



Guidance for Completion of the Industry Performance Return

Malta Gaming Authority

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1 Introduction

This document provides guidelines to gaming operators on the submission of the Industry Performance Return (IPR/Return).

This document consists of the following sections:

- Guidelines on clarifying the required data for the licensees, operating in the online and land-based channels, in possession of:
 - Business-to-Consumer (B2C) – Gaming Service Licence; and/or
 - Business-to-Business (B2B) – Critical Gaming Supply Licence.
- Frequently Asked Questions (FAQs)

2 Guidelines on Required Data – Remote Channel

2.1 IPR for B2C – Gaming Service Licence holders

The following section aims to provide the necessary supporting information on how to fill each request for data which is set out in the IPRs.

2.1.1 Customer Accounts

1. Number of **all unique registered accounts** as at the end of reporting period (30 June or 31 December) per company licensed by the MGA.

In this question, the data provided should represent the total number of unique registered accounts (irrespective of their status, be it, active, suspended, inactive etc.) under the Maltese gaming licence as at the end of June or the end of December for the year under review.

The word unique implies that any accounts that may exist across multiple brands and/or websites are not to be counted more than once.

2. Number of **new registered accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

This question requires the number of player accounts that were registered during the reporting period (1 January – 30 June or 1 July – 31 December).

3. Number of **active player accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

The data submitted in this question should reflect the total number of active player accounts for the MGA licensed activity, defined as:

those accounts for customers that played at least once during the specified reporting period.

It is accepted that there might be an overlap of players which were active in both reporting periods (1 January – 30 June and 1 July – 31 December). To this end, when the IPR refers to the reporting period 1 July – 31 December, the following question applies:

3.1 Number of **unique active player accounts** during the year (1 January – 31 December) per company licensed by the MGA.

The intention of this question is to capture the unique and distinctive number of active player accounts during the entire year that should not include any double counting of accounts.

For example, if an account was active in April, May, July, and October, it is counted as one (1) active account for Question 3 in the Jan–Jun IPR and one (1) active account for Question 3 in the Jul–Dec IPR. For Question 3.1 in the Jul–Dec IPR, it is counted once only, as it is one unique active player account for the year.

4. Number of **new active player accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

The data provided for this question should reflect the total number of new active player accounts under the MGA licensed activity, defined as:

those accounts on which customers played for the first time during their lifetime with the company licensed by the MGA during the specified reporting period.

5. Number of **suspended player accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

The number of suspended player accounts refers to the total number of active accounts that have been suspended/blocked by the operator, for any reason, during the specified reporting period. This should exclude accounts that were suspended due to self-exclusion.

6. In actual terms, indicate the **age distribution of the active players** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

Question 6 requires the age distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

7. In actual terms, indicate the **gender of the active players** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

This question requires the gender distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under the header "not specified", please report all players that did not indicate their gender upon registration. This field can also be used by the licensees who did not collect information on gender. In such a case, a note in the Additional Notes section should be included.

8. In actual terms, indicate the distribution of the active players based on the amount of money wagered during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA.

This question requires the active customer distribution in actual terms, according to the money wagered by players, based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

9. Does the company offer a mobile application to its players?

This question requires a yes or no answer as to whether the licensee offers games to its players via a mobile application.

10. In monetary terms, indicate the **methods of payment for both deposits and withdrawals** used during the reporting period (1 January – 30 June or 1 July – 31 December).

This question requires in actual monetary terms (€), the methods of payment, for both deposits and withdrawals, broken down by the various methods provided, namely:

- Credit/debit cards
- Pre-paid vouchers
- Pre-paid debit cards
- E-wallet
- Online money remittance services
- Bank transfer
- Mobile Payment services (incl. by telecoms providers)
- Cash
- Virtual Financial Assets
- Other*

*When the category of "Other" is filled in, a description of such method should be provided in the relevant field.

11. Kindly list the exchange used to transfer VFA to and from fiat currency.

In this question, information on the exchange used to transfer VFA to and from fiat currency is required. In case where different VFA exchanges are used within the reporting period, licensees are requested to specify the exchange(s) for each currency and indicate the respective period in which it was used in line with the MGA's [Policy on the use of Distributed Ledger Technology by Authorised Persons](#).

12. Do you operate **betting shops** to provide services to customers?

Question 12 requires information on whether the licensee operates any betting shops.

12.1 Indicate the following information on betting shops per country: (a) **country** where the betting shops are located; (b) **total number of betting shops**; (c) total number of unique registered customers as at the end of the reporting period; (d) total **number of new registered customers**; (e) total number of **active** customers during the reporting period; (f) total **Money Wagers**; (g) total Gaming Revenue.

In the case where betting shops are operated, the following information must be provided in Question 12.1:

- Country where the betting shops are located;
- Total number of betting shops;
- Total number of unique registered customers as at the end of the reporting period;
- Total number of new registered customers;
- Total number of active customers;
- Total Money Wagers;
- Total Gaming Revenue.

The above information must be added for each country separately by clicking on the button “Add Betting Shop”.

Add Betting Shop

Country	Betting Shops	Unique Registered Customers	New Registered Customers	No. Active Customers	Money Wagers (€)	Gaming Revenue (€)
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13. For **every entity covered under the Maltese Corporate Licence** indicate: (a) is the child entity currently in operation under the MGA licence; (b) does the child entity operate as a B2B or B2C; (c) if the child entity operates as a B2C, provide the **number of active player accounts** with the child entity during the reporting period (1 January – 30 June / 1 July – 31 December); (d) if the child entity operates as a B2C, provide the **number of unique active player accounts** with the child entity during the year (1 January – 31 December); (e) additional notes.

