



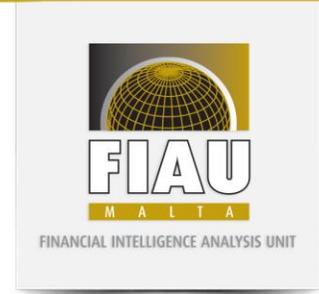
The 2019 REQ Review

Gaming

14 February 2020

Elena Tabone and Daniella Mizzi
Financial Intelligence Analysis Unit

2019 REQ: Agenda



- 2019 REQ Statistics
- Common Mistakes
- Administrative Penalties & the Enforcement Process

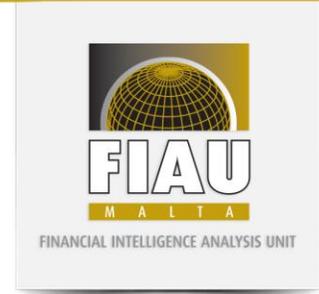
Statistics: 2019 REQ

Gaming
Companies

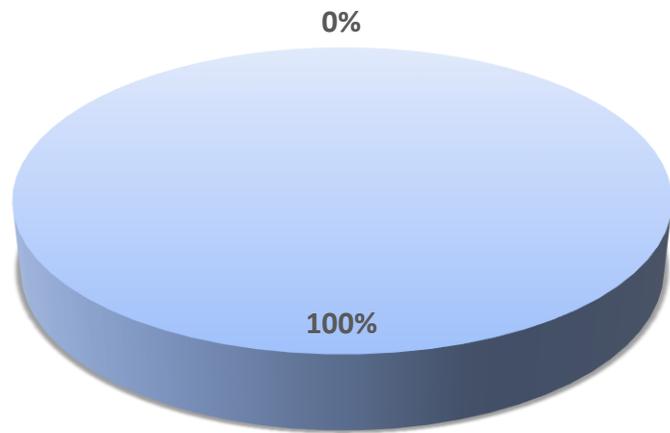
Land-Based
Casinos

Remote Gaming
Operators

Statistics: REQ Submissions – Gaming Companies

