As indicated in the Guidance for Completion of the Anti-Money Laundering and Countering the Financing of Terrorism Risk Evaluation Questionnaire, sole practitioners should, for each of the questions included in this questionnaire, choose the answer option that is best suited to them.

The FIU acknowledges that the answer options defined by it may 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 your actual situation and that can be justified later on.

In the text box below, you can formulate general remarks on the answers submitted by you. Please note that these general remarks are not taken into account in the initial, automated analysis of your answers.

### Subject Person Information

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options / Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Please indicate the total number of employees (including partners or staff), expressed in full time equivalents (&quot;FTEs&quot;), working for you.</td>
</tr>
<tr>
<td></td>
<td>[Not available] / [Number]</td>
</tr>
<tr>
<td>1.2</td>
<td>What is your Business Risk Assessment residual risk score and rating for ML/FT risk?</td>
</tr>
<tr>
<td>1.3</td>
<td>How many years experience in this industry do you have?</td>
</tr>
<tr>
<td></td>
<td>[Less than 1 year] / [Between 1-3 years] / [Between 3-5 years] / [Between 5-9 years] / [10 or more years]</td>
</tr>
<tr>
<td>1.4</td>
<td>What is your primary practice area(s)?</td>
</tr>
<tr>
<td>1.5</td>
<td>Does your staff hold any professional licenses, warrants, or memberships?</td>
</tr>
<tr>
<td></td>
<td>[Member of the Malta Institute of Taxation] / [Warranted Accountant registered with the Accountancy Board] / [Other certification from an EU members state] / [Other Maltese license or certification] / [None] / [Not applicable]</td>
</tr>
</tbody>
</table>

### Governance/Organization

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options / Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1</td>
<td>How many staff members (FTEs) are part of the AML/CFT Compliance team (if one exists)?</td>
</tr>
<tr>
<td></td>
<td>[Number] / [Not applicable]</td>
</tr>
<tr>
<td>2.2</td>
<td>Is any of the AML/CFT Compliance team staff responsible for other roles and responsibilities (front office, back office, etc.)?</td>
</tr>
<tr>
<td></td>
<td>[Yes] / [No] / [Not applicable]</td>
</tr>
<tr>
<td>2.3a</td>
<td>Have you outsourced any tasks regarding compliance with the AML/CFT regulations?</td>
</tr>
<tr>
<td></td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>2.3b</td>
<td>If &quot;Yes&quot;, please specify the obligations that are being outsourced:</td>
</tr>
<tr>
<td></td>
<td>[Text]</td>
</tr>
<tr>
<td>2.4a</td>
<td>Have you, in your personal and/or professional capacity, been subject to any regulatory enforcement actions, criminal investigations for ML/FT or any other financial crime and/or subject of negative news reports (if known and/or applicable) in the last five (5) years either in Malta or abroad?</td>
</tr>
<tr>
<td></td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>2.4b</td>
<td>If &quot;Yes&quot;, please explain:</td>
</tr>
<tr>
<td></td>
<td>[Text]</td>
</tr>
</tbody>
</table>

### Policies and Procedures

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer Options / Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1</td>
<td>Do you have written policies and procedures pertaining to AML/CFT regulations?</td>
</tr>
<tr>
<td></td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>3.2a</td>
<td>Do your procedures specify that you must undertake measures to identify whether the customer and the BO are PEPs or are family members and/or close associates of PEPs?</td>
</tr>
<tr>
<td></td>
<td>[Yes] / [No] / [We do not offer services to PEPs]</td>
</tr>
<tr>
<td>3.2b</td>
<td>If &quot;no&quot;, please explain:</td>
</tr>
<tr>
<td></td>
<td>[Text]</td>
</tr>
<tr>
<td>3.3</td>
<td>Do you have policies and procedures regarding the approval to establish or continue business relationships with PEPs or their family members/close associates?</td>
</tr>
<tr>
<td></td>
<td>[Yes] / [No] / [We do not offer services to PEPs]</td>
</tr>
</tbody>
</table>
### Advocates (Sole Practitioners) Questionnaire

#### 3.4 Do you have documented policies and procedures to follow up on missing documentation from the customer file?  
**Yes / No**

#### 3.5 In the cases where an introducer was used, was due diligence performed on the introducer?  
**Yes / No / Not applicable**

