset to cash.*

---

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

**Products and Services (Insurance and Pensions) (48.Pensions)**

**Q12**

How many new applications were funded partially and/or completely through 'in specie' transfers?

---

**Products and Services (Insurance and Pensions) (49.Pensions)**

**Q13**

What was the total value (€) of 'in specie' transfer in received during the prior calendar year?

---

**Products and Services (Insurance and Pensions) (50.Pensions)**

**Q14**

What was the highest value (€) of the pension product, in the prior calendar year ?

---

or choose one of:

- Not Available

**Products and Services (Insurance and Pensions) (51.Pensions)**

**Q15**

Does your entity allow its customers to carry out top-ups to existent pension products?

---

Choose only one option:

- Yes
- No

**Products and Services (Insurance and Pensions) (52.Pensions)**

**Q16**

What was the total value (€) of top-ups to existent pension products, in the prior calendar year?

---

or choose one of:

- Not Available

**Products and Services (Insurance and Pensions) (53.Pensions)**

**Q17**

Is there a maximum top-up threshold amount?

---

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

**Q18**

Please indicate the maximum threshold amount (€)

---

or choose one of:

- ◆ Not Applicable

**Products and Services (Insurance and Pensions) (54.Pensions)****Q19**

Are cash top-ups allowed?

---

Choose only one option:

- ◆ Yes
- ◆ No

or choose one of:

- ◆ Not Applicable

**Products and Services (Insurance and Pensions) (55.Pensions)****Q20**

What was the value (€) of cash top-ups to existent pension products in the prior calendar year?

---

or choose one of:

- ◆ Not Available

**Products and Services (Insurance and Pensions) (56.Pensions)**

**Q21**

What was the highest value (€) of cash top-ups to existent pensions products in the prior calendar year?

---

or choose one of:

- Not Available

**Products and Services (Insurance and Pensions) (57.Pensions)****Q22**

Does your entity allow its customers to surrender pension products earlier than maturity?

---

Choose only one option:

- Yes
- No

**Products and Services (Insurance and Pensions) (58.Pensions)****Q23**

What is the minimum time-period (#) after which a customer can surrender the pension product?

---

**Products and Services (Insurance and Pensions) (59.Pensions)****Q24**

What was the total number (#) of pension products applications that were surrendered in the prior calendar year

---

**Products and Services (Insurance and Pensions) (60.Pensions)**

**Q25**

What was the total value (€) of surrendered pension products in the previous calendar year

*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.*

---

**Products and Services (Insurance and Pensions) (61.Pensions)****Q26**

What was the total value (#) of surrendered pension products in the prior calendar year?

---

**Products and Services (Insurance and Pensions) (62.Pensions)****Q27**

What was the highest value (#) of surrendered pension product in the prior calendar year?

---

# De-Risking Risks

## De-Risking Risks (1)

### Q1

Were any of the products and/or services provided to you as a subject person, ceased due to de-risking practices during the prior calendar year?

*"Experiencing de-risking" refers to a process being carried out by a service provider which includes terminating or restricting business relationships with you/ your entity, to avoid, rather than manage risk.*

---

Choose only one option:

- Yes
- No

## De-Risking Risks (2)

### Q2

Provide details of the de-risking

*Such reasons should include why and whether it was completely ceased their business relationship or was subject to limited services.*

---

# Customers

## Customers (17.Pensions)

### Q1

Please list the total number of customers (as at the end of the prior calendar year) with whom your entity had an active business relationship.