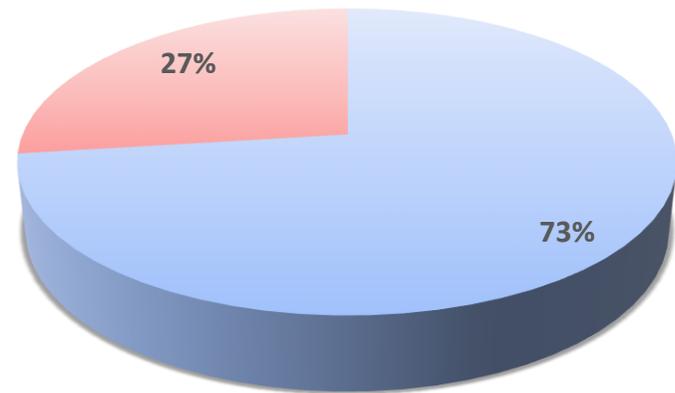


Land-Based Casinos



■ REQ Submitters ■ Non-Submitters

Remote Gaming Companies

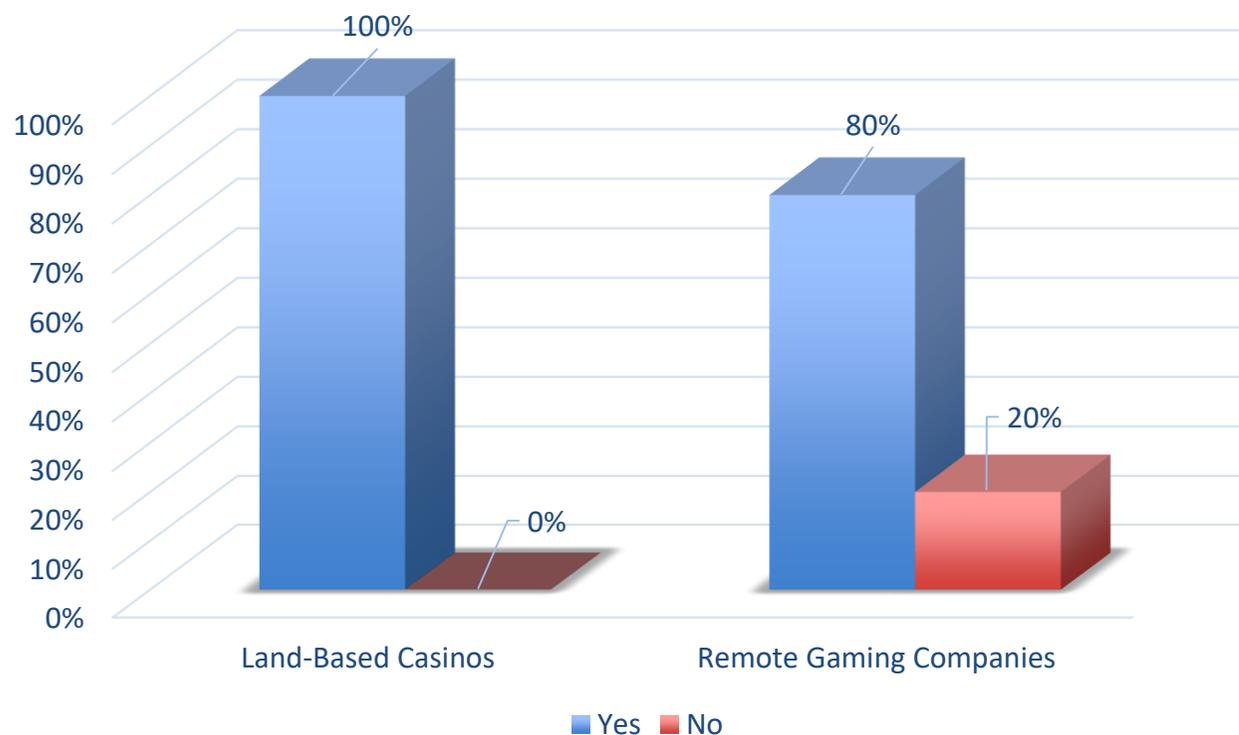


■ REQ Submitters ■ Non-Submitters

REQ Statistics: Business Risk Assessment (BRA)



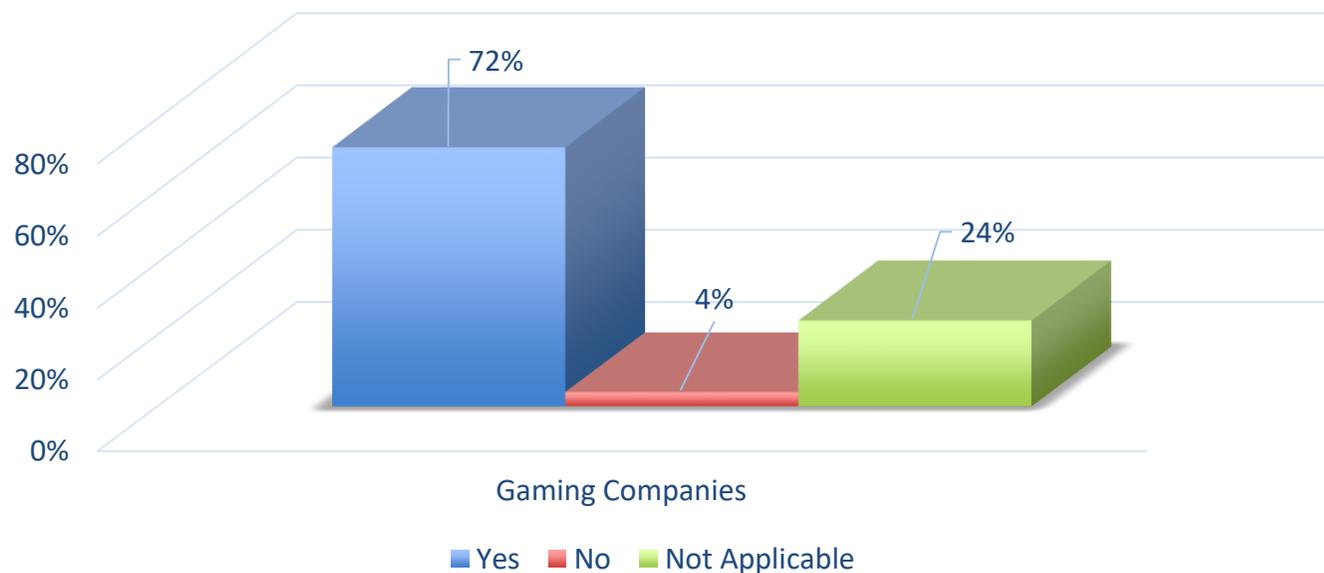
Have you / your institution performed a Business Risk Assessment?



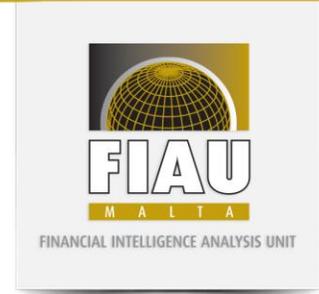
REQ Statistics: Business Risk Assessment (BRA)



