Risk Evaluation Questionnaire 2023

VFA SERVICE PROVIDERS

This document contains provisional questions which will be featured in the REQ for VFA SERVICE PROVIDERS 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 (3)

Q1

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)

Q2

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)

Q3

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

Choose only one option:

- Yes
- No

Governance / Organization (6)

Q4

Does the MLRO also hold MLRO positions with other entities?

Choose only one option:

- Yes
- No

Governance / Organization (7)

Q5

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

Governance / Organization (8)

Q6

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

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

or choose one of:

- Not Applicable
- Not Available

Governance / Organization (10)

Q7

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

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

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Governance / Organization (12)

Q8

Does your entity implement appropriate procedures (including obtaining a police conduct or equivalent upon hiring) and assess the conduct and integrity of employees (including partners and directors) handling relevant financial business or relevant activity?

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

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Governance / Organization (14)

Has your entity, MLRO, Compliance Officer, senior management, partners, directors, BOs, and / or shareholders (as applicable), been subject to any of the following in the last five (5) years either in Malta or abroad:

Q9 a) regulatory enforcement actions, criminal investigations for ML/FT, or any other financial crime	*Choose only one option:* • Yes • No
Q10 b) subject to negative news reports or other adverse media	*Choose only one option:* • Yes • No

Governance / Organization (15)

Q11

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

Choose only one option:

- Yes
- No

Governance / Organization (15.25)

Q12

If 'Yes' please explain.

Governance / Organization (15.5)

Q13

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

Choose only one option:

- Yes
- No

Governance / Organization (15.75)

Q14

If 'Yes' please explain.

Governance / Organization (16)

Q15

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

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

Q16

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 (24)

Q17

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

Choose only one option:

- Yes
- No

Governance / Organization (25)

Q18

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 (11)

Q7

Do your entity's policies and procedures allow payments to be effected to third parties other than the original investor?

Choose only one option:

- Yes
- No

Policies and Procedures (13)

Q8

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)

Q9

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)

Q10

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)

Q11

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)

Q12

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)

Q13

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 (17)

Q14

Do your entity's policies and procedures define, on a risk basis, processes and controls to identify and review customers / customer accounts, which regularly change the source of payment methods into their wallet account?

Choose only one option:

- Yes
- No

Policies and Procedures (18)

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

Q15 a) systematically monitor customer activity or transactions, on a risk sensitive basis	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q16 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)

Q17

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)

Q18

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)

Q19

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

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

Choose only one option:

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

or choose one of:

- Not Applicable

Policies and Procedures (21)

Q20

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

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Policies and Procedures (22)

Q21

Do your entity's policies and procedures define controls and processes for managing and/or tracking the use of customer wallet facilities?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (70)

Q22

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)

Q23

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)

Q24

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)

Q25

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)

Q26

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)

Q27

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)

Q28

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 (6)

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
Q8 e) the funding methods that your entity intends to accept	*Choose only one option:* • Yes • No

Business Risk Assessment (7.5)

Q9

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

Choose only one option:

- Yes
- No

Business Risk Assessment (8)

Q10

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

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

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

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

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

Choose only one option:

- Yes
- No

Business Risk Assessment (9)

Q11

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 (30)

Q13

When is the customer due diligence performed on the licence holder and/or issuer?

Choose only one option:

- Prior to the submission of the whitepaper and (or) licence application
- Following the submission of the whitepaper and (or) licence application
- Other

Customer Acceptance and Risk Assessment (31)

Q14

If "Other" please specify.

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (33)

Q15

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)

Q16

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 (55)

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

Q17 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
Q18 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
Q19 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
Q20 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
Q21 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
Q22 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 (61.5)

Q23

Does your PEP screening process allow for fuzzy logic/matching technology?

Fuzzy Logic/ Matching technology are tools which give the user the ability to match one name where the contents of the information being screened is not identical, but the spelling, pattern or sound is a close match to the contents combined on a list used for screening

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customer Acceptance and Risk Assessment (63)

Q24

Does your entity accept service issuers who do not impose any capping on the amounts invested by acquirers of their VFA?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (64)

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

Q25 a) Rely on publicly available information	*Choose only one option:* • Yes • No
Q26 b) Obtain information directly from the customer and/or, where applicable, beneficial owner	*Choose only one option:* • Yes • No
Q27 c) Use commercial databases	*Choose only one option:* • Yes • No

Customer Acceptance and Risk Assessment (65)

Q28

Does your entity make use of social media as a source to obtain and/or corroborate customer information?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (67)

Q29

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?

