Risk Evaluation Questionnaire 2023

Financial Institutions

This document contains provisional questions which will be featured in the REQ for Financial Institutions for the year 2023. This document should be utilised by subject persons to initiate the gathering of the necessary information required to ensure timely and accurate submission of the 2023 REQ. Questions presented in this document may be subject to change should the FIAU deem it necessary. The 2023 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:

- Yes
- No

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:

- Yes
- No

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:

- Yes

- No

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:

- Yes
- No

Governance / Organization

Governance / Organization (1)

Q1

How many agents / distributors did your entity have at the end of the previous calendar year?

"Agent" means a person who acts on behalf of a financial institution in providing those services listed under the First Schedule of the Financial Institutions Act, other than issuing electronic money. "Distributor" has the same definition as included in the Investments Services Act. Reference to agents / distributors is made specifically to agents / distributors of the financial institution and should not include agents of the entity's customers (e.g. authorised signatories).

or choose one of:

- Not Applicable

Governance / Organization (2)

Q2

Has your entity terminated any agency / distributor relationship due to AML / CFT issues during the prior calendar year?

"Agent" means a person who acts on behalf of a financial institution in providing those services listed under the First Schedule of the Financial Institutions Act, other than issuing electronic money. "Distributor" has the same definition as included in the Investments Services Act. Reference to agents / distributors is made specifically to agents / distributors of the financial institution and should not include agents of the entity's customers (e.g. authorised signatories).

or choose one of:

- Not Applicable

Governance / Organization (3)

Q3

When was the current MLRO appointed?

Choose only one option:

- 5 or more years
- Between 3-5 years
- Between 1-2 years
- Less than 1 Year

Governance / Organization (4)

Q4

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

Choose only one option:

- 5 or more years
- Between 3-5 years
- Between 1-2 years
- Less than 1 Year

Governance / Organization (5)

Q5

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

Choose only one option:

- Yes
- No

Governance / Organization (6)

Q6

Does the MLRO also hold MLRO positions with other entities?

Choose only one option:

- Yes
- No

Governance / Organization (7)

Q7

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

Governance / Organization (8)

Q8

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

"AML / CFT team" refers to individual/s who are part of an organised setup within the entity whose responsibilities include the assistance / execution, in part or in whole, of the entity's obligations arising from the PMLFTR and IPs and the entity's policies and procedures. Employment in full-time equivalent is a conversion method used to measure the number of employees according to the number of hours worked. When using FTE a full-time employee working a 40 hour week is equivalent to 1, whereas a person who works 20 hours per week is equivalent to 0.5. Self employed should be included in the FTEs calculation. The reported number should exclude the MLRO

or choose one of:

- Not Applicable
- Not Available

Governance / Organization (10)

Q9

Is any of the AML / CFT team staff responsible for other roles and responsibilities not attributable to AML / CFT (e.g. front office / back office etc.)?

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

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Governance / Organization (12)

Q10

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:

Q11 a) regulatory enforcement actions, criminal investigations for ML/FT, or any other financial crime	*Choose only one option:* • Yes • No
Q12	*Choose only one option:*

b) subject to negative news reports or other adverse media	• Yes • No

Governance / Organization (15)

Q13

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)

Q14

If 'Yes' please explain.

Governance / Organization (15.5)

Q15

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

Choose only one option:

- Yes
- No

Governance / Organization (15.75)

Q16

If 'Yes' please explain.

Governance / Organization (16)

Q17

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 definition 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.

For the avoidance of doubt, the acquisition of software or access to commercial databases to assist in, or facilitate, the carrying out of AML/CFT obligations without any data or information belonging to the subject person being submitted to and processed by a third party is not to be considered as outsourcing.

Choose only one option:

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

Governance / Organization (16.5)

Q18

Please specify the obligations that are being outsourced.

Choose more than one option:

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

Governance / Organization (21)

Q19

Are any of the above-mentioned functions outsourced to service providers situated in a non-EU or non-EEA jurisdiction?

The outsourced functions referred to in this question, are those identified in Section 5.1.2 of the IPs Part 1. This question should also be answered as 'Yes' should the subject person outsource 2 functions to service providers in EU/EEA jurisdictions and 1 function in non-EU/EEA jurisdictions.

Choose only one option:

- Yes
- No

Governance / Organization (24)

Q20

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

Choose only one option:

- Yes
- No

Governance / Organization (25)

Q21

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 (5)

Q2

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 (4)

Q3

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 (7)

Q4

Does your entity's policies and procedures provide for measures to determine whether customers and, where applicable, their beneficial owners, are politically exposed persons (PEPs) or PEPs' family members or close associates, prior to the commencement of service and during the course of the business relationship?

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, prior to the commencement of service only
- Yes, during the course of the business relationship only
- Yes, for both
- No, never

Policies and Procedures (8)

Q5

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)

Q6

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

Choose only one option:

- Yes
- No

Policies and Procedures (13)

Q7

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

Choose only one option:

- Yes
- No

Policies and Procedures (13.25)

Q8

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

Choose only one option:

- Yes
- No

Policies and Procedures (13.5)

Q9

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

Choose only one option:

- Yes
- No

Policies and Procedures (15)

Q10

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

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (38)

Q11

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

The application of 'hierarchical authorisation' 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

Policies and Procedures (16)

Q12

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 (18)

In case of business relationships, does your entity's policies and procedures require you to:

Q13 a) systematically monitor customer activity or transactions, on a risk sensitive basis	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q14 b) perform a more detailed review when unusual activity or transactions are detected	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable

Customer Acceptance and Risk Assessment (49)

Q15

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

Policies and Procedures (19)

Q16

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)

Q17

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 (26)

Q18

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

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (70)

Q19

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)

Q20

Do the policies and procedures require due diligence (including customer risk assessment) to be repeated when there are doubts about the completeness, reliability or accuracy on priorly obtained customer identification information, data or documentation?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (76)

Q21

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

Policies and Procedures (33)

Q22

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)

Q23

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)

Q24

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)

Q25

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:

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

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:

Q4 a) the entity's customers	*Choose only one option:* • Yes • No
Q5 b) the products or services offered by the entity	*Choose only one option:* • Yes • No
Q6 c) specific countries or geographical areas	*Choose only one option:* • Yes • No
Q7 d) distribution channels	*Choose only one option:* • Yes • No

Business Risk Assessment (7)

Q8

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

Choose only one option:

- Yes
- No

Business Risk Assessment (8)

Q9

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

'Senior management' differs according to the type of setup of the entity. It intends to capture individual(s):

a) who are responsible for taking strategic decisions that fundamentally effect the business operations or general direction of that entity; and

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

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

Choose only one option:

- Yes
- No

Business Risk Assessment (4)

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:

Q3 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.	*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
Q4	*Choose only one option:*

b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring that persons are duly authorised in writing	• No • Yes- when risk is not low • Yes- only when risk is high • Yes - always *or choose one of:* • Not Applicable
Q5 c) Information on the PEP status of the customer and of the beneficial owner, where applicable.	*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
Q6 d) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover or other income streams)	*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
Q7 e) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	*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 (12)

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

Q8	*Choose only one*

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.	*option:* • No • Yes- when risk is not low • Yes- only when risk is high • Yes - always *or choose one of:* • Not Applicable
Q9 b) Where applicable, identification and verification of persons acting on behalf of the customer, including ensuring that persons are duly authorised in writing	*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
Q10 c) Information on the PEP status of the customer and of the beneficial owner, where applicable.	*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
Q11 d) Information on the overall wealth of the customer (nature of activities conducted and corresponding level of income or turnover or other income streams)	*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
Q12 e) Information on the expected source and origin of the funds and / or assets transacted by the customer / on behalf of the customer	*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 (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 (44)

Q14

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 (45)

Q15

Does your entity identify and verify the agents and/or distributors?

"Agent" means a person who acts on behalf of a financial institution in providing those services listed under the First Schedule of the Financial Institutions Act, other than issuing electronic money. "Distributor" has the same definition as included in the Investments Services Act. Reference to agents / distributors is made specifically to agents / distributors of the financial institution and should not include agents of the entity's customers (e.g. authorised signatories).

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (55)

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

Q16 a) Verification on the basis of documents *Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.*	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q17 b) Use of video conferencing tools *Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.*	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q18 c) Use of identity verification software *Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.*	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q19 d) Verification through the use of commercial electronic data providers *Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.*	*Choose only one option:* • Yes • No *or choose one of:*

	• Not Applicable
Q20 e) Use of e-IDs *Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.*	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q21 f) Verification through the use of Identity Platforms *Respondents should only select the "Not Applicable" option in their reply, when, in accordance with the subject persons' policies and procedures, it is not permitted to onboard customers on a non-face-to-face basis.*	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable

Customer Acceptance and Risk Assessment (64)

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

Q22 a) Rely on publicly available information	*Choose only one option:* • Yes • No
Q23 b) Obtain information directly from the customer and/or, where applicable, beneficial owner	*Choose only one option:* • Yes • No
Q24 c) Use commercial databases	*Choose only one option:* • Yes • No

Customer Acceptance and Risk Assessment (67)

Q25

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?