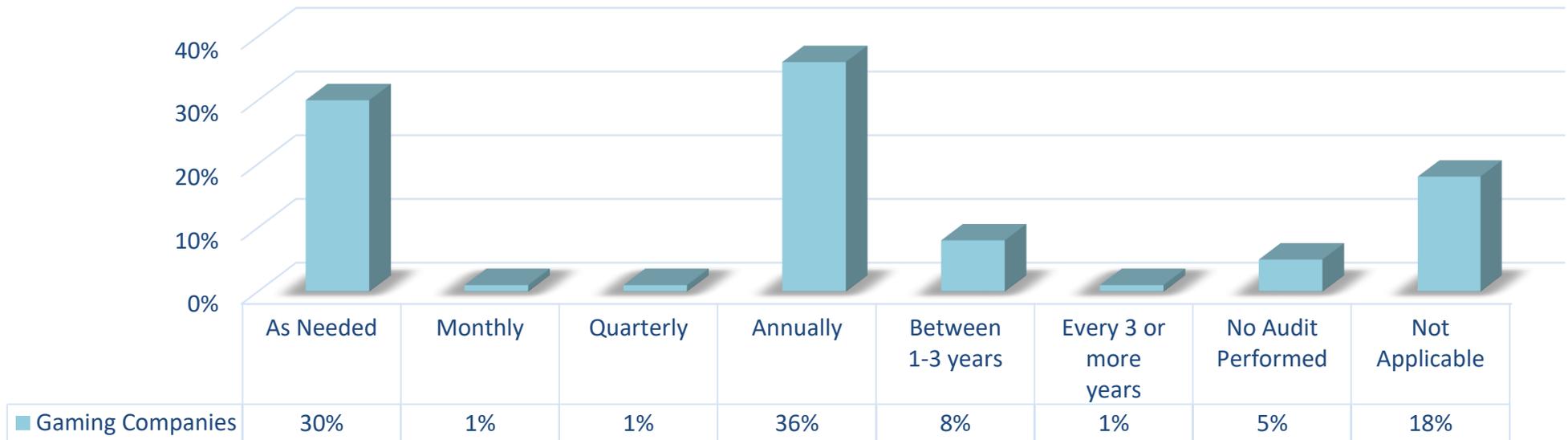
Do your / your institution's internal procedures provide for a regular update of the Business Risk Assessment, or for a periodic assessment verifying that the risk assessment is still complete and up to date?



REQ Statistics: Internal Audit & Independent Testing



What is the schedule/frequency for performing audits with regard to proper compliance with the Maltese AML/CFT regulations?