*Customer is defined as natural person or a legal person / entity with whom the subject person has a business relationship or for whom the subject person carried out an occasional transaction. In this context, customers refers to active customers as at the end of the prior calendar year. Customer in terms of insurance is defined as the "policyholder" and / or "insured". "Insured" is defined as the party to whom, or on whose account, or to whose beneficiaries, a sum of money or other consideration is payable under a contract of insurance on the happening of a specified event; "policyholder" is defined as the person who is the legal holder of the policy for securing the contract with the insurer. In their response to questions, respondents should only take into consideration relevant financial business, that is customers relating to long term insurance business. Where a subject person offers more than one service to the same customer, it should count the customer as one to avoid duplication*

---

or choose one of:

- Not Available

## Customers (29)

**Q2**

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 (Insurance) (2.Pensions)

*Of the total number of customers, what % are rated as:*

**Q3**

a) "High Risk"

*The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.*

---



*or choose one of:*

- Not Available

## Customers (Insurance) (3.Pensions)

*Of the total number of customers, what % are rated as:*



**Q4**

## b) "Medium Risk"

*The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.*

---



or choose one of:

- ◆ Not Available

**Customers (Insurance) (6.Pensions)**

*Of the total number of customers, what % are rated as:*

**Q5**

## e) "Low Risk"

*The risk rating of your customers should be as at the end of the prior calendar period. The risk rating should reflect the result of the latest customer risk assessment as carried out in line with the policies and procedures.*

---



or choose one of:

- ◆ Not Available

**Customers (Insurance) (7.Pensions)****Q6**

Are there customers that have a risk rating outside of the "high", "medium" and "low" categories?

*Choose only one option:*

- ◆ Yes
- ◆ No

**Customers (Insurance) (8.Pensions)**

**Q7**

If yes, please specify the additional risk rating.

---

or choose one of:

- Not Available

**Customers (Insurance) (9.Pensions)****Q8**

Please specify the number of customers in the additional risk category specified in the prior question.

---

or choose one of:

- Not Available

**Customers (Insurance) (12.Pensions)****Q9**

Does your entity have customers for which instructions are received directly from a discretionary fund manager?

*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. These may include portfolio management companies which use the entity's services to trade on behalf of their customers*

*'Yes' should only be chosen in instances were the respondent deals primarily with the third party and not the customer directly.*

---

Choose only one option:

- Yes
- No

**Customers (Insurance) (13.Pensions)**

**Q10**

Does your entity allow the on-boarding of customers with incomplete Customer Due Diligence?

---

Choose only one option:

- Yes
- No

**Customers (Insurance) (14.Pensions)****Q11**

If yes, how many customers were on-boarded with incomplete Customer Due Diligence?

---

**Customer Type (9.Pensions)****Q12**

Please list the number of customers 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 programs'), 'citizenships for sale' or 'golden passports'. They allow foreigners to be naturalized 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 Available

**Customer Type (39)**

**Q13**

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

---



or choose one of:

- Not Available

**PEPs (1)**

*PEPs refers to Politically Exposed Persons*

**Q14**

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 (20.Pensions)****Q15**

What is the % of long-term business customers were PEPs in the prior calendar year?

---



or choose one of:

- Not Applicable
- Not Available

## PEPs (21.Pensions)

### Q16

What is the % of long-term business customers were local PEPs in the prior calendar year?

---

or choose one of:

- Not Applicable
- Not Available

## PEPs (22.Pensions)

### Q17

What is the % of were long term business customers were PEPs from an EU or EEA jurisdiction, in the prior calendar year?

---

or choose one of:

- Not Applicable
- Not Available

## PEPs (23.Pensions)

### Q18

What is the % of long term business customers were PEPs 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.

*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

## PEPs (24)

**Q19**

If your answer to the above question was yes, please select the respective jurisdictions.