Q26 a) Transaction customer activity threshold	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q27 b) Pre-determined time frame	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q28 c) Prior to completion of service provided	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable

Customer Acceptance and Risk Assessment (69)

Q29

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 (77)

Q30

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

or choose one of:

- Not Available

Customer Acceptance and Risk Assessment (81)

Q31

Are customer identification measures applied each time the payer accesses the entity's services and/or products through remote electronic channels of communication?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (82)

Q32

Does your entity have a system in place to monitor the location (such as IP addresses) from where the services are being accessed, in case of electronic fund transfer or electronic money remittance or the purchase of any other product/service through electronic means?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (83)

Q33

In cases where your entity utilises agents to market its products/services, do policies and procedures state what action needs to be taken, if the agent fails to provide the originator information upon request?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (84)

Q34

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:

Q35 a) Low risk Customers	*Choose only one option:* • Immediately upon material change • Annually • Every 2-3 years • More than every 3 years • Never • Less than 1 year • Trigger event based *or choose one of:* • Not Applicable
Q36 b) Medium Risk Customers	*Choose only one option:* • Immediately upon material change • Annually • Every 2-3 years • More than every 3 years • Never • Less than 1 year • Trigger event based *or choose one of:* • Not Applicable
Q37 c) High Risk Customers	*Choose only one option:* • Immediately upon material change • Annually • Every 2-3 years • More than every 3 years • Never • Less than 1 year • Trigger event based *or choose one of:* • Not Applicable

Customer Acceptance and Risk Assessment (86)

Q38

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 (90)

Q39

Does the Customer Due Diligence and/or monitoring system identify frequent changes in the customer's identification data, such as home address, IP address or linked bank accounts?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (91)

Q40

Do policies and procedures require your entity to understand the rationale and the source of funding of transactions happening in the context of an occasional transaction, on a risk sensitive basis?

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 utilised 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*	*Choose only one option:* • As necessary but at least annually • Annually • Every 18 months • Every 2-3 years • More than every 3 years • Never

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*	*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 (7)

Q7

Where your entity provides payment services, are these services made available online?

Reference is made to payment services which are accessed by the customer through the use of an online portal / platform which is made available by the subject person. Respondents that do not provide payment services should select the 'Not Applicable' option in their response.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (8)

Q8

Where your entity provides payment services are all Payment Service Provider (PSP) related systems fully automated?

This question should be marked as 'Not applicable' by those entities which do not provide payment services.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (9)

Q9

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)

Q10

Which techniques are utilised 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)

Q11

How often are the criteria and rules utilised 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 (11.5)

Q12

Is your monitoring system able to detect transafers made from one or more payers in different countries to a local payee?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (12)

Q13

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

Choose only one option:

- Post Event
- Real-time
- Combination of both

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (14.5)

Q14

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)

Q15

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)

Q16

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)

Q17

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:

Q18 a) The characteristics of the products and services offered	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q19	*Choose only one option:*

b) The characteristics of the customers	• Yes • No *or choose one of:* • Not Applicable
Q20 c) The characteristics of the relevant countries and geographical areas	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q21 d) The characteristics of the distribution channels used	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q22 e) The payment method/payment transaction used by the customer	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q23 f) Other factors	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable

Ongoing Monitoring / Transaction Scrutiny (25)

Q24

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)

Q25

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

Choose only one option:

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

Ongoing Monitoring / Transaction Scrutiny (26)

Q26

Does your entity have systems in place to detect instances where services and/or products offered to the customer, may be accessed by persons other than the customer?

An example of system controls that a subject person may have in place includes the identification of when a service / product is used from several IP addresses at the same time.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (28)

Q27

Of the total alerts generated by the monitoring system, how many resulted in internal investigations during the prior calendar year?

or choose one of:

- Not Applicable
- Not Available

Ongoing Monitoring / Transaction Scrutiny (29)

Q28

Does the monitoring system in place identify linked transactions?

Linked transactions' refers to a series of transactions by a legitimate customer, or they may be transactions that appear to be independent, but are in fact split into two or more transactions to avoid detection. This typically happens when a customer tries to avoid anti-money laundering controls by splitting transactions into several smaller amounts.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (33)

Q29

Does the monitoring system in place identify whether transactions from different customers are destined for the same payee?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (34)

Q30

Does the monitoring system in place establish from where funds are being remitted and where funds are being received?

Choose only one option:

- No
- Yes, when the funds are received
- Yes, when the funds are remitted
- Yes, in both instances

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (35)

Q31

Does the monitoring system identify discrepancies between submitted and detected information?

The response should include instances where there are discrepencies between identified country of origin information and the electronically detected IP address.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (37)

Q32

Do you have a monitoring system in place to detect transactions involving countries present in the following list?

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)

Q33

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 (45)

Q34

Does the system identify unusual use of the service provided?

Unusual use of service provided' refers to instances such as when the customers send or receive money to or from themselves or, send funds immediately upon receiving them.

Choose only one option:

- Yes
- No

Ongoing Monitoring / Transaction Scrutiny (46)

Q35

Does the monitoring system detect incoming fund transfers, which have missing or incomplete information on the payer and / or payee?

Choose only one option:

- Yes

- No

Ongoing Monitoring / Transaction Scrutiny (47)

Q36

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 (49)

Q37

Does your entity consider whether transactions carried out through agents have an unusual pattern, when comparing one with the other?

Examples of unusual patterns may include unusually high or low transaction sizes; unusually large cash transactions; a high number of transactions that fall just below the customer due diligence threshold; business undertaken outside normal business hours. Subject persons that do not carry out transactions through agent should select the 'Not Applicable' option in their response

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (50)

Q38

How many fund transfers, with missing or incomplete information, did your entity detect in the prior calendar year?

or choose one of:

- Not Applicable
- Not Available

Ongoing Monitoring / Transaction Scrutiny (51)

Q39

How many of these transfer of funds did your entity suspend or refuse to execute?

or choose one of:

- Not Applicable
- Not Available

Ongoing Monitoring / Transaction Scrutiny (52)

Q40

Did your entity terminate any relationship with a payment service provider in the prior calendar year, due to the provider repeatedly failing to provide the necessary information on the payer and/or payee?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Internal Audit / Independent Testing

Internal Audit / Independent Testing (0.5)

Q1

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

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

Choose only one option:

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

Internal Audit / Independent Testing (0.75)

Q2

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

Choose only one option:

- Yes
- No

Internal Audit / Independent Testing (1)

Q3

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

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

Choose only one option:

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

Internal Audit / Independent Testing (3)

Q4

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

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

(a) the appointment of an officer at management level whose duties are to include monitoring of the day-to-day implementation of the measures, policies, controls and procedures adopted by the subject person; and

(b) the implementation of an independent audit function to test the said internal measures, policies, controls and procedures from time to time.

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

Choose only one option:

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

or choose one of:

- Not Applicable

Internal Audit / Independent Testing (4)

Q5

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

Choose only one option:

- Quarterly
- Half Yearly
- Annually
- Between 1-3 years
- Every 3 or more years
- As needed
- No Reviews performed

or choose one of:

- Not Applicable

Internal Audit / Independent Testing (6)

Q6

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

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

Choose only one option:

- Satisfactory
- Satisfactory but improvements required
- Unsatisfactory

or choose one of:

- Not Applicable

Internal Audit / Independent Testing (7)

Q7

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

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

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

or choose one of:

- Not Applicable
- Not Available

Internal Audit / Independent Testing (8)

Q8

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

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

or choose one of:

- Not Applicable
- Not Available

Internal Audit / Independent Testing (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 pary 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

Internal Audit / Independent Testing (14)

Q12

Does your entity carry out reviews of its agents / distributors to assess the application of your entity's AML / CFT policies and procedures?

"Agent" means a person who acts on behalf of a financial institution in providing those services listed under the First Schedule of the Financial Institutions Act, other than issuing electronic money. "Distributor" has the same definition as included in the Investments Services Act. Reference to agents / distributors is made specifically to agents / distributors of the financial institution and should not include agents of the entity's customers (e.g. authorised signatories)

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Internal Audit / Independent Testing (15)

Q13

If yes, how regular are reviews carried out?

Choose only one option:

- Monthly
- Quarterly
- Half Yearly
- Annually
- Between 1-3 years
- Every 3 or more years
- As needed

or choose one of:

- Not Applicable

Reporting

Reporting (2)

Q1

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)

Q2

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)

Q3

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)

Q4

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)

Q5

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

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

Choose only one option:

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

or choose one of:

- Not Applicable
- Not Available

Reporting (10)

Q6

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
- Only internal reports maintained
- Yes, internal report & analysis maintained

Reporting (11)

Q7

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 (12)

Q8

Did you entity file any reports with the FIAU in terms of Regulation (EU) 2015/847 on any payment service providers, for repeatedly not providing the necessary information on the payer and/or payee?

Choose only one option:

- Yes
- No

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:

Q6	*Choose only one option:*

a) specific Maltese AML / CFT regulations (PMLA, PMLFTR, IPs) *Outsourced providers staff' makes reference to the individuals directly involved in assisting the subject person with AML / CFT measures*	• Yes • No *or choose one of:* • Not Applicable
Q7 b) AML / CFT policies and procedures relating to the subject person *Outsourced providers staff' makes reference to the individuals directly involved in assisting the subject person with AML / CFT measures*	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable

AML / CFT Training (11)

Q8

Does your entity provide AML / CFT training to agents to ensure that agents have an adequate understanding of relevant ML / FT risks, and of the AML / CFT policies and procedures they are to apply?

"Agent" means a person who acts on behalf of a financial institution in providing those services listed under the First Schedule of the Financial Institutions Act, other than issuing electronic money.