#### 3.6 How frequently do you review and update your written policies and procedures?  
**As needed / Monthly / Quarterly / Annually / Between 1-3 years / Every 3 or more years**

### 4 AML/CFT Training

#### 4.1 Have you attended or received training which covered the following topics during the last three years:  
**Yes / No**

- **4.1a** Specific Maltese AML/CFT regulations (PMLFTR, PMLA)  
  **Yes / No**

- **4.1b** Business Risk Assessment  
  **Yes / No**

- **4.1c** Customer Acceptance and Risk Assessment  
  **Yes / No**

- **4.1d** Due Diligence  
  **Yes / No**

- **4.1e** Periodic review of customer information  
  **Yes / No**

- **4.1f** Ongoing monitoring and/or scrutiny of activity, deals, or transactions (as applicable)  
  **Yes / No**

- **4.1g** Red flags or criminal typologies  
  **Yes / No**

- **4.1h** Suspicious Transaction Activity or Suspicious Activity Reporting  
  **Yes / No**

- **4.1i** Recordkeeping  
  **Yes / No**

#### 4.2 How often do you attend external AML/CFT training?  
**As needed / Monthly / Quarterly / Annually / Between 1-3 years / Every 3 or more years / Not applicable**

### 5 Business Risk Assessment

#### 5.1 Have you performed a Business Risk Assessment?  
**Yes / No**

#### 5.2 Did the Business Risk Assessment conducted take into account:  
**Yes / No**

- **5.2a** the risks and controls related to your customers?  
  **Yes / No**

- **5.2b** the risks and controls related to the products and services offered by you?  
  **Yes / No**

- **5.2c** the risks and controls related to specific countries or geographical areas?  
  **Yes / No**

- **5.2d** the risks and controls related to the distribution channels used by you?  
  **Yes / No**

#### 5.3a Do your internal procedures provide for a regular update of the Business Risk Assessment, or for a periodic assessment verifying that the risk assessment is still complete and up to date?  
**Yes / No**

#### 5.3b Please ATTACH Latest Business Risk Assessment  
(insert attachment)

### 6 Customer Acceptance and Risk Assessment

#### 6.1 Do you perform a customer risk assessment prior to the acceptance and approval of customers?  
**Yes always / Yes most of the time / No**

#### 6.2 In case of material changes, do you perform a subsequent customer risk assessment?  
**Yes always / Yes most of the time / No**

Please indicate, for all your customers or, depending on the risk, only for a specific part of your customers, whether you collect the following:

- **6.3 Nationality / country of incorporation**  
  **Yes / No / Only for high risk**

- **6.4 Nationality / country of residence, or place of effective management**  
  **Yes / No / Only for high risk**

- **6.5 Nature of business /employment**  
  **Yes / No / Not applicable / Only for high risk**

- **6.6 Information on the professional activities and on the level of professional income or turnover**  
  **Yes / No / Not applicable / Only for high risk**

- **6.7 Information on any sources of income aside from the professional income**  
  **Yes / No / Not applicable / Only for high risk**

- **6.8 Information on the origin of the funds transacted by the customer**  
  **Yes / No / Not applicable / Only for high risk**

- **6.9 Information on the overall wealth of the customers**  
  **Yes / No / Not applicable / Only for high risk**

- **6.10 Information on the expected frequency, the geographical distribution and/or the size of the transactions and cash flows**  
  **Yes / No / Not applicable / Only for high risk**
## Advocates (Sole Practitioners) Questionnaire

### 6.11 PEP status
- [ ] Yes
- [ ] No
- [ ] Do not offer services to PEPs
- [ ] Only for high risk

6.12 When a customer does not self identify as a PEP, do you perform a verification through commercial or public data sources?
- [ ] Yes
- [ ] No
- [ ] Do not offer services to PEPs
- [ ] Only for high risk

### 6.13 Please indicate if policies and procedures require due diligence be applied in the following instances:

#### 6.13a when there are doubts about the completeness, reliability or accuracy of any documents?
- [ ] Yes
- [ ] No

#### 6.13b when there is a change in owners and beneficiaries?
- [ ] Yes
- [ ] No

#### 6.13c enhanced due diligence for higher risk situations (e.g. request updates to the customer data, additional documentation, etc.)?
- [ ] Yes
- [ ] No
- [ ] Not applicable