---

*Choose more than one option:*

- ◆ Albania
- ◆ Barbados
- ◆ Botswana
- ◆ Cape Verde
- ◆ Bahamas
- ◆ Democratic Republic of the 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

## Funding Methods (33.Pensions)

*Please indicate the following details for contributions made through bank transfers in EU/EEA (or equivalent safeguards), in the prior calendar year:*

**Q20**

a) Volume (#)

---


*or choose one of:*

- Not Applicable
- Not Available

**Funding Methods (34.Pensions)**

*Please indicate the following details for contributions made through bank transfers in EU/EEA (or equivalent safeguards), in the prior calendar year:*

**Q21**

b) Value (€)

*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

**Funding Methods (35.Pensions)**

*Please indicate the following details for premium contributions made through bank transfers in non-EU/EEA (or equivalent safeguards), in the prior calendar year:*

**Q22**

a) Volume (#)

*Insurance Intermediaries that are not handling premia should mark this question as 'Not applicable'.*

---


*or choose one of:*

- Not Applicable
- Not Available

**Funding Methods (36.Pensions)**

Please indicate the following details for premium contributions made through bank transfers in non-EU/EEA (or equivalent safeguards), in the prior calendar year:

**Q23**

## b) Value (€)

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

**Funding Methods (37.Pensions)**

Please indicate the following details for premium contributions made through debit/credit cards issued by EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:

**Q24**

## a) Volume (#)

---

or choose one of:

- Not Available

**Funding Methods (38.Pensions)**

Please indicate the following details for premium contributions made through debit/credit cards issued by EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:



**Q25**

## b) Value (€)

*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 Available

**Funding Methods (39.Pensions)**

*Please indicate the following details for premium contributions made through debit/credit cards issued by non-EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:*

**Q26**

## a) Volume (#)

---



or choose one of:

- ◆ Not Available

**Funding Methods (40.Pensions)**

*Please indicate the following details for premium contributions made through debit/credit cards issued by non-EU/EEA (or equivalent safeguards) banks or other licensed financial institutions:*

**Q27**

## b) Value (€)

*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 Available

**Funding Methods (41.Pensions)**

Please indicate the following details for premium contributions made through prepaid cards and/or vouchers:

**Q28**

a) Volume (#)

---

or choose one of:

- Not Available

**Funding Methods (42.Pensions)**

Please indicate the following details for premium contributions made through prepaid cards and/or vouchers:

**Q29**

b) Value (€)

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 Available

**Funding Methods (43.Pensions)**

Please indicate the following details for premium payments and/or contributions made through cash:

**Q30**

a) Volume (#)

---

or choose one of:

- Not Available

**Funding Methods (44.Pensions)**

Please indicate the following details for premium contributions made through cash:

**Q31****b) Value (€)**

*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 Available

**Additional (Customers) (2)****Q32**

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)**

**Q33**

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) (5)****Q34**

Please list the number of customers who operate cash intensive businesses.

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

---

or choose one of:

- Not Available

# Geography

## Residence of Customers + BOs (1)

*The percentage should reflect the total number of natural persons. Therefore where the customer is a legal entity, the response should take into consideration the beneficial owners. Example where there are 50 customers that are legal entities, each having 2 beneficial owners, the total will be 100 beneficial owners. Therefore the percentage should reflect the total number of customers, irrespective of whether they are beneficial owners of the same entity or otherwise.*

As at the end of the prior calendar year, what is the % of total customers and/or beneficial owners that are resident, or otherwise, incorporated or have their principal place of business in:

<p><b>Q1</b></p> <p>a) Malta?</p>	<input data-bbox="796 707 1505 779" type="text"/> or choose one of: <ul style="list-style-type: none"> <li>• Not Applicable</li> <li>• Not Available</li> </ul>
<p><b>Q2</b></p> <p>b) an EU/EEA jurisdiction, excluding Malta?</p> <p><i>Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.</i></p> <p><i>Principal place of business refers to the place where key management and commercial decisions that are necessary for the conduct of the business of an entity are made.</i></p>	<input data-bbox="796 958 1505 1030" type="text"/> or choose one of: <ul style="list-style-type: none"> <li>• Not Applicable</li> <li>• Not Available</li> </ul>
<p><b>Q3</b></p> <p>c) <u>an</u> non-EU/EEA jurisdiction?</p> <p><i>Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.</i></p> <p><i>Principal place of business refers to the place where key management and commercial decisions that are necessary for the conduct of the business of an entity are made.</i></p>	<input data-bbox="796 1570 1505 1641" type="text"/> or choose one of: <ul style="list-style-type: none"> <li>• Not Applicable</li> <li>• Not Available</li> </ul>

**Q4**

d) a jurisdiction listed in the FATF lists and/or in the EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index?