Choose only one option:

- Yes
- No

AML / CFT Training (16)

Q9

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)

Q10

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 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?

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

Customers

Customers (2)

Q1

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

Customer is defined as a natural person or a legal person and/or 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 beginning of the prior calendar year.

For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.

or choose one of:

- Not Available

Customers (8)

Q2

Please list the total number of customer relationships which were closed and/or terminated during the prior calendar year.

"Terminated" refers to customer relationships which were closed during the prior calendar year. The term 'terminated' should be interpreted in its widest form and be inclusive of any closed relationship, independent of the reason behind such closure. Closure should not necessarily relate to AML / CFT reasons but should include all kinds of terminations such as:

a) Terminations that were initiated by the customer and/ or;

b) Relationships that were closed during a process of de-risking

For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.

or choose one of:

- Not Available

Customers (10)

Q3

Please list the total number of customers for whom your entity carried out an occasional transaction during the prior calendar year.

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 refer to customers for whom the subject person carried out an occasional transaction during the prior calendar year. Where a subject person carried out more than one occasional transaction to the same customer, it should count the customer as one to avoid duplication. "Total number of customers" only includes those clients that have been provided with a relevant activity by the subject person.

For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.

or choose one of:

- Not Available

Customers (18)

Q4

Please list the total number of new customers onboarded during the prior calendar year.

"Onboarding" refers to the process through which a business relationship is established or an occasional transaction is carried out. "Total number of customers" only includes those clients that have been provided with a relevant activity by the subject person.

For subject persons authorised to act as a trustee or to provide other fiduciary duties in terms of the Trusts and Trustees Act, and persons registered to act as a VFA Agent in terms of the Virtual Financial Assets Act shall include in the answer the number of customers to which CSP services are provided to.

or choose one of:

- Not Available

Customers (29)

Q5

Do you have any customers in the following industries?

Choose more than one option:

- Precious metals, stones, jewelry dealers or wholesalers
- Arts or Antiques dealers
- Aviation technology, materials or Parts
- Cash intensive businesses
- Hydrocarbon trading or investing
- Arms or weapons dealers or manufacturers
- Car dealers
- Remote Gaming Operators or Land Based Casinos
- Attorneys / Lawyers
- Chemical, Oil, Gas or Petrochemicals companies

- International Transportation businesses (including by air, land or sea)
- Import or Export Agents

or choose one of:

- Not Applicable
- Not Available

Funding Methods (Customers) (1)

Please provide the total number of customers who utilised the following funding method during the prior calendar year:

Q6

Wire Transfers (Bank Transfers)

or choose one of:

- Not Applicable
- Not Available

Funding Methods (Customers) (2)

Please provide the total number of customers who utilised the following funding method during the prior calendar year:

Q7

Cash

or choose one of:

- Not Applicable
- Not Available

Funding Methods (Customers) (3)

Please provide the total number of customers who utilised the following funding methods during the prior calendar year:

Q8

Debit Cards

Funding methods refers to the payment sources from where the funds for payment transactions were received. Customers using debit / credit cards issued by financial institutions other than banks should also be included in calculation of customers required for this question.

or choose one of:

- Not Applicable
- Not Available

Funding Methods (Customers) (4)

Please provide the total number of customers who utilised the following funding methods during the prior calendar year:

Q9

Credit Cards / Prepaid Cards / Vouchers

or choose one of:

- Not Applicable
- Not Available

Funding Methods (Customers) (5)

Please provide the total number of customers who utilised the following funding method during the prior calendar year:

Q10

Cheques

or choose one of:

- Not Applicable
- Not Available

Funding Methods (Customers) (6)

Please provide the total number of customers who utilised the following funding method during the prior calendar year:

Q11

Internet-based payment systems or other e-money services (as defined by FATF)

Internet-based payment services provide mechanisms for customers to access, via the Internet, pre-funded accounts which can be used to transfer the electronic money or value held in those accounts to other individuals or businesses which also hold accounts with the same provider. The recipient then redeems the value from the issuer by making payments or withdrawing the funds. Many Internet-based payment services use a variety of business models. These services are referred to as digital wallets, digital currencies, virtual currencies or electronic money. E-money is a digital representation of fiat currency used to electronically transfer value denominated in fiat currency i.e., it electronically transfers value that has legal tender status. Internet-based payment systems include PayPal, Alipay, Apple Pay, Google Checkout

or choose one of:

- Not Applicable
- Not Available

Funding Methods (Customers) (9)

Please provide the total number of customers who utilised the following funding methods during the prior calendar year:

Q12

Virtual Financial Assets

Virtual digital assets (virtual currencies) are a digital representation of value that can be digitally traded and functions as: (1) a medium of exchange; and/or (2) a unit of account; and/or (3) a store of value, but does not have legal tender status (i.e. when tendered to a creditor, is a valid and legal offer of payment) in any jurisdiction. Virtual currencies are not issued nor guaranteed by any jurisdiction, and fulfils the above functions only by agreement within the community of users of the virtual assets. Virtual currencies are distinct from e-money, which is a digital representation of fiat currency used to electronically transfer value denominated in fiat currency. Digital currency can mean a digital representation of either virtual currency (non-fiat) or e-money (fiat) and thus is often used interchangeably with the term 'virtual currency'

or choose one of:

- Not Applicable
- Not Available

Customer Type (5)

Please state the % of total customers as at the end of the prior calendar year for the following:

Q13

a) Natural persons

or choose one of:

- Not Available

Q14

b) Legal persons

or choose one of:

- Not Available

Customer Type (7)

Please state the % of total customers as at the end of the prior calendar year for the following:

Q15

c) Customers with complex structures

Customers reported under in the previous question should be reflected in this question. The term complex structure refers to an ownership structure that includes (but is not limited to) foundations, charities, not-profit organisations, offshore vehicles trusts, or other legal arrangements including bearer shares and nominee shareholding. The term offshore refers to jurisdictions that have distinctive characteristics such as low or zero taxation, tax secrecy and possibly lack of transparency. You are kindly requested to refer to the EU list of Non-Cooperative Jurisdictions. The list can be found in the following link: https://cfr.gov.mt/en/inlandrevenue/tcu/Pages/EU- List-of-non-cooperative-jurisdictions.aspx. All arrangements, as applicable, irrespective of whether these are Maltese or otherwise should be included in your response.

or choose one of:

- Not Available

Customer Type (9)

Q16

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

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

The answer provided should include all the customers of the subject person who have benefitted or applied to benefit from CIPs, irrespective wether the application for the CIP was done by the SP.

or choose one of:

- Not Available

Customer Type (31)

Of the total number of active customers, please specify the % of:

Q17

a) customers rated as 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

Customer Type (32)

Of the total number of active customers, please specify the % of:

Q18

b) customers rated as 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

Customer Type (33)

Of the total number of active customers, please specify the % of:

Q19

c) customers rated as 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

Customer Type (36)

Q20

Does your customer base have a risk rating outside of the 'high', 'medium' and 'low' categories?

Choose only one option:

- Yes
- No

Customer Type (37)

Q21

Please specify the additional risk rating/s.

or choose one of:

- Not Applicable

Customer Type (39)

Q22

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

or choose one of:

- Not Available

Customers (Others) (6)

Q23

Do shell companies form part of the customer base?

A shell company is an incorporated company with no independent operations, significant assets, ongoing business activities or employees.

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Customers (Others) (9)

Q24

Are express trusts, which are trusts with unexplained nature of classes of beneficiaries and acting as trustees of such a trust, part of the customer base?

An express trust is a trust created in express terms, and usually in writing, as distinguished from one inferred by the law from the conduct or dealings of the parties which are expressed by the settlor. In an express trust, the intention to set up the trust is clearly and openly expressed.

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Customers (Others) (19)

Q25

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

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

or choose one of:

- Not Applicable
- Not Available

PEPs (1)

PEPs refers to Politically Exposed Persons

Q26

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%20Gazette%20-%206th%20April.pdf]. In relation to those services specified above (contracts of sale published managing money securities or assets on behalf of clients by way of investment; providing trust or company services; opening or management of bank savings or securities accounts; organization of contributions/funding for the creation operation or management of companies; provision of tax advice).

or choose one of:

- Not Applicable
- Not Available

PEPs (2)

Q27

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

or choose one of:

- Not Applicable
- Not Available

PEPs (3)

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

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

Q28 a) the % of Maltese PEPs (including beneficial owners), in the prior calendar year *Regulation 2(1) of the PMLFTR defines a PEP as a natural person who is or has been entrusted with a prominent public function, other than middle ranking or more junior officials. The PMLFTR The Government Gazette no. 20,602 published on 6 April, 2021 provides an exhaustive list of public functions that are considered to be prominent public functions and would therefore render the holder thereof a PEP. Regulation 11(8) of the PMLFTR defines the term "family members" as including:* *(i) the spouse, or a person considered to be equivalent to a spouse;* *(ii) the children and their spouses, or persons considered to be equivalent to a spouse; and* *(iii) the parents.* *The list of 'family members' is not an exhaustive list and therefore subject persons should consider whether other family relationships in specific circumstances may be considered to be similar to those under the indicative list in the PMLFTR. Regulation 11(8) also defines the term "close associates" as:* *(i) a natural person known to have joint beneficial ownership of a body corporate or any other form of legal arrangement, or any other close business relations, with that politically exposed person;* *(ii) a natural person who has sole beneficial ownership of a body corporate or any other form of legal arrangement that is known to have been established for the benefit of that politically exposed person.*	*or choose one of:* • Not Available
Q29 b) the % of PEPs (including beneficial owners) from EU/EEA jurisdictions (other than Malta), in the prior calendar year	*or choose one of:* • Not Available
Q30 c) the % of PEPs (including beneficial owners) from non-EU/EEA jurisdictions, in the prior calendar year	*or choose one of:* • Not Available
Q31 d) the % of PEPs (including beneficial owners) from jurisdictions listed in the FATF lists and/or, the EU lists identifying high-risk 3rd countries with strategic deficiencies, and/or the jurisdictions featuring in the top 20 countries of the Basel Index, in the prior calendar year *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