### 6.14 When due diligence is not complete but activity has begun or is complete, do the customer files include a written justification for the exception and formal approval of the exception?
- [ ] Yes
- [ ] No

### 6.15a Is the cancellation/termination of the customer relationship required if the Customer Acceptance process is not completed?
- [ ] Yes
- [ ] No

### 6.15b Please describe in further detail, your answer to the previous question.

---

## 7 Ongoing Monitoring (Monitoring of high risk activity, contracts, deals, or transactions)

### 7.1 How frequently do you review and update the information held in their files on customers and BOs?
- [ ] Annually
- [ ] Every 2-3 years
- [ ] More than every 3 years
- [ ] Never

### 7.2 Do your policies and procedures require you to:

#### 7.3 systematically monitor all activity, deals, or transactions?
- [ ] Yes
- [ ] No
- [ ] Not applicable

#### 7.4 perform a more detailed review when suspicious activity/transactions are detected?
- [ ] Yes
- [ ] No

#### 7.5 Do you request additional information, when funding sources or transactions that you are aware of do not match the customer profile?
- [ ] Yes
- [ ] No
- [ ] Not applicable

#### 7.5a Do you employ any automated tool or transaction monitoring system which functions on the basis of alerts or scenarios?
- [ ] Yes
- [ ] No
- [ ] Not applicable

#### 7.5b If yes, does it include scrutiny of transactions undertaken which are not consistent with knowledge of the customer, its business and its risk profile?
- [ ] Yes
- [ ] No
- [ ] Not applicable

#### 7.5c If yes, does the system employ any threshold based scenarios?
- [ ] Yes
- [ ] No
- [ ] Not applicable

### 7.6 How many inquiries/requests for information from the Maltese authorities did you receive about any of your customers in 2018?
- [ ] Number
- [ ] Unknown

### 7.7 Are you aware of any of your customers whose assets were frozen (in any domicile)?
- [ ] Yes
- [ ] No

### 7.8 How many customer relationships were closed for AML/CFT reasons during 2018?
- [ ] Not available
- [ ] Number

### 7.9 How many customers did you refuse to onboard or provide services to/assist in transactions for AML/CFT reasons during 2018?
- [ ] Not available
- [ ] Number

---

## 8 Internal Audit/Independent Testing

### 8.1 Do you have an independent audit function, which tests in terms of AML/CFT?
- [ ] Yes
- [ ] No

### 8.2 What is the schedule/frequency for performing audits with regard to proper compliance with the Maltese AML/CFT regulations?
- [ ] As needed
- [ ] Monthly
- [ ] Quarterly
- [ ] Annually
- [ ] Between 1-3 years
- [ ] Every 3 or more years
- [ ] No audit performed

### 8.3 When was the last audit performed in regards to your compliance with the Maltese AML/CFT regulations?
- [ ] Less than 1 year ago
- [ ] Between 1-2 years ago
- [ ] More than 2 years ago
- [ ] Never before
- [ ] Not applicable

### 8.4 What was the result of the audit referred to in the previous question?
- [ ] Sufficient
- [ ] Sufficient, with remarks
- [ ] Insufficient
- [ ] No activities were carried out
- [ ] Not applicable

### 8.5 When was the last time the Customer Acceptance process with regards to ML/FT was independently tested?
- [ ] Less than 1 year ago
- [ ] Between 1-2 years ago
- [ ] More than 2 years ago
- [ ] Never before
- [ ] Not applicable

### 8.6 When was the last time your customer files were tested independently?
- [ ] Less than 1 year ago
- [ ] Between 1-2 years ago
- [ ] More than 2 years ago
- [ ] Never before
- [ ] Not applicable
**Advocates (Sole Practitioners) Questionnaire**

**9 Reporting**

9.1 Do you have policies and procedures regarding the reporting of suspicious activity or transactions? [Yes] / [No] / [Not applicable]

9.2 Were any suspicions not reported due to lack of information received from the customer during 2018? [Yes] / [No] / [Not applicable]

9.3 Please list the number of alerts on which you performed a deeper review as a result of suspicious activity or transactions in 2018. [Number] / [Unknown] / [Not applicable]