Q30 a) Transaction customer activity threshold	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q31 b) Pre-determined time frame	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q32 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)

Q33

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 (74)

Q34

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

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (77)

Q35

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

or choose one of:

- Not Available

Customer Acceptance and Risk Assessment (84)

Q36

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:

Q37 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
Q38 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

Q39 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)

Q40

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)

Q41

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)

Q42

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

Customer Acceptance and Risk Assessment (93)

Q43

Is the person controlling the wallet identified?

Choose only one option:

- No
- Yes, for high risk customers only
- Yes, always

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 (9)

Q7

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

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

Choose only one option:

- Fully automated
- Partially automated
- Manual

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (10)

Q8

Which techniques are 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)

Q9

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 (12)

Q10

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 (15)

Q11

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)

Q12

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)

Q13

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:

Q14 a) The characteristics of the products and services offered	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q15 b) The characteristics of the customers	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q16 c) The characteristics of the relevant countries and geographical areas	*Choose only one option:* • Yes

	• No *or choose one of:* • Not Applicable
Q17 d) The characteristics of the distribution channels used	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q18 e) The payment method/payment transaction used by the customer	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable
Q19 f) Other factors	*Choose only one option:* • Yes • No *or choose one of:* • Not Applicable

Ongoing Monitoring / Transaction Scrutiny (25)

Q20

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)

Q21

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 (28)

Q22

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)

Q23

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 (30)

Q24

Does the monitoring system identify unusual turnover patterns, unusually large cash transactions or a high number of transactions that fall just under the customer's threshold?

The 'customer threshold' refers to the amount determined at the beginning of the business relationship.

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (30.5)

Q25

Do you employ a system of thresholds to support the monitoring of transactions?

Choose only one option:

- Yes
- No

Ongoing Monitoring / Transaction Scrutiny (33)

Q26

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)

Q27

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)

Q28

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)

Q29

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)

Q30

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)

Q31

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)

Q32

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)

Q33

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 (60)

Q34

On a risk sensitive basis, does the entity perform ongoing monitoring to establish the reasons for an unusual increase in trading activity?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Ongoing Monitoring / Transaction Scrutiny (61)

Does your entity have system in place to:

Q35 (a) Check the wallet address associated with the payment/transaction made using VFAs, for any adverse information in the public domain	*Choose only one option:* • Yes • No
Q36 (b) Use, where available, DLT analytical tools to detect fraudulent or suspicious transactions	*Choose only one option:* • Yes • No
Q37 (c) Check, on a risk sensitive basis, whether a customer exercises control over the private wallet being, or to be used	*Choose only one option:* • Yes • No

Ongoing Monitoring / Transaction Scrutiny (62)

Q38

Is rationale for transfers questioned or assessed?

Choose only one option:

- No
- Yes, for high risk situations only
- Yes, always

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

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 (13)

Q8

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 (16)

Q8

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

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

Choose only one option:

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

or choose one of:

- Not Applicable
- Not Available

AML / CFT Training (20)

Q9

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

Self-employed persons who principally work for the subject person should 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 (1)

Q1

Please list the total number of customers with whom your entity had an active business relationship as at the beginning 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 (2)

Q2

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)

Q3

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)

Q4

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)

Q5

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)

Q6

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:

Q7

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:

Q8

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:

Q9

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:

Q10

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:

Q11

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:

Q12

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:

Q13

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

Customers (VFA) (1)

Please list the number of customers who presented any one or more of the following characteristics:

Q14

a) Carried out VFA offerings with no capping per user or, even though capped, there are no controls in place to ensure that the capping is not somehow circumvented

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (2)

Please list the number of customers who presented any one or more of the following characteristics:

Q15

b) Allow their customers to transact or make use of privacy coins

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (3)