*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 Customers + BOs (5)



**Q5**

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

## Residence of Customers + BOs (6)

## Q6

Do any of the customers making part of the customer base provide goods and/or services (main markets) in, or to, 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 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>*

---

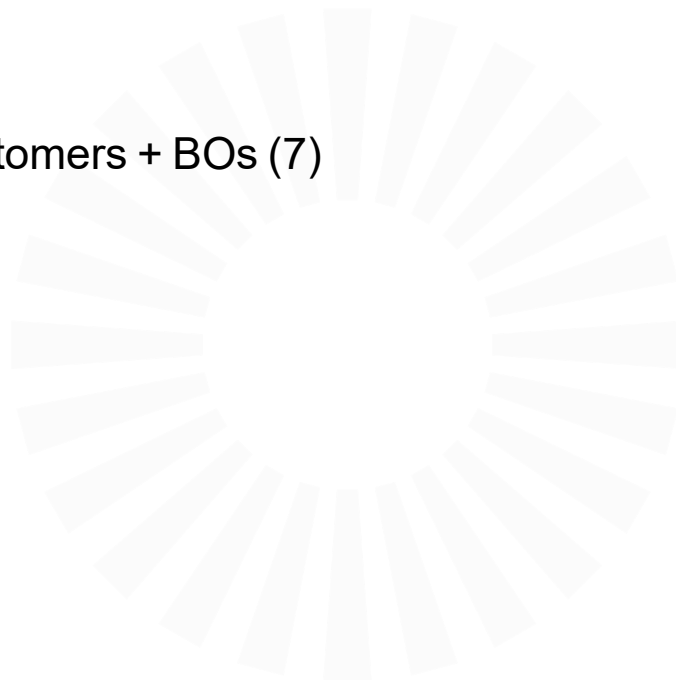
*Choose only one option:*

- ◆ Yes
- No

*or choose one of:*

- ◆ Not Available

## Residence of Customers + BOs (7)





**Q**

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
- Philippines
- South Sudan
- ◆ Turkey
- ◆ Democratic Republic of the Congo
- ◆ Mozambique
- ◆ Burkina Faso
- ◆ Jordan
- ◆ Mali
- Morocco
- ◆ China
- ◆ Cayman Islands
- ◆ Senegal
- ◆ Uganda
- Yemen
- ◆ Zimbabwe
- ◆ Haiti
- ◆ Nicaragua
- ◆ Pakistan
- ◆ Panama
- Syria
- ◆ Ghana
- Iran
- ◆ Jamaica
- ◆ Mauritius

*or choose one of:*

- ◆ Not Applicable
- Not Available

## Transactions / Payments (5.Pensions)

*Please indicate the following details for contribution payments paid out to cross border insured-persons or beneficiaries in the prior calendar year:*

**Q8**

## a) Volume (#)

---

or choose one of:

- Not Applicable
- Not Available

**Transactions / Payments (6.Pensions)**

*Please indicate the following details for contribution payments paid out to cross border insured-persons or beneficiaries in the prior calendar year:*

**Q9**

## b) Value (€)

*Where applicable, amounts are to 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

# Interface / Distribution Channels

## Interface / Distribution Channels (14.Pensions)

### Q1

What is the % of the customers who were onboarded on a non-face-to-face basis?

*Non- face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Examples include online postal or telephone sales.*

---

or choose one of:

- Not Applicable
- Not Available

## Interface / Distribution Channels (47)

### Q2

What is the % of customers whose Customer Due Diligence had been carried out by another subject person/third party, on the basis of a reliance agreement between your entity and the other subject person/third party?

*The PMLFTR permit 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*

---

or choose one of:

- Not Applicable
- Not Available