**10 Recordkeeping**

10.1 Do you have policies and procedures to ensure compliance with recordkeeping and data protection obligations regarding AMU/CFT, including supporting evidences for customer due diligence and the records of transactions (as listed in the Implementing Procedures) for a period of at least five (5) years after the end of the business relationship with your customers or after the date of an occasional transaction? [Yes] / [No]

10.2 If the FIAU requests specific customer or alert investigation records, are you in a position to retrieve such records immediately? [Yes, always] / [Yes, most of the time] / [Depending on the request] / [No]

**11 Products and Services**

Please indicate which activities that were performed by you during 2018 are important (main activity carried out) or ancillary/accessory (not a main activity) or N/A. Multiple activities are possible. Also, please mark which activity is a new activity in 2018.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Was the activity important or ancillary/accessory as performed during 2018?</th>
<th>Was this a new activity in 2018?</th>
</tr>
</thead>
<tbody>
<tr>
<td>11.1 Tax compliance: Preparation of tax returns, compliance with various statutory reporting, registration, or publication requirements</td>
<td>Important / Ancillary / Not applicable</td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>11.2 Advisory: Advice on specific tax related questions that do not occur on regular basis (e.g. inheritance, mergers or spin-offs, insolvencies, setting up a company, purchase of immovable property), tax investigation, tax planning/tax optimization</td>
<td>Important / Ancillary / Not applicable</td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>11.3 Tax litigation and appeals, advice on these proceedings, representation in criminal tax cases</td>
<td>Important / Ancillary / Not applicable</td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>11.4 Cross border tax advisory services</td>
<td>Important / Ancillary / Not applicable</td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>11.5 Sale or Purchase of real property (e.g. provision of advice, negotiation of contract, appearing on contract on behalf of a party in the sale)</td>
<td>Important / Ancillary / Not applicable</td>
<td>[Yes] / [No]</td>
</tr>
<tr>
<td>11.6 Directorship services</td>
<td>Important / Ancillary / Not applicable</td>
<td>[Yes] / [No]</td>
</tr>
</tbody>
</table>

**12 Customers**

Customers are natural or legal persons with whom you have a business, professional, or commercial relationship or who are involved as parties in executed contracts.

12.1 Please list the total number of customers as at 31/12/2018. [Not available] / [Number]

12.2 Does the above number represent, to the best of your ability, the distinct number of customers, or is it known that it contains duplicates? [Distinct number] / [Contains duplicates] / [Unknown]
12.3 Please list the % of natural persons of the total customers. [Not available] / [Number]

12.4 Please list the % of legal persons of the total customers. [Not available] / [Number]

12.5 Breakdown of the legal persons identified in 12.4:
Please list the % of customers with an ownership structure that includes offshore vehicles or trusts or other legal arrangements including bearer shares, fiduciary deposits and foundations of the total number of legal persons as indicated in 12.4. [Not available] / [Number]

12.6 Please list % of "high risk" customers. [Not available] / [Number]

12.7 Please list % of "medium risk" customers. [Not available] / [Number]

12.8 Please list % of "low risk" customers. [Not available] / [Number]

12.9a Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories? [Yes] / [No]

12.9b Additional Risk Rating [Text]

12.9c Corresponding % of customers of that risk rating [Number]

12.9d Additional Risk Rating [Text]

12.9e Corresponding % of customers of that risk rating [Number]

12.10 Please list the number of customers serviced (of which you are aware) that have benefited from residency schemes (such as HNWI Rules or MRVP), or citizenship by investment schemes, or are applicants/prospective applicants for such schemes. [Not available] / [Number]

12.11 Please list the % of customers that are high net worth individuals. [Not available] / [Number] / [Not applicable]

12.12 Do you have any business relationships with companies that act as holding companies? [Yes] / [No] / [Not applicable]

12.13 Do you have customers for which management is vested in a representative or an agent (i.e. where you deal primarily with a third party and not the customer directly)? [Yes] / [No] / [Not applicable]

12.14 Please list the % of customers that are charities or foundations, if applicable. [Not available] / [Number] / [Not applicable]

12.15 Please list the % of customers that are cash intensive businesses (e.g. businesses by which their operations receive or depend largely on cash-based transactions such as restaurants, petrol stations, convenience stores, parking garages, etc.) if applicable. [Not available] / [Number] / [Not applicable]

12.16 Please list the % of customers, of which you are aware, where the audited financial statements of 2017 have not been registered with the Registry of Companies. [Not available] / [Number] / [Not applicable]

12.17 Please list the % of customers whereby the independent audit opinion expressed in the financial statements is either adverse or limited. [Not available] / [Number] / [Not applicable]

12.18 Please list total number of new customers in 2018. [Not available] / [Number]

12.19 Industry Type
Please list the % of customers that are legal persons (as indicated in 12.4) who are operating in high risk industries or trading in high risk or dual use* products (as designated by your policies and procedures) or separately as per SI 365.12.