PEPs (7)

Q32

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

Choose more than one option:

- Afghanistan
- Albania
- Barbados
- Benin
- Burkina Faso
- Cambodia
- Cameroon
- Cayman Islands
- Democratic People's Republic of Korea
- Democratic Republic of the Congo
- Eswatini
- Gibraltar
- Guinea-Bissau
- Haiti
- Iran
- Jamaica
- Jordan
- Madagascar
- Mali
- Mauritania
- Morocco
- Mozambique
- Myanmar
- Nicaragua
- Nigeria
- Pakistan
- Panama
- Philippines
- Senegal
- Sierra Leone
- South Sudan
- Syria
- Tanzania
- Tonga
- Trinidad and Tobago
- Türkiye
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Zimbabwe

or choose one of:

- Not Applicable
- Not Available

Additional (Customers) (2)

Q33

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)

Q34

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)

Q35

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

Additional (Customers) (6)

Q36

Please list the number of customers also carrying out Relevant Financial Business in terms of Regulation 2 of the PMLFTR.

or choose one of:

- Not Available

Additional (Customers) (7)

Q37

In the case where Simplified Due Diligence was applied, for how many relationships is the beneficial owner unknown?

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. In accordance with Regulation 10(1) of the PMLFTR, simplified customer due diligence may be applied: (a) in relation to activities or services that are determined by the Financial Intelligence Analysis Unit to represent a low risk of money laundering and funding of terrorism, having taken into consideration the findings of any national risk assessment and any other relevant factors as maybe deemed appropriate; or (b) where, on the basis of the risk assessment carried out in accordance with regulation 5(1), the subject person determines that any occasional transaction or a business relationship represents a low risk of money laundering and funding of terrorism.

or choose one of:

- Not Available

Additional (Customers) (8)

Q38

What is the total withdrawal amount relating to the relationships where the beneficial owner is unknown due to the application of Simplified Due Diligence, during the prior calendar year?

Subject persons are only required to provide the requested information for customers that are legal persons or legal arrangements. 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. In accordance with Regulation 10(1) of the PMLFTR, simplified customer due diligence may be applied: (a) in relation to activities or services that are determined by the Financial Intelligence Analysis Unit to represent a low risk of money laundering and funding of terrorism, having taken into consideration the findings of any national risk assessment and any other relevant factors as maybe deemed appropriate; or (b) where, on the basis of the risk assessment carried out in accordance with regulation 5(1), the subject person determines that any occasional transaction or a business relationship represents a low risk of money laundering and funding of terrorism

or choose one of:

- Not Available

Additional (Customers) (8.5)

Q39

What is the total withdrawal amount relating to the relationships where the beneficial owner is unknown due to the application of Simplified Due Diligence, during the prior calendar year?

Products and Services

Products and Services (Financial Institutions)

Q1

Out of the following, please tick the products and services that have been offered by your entity as a Financial Institution:

Choose more than one option:

- Correspondent Activity
- Loans
- Credit Cards
- Currency Exchange Services
- Money Remittance
- E-Money
- Prepaid Cards

or choose one of:

- Not Applicable
- Not Available

Correspondent activity (4)

Please indicate the following for correspondent activity where the entity was a corrrespondent in the prior calendar year:

Q2

Please indicate the total number (#) of respondents to whom you offer correspondent services.

The answer to this question should include the number of distinct customers (respondents), rather than the number of accounts. Therefore if a customer has 5 accounts, the reply should be 1.

or choose one of:

- Not Available

Q3

How many new respondents were onboarded during the prior calendar year?

The answer to this question should include the number of distinct customers (respondents), rather than the number of accounts. Therefore if a customer has 5 accounts, the reply should be 1.

or choose one of:

- Not Available

Correspondent activity (5)

Please indicate the following for correspondent activity where the entity was a corrrespondent in the prior calendar year:

Q4

Does your entity allow for correspondent activity relationships to include the opening of payable-through accounts?

Payable-through accounts shall be construed to mean an account which allows the respondent entity's customers to carry out transactions directly on the account of the respondent.

Choose only one option:

- Yes
- No

Q5

Has any respondent entity terminated its relationship with your entity in the prior calendar year?

The answer to this question should include relationships that where terminated because the respondent decided to close the relationship.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Q6

Has your entity terminated its relationship with a respondent entity in the prior calendar year?

The answer to this question should include relationships that where terminated by your entity with the respondent, following a decision taken by your entity.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Q7

Has any correspondent entity terminated its relationship with your entity (where your entity is the respondent), during the prior calendar year?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Q8

Could the accounts placed at the disposal of your respondent, as listed above, be used by other respondent banks/financial entities that have a direct relationship with the respondent, but not with your entity (commonly referred to as "nesting" or downstream correspondent activity) which means that your entity (correspondent) is indirectly providing services to other banks/financial entities that are not the respondent?

Choose only one option:

- Yes
- No

Correspondent activity (6)

Please indicate the following for correspondent activity where the entity was a corrrespondent in the prior calendar year:

Q9

Of the correspondent relationships, how many of the respondents are based in Malta?

or choose one of:

- Not Available

Q10

Of the correspondent relationships, how many of the respondents are based in EU/EEA jurisdictions, excluding Malta?

or choose one of:

- Not Available

Q11

Of the correspondent relationships, how many of the respondents are based in non-EU/EEA jurisdictions?

or choose one of:

- Not Available

Q12

Of the correspondent relationships, how many of the respondents are based in jurisdictions listed in the FATF lists and/or the EU list identifying high risk 3rd countries with strategic deficiencies and/or jurisdictions featuring in the top 20 countries of the Basel Index?

The FATF and EU lists identitifying 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

Correspondent activity (7)

Please indicate the following for correspondent activity where the respondents are based in Malta, the prior calendar year:

Q13 a) Volume (#) of outgoing transactions (number of transactions)	
Q14 b) Value (€) of outgoing transactions	

Correspondent activity (8)

Please indicate the following for correspondent activity where the respondents are based in EU/EEA (excluding Malta), the prior calendar year:

Q15 a) Volume (#) of outgoing transactions (number of transactions)	
Q16 b) Value (€) of outgoing transactions	

Correspondent activity (9)

Please indicate the following for correspondent activity where the respondents are based in non-EU/EEA, the prior calendar year:

Q17 a) Volume (#) of outgoing transactions (number of transactions)	
Q18 b) Value (€) of outgoing transactions	

Correspondent activity (10)

Please indicate the following for correspondent activity where the respondents are based jurisdictions listed in the FATF lists and/or the EU list identifying high risk 3rd countries with strategic deficiencies and/or jurisdictions featuring in the top 20 countries of the Basel Index, the prior calendar year:

Q19 a) Volume (#) of outgoing transactions (number of transactions)	
Q20 b) Value (€) of outgoing transactions	
Q21	*Choose more than one option:*

Please specify which jurisdictions	• Albania • Barbados, ETC *or choose one of:* • Not Applicable • Not Available

Correspondent activity (11)

Q22

Does your entity make use of correspondent activity, where your entity is the correspondent?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Q23

Does your entity carry out ongoing monitoring on the respondent's ML/FT controls?

Choose only one option:

- Yes
- No

Correspondent activity (12)

Please indicate the following for correspondent activity where the entity was a correspondent in the prior calendar year:

Q24 a) Volume (#) of incoming transactions (number of transactions)	*or choose one of:* • Not Available
Q25 b) Value (€) of incoming transactions	*or choose one of:* • Not Available

Correspondent activity (13)

Please indicate the following for correspondent activity where the entity was a correspondent in the prior calendar year:

Q26	

a) Volume (#) of outgoing transactions (number of transactions)	*or choose one of:* • Not Available
Q27 b) Value (€) of outgoing transactions (number of transactions) *Value of transactions is to be provided in € converted the daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other reputable source) for the prior calendar year.* *Correspondent activity is the provision of banking services by one bank (the "correspondent bank") to another bank (the "respondent bank"). Respondent banks may be provided with a wide range of services, including cash management (e.g. interest-bearing accounts in a variety of currencies), international wire transfers, cheque clearing, payable-through accounts and foreign exchange services. Correspondent activity should however exclude one-off transactions or the mere exchange of SWIFT Relationship Management Application (RMA) keys in the context of non-customer relationships*	*or choose one of:* • Not Available

Correspondent activity (14)

Q28

Please indicate the total number (#) of respondents to whom you offer correspondent services.

The answer to this question should include the number of distinct customers (respondents), rather than the number of accounts. Therefore if a customer has 5 accounts, the reply should be 1.

or choose one of:

- Not Available

Q29

How many new respondents were onboarded during the prior calendar year?