Please list the number of customers who presented any one or more of the following characteristics:

Q16

c) Allow customers to transfer VFAs from non-custodian wallets

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (4)

Please list the number of customers who presented any one or more of the following characteristics:

Q17

d) Allow customers to transfer VFAs which have passed through mixers, tumblers, etc

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (5)

Please list the number of customers who presented any one or more of the following characteristics:

Q18

e) Allow customers to make use of unverifiable IP Addresses or other means to obscure their location

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (6)

Please list the number of customers who presented any one or more of the following characteristics:

Q19

f) The AML/CFT program of the prospective VFA issuer or service provider not being sufficiently robust?

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (7)

Please list the number of customers who presented any one or more of the following characteristics:

Q20

g) A lack of transparency surrounding the issue, including the rights of holders and how financing will be used

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (8)

Please list the number of customers who presented any one or more of the following characteristics:

Q21

h) VFA offerings teams and promoters suddenly withdrawing from the project after the issue has been concluded

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (9)

Please list the number of customers who presented any one or more of the following characteristics:

Q22

i) No mechanisms in place to be able to determine the jurisdictions from which the VFA Issuer's services are accessed and control access thereto.

or choose one of:

- Not Applicable
- Not Available

Customers (VFA) (11)

Do you accept payments through the following funding methods:

Q23

Crypto-backed credit cards

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customers (VFA) (13)

Q24

Please list the number of customers who were issuers:

Customers (VFA) (14)

From the number of customers indicated above:

Q25

(a) How many had the issue subject to capping

Customers (VFA) (15)

From the number of customers indicated above:

Q26

(b) How many had to meet regulatory requirements prior to carry out the said issue?

Customers (VFA) (16)

From the number of customers indicated above:

Q27

(c) How many were subject to regulation, including AML/CFT obligations?

Customers (VFA) (17)

From the number of customers indicated above:

Q28

(d) How many operated in or from EU/EEA jurisdictions?

Customers (VFA) (18)

From the number of customers indicated above:

Q29

(e) how many operated in or from non-EU/EEA jurisdictions?

Customers (VFA) (19)

Q30

Please list the number of customers who were VASPs

Customers (VFA) (20)

From the number of customers indicated above:

Q31

(a) How many were subject to regulation, including AML/CFT obligations?

Customers (VFA) (21)

From the number of customers indicated above:

Q32

(b) How many operated in or from EU/EEA Jurisdictions

Customers (VFA) (22)

From the number of customers indicated above:

Q33

(c) How many operated in or from non-EU/EEA jurisdictions

Customers (VFA) (23)

Q34

Does the Company hold and/or control client money (FIAT), in terms of Part IV of S.L. 590 of the Laws of Malta?

Choose only one option:

- Yes
- No

Customers (VFA) (24)

Q35

Please indicate the number (#) of Investors holding FIAT with the Company

Customers (VFA) (25)

Q36

Please indicate the number (#) of individuals that have access to private keys/partial keys

Customers (VFA) (26)

Q37

Are the private keys located in different geographical regions?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Customers (VFA) (27)

Q38

Please indicate the number (#) of corporate Entities

Customers (VFA) (28)

From the number of customers indicated above:

Q39

(a) How many are DLT Service Providers

Customers (VFA) (29)

From the number of customers indicated above:

Q40

(b) How many are financial intermediaries

Customers (VFA) (30)

From the number of customers indicated above:

Q41

(c) How many are non-financial intermediaries

Customer Type (9)

Q42

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:

Q43

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:

Q44

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:

Q45

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)

Q46

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)

Q47

Please specify the additional risk rating/s.

or choose one of:

- Not Applicable

Customer Type (39)

Q48

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

or choose one of:

- Not Available

Customers (Others) (1)

Q49

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

Choose only one option:

- Yes
- No

Customers (Others) (6)

Q50

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) (8)

Q51

Are there customers in the customer base who raised capital through Initial Coin Offerings (ICOs), Securitised Coin Offerings (SCOs) and/or crowdfunding?

An Initial Coin Offering (ICO) is the cryptocurrency industry's equivalent to an Initial Public Offering (IPO).