*"dual use items" means 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

12.20 PEPs
"Politically Exposed Persons or PEPS" are defined in the Regulation 2 of the PMLFTR.

Please provide the following information based on your customers and beneficial owners that are politically exposed as of 31/12/2018:

12.20 Of the total number of customers (per question 12.1), how many PEPs and/or close associates and family members (collectively referred to as PEPs) are in your institution’s customer base? [Not available] / [Number]

12.21 Of the total number of PEPs (per question 12.20), what is the % of Maltese PEPs in your customer base as at 31/12/2018 (including BOs)? [Not available] / [Number]

12.22 Of the total number of PEPs (per question 12.20), what is the % of PEPs from non-Maltese EU or EEA jurisdictions in your customer base as at 31/12/2018 (including BOs)? [Not available] / [Number]
<table>
<thead>
<tr>
<th>Question Number</th>
<th>Question Description</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>12.23</td>
<td>Of the total number of PEPs (per question 12.20), what is the % of foreign (non-EU or non-EEA) PEPs in your customer base as at 31/12/2018 (including BOs)?</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>12.24</td>
<td>Of the total number of foreign PEPs as identified in 12.22 and 12.23 (i.e., sum of 12.22 and 12.23), what is the % of PEPs from high risk jurisdictions (as defined by your policies and procedures) as at 31/12/2018 (including BOs)?</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>Additional</td>
<td>Please list the % of customers for which you were involved in setting up nominee directorship in 2018.</td>
<td>(Not available) / (Number) / (Not applicable)</td>
</tr>
<tr>
<td>13</td>
<td>Geography</td>
<td></td>
</tr>
<tr>
<td>13.1</td>
<td>Of the total number of customers, please list the % of customers domiciled in Malta.</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>13.2</td>
<td>Of the total number of customers, please list the % of foreign customers domiciled in a non-Maltese EU and EEA member state jurisdiction.</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>13.3</td>
<td>Of the total number of customers, please list the % of foreign customers domiciled in a non-EU and non-EEA member state jurisdiction.</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>13.4</td>
<td>Of the total number of customers, please list the % of foreign customers domiciled in a high risk jurisdiction (as defined by your policies and procedures).</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>13.5</td>
<td>Please list the number of BOs domiciled in Malta.</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>13.6</td>
<td>Please list the % of foreign BOs domiciled in a non-Maltese EU or EEA member state jurisdiction.</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>13.7</td>
<td>Please list the % of foreign BOs domiciled in an non-EU or non-EEA member state jurisdiction.</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>13.8</td>
<td>Please list the % of BOs domiciled in a high risk jurisdiction (as defined by your policies and procedures).</td>
<td>(Not available) / (Number)</td>
</tr>
<tr>
<td>14</td>
<td>Interface/Distribution Channels</td>
<td></td>
</tr>
<tr>
<td>14.1</td>
<td>Of the total number of customers, please list the % of customers that were onboarded or serviced on a non-Face-to-Face basis in 2018.</td>
<td>(Not available) / (Number) / (Not applicable)</td>
</tr>
<tr>
<td>14.2</td>
<td>Of those customers onboarded or serviced on a non-Face-to-Face basis in 2018, what % of customers were established outside of Malta?</td>
<td>(Not available) / (Number) / (Not applicable)</td>
</tr>
<tr>
<td>14.3</td>
<td>Did you have any arrangements with agents or regulated intermediaries in 2018?</td>
<td>(Yes) / (No)</td>
</tr>
<tr>
<td>14.4</td>
<td>Did you use third parties for completion of onboarding of customers in 2018 in any of the following ways: 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 or c) outsourcing any part of identity verification to a third party?</td>
<td>(Yes) / (No)</td>
</tr>
</tbody>
</table>