The answer to this question should include the number of distinct customers (respondents), rather than the number of accounts. Therefore if a customer has 5 accounts, the reply should be 1.

or choose one of:

- Not Available

Correspondent activity (15)

Q30

Does your entity allow for correspondent activity relationships to include the opening of payable-through accounts?

Payable-through accounts shall be construed to mean an account which allows the respondent entity's customers to carry out transactions directly on the account of the respondent.

Choose only one option:

- Yes
- No

Q31

Has any respondent entity terminated its relationship with your entity in the prior calendar year?

The answer to this question should include relationships that where terminated because the respondent decided to close the relationship.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Q32

Has your entity terminated its relationship with a respondent entity in the prior calendar year?

The answer to this question should include relationships that where terminated by your entity with the respondent, following a decision taken by your entity.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Q33

Has any correspondent entity terminated its relationship with your entity (where your entity is the respondent), during the prior calendar year?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Q34

Could the accounts placed at the disposal of your respondent, as listed above, be used by other respondent banks/financial entities that have a direct relationship with the respondent, but not with your entity (commonly referred to as "nesting" or downstream correspondent activity) which means that your entity (correspondent) is indirectly providing services to other banks/financial entities that are not the respondent?

Choose only one option:

- Yes
- No

Correspondent activity (16)

Q35

Of the correspondent relationships, how many of the respondents are based in Malta?

or choose one of:

- Not Available

Q36

Of the correspondent relationships, how many of the respondents are based in EU/EEA jurisdictions, excluding Malta?

or choose one of:

- Not Available

Q37

Of the correspondent relationships, how many of the respondents are based in non-EU/EEA jurisdictions?

or choose one of:

- Not Available

Q38

Of the correspondent relationships, how many of the respondents are based in jurisdictions listed in the FATF lists and/or the EU list identifying high risk 3rd countries with strategic deficiencies and/or jurisdictions featuring in the top 20 countries of the Basel Index?

The FATF and EU lists identitifying 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

Correspondent activity (17)

Please indicate the following for correspondent activity where the respondents are based in Malta, the prior calendar year:

Q39 a) Volume (#) of outgoing transactions (number of transactions)	
Q40 b) Value (€) of outgoing transactions	

Correspondent activity (18)

Please indicate the following for correspondent activity where the respondents are based in EU/EEA (excluding Malta), the prior calendar year:

Q41 a) Volume (#) of outgoing transactions (number of transactions)	
Q42 b) Value (€) of outgoing transactions	

Correspondent activity (19)

Please indicate the following for correspondent activity where the respondents are based in non-EU/EEA, the prior calendar year:

Q43 a) Volume (#) of outgoing transactions (number of transactions)	
Q44 b) Value (€) of outgoing transactions	

Correspondent activity (20)

Please indicate the following for correspondent activity where the respondents are based jurisdictions listed in the FATF lists and/or the EU list identifying high risk 3rd countries with strategic deficiencies and/or jurisdictions featuring in the top 20 countries of the Basel Index, the prior calendar year:

Q45 a) Volume (#) of outgoing transactions (number of transactions)	
Q46 b) Value (€) of outgoing transactions	
Q47 Please specify which jurisdictions	*Choose more than one option:* • Afghanistan • Albania • Barbados • Benin • Burkina Faso • Cambodia

	• Cameroon • Cayman Islands • Democratic People's Republic of Korea • Democratic Republic of the Congo • Eswatini • Gibraltar • Guinea-Bissau • Haiti • Iran • Jamaica • Jordan • Madagascar • Mali • Mauritania • Morocco • Mozambique • Myanmar • Nicaragua • Nigeria • Pakistan • Panama • Philippines • Senegal • Sierra Leone • South Sudan • Syria • Tanzania • Tonga • Trinidad and Tobago • Türkiye • Uganda • United Arab Emirates • Vanuatu • Vietnam • Yemen • Zimbabwe *or choose one of:* • Not Applicable • Not Available

Currency exchange services (1)

For the following please indicate, for currency exchange services:

Q48 a) Volume (#) of transactions *Currency exchange services refers to the exchange of one currency for another currency, identifying arbitrage opportunities through the capitalization on fluctuating exchange rates or in charging a fee for its exchange services.*	*or choose one of:* • Not Applicable • Not Available
Q49 b) Value (€) of transactions *Total amount is to be presented in €. Where applicable, the amounts is to be converted to € at the official daily exchange rate at the end of the prior calendar year.*	*or choose one of:* • Not Applicable • Not Available

Acquisition of payment transactions (1)

For the following please indicate, for acquisition of payment transactions

Q50 a) The number (#) of transactions *The Financial Institutions Act (Chapter 376) defines "acquiring of payment transactions" as a payment service provided by a payment service provider contracting with a payee to accept and process payment transactions that result in a transfer of funds to the payee*	*or choose one of:* • Not Available
Q51 b) The value (€) transactions *Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year.*	*or choose one of:* • Not Available

Execution of payment transactions (1)

For the following, please indicate for execution of payment transactions:

Q52 a)The number (#) of transactions *Execution of payment transaction has the same meaning as described in paragraph (c) and (d) of the Second Schedule of The Financial Institutions Act (Chapter 376):* *(c) Execution of payment transactions, including transfers of funds on a payment account with the user's payment service provider or with another payment service provider:* *(i) execution of direct debits, including one-off direct debits;* *(ii)execution of payment transactions through a payment card or a similar device;* *(iii)execution of credit transfers, including standing orders;* *(d) Execution of payment transactions where the funds are covered by a credit line for a payment service user:* *(i) execution of direct debits, including one-off direct debits;* *(ii)execution of payment transactions through a payment card or a similar device;* *(iii) execution of credit transfers, including standing orders;* *The amounts to be reported under 'Execution of Payment Transactions' are to include both incoming and outgoing transactions but should not be included in the values reported under 'Money Remittance'*	*or choose one of:* • Not Applicable • Not Available
Q53 b) The value (€) of transactions *Total amount is to be presented in €. 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

Products and Services (PSPs) (1)

Q54

Has your entity introduced new products in the prior calendar year?

Choose only one option:

- Yes
- No

Products and Services (PSPs) (1.5)

Q55

Please include a brief description of the product features recently introduced

Products and Services (PSPs) (2)

Q56

Do the products have limitations, or don't allow cash withdrawals or cash transactions at all?

The interpretation given to cash withdrawals should not only be limited to cash withdrawals over the counter, but should be extended to include all kinds of cash withdrawals, including the withdrawal of cash from ATMs.

Choose only one option:

- No
- Yes, some of the products
- Yes, all products

Products and Services (PSPs) (4)

Q57

Are the products designed specifically to restrict its use by customers dealing in goods and services that are associated with a high risk of financial crime?

A negotiable instrument is a transferable document such as a bank note, cheque or draft containing an unconditional promise or order to pay a specified amount to its holder upon demand.

Choose only one option:

- Yes
- No

Products and Services (PSPs) (5)

Q58

Is cash accepted as a funding method?

Choose only one option:

- Yes
- No

Products and Services (PSPs) (6)

Q59

Can funds standing to the credit of the customer be withdrawn as cash?

Choose only one option:

- Yes
- No

IBAN Accounts (1)

Q60

Is your entity a BIC-holder authorised by a national competent authority (e.g. Central Bank of Malta) to provide IBAN-identifiable accounts?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

IBAN Accounts (2)

Q61

Does your entity also provide the facility to its customers to map a range of virtual IBANs against an IBAN-identifiable master account held in their name?

Choose only one option:

- Yes
- No

IBAN Accounts (3)

Q62

Is your entity taking active steps to seek authorization and start offering IBAN accounts under own BIC?

Choose only one option:

- Yes
- No

IBAN Accounts (4)

Q63

Does your entity offer its clients virtual IBAN accounts which are mapped against an IBAN-identifiable master account in the name of your entity held with another institution?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

IBAN Accounts (5)

Q64

Is your entity taking active steps to start offering virtual IBANs?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Funding Methods (1)

For Wire (Bank) transfers during the prior calendar year, please specify:

Q65 Number (#) of incoming transactions *For other "reputable jurisdictions" please refer to Chapter 8 of the Implementing Procedures Part I for an explanation on what subject persons are required to take into account when determining whether a jurisdiction is to be deemed as non-reputable or otherwise.*	*or choose one of:* • Not Applicable • Not Available
Q66 Value (€) of incoming transactions *For other "reputable jurisdictions" please refer to Chapter 8 of the Implementing Procedures Part I for an explanation on what subject persons are required to take into account when determining whether a jurisdiction is to be deemed as non-reputable or otherwise.*	*or choose one of:* • Not Applicable • Not Available
Q67	

Number (#) of outgoing transactions *For other "reputable jurisdictions" please refer to Chapter 8 of the Implementing Procedures Part I for an explanation on what subject persons are required to take into account when determining whether a jurisdiction is to be deemed as non-reputable or otherwise.*	*or choose one of:* • Not Applicable • Not Available
Q68 Value (€) of outgoing transactions *For other "reputable jurisdictions" please refer to Chapter 8 of the Implementing Procedures Part I for an explanation on what subject persons are required to take into account when determining whether a jurisdiction is to be deemed as non-reputable or otherwise.*	*or choose one of:* • Not Applicable • Not Available

Funding Methods (2)

For cash deposits during the prior calendar year, please specify:

Q69 Number (#) of incoming transactions *Other reputable jurisdictions refers to non-EU countries which were recognised by the European Commission as having regulatory or supervisory regime which is equivalent to the corresponding EU framework. A list of all equivalence decisions adopted by the Commission in the area of financial regulation is found in the following link: https://ec.europa.eu/info/sites/info/files/business_economy_euro/banking_and_finance/documents/overview-table-equivalence-decisions_en_0.pdf*	*or choose one of:* • Not Applicable • Not Available
Q70 Value (€) of incoming transactions *For other "reputable jurisdictions" please refer to Chapter 8 of the Implementing Procedures Part I for an explanation on what subject persons are required to take into account when determining whether a jurisdiction is to be deemed as non-reputable or otherwise.*	*or choose one of:* • Not Applicable • Not Available

Funding Methods (3)

For Cheque deposits during the prior calendar year, please specify

Q71 Number (#) of incoming transactions *Other reputable jurisdictions refers to non-EU countries which were recognised by the European Commission as having regulatory or supervisory regime which is equivalent to the corresponding EU framework. A list of all equivalence decisions adopted by the Commission in the area of financial regulation is found in the following link: https://ec.europa.eu/info/sites/info/files/business_economy_euro/banking_and_finance/documents/overview-table-equivalence-decisions_en_0.pdf*	*or choose one of:* • Not Applicable • Not Available
Q72 Value (€) of incoming transactions *For other "reputable jurisdictions" please refer to Chapter 8 of the Implementing Procedures Part I for an explanation on what subject persons are required to take into account when determining whether a jurisdiction is to be deemed as non-reputable or otherwise.*	*or choose one of:* • Not Applicable • Not Available

Funding Methods (4)

For Debit Card deposits made during the prior calendar year, please specify:

Q73 Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available
Q74 Value (€) of incoming transactions	*or choose one of:* • Not Applicable • Not Available

Funding Methods (5)

For Credit Card / Prepaid card deposits made during the prior calendar year, please specify:

Q75 Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available
Q76 Value (€) of incoming transactions	*or choose one of:* • Not Applicable • Not Available

Funding Methods (6)

For deposits made via Internet-based payment systems or other e-money services (as defined by FATF) during the prior calendar year, please specify:

Q77 Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available
Q78 Value (€) of incoming transactions *Value of transactions should be reported in € converted the daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other reputable source) for the prior calendar year*	*or choose one of:* • Not Applicable • Not Available

Funding Methods (7)

For deposits made via Virtual Financial Assets during the prior calendar year, please specify:

Q79	

Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available
Q80 Value (€) of incoming transactions	*or choose one of:* • Not Applicable • Not Available

Funding Methods (28)

Q81

What is the volume (#) of cash withdrawal of electronic money, where the amount redeemed exceeded €100?

or choose one of:

- Not Applicable
- Not Available

Funding Methods (29)

Q82

What is the value (€) of cash withdrawal of electronic money where the amount redeemed exceeded €100?

Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Funding Methods (30)

Q83

In how many instances has a single customer purchased several e-money products from your entity?

For the purpose of this question "several" is meant to construe more than four (4) e-money products

or choose one of:

- Not Applicable
- Not Available

Funding Methods (31)

Q84

In how many instances has a single customer frequently reloaded the product, or affected more than four (4) cash withdrawals, with inexplicably rapid succession and without an economic rationale?

The meaning of cash withdrawals should not only be limited to cash withdrawals over the counter but should be extended to include all kinds of cash withdrawals, including the withdrawal of cash through ATMs.

or choose one of:

- Not Applicable
- Not Available

Funding Methods (32)

In cases where Customer Due Diligence exemptions were granted and/or applied to customers, does the Company carry out the following:

Q85 a) The payment instrument is not reloadable, or has a maximum monthly payment transactions limit of €250	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q86 b) The maximum amount stored electronically does not exceed €250 internationally or €500 domestically	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q87 c) The payment instrument is used exclusively to purchase goods or services	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q88 d) The payment instrument cannot be funded with anonymous electronic money	*Choose only one option:* • Yes

	• No *or choose one of:* • Not Applicable
Q89 e) The issuer carries out sufficient monitoring of the transactions or business relationship to enable the detection of unusual or suspicious transactions	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable

Loans (1.FIs)

Q90

Did your entity have a loan portfolio, as at the end of the prior calendar year?

The response to this question should indicate the pools of loans that the subject person owns and manage.

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Loans (2.FIs)

Q91

As per your entity's internal policies, what is the maximum value of any single facility that can be granted by your entity?

Respondents should choose the 'Not applicable' option should there isn't a maximum value specified.

Choose only one option:

- No Limits imposed
- Between €100,000 and €499,999.99
- Between €500,000 and €999,999.99
- Over €1,000,000
- Under €99,999.99

or choose one of:

- Not Applicable

Loans (3.FIs)

Please provide the following for loans issued to your customers in the prior calendar year:

Q92 a) Volume (#) (number of loans)	*or choose one of:* • Not Applicable • Not Available
Q93 b) Value (€) *Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year.*	*or choose one of:* • Not Applicable • Not Available

Loans (5.FIs)

Please provide the following for loan repayments effected by your customers in the prior calendar year:

Q94 a) Volume (#) (number of transactions) *Loan repayments refers to all incoming payments which were made towards a loan / in repayment of a loan.*	*or choose one of:* • Not Applicable • Not Available
Q95 b) Value (€) *Loan repayments refers to all incoming payments which were made towards a loan / in repayment of a loan. Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year.*	*or choose one of:* • Not Applicable • Not Available

Loans (7.FIs)

Please indicate the following for loans which were secured against the value of assets in EU/EEA jurisdictions (including Malta) as at the end of the period calendar year:

Q96 a) volume (#) *Please indicate the total number of loans.*	*or choose one of:* • Not Applicable • Not Available
Q97 b) value (€) *Value of loans are, where applicable, to be converted to € at the applicable rate of exchange as per ECB rate (or other reputable source) as the end of the prior calendar year.*	*or choose one of:* • Not Applicable • Not Available

Loans (8.FIs)

Please indicate the following for loans which were secured against the value of assets in non-EU/EEA jurisdictions as at the end of the period calendar year

Q98 a) volume (#) *Please indicate the total number of loans.*	*or choose one of:* • Not Applicable • Not Available
Q99 b) value (€) *Total amount is to be presented in €. Where applicable, amounts are to be converted to € at the official daily exchange rate or in the absence thereof, at the average monthly / annual ECB exchange rate (or other official source) for the prior calendar year.*	*or choose one of:* • Not Applicable • Not Available

Loans (9.FIs)

Q100

Out of the total number of loans issued during the prior calendar year, what is the % of un-secured loans issued?

or choose one of:

- Not Available

Loans (10.FIs)

Q101

Please indicate the value (€) of un-secured loans issued.

Value of un-secured loans are, where applicable, to be converted to Euro at the applicable rate of exchange as per ECB rate (or other reputable source) as the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Credit Cards (1.FIs)

Q102

Please indicate the total number of credit cards issued during the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Credit Cards (2.FIs)

Q103

Please indicate the total number of customers related to the service of credit cards as at the end of the prior calendar year.

Customers refers to active customers, i.e. customers with whom the subject person has a business relationship or who carried out an occasional transaction in the prior calendar year. By way of example, a customer that has a credit card facility but did not use that facility in the prior calendar year will still be deemed to have a business relationship with the subject person as the customer may still avail himself / herself of the facility

or choose one of:

- Not Applicable
- Not Available

Credit Cards (3.FIs)

Q104

a) Volume (#)

Incoming transactions refers to deposits made to the credit card account.

or choose one of:

- Not Applicable
- Not Available

Q105

b) Value (€)

Incoming transactions refers to deposits made to the credit card account. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Credit Cards (5.FIs)

Q106

Does your entity issue credit cards with unlimited credit?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Credit Cards (6.FIs)

Q107

What % of these customers have a credit limit below Eur 19,999

or choose one of:

- Not Applicable

Credit Cards (7.FIs)

Q108

What % of these customers have a credit limit between Eur 20,000 and Eur 99,999

or choose one of:

- Not Applicable

Credit Cards (8.FIs)

Q109

What % of these customers have a credit limit between Eur 100,000 and Eur 999,999

or choose one of:

- Not Applicable

Credit Cards (9.FIs)

Q110

What % of these customers have a credit limit over Eur 1,000,000, or do not have a credit limit

or choose one of:

- Not Applicable

Money Remittance (1.FIs)

Please indicate the following, for money remittance:

Q111 a) Number (#) of transactions *Money remittance means a payment service where funds are received from a payer, without any payment accounts being created in the name of the payer or the payee, for the sole purpose of transferring a corresponding amount to a payee or to another payment service provider acting on behalf of the payee, and / or where such funds are received on behalf of and made available to the payee.*	*or choose one of:* • Not Applicable • Not Available
Q112 b) Value (€) of transactions *Total amount is to be presented in €. Where applicable, the amounts is to be converted to € at the official daily exchange rate at the end of the prior calendar year.*	*or choose one of:* • Not Applicable • Not Available

Money Remittance (3.FIs)

Q113

Are there restrictions imposed by your entity on the geographical distribution of the money remittance services?

Geographical distribution of the money remittance service refers to the jurisdiction from which the funds can be received or to which the funds can be sent. Restrictions refer to the limitations on certain jurisdictions from where customers can transfer funds to or receive funds from.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Money remittance (4.FIs)

Q114

Are there restrictions imposed by your entity on the value of the transactions relating to money remittance?