Choose only one option:

- Yes
- No

or choose one of:

- Not Available

Customers (Others) (10)

Q52

Please list the number of customers that are foundations, charities or other not-for-profit entities.

or choose one of:

- Not Applicable
- Not Available

Customers (Others) (12)

Q53

Please list the number of customers who are holding and/or trading companies, incorporated in Malta and with no economic substance in Malta.

Customers (Others) (25)

Q54

Please list the number of customers who have not filed the financial statements of the year preceding the prior calendar year with the Malta Business Registry.

or choose one of:

- Not Applicable
- Not Available

PEPs (1)

PEPs refers to Politically Exposed Persons

Q55

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)

Q56

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:

Q57 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
Q58 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
Q59 c) the % of PEPs (including beneficial owners) from non-EU/EEA jurisdictions, in the prior calendar year	*or choose one of:* • Not Available
Q60 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)

Q61

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)

Q62

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)

Q63

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

Products and Services

Products and Services (VFA) (1)

Q1

Please indicate the aggregate amount of clients' money holding in €

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

Products and Services (VFA) (2)

Q2

How does the Company accept VFA deposits?

Choose only one option:

- Offers Custody
- Accepts Self Custody
- Both
- Other

Products and Services (VFA) (3)

Q3

If 'Other', please provide further details.

or choose one of:

- Not Applicable

Products and Services (VFA) (4)

Q4

Does the Company accept VFA transfers to and/or from unidentified wallets?

Choose only one option:

- Yes
- No

Products and Services (VFA) (5)

Q5

Please provide value (€) of VFAs transferred to unidentified wallets

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

Products and Services (VFA) (6)

Q6

Please provide value (€) of VFAs received from unidentified wallets.

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

Products and Services (VFA) (7)

Q7

Does the Company accept VFA transfers from third party wallets of which the client is not the beneficial owner?

Choose only one option:

- Yes
- No

Products and Services (VFA) (8)

Q8

Please provide the value (€) of VFAs received from third party wallets (of which the client is not the beneficial owner)

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

Products and Services (VFA) (9)

Q9

Does the Company facilite VFA transfers to third party wallets, of which the client is not the beneficial owner?

Choose only one option:

- Yes
- No

Products and Services (VFA) (10)

Q10

Please indicate the value (€) of VFAs transferred to third party wallets (of which the client is not the beneficial owner)

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

Products and Services (VFA) (12)

Q11

Please indicate the total number (#) of reception and transmission of orders.

Products and Services (VFA) (13)

Q12

Please indicate the total value (€) of reception and transmission of orders.

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

Products and Services (VFA) (14)

Q13

Please indicate the total number (#) of execution of orders on behalf of other persons.

Products and Services (VFA) (15)

Q14

Please indicate the total value (€) of execution of orders on behalf of other persons.

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

Products and Services (VFA) (16)

Q15

Please indicate the total number (#) of dealing on own 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.

Products and Services (VFA) (17)

Q16

Please indicate the total value (€) of dealing on own account.

Products and Services (VFA) (18)

Q17

Please indicate the total number (#) of portfolio management.

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

Products and Services (VFA) (19)

Q18

Please indicate the total value (€) of portfolio management.

Products and Services (VFA) (20)

Q19

Please indicate the total number (#) of custodian or nominnee services.

Products and Services (VFA) (21)

Q20

Please indicate the total value (€) of custodian or nominee services.

Products and Services (VFA) (22)

Q21

Please indicate the total number (#) of investment advice.

Products and Services (VFA) (23)

Q22

Please indicate the total value (€) of investment advice.

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

Products and Services (VFA) (24)

Q23

Please indicate the total number (#) of placing of virtual financial assets.

Products and Services (VFA) (25)

Q24

Please indicate the total value (€) of placing of virtual financial assets.

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

Products and Services (VFA) (26)

Q25

Please indicate the total number (#) of the operation of a VFA exchange.

This question is only applicable to Class 4 only

Products and Services (VFA) (27)

Q26

Please indicate the total value (€) of the operation of a VFA exchange.

Products and Services (VFA) (28)

Q27

Please indicate the total number (#) of transfer of virtual financial assets.