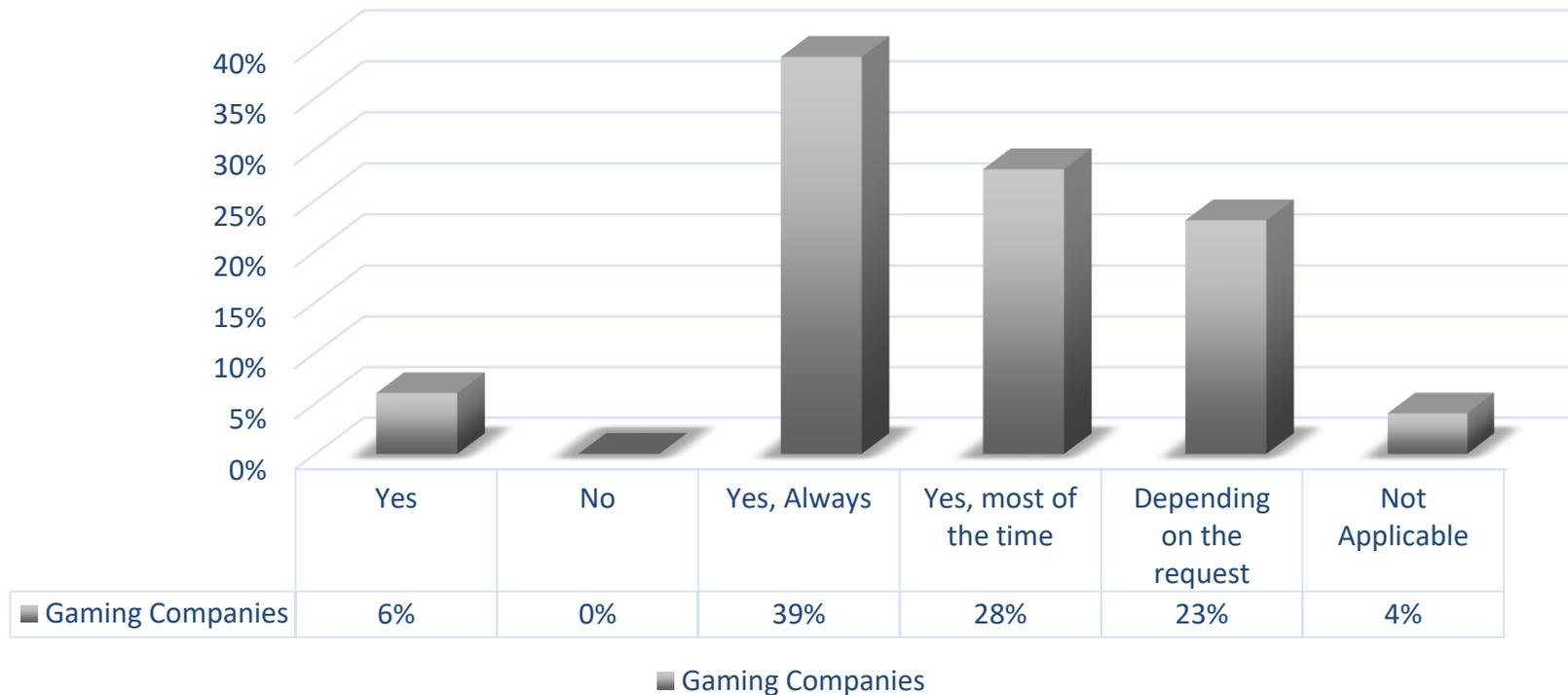


■ Gaming Companies

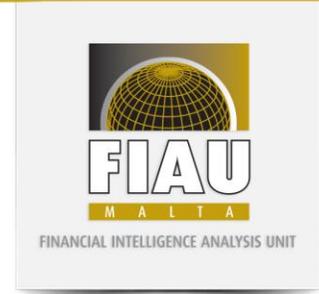
REQ Statistics: Recordkeeping



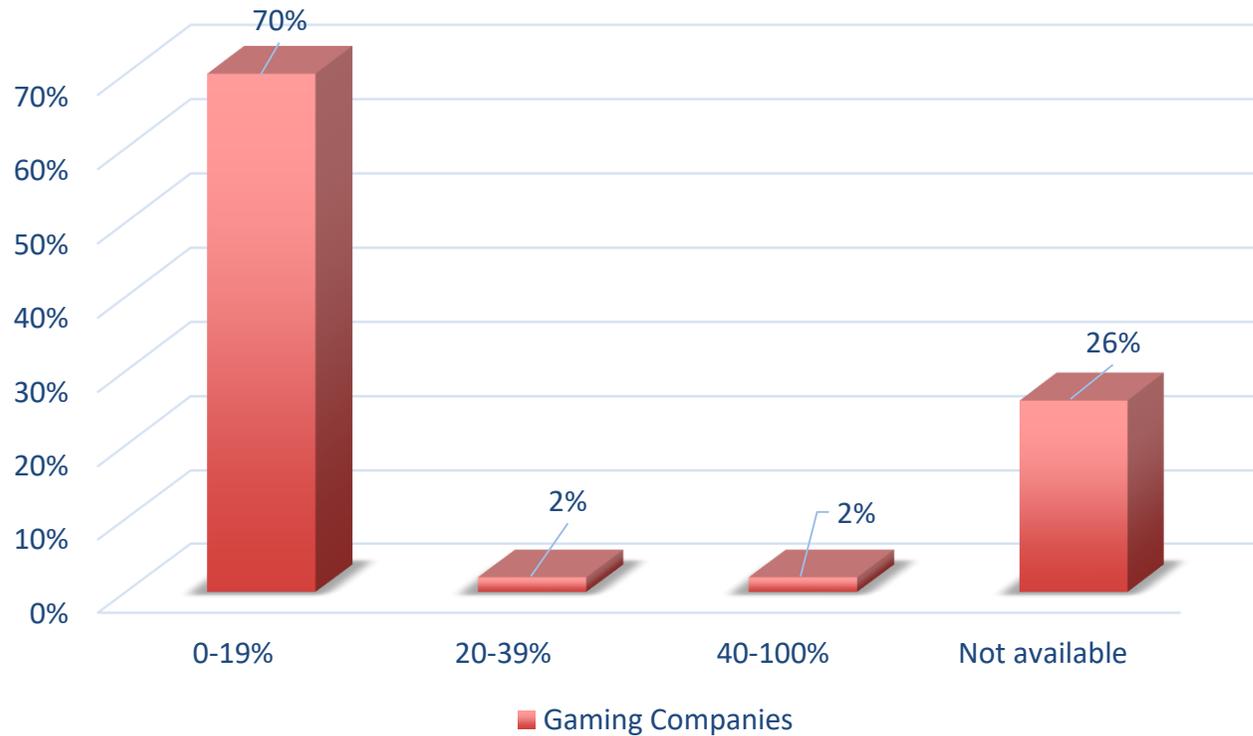
If the FIAU requests specific customer or alert investigation records, are you / is your institution in a position to retrieve such records immediately?