Restrictions refer to thresholds applied to limit the transfers that can be carried out by the customers.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Money Remittance (5.FIs)

Q115

Please specify the amount (€) of the restriction.

Total amount is to be presented in €. Where applicable, the amounts is to be converted to € at the official daily exchange rate at the end of the prior calendar year.

or choose one of:

- Not Applicable

Money Remittance (6.FIs)

Q116

Please specify the period of time over which this restriction applies.

Choose only one option:

- Daily
- Weekly
- Monthly
- Annual
- Other

or choose one of:

- Not Applicable

Electronic Money (1.FIs)

Q117

Do electronic money services allow for high value or unlimited-value payments, loading or redemption or for high/unlimited funds to be stored on the e-money product/ account?

In terms of the Financial Institutions Act, 'electronic money' means electronically, including magnetically, stored monetary value as represented by a claim on the issuer which is issued on receipt of funds for the purpose of making payment transactions and that is accepted by a person other than the financial institutions that issued the electronic money.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Electronic Money (2.FIs)

Q118

Do the services offered in relation to electronic money allow for the anonymous loading?

Anonymous loading may refer to loading with cash, anonymous e-money or e-money products, or funding with payments from unidentified third parties, or with other e-money products.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Electronic Money (3.FIs)

Q119

Can the e-money products be pre-paid by the user (payer) or by third party on behalf of or in favour of the payer?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Electronic Money (4.FIs)

Q120

What is the total number of outgoing payment activity to Internet-based and/or mobile-application based payment systems

Internet based and/or mobile based applications include PayPal, Alipay, ApplePay, Venmo, Google Checkout etc.

or choose one of:

- Not Applicable
- Not Available

Electronic Money (5.FIs)

Q121

What is the total value of outgoing payment activity to Internet-based and/or mobile-application based payment systems.

Internet based and/or mobile based applications include PayPal, Alipay, ApplePay, Venmo, Google Checkout etc. Total amount is to be presented in €. 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

Electronic Money (6.FIs)

For the following, please indicate for electronic money:

Q122 a) The number (#) of transactions *The Financial Institutions Act (Chapter 376) defines electronic money as electronically, including magnetically, stored monetary value as represented by a claim on the issuer which is issued on receipt of funds for the purpose of making payment transactions and that is accepted by a person other than the financial institutions that issued the electronic money.*	*or choose one of:* • Not Applicable • Not Available
Q123 b) The value (€) of transactions *The Financial Institutions Act (Chapter 376) defines "electronic money" as electronically, including magnetically, stored monetary value as represented by a claim on the issuer which is issued on receipt of funds for the purpose of making payment transactions and that is accepted by a person other than the financial institutions that issued the electronic money. Total amount is to be presented in €. 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

Electronic Money (8.FIs)

Q124

Do the e-money products offered allow for reloading?

Reloading refers to the ability to add more value to the product after the initial issuing of e-money by the issuer.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Electronic Money (9.FIs)

Q125

What is the maximum amount of funds that can be deposited in the e-money product?

Choose only one option:

- No Limits imposed
- Under €9,999.99
- Between €10,000 and €49,999.99
- Between €50,000 and €99,999.99
- Over €100,000

or choose one of:

- Not Available

Electronic Money (10.FIs)

Q126

What is the maximum transaction limit applicable to e-money products provided by your entity?

Choose only one option:

- No Limits imposed
- Under €9,999.99
- Between €10,000 and €49,999.99
- Between €50,000 and €99,999.99
- Over €100,000

or choose one of:

- Not Applicable
- Not Available

Prepaid Cards (1.FIs)

Q127

Please indicate the total number of prepaid cards issued by your entity during the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Prepaid Cards (2.FIs)

Q128

Out of the total number of pre-paid cards issued by your entity during the prior calendar year, what % are reloadable prepaid cards?

or choose one of:

- Not Applicable
- Not Available

Prepaid Cards (4.FIs)

Q129

Please indicate the total number of customers to whom prepaid cards were issued as at the end of the previous calendar year.

or choose one of:

- Not Applicable
- Not Available

Prepaid Cards (5.FIs)

Q130

Please indicate the total value of incoming transactions relating to prepaid cards, as at the end of the prior calendar year.

Total amount is to be presented in €. 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

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.

Geography

Residence of Customers + BOs (1)

As at the end of the prior calendar year, what is the % of total customers that are resident, or otherwise, incorporated or have their principal place of business in (The total % of customers resident in Malta, EU/EEA, non-EU/EEA and FATF list jurisdictions for each sub-sector should add up to 100%):

Q1 a) Malta?	*or choose one of:* • Not Applicable • Not Available
Q2 b) an EU/EEA jurisdiction, excluding Malta? *Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.* *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.*	*or choose one of:* • Not Applicable • Not Available
Q3 c) an non-EU/EEA jurisdiction? *Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.* *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.*	*or choose one of:* • Not Applicable • Not Available
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 identitifying 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 (2)

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.

What % of your / your entity's customers' BOs are resident in:

Q5 a) Malta?	*or choose one of:* • Not Applicable • Not Available

Q6 b) an EU/EEA jurisdiction, excluding Malta? *Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.* *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.*	*or choose one of:* • Not Applicable • Not Available
Q7 c) an non-EU/EEA jurisdiction? *Reference to residency in the question refers to the principal country of residence of the person and not to the customer's tax residence.* *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.*	*or choose one of:* • Not Applicable • Not Available
Q8 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 identitifying 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)

Q9

Please select the respective jurisdictions.

Choose more than one option:

- Afghanistan
- Albania
- Barbados
- Benin
- Burkina Faso
- Cambodia
- Cameroon
- Cayman Islands
- Democratic People's Republic of Korea
- Democratic Republic of the Congo
- Eswatini
- Gibraltar
- Guinea-Bissau
- Haiti
- Iran
- Jamaica
- Jordan
- Madagascar
- Mali
- Mauritania
- Morocco
- Mozambique
- Myanmar
- Nicaragua
- Nigeria
- Pakistan
- Panama

- Philippines
- Senegal
- Sierra Leone
- South Sudan
- Syria
- Tanzania
- Tonga
- Trinidad and Tobago
- Türkiye
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Zimbabwe

or choose one of:

- Not Applicable
- Not Available

Residence of Customers + BOs (6)

Q10

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 identitifying 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)

Q11

Please select the respective jurisdictions.

Choose more than one option:

- Afghanistan
- Albania
- Barbados
- Benin
- Burkina Faso
- Cambodia
- Cameroon
- Cayman Islands

- Democratic People's Republic of Korea
- Democratic Republic of the Congo
- Eswatini
- Gibraltar
- Guinea-Bissau
- Haiti
- Iran
- Jamaica
- Jordan
- Madagascar
- Mali
- Mauritania
- Morocco
- Mozambique
- Myanmar
- Nicaragua
- Nigeria
- Pakistan
- Panama
- Philippines
- Senegal
- Sierra Leone
- South Sudan
- Syria
- Tanzania
- Tonga
- Trinidad and Tobago
- Türkiye
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Zimbabwe

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (1)

Please indicate the following for incoming domestic payment transactions, during the prior calendar year:

Q12

a) The volume (#) (number of transactions)

In this context, payments only refer to transfers of funds and to transactions to and from customers. Therefore transactions with other financial institutions should not be taken into account unless these transactions were undertaken on behalf of customers in the context of correspondent activity.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (2)

Please indicate the following for incoming domestic payment transactions, during the prior calendar year:

Q13

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (3)

Please indicate the following for outgoing domestic payment transactions, during the prior calendar year:

Q14

a) The volume (#) (number of transactions)

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (4)

Please indicate the following for outgoing domestic payment transactions, during the prior calendar year:

Q15

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (5)

Please indicate the following for incoming international payment transactions, during the prior calendar year:

Q16

a) The volume (#) (number of transactions)

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (6)

Please indicate the following for incoming international payment transactions, during the prior calendar year:

Q17

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (7)

Please indicate the following for outgoing international payment transactions, during the prior calendar year:

Q18

a) The volume (#) (number of transactions)

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (8)

Please indicate the following for outgoing international payment transactions, during the prior calendar year:

Q19

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (9)

Please indicate the following for incoming payment transactions remitted to payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index, during the prior calendar year:

Q20

a) The volume (#) (number of transactions)

The jurisdictions in the FATF lists can be found through the following link: https://fiumalta.org/FATF The jurisdictions in the EU list identifying high risk 3rd countries with strategic deficiencies can be found through the following link: https://ec.europa.eu/info/policies/justice-and-fundamental-rights/criminal-justice/anti- money-laundering-and-counter-terrorist-financing/eu-policy-high-risk-third- countries_en#evolutionoftheeulistonhighriskthirdcountries The jurisdictions in the Basel Index can be found through the following link: https://www.baselgovernance.org/sites/default/files/2019-08/Basel%20AML%20Index%202019.pdf Reference made to the Basel Index is only included for the purpose of this exercise and should not be taken or construed as being an exhaustive list of jurisdictions considered as non reputable or high risk in line with their obligations under the relevant AML / CFT obligations. Subject persons are obliged to carry out the necessary jurisdiction risk assessments to understand the risk posed by such jurisdictions.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (10)

Please indicate the following for incoming payment transactions remitted to payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index, during the prior calendar year:

Q21

b) The value (€) of transactions

Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (11)

Please indicate the following for outgoing payment transactions remitted to payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index, during the prior calendar year:

Q22

a) The volume (#) (number of transactions)

The FATF and EU lists identitifying 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

Transactions / Payments (FI) (12)

Please indicate the following for outgoing payment transactions remitted to payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index, during the prior calendar year:

Q23

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (13)

Q24

If there were payment transactions remitted to payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index, during the prior calendar year, please select the respective jurisdictions.