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

Products and Services (VFA) (29)

Q28

Please indicate the total value (€) of transfer of virtual financial assets.

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

Products and Services (VFA) (30)

Q29

Please indicate the volume (#) of VFAs transferred during the reporting period

Products and Services (VFA) (31)

Q30

Please indicate the value (€) of VFAs transferred during the reporting period

Products and Services (VFA) (32)

Q31

Please indicate the top 3 deposited VFAs:

Products and Services (VFA) (33)

Q32

Please indicate the top 3 withdrawn VFAs:

Products and Services (VFA) (34)

Q33

Please indicate the % of hot wallets used

Products and Services (VFA) (35)

Q34

Please indicate the % of cold wallets used.

Products and Services (VFA) (36)

Q35

Please indicate the value (€) of VFAs held on own account for trading purposes as at end of reporting period

Products and Services (VFA) (37)

Q36

Please indicate the number (#) of trades on own account during the reporting period

Products and Services (VFA) (38)

Q37

Please indicate the value (€) of trades on own account during the reporting period

Products and Services (VFA) (39)

Q38

Does the entity deal on own account on its own exchange?

Choose only one option:

- Yes
- No

or choose one of:

- Not Applicable

Products and Services (VFA) (40)

Q39

Please indicate the number of active clients placing orders during the reporting period

Products and Services (VFA) (41)

Q40

Please indicate the average daily trading value (€) for the reporting period

Products and Services (VFA) (42)

Q41

Please indicate the trade value (€) for the reporting period

Products and Services (VFA) (43)

Q42

Please indicate the total orders placed during the reporting period

Products and Services (VFA) (44)

Q43

Please indicate the orders matched during the reporting period

Products and Services (VFA) (45)

Q44

Please indicate the number of newly-created VFAs

Products and Services (VFA) (46)

Q45

Please indicate the number of VFAs already in issue but not admitted to trading on DLT, being marketed to specified persons, which does not involve an offer to the public or to existing holders of the issuer's VFA

Funding Methods (1)

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

Q46 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
Q47 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
Q48 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
Q49 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:

Q50 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

Q51 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

Q52 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
Q53 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:

Q54 Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available
Q55 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:

Q56 Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available

Q57 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:

Q58 Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available
Q59 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:

Q60 Number (#) of incoming transactions	*or choose one of:* • Not Applicable • Not Available
Q61 Value (€) of incoming transactions	*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

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 (5)

Q3

Of those customers who are legal persons, and who were onboarded and/or serviced on a non-face-to-face basis in the prior calendar year, indicate whether the majority are incorporated in Malta, within EU/EEA or outside EU/EEA jurisdictions?

Non-face-to-face refers to the cases when the customer (or its agent) was not physically present for verification purposes.

Choose only one option:

- Majority of non-face-to-face customers are incorporated in Malta
- Majority of non-face-to-face customers are incorporated within the EU or EEA
- Majority of non-face-to-face customers are incorporated outside the EU or EEA

or choose one of:

- Not Applicable
- Not Available

Interface / Distribution Channels (13.5)

Q4

What % of customers have not yet completed Customer Due Diligence, since the €1,000 threshold was not exceeded?

Interface / Distribution Channels (43)

Q5

Does your entity have any reliance agreements in place, in terms of Regulation 12 of the PMLFTR?

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

Choose only one option:

- Yes
- No

Interface / Distribution Channels (56)

Q6

If reliance was placed on third parties, where are the third parties located?

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

Choose more than one option:

- Malta
- EU
- Non-EU

or choose one of:

- Not Applicable

Interface / Distribution Channels (57)

Q7

If reliance is placed on third parties, do the third parties carry out relevant financial business (or equivalent activities) or relevant activity (or equivalent)?

Choose only one option:

- Relevant Financial Business (or equivalent activities)
- Relevant Activity (or equivalent)

or choose one of:

- Not Applicable

Interface / Distribution Channels (58)

Q8

Do any of your customers make use of VPNs, proxy servers or TOR?

Choose only one option:

- Yes
- No

Customer Acceptance and Risk Assessment (39)

Q9

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)

Q10

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

or choose one of:

- Not Applicable
- Not Available