REQ Statistics: Customers



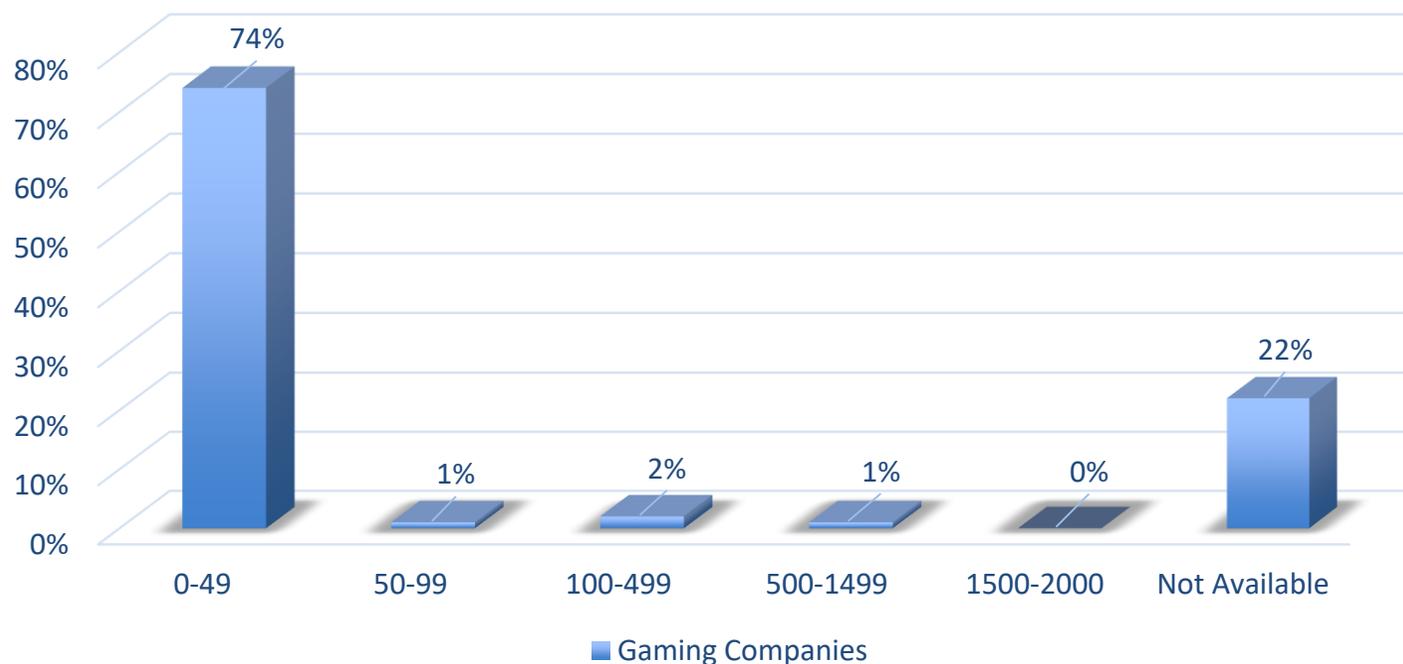
Breakdown of total customers identified: Please list % of "high risk" customers.



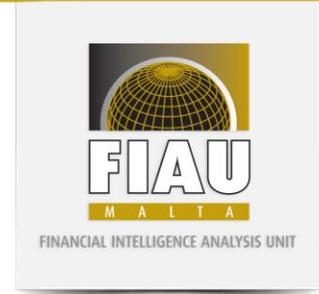
REQ Statistics: Customers



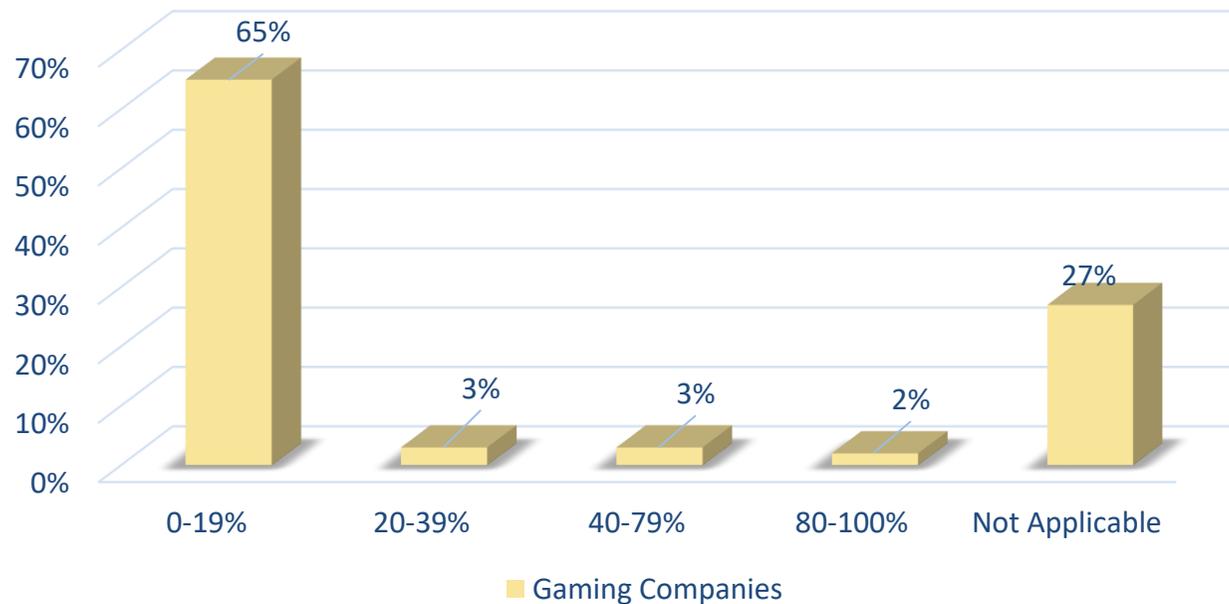
Of the total number of customers, how many PEPs and/or close associates and family members (collectively referred to as PEPs) are in your / your institution's customer base (including BOs)?



