



12 May 2017

ATTN: All subject persons

**Subject: Inherent Risk Analysis – Data Collection**

On the 26 April, the Compliance Section of the FIAU announced that it had begun work on a project to produce a detailed risk analysis of Malta’s Credit Institutions, Trustees and Corporate Services Providers. During the following week, each of these groups of subject persons received an email requesting the completion of a set of questionnaires as part of this risk data collection exercise. The email contained two Excel worksheets, one for inputting inherent risk data (risk data) and the other for inputting risk mitigation data (mitigation data) and guidance notes for completing both Excel worksheets.

Our newsletter of the 26 April advised subject persons that under AMLD4 they are required to conduct an enterprise risk assessment, to establish the ML/TF risks that are inherent with their business. The newsletter stated that the FIAU would publish the questionnaires that it is sending to Banks and TCSPs, for the benefit of all subject persons. As the direction and structure of the questionnaires will assist and prompt all subject persons, as to how they should approach and structure their individual enterprise risk assessments. The table below provides hyperlinks to these documents. Once you open the document through the hyperlink below, save the template in a folder of your choice on your device prior to filling it in.

Please note that updated versions of the Excel worksheets and guidance notes are located in the table below. Please track the version numbers of these documents.

Subject Person Type	Guidance Note	Risk Data	Mitigation Data
Credit Institutions	<a href="http://fiumalta.org/library/PDF/misc/1. Guidance Document - Credit Ins..pdf">http://fiumalta.org/library/PDF/misc/1. Guidance Document - Credit Ins..pdf</a>	<a href="http://fiumalta.org/library/PDF/misc/2. IRD-CI-name-of-subject-person-2017MMDD.xlsx">http://fiumalta.org/library/PDF/misc/2. IRD-CI-name-of-subject-person-2017MMDD.xlsx</a>	<a href="http://fiumalta.org/library/PDF/misc/3. CMD-CI-name-of-subject-person-2017MMDD-v2.xlsx">http://fiumalta.org/library/PDF/misc/3. CMD-CI-name-of-subject-person-2017MMDD-v2.xlsx</a>
Trustees & Fiduciaries	<a href="http://fiumalta.org/library/PDF/misc/1. Guidance Document - Trustees.pdf">http://fiumalta.org/library/PDF/misc/1. Guidance Document - Trustees.pdf</a>	<a href="http://fiumalta.org/library/PDF/misc/2. IRD-TF-name-of-subject-person-2017MMDD.xlsx">http://fiumalta.org/library/PDF/misc/2. IRD-TF-name-of-subject-person-2017MMDD.xlsx</a>	<a href="http://fiumalta.org/library/PDF/misc/3. CMD-TF-name-of-subject-person-2017MMDD-v2.xlsx">http://fiumalta.org/library/PDF/misc/3. CMD-TF-name-of-subject-person-2017MMDD-v2.xlsx</a>
CSP – Legal Persons	<a href="http://fiumalta.org/library/PDF/misc/1. Guidance Document - CSPs.pdf">http://fiumalta.org/library/PDF/misc/1. Guidance Document - CSPs.pdf</a>	<a href="http://fiumalta.org/library/PDF/misc/2. IRD-CSPLP-name-of-subject-person-2017MMDD.xlsx">http://fiumalta.org/library/PDF/misc/2. IRD-CSPLP-name-of-subject-person-2017MMDD.xlsx</a>	<a href="http://fiumalta.org/library/PDF/misc/3. CMD-CSPLP-name-of-subject-person-2017MMDD-v2.xlsx">http://fiumalta.org/library/PDF/misc/3. CMD-CSPLP-name-of-subject-person-2017MMDD-v2.xlsx</a>
CSP – Natural Persons	<a href="http://fiumalta.org/library/PDF/misc/1. Guidance Document - CSPs.pdf">http://fiumalta.org/library/PDF/misc/1. Guidance Document - CSPs.pdf</a>	<a href="http://fiumalta.org/library/PDF/misc/2. IRD-CSPNP-name-of-subject-person-2017MMDD.xlsx">http://fiumalta.org/library/PDF/misc/2. IRD-CSPNP-name-of-subject-person-2017MMDD.xlsx</a>	<a href="http://fiumalta.org/library/PDF/misc/3. CMD-CSPNP-name-of-subject-person-2017MMDD-v2.xlsx">http://fiumalta.org/library/PDF/misc/3. CMD-CSPNP-name-of-subject-person-2017MMDD-v2.xlsx</a>

For any queries, kindly contact us on:

Credit Institutions: [compliance@fiumalta.org](mailto:compliance@fiumalta.org)

Trustees & Fiduciaries: [trustees@fiumalta.org](mailto:trustees@fiumalta.org)

CSPs: [csp@fiumalta.org](mailto:csp@fiumalta.org)