The FATF and EU lists identitifying 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 more than one option:

- Afghanistan
- Albania

- Barbados
- Benin
- Burkina Faso
- Cambodia
- Cameroon
- Cayman Islands
- Democratic People's Republic of Korea
- Democratic Republic of the Congo
- Eswatini
- Gibraltar
- Guinea-Bissau
- Haiti
- Iran
- Jamaica
- Jordan
- Madagascar
- Mali
- Mauritania
- Morocco
- Mozambique
- Myanmar
- Nicaragua
- Nigeria
- Pakistan
- Panama
- Philippines
- Senegal
- Sierra Leone
- South Sudan
- Syria
- Tanzania
- Tonga
- Trinidad and Tobago
- Türkiye
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Zimbabwe

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (14)

Please indicate the following for incoming payments coming from third countries where only one of the payment service provider is located in EU/EEA ('one-legged transactions'), during the prior calendar year:

Q25

a) The volume (#) (number of transactions)

One leg transactions" refer to those payment transactions where one of the PSPs (either of the payer or the payee) is based outside of the EU.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (15)

Please indicate the following for incoming payments coming from third countries where only one of the payment service provider is located in EU/EEA ('one-legged transactions'), during the prior calendar year:

Q26

b) The value (€) of transactions

One leg transactions" refer to those payment transactions where one of the PSPs (either of the payer or the payee) is based outside of the EU. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (16)

Please indicate the following for outgoing payments coming from third countries where only one of the payment service provider is located in EU/EEA ('one-legged transactions'), during the prior calendar year:

Q27

a) The volume (#) (number of transactions)

One leg transactions" refer to those payment transactions where one of the PSPs (either of the payer or the payee) is based outside of the EU.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (17)

Please indicate the following for outgoing payments coming from third countries where only one of the payment service provider is located in EU/EEA ('one-legged transactions'), during the prior calendar year:

Q28

b) The value (€) of transactions

One leg transactions" refer to those payment transactions where one of the PSPs (either of the payer or the payee) is based outside of the EU. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (18)

Please indicate the following for incoming payments received from payment accounts in Malta, during the prior calendar year:

Q29

a) The volume (#) (number of transactions)

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (19)

Please indicate the following for incoming payments received from payment accounts in Malta, during the prior calendar year:

Q30

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (20)

Please indicate the following for outgoing payments remitted from payment accounts in Malta, during the prior calendar year:

Q31

a) The volume (#) (number of transactions)

or choose one of:

- Not Applicable

- Not Available

Transactions / Payments (FI) (21)

Please indicate the following for outgoing payments remitted from payment accounts in Malta, during the prior calendar year:

Q32

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (22)

Please indicate the following for incoming payments received from payment accounts in EU/EEA jurisdctions, during the prior calendar year:

Q33

a) The volume (#) (number of transactions)

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (23)

Please indicate the following for incoming payments received from payment accounts in EU/EEA jurisdctions, during the prior calendar year:

Q34

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (24)

Please indicate the following for outgoing payments remitted from payment accounts in EU/EEA jurisdctions, during the prior calendar year:

Q35

a) The volume (#) (number of transactions)

Total amount is to be presented in €. 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

Transactions / Payments (FI) (25)

Please indicate the following for outgoing payments remitted from payment accounts in EU/EEA jurisdctions, during the prior calendar year:

Q36

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (26)

Please indicate the following for incoming payments received from payment accounts in non-EU/EEA jurisdctions, during the prior calendar year:

Q37

a) The volume (#) (number of transactions)

The geographical location should be determined on the basis of the geographical location of the payment account, irrespective of the residence of the account holder / customer

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (27)

Please indicate the following for incoming payments received from payment accounts in non-EU/EEA jurisdctions, during the prior calendar year:

Q38

b) The value (€) of transactions

The geographical location should be determined on the basis of the geographical location of the payment account, irrespective of the residence of the account holder / customer. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (28)

Please indicate the following for outgoing payments remitted from payment accounts in non-EU/EEA jurisdctions, during the prior calendar year:

Q39

a) The volume (#) (number of transactions)

The geographical location should be determined on the basis of the geographical location of the payment account, irrespective of the residence of the account holder / customer

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (29)

Please indicate the following for outgoing payments remitted from payment accounts in non-EU/EEA jurisdctions, during the prior calendar year:

Q40

b) The value (€) of transactions

The geographical location should be determined on the basis of the geographical location of the payment account, irrespective of the residence of the account holder / customer. Where applicable, amounts are to be converted to € at the applicable exchange rate as per ECB rate as at the end of the prior calendar year.

or choose one of:

- Not Applicable
- Not Available

Transactions / Payments (FI) (30)

Please indicate the following for incoming payments received from payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index:

Q41

a) The volume (#) (number of transactions)

The FATF and EU lists identitifying 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

Transactions / Payments (FI) (31)

Please indicate the following for incoming payments received from payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index:

Q42

b) The value (€) of transactions

Total amount is to be presented in €. 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

Transactions / Payments (FI) (32)

Please indicate the following for outgoing payments received from payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index:

Q43

a) The volume (#) (number of transactions)

The FATF and EU lists identitifying 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

Transactions / Payments (FI) (33)

Please indicate the following for outgoing payments received from payment accounts in jurisdictions listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index:

Q44

b) The value (€) of transactions

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels

Interface / Distribution Channels (9)

From the total number of customers, what % were onboarded:

Q1 a) face-to-face during the prior calendar year? *Onboarded on a face-to-face basis refers to the cases when the customer is physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group, but not by the subject person, the relationship is to be considered as non-face-to-face - since the subject person did not meet the client (or its agent) for verification purposes.*	*or choose one of:* • Not Available
Q2 b) on a non-face-to-face basis, during the prior calendar year? *Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes. Where a customer was met face-to-face by an entity within the Group but not by the subject person, the relationship is to be considered as non-face- to-face - since the subject person did not meet the client (or its agent) for verification purposes.*	*or choose one of:* • Not Applicable • Not Available

Interface / Distribution Channels (29)

Q3

Does your entity provide any of its services through an agent or, in the case of an electronic money entity, did it appoint distributors to distribute or redeem electronic money?

Choose only one option:

- Yes
- No

Interface / Distribution Channels (30)

Q4

What % of customers were onboarded by a domestically-based agent, distributor and/or introducer?

Agent , distributor and/or intriducer refers toa person who acts on behalf of a financial institution in providing those services listed under the First Schedule of the Financial Institutions Act, other than issuing electronic money.

or choose one of:

- Not Available

Interface / Distribution Channels (31)

Q5

What % of customers were onboarded by a EU/ EEA based agent, distributor and/or introducer?

or choose one of:

- Not Available

Interface / Distribution Channels (32)

Q6

What % of customers were onboarded by a non-EU/ EEA based agent, distributor and/or introducer?

or choose one of:

- Not Available

Interface / Distribution Channels (33)

Q7

What % of customers were onboarded by an agent, distributor and/or introdcuer situated in a jurisdiction listed in the FATF lists and/or EU list identifying high risk 3rd countries with strategic deficiencies and/or the jurisdictions featuring in the top 20 countries of the Basel Index?

The FATF and EU lists identitifying 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

Interface / Distribution Channels (34)

Q8

Please select the respective jurisdictions.

Choose more than one option:

- Afghanistan
- Albania
- Barbados
- Benin
- Burkina Faso
- Cambodia
- Cameroon

- Cayman Islands
- Democratic People's Republic of Korea
- Democratic Republic of the Congo
- Eswatini
- Gibraltar
- Guinea-Bissau
- Haiti
- Iran
- Jamaica
- Jordan
- Madagascar
- Mali
- Mauritania
- Morocco
- Mozambique
- Myanmar
- Nicaragua
- Nigeria
- Pakistan
- Panama
- Philippines
- Senegal
- Sierra Leone
- South Sudan
- Syria
- Tanzania
- Tonga
- Trinidad and Tobago
- Türkiye
- Uganda
- United Arab Emirates
- Vanuatu
- Vietnam
- Yemen
- Zimbabwe

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (35)

Q9

How many of your entity's agents, distributors and/or introducers carry out relevant financial business?

or choose one of:

- Not Available

Interface / Distribution Channels (38)

Q10

How many of your agents are located outside of Malta?

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (39)

Q11

What was the value of payment transactions carried out by the agents located outside of Malta?

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (41)

Q12

What is the % of total customers on-boarded through agents and/or distributors, were Customer Due Diligence was carried out by the agent and/or distributor?

or choose one of:

- Not Available

Interface / Distribution Channels (45)

Q13

Were there any new delivery channels introduced during the prior calendar year?

Delivery channel is the way a subject person interacts with the customers and the channels it uses to provide a given product or service.

Choose only one option:

- Yes
- No

Interface / Distribution Channels (46)

Q14

Please specify the type of new delivery channels used.

or choose one of:

- Not Applicable

Interface / Distribution Channels (47)

Q15

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

Customer Acceptance and Risk Assessment (39)

Q16

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)

Q17

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

or choose one of:

- Not Applicable
- Not Available