REQ Statistics: Customers



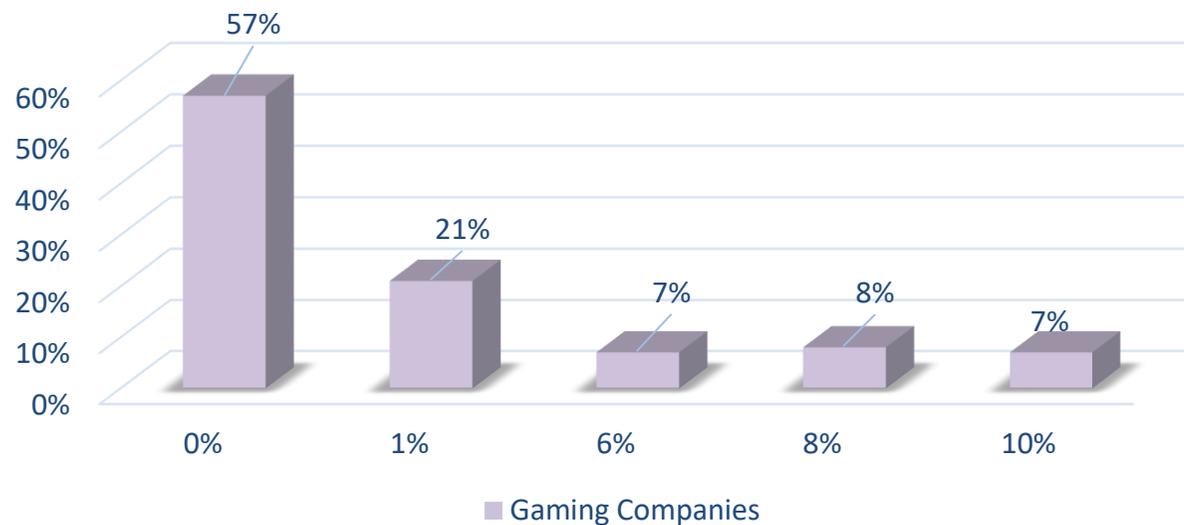
Of the total number of PEPs (if applicable), what is the % of foreign (non-EU or non-EEA) PEPs in your / your institution's customer base as at 31/12/2018 (including BOs)?



REQ Statistics: Products and Services



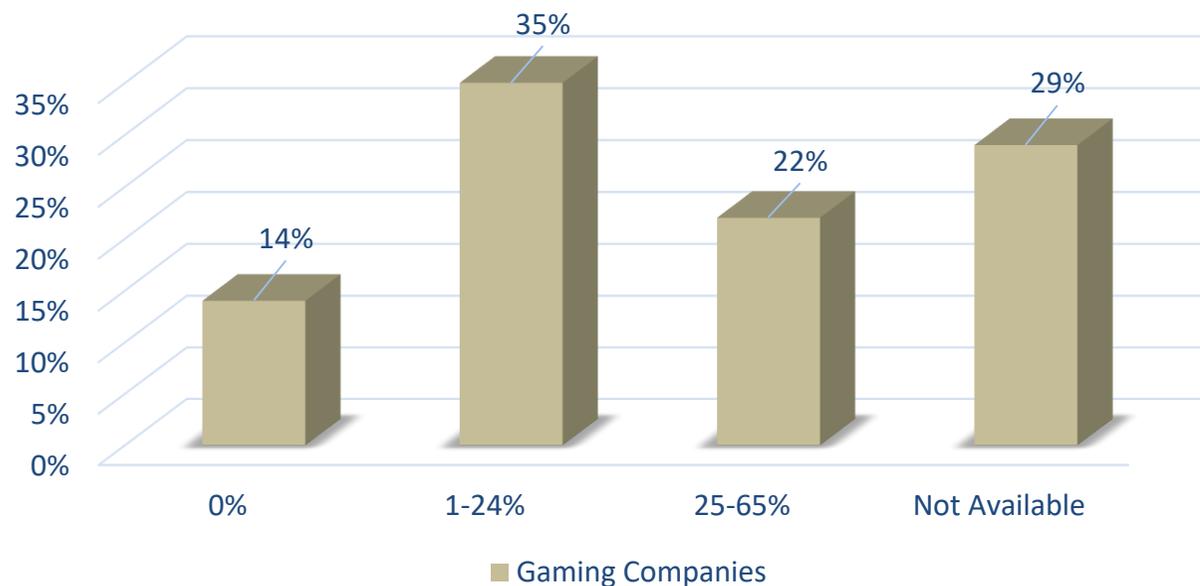
Of the total number of transactions, what percentage were single deposits of €2,000 or more for providers of gambling services in 2018?



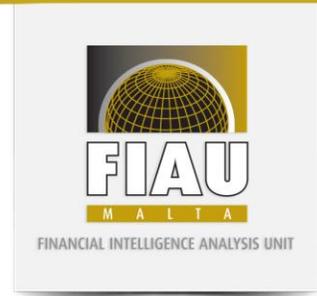
REQ Statistics: Products and Services



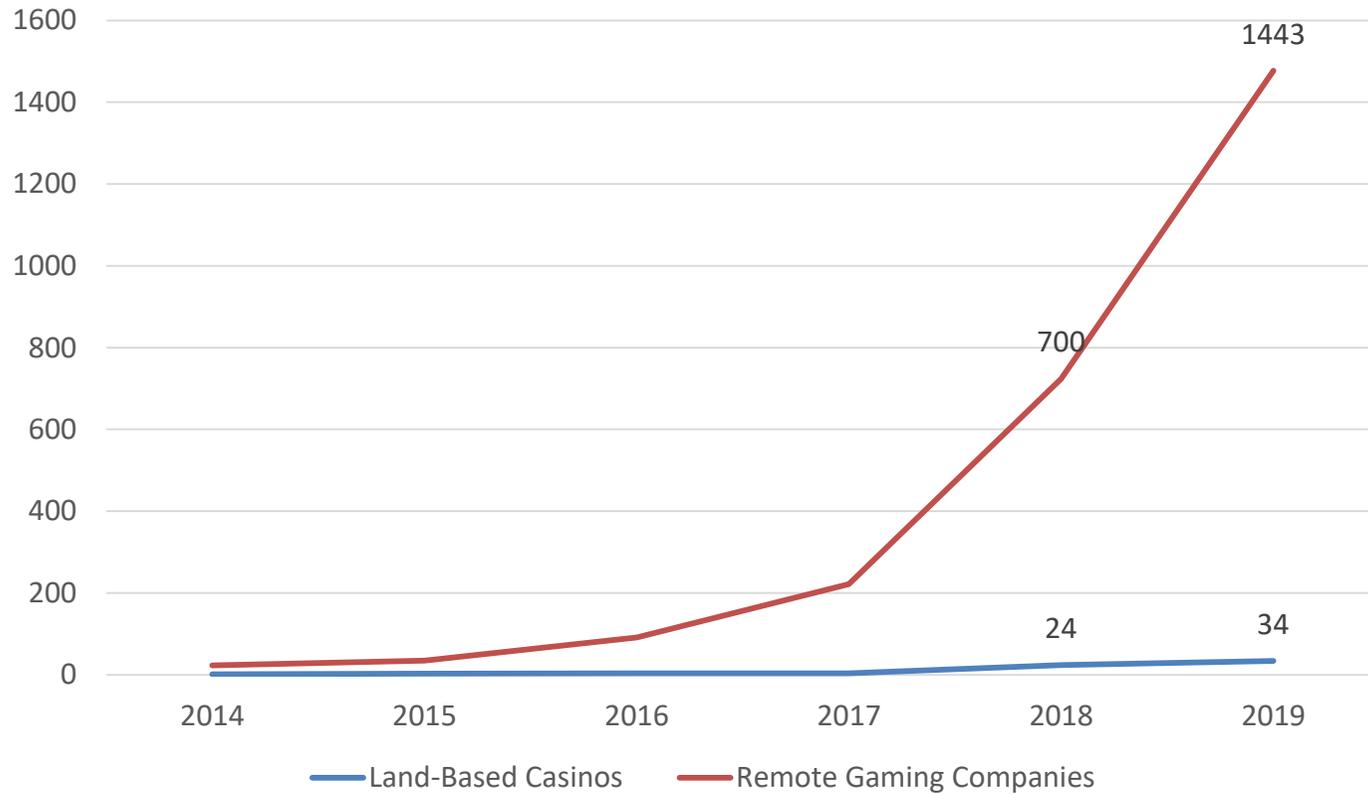
Of the total number of transactions, what percentage were transactions that met the €2,000 threshold within 180 days (cumulative)?



Statistics: Reporting



STR Submissions 2016-2019



REQ 2019 – Common mistakes



Question: *Of the total number of transactions, what percentage were single deposits of €2,000 or more for providers of gambling services in 2018?*

Answer: 1

Question: *Of the total number of customers, what percentage of customers submitted single deposits of €2,000 or more for providers of gambling services in 2018?*

Answer: 0



Question: *Breakdown of total customers identified: Please list % of "high risk" customers.*

Answer: 4

Question: *Breakdown of total customers identified: Please list % of "medium risk" customers.*

Answer: 6

Question: *Breakdown of total customers identified: Please list % of "low risk" customers.*

Answer: 83

Question: *Does a percentage of your customer base have a risk rating outside of the "high", "medium" and "low" categories?*

Answer: No



REQ 2019 – Common mistakes



Question: What percentage of the institution's customers are considered VIP customers?

Answer: 1

Question: Of the total number of VIP customers (as stated above), what percentage of VIP customers are resident in Malta?

Answer: Not Available

Question: Of the total number of VIP customers (as stated above), what percentage of VIP customers are resident in an EU or EEA jurisdiction other than Malta?

Answer: 100



Question: Of the total number of customers, what percentage were on-boarded on a non-face-to-face basis.

Answer: 35563

Question: Have you / your institution performed a Business Risk Assessment?

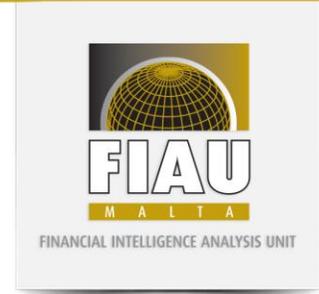
Answer: No

Question: Did the Business Risk Assessment conducted take into account: the risks and controls related to your / your institution's customers?

Answer: Yes



REQ 2019 – Common mistakes



Question: Please list the total number of customers as at 31/12/2018. [Relates to Remote Gaming Operators only]

Answer: 125300

Question: Please list the total number of new customers in 2018. [Relates to Remote Gaming Operators only]

Answer: 222943



Question: Please provide percentage of total customers who employed the following funding methods: Cash

Answer: 94

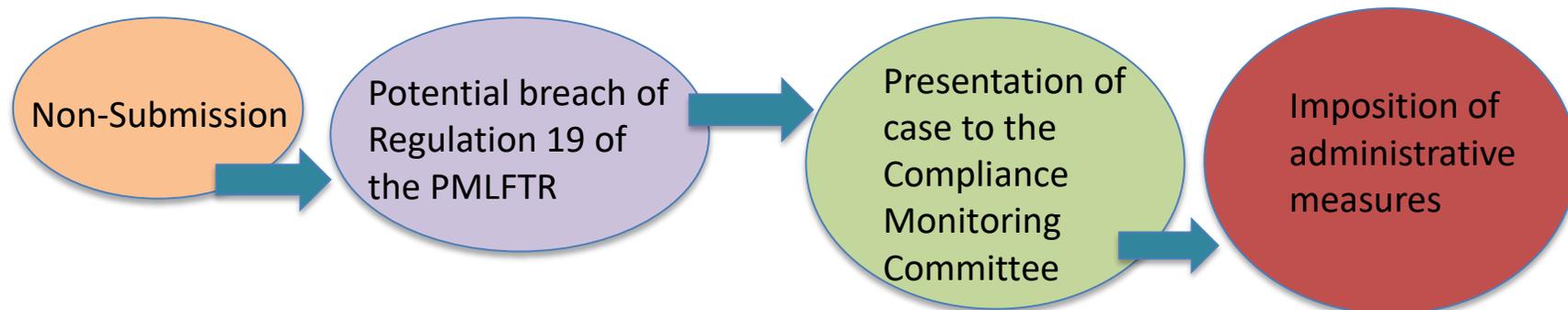
Question: How many customer master account arrangements does the institution have?

Answer: Not Available

The imposition of administrative penalties and the enforcement process

Periodical Reporting

Regulation 19 of the PMLFTR - In fulfilment of its supervisory functions under the Act, the Financial Intelligence Analysis Unit may require subject persons to submit periodical reports on the measures and procedures they maintain and apply pursuant to regulation 5 and any other information or documents as the Financial Intelligence Analysis Unit may consider necessary.



The imposition of administrative penalties and the enforcement process



Imposition of administrative measures

*Failure to submit the REQ 2019 or not submit the REQ in a timely manner has led to the issuance of a potential breaches letter on a total of **207** subject persons.*

*Potential breaches letters issued: **207***

Currently:
Ongoing process of receiving representations, presentation to the CMC and issuance of letters reflecting the administrative measure to be taken.





Sli.do event code: J782

WIFI

User: IC Meeting

Password: meeting247

65C, Tower Street, Birkirkara BKR 4012, Malta

T. (+356) 21 231 333 F. (+356) 21 231 090 E. info@fiumalta.org W. fiumalta.org