This question is applicable to licensees holding a Maltese Corporate Licence. The information below must be provided for each entity covered under the Maltese Corporate Licence:

- Is the child entity currently in operation under the MGA licence? Indicate ‘Yes’ or ‘No’. For the purpose of this question:
 - A **B2C entity is considered to be in operation** when, during the reporting period, the entity services customers by providing them with the potential of gaming services (including registration of account, holding customer funds and provision of gambling services) in terms of its licence. This excludes situations where the business is holding customer funds pending settlement of customer balance dues during an orderly winding down of business;
 - A **B2B entity is considered to be in operation** when the entity is currently providing a B2B service to B2B customer in terms of ongoing services that require a B2B licence.

- Does the child entity operate as a B2B or B2C? Indicate 'B2B' or 'B2C'.
- Where the child entity operates as a B2C, provide the number of active player accounts with the child entity during the reporting period (1 January – 30 June, 1 July – 31 December). The definition of an active player account set out in Question 3 applies.
- Where the child entity operates as a B2C, provide the number of unique active player accounts with the child entity during the year (1 January – 31 December). This question applies for the reporting period 1 July – 31 December, using the definition set out in Question 3.1.
- Any additional notes, where necessary, to clarify or contextualise the information provided for the entity.

2.1.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of “suspicious betting” can vary among companies. To this end, an activity may be considered to be “suspicious” when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term “unusual activity” may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (e.g. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously;
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January – 30 June or 1 July – 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January – 30 June or 1 July – 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent question should be answered.

3.1. How many sports betting markets had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1, the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December).

4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January – 30 June / 1 July – 31 December)?

- If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
- If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1 Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) type of Sport; (b) the number of **markets**; (ci) the total **Real Money Wagers**; (cii) the total **Real Money Wagers of players residing in Malta** from the amount reported in (ci); (di) the total **Winnings**; (dii) the total **Winnings of players residing in Malta** from the amount reported in (di); (e) the percentage share of **Real Money Wagers** out of total business; (f) the percentage share of **Gaming Revenue** out of total business; and (g) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport;
- Number of markets offered;
- Total real money wagers;

- Total real money wagers of players residing in Malta
 - The **total real money wagers** reported in (ci) must be greater or equal to the **total real money wagers of players residing in Malta** reported in (cii), since the wagers generated by players residing in Malta form part of the total real money wagers of the sport event held in Malta;
- Total winnings;
- Total winnings of players residing in Malta
 - The **total winnings** reported in (di) must be greater or equal to the **total winnings of players residing in Malta** reported in (dii), since the winnings generated by players residing in Malta form part of the total winnings of the sport event held in Malta;
- Percentage of real money wagers out of total business;
- Percentage of gaming revenue out of total business;
- Percentage share of real money wagers for live events, and for pre-events (separately)
 - The percentage share of real money wagers for live events and pre-events must add up to 100% for each sport event held in Malta.

The above information must be added for each type of sport separately by clicking on the red button "Add Sport".

Add Sport

Type of Sport	No. of Markets Offered	Real Money Wagers (€)	Winnings (€)	Real Money Wagers out of Total Business (%)	Gaming Revenue out of Total Business (%)	Real Money Wagers on live events (%)	Real Money Wagers on pre-events (%)
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2.1.3 Responsible Gambling

This section aims to provide further insights to the MGA on the responsible gambling tools implemented by the operators. This will assist the Authority to further consolidate its knowledge on the subject and impact of gambling and ensure the regulation is updated accordingly in the area.

1. Number of self-exclusion requests (sign-ups) by player.

The data provided in this question should reflect the number of self-exclusion requests made by players residing in Malta and players residing outside of Malta within the reporting period, each categorised by age and duration (definite/indefinite).

The data provided under "definite" must **not** include time/session limits as these should be reported separately under Questions 9 and 9.1 within this section.

2. Number of exclusions imposed by the B2C licensee.

The data provided in this question should reflect the number of self-exclusion requests imposed by the licensee for player residing in Malta and players residing outside of Malta within the reporting period, each categorised by age and duration (definite/indefinite). It is important to note that the exclusions imposed by the B2C licensee refer **solely** to exclusions that relate to Responsible Gambling and exclude any other exclusions imposed for other reasons, such as AML issues.

The data provided under “definite” must **not** include time/session limits as these should be reported separately under Questions 9 and 9.1 within this section.

3. Is your company able to provide the number of players who communicated that they were suffering from gambling addiction during the reporting period?

3.1 If Q3 is yes, indicate in actual terms, the number of players who communicated to the operator that they were suffering from gambling addiction problems during the reporting period (1 January – 30 June or 1 July – 31 December):

This will require the operator to specify the number of players who have communicated to the operator that they were suffering from issues related to gambling addiction. Where the operator is able to provide quantitative information, Question 3 should be answered Yes and Question 3.1 should be completed. Where such information cannot be provided, the operator should answer No to Question 3.

4. Does your company offer **self-exclusion reversals/cancellations** (excluding removals upon expiry) on player’s request?

4.1 Indicate the **number of requests, made by players, for self-exclusion reversals/cancellations** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 4 starts with a leading question in order to establish whether the company offers self-exclusion reversals on player’s request. Such requests refer to cancellations of self-exclusions which are solely by the relevant player and exclude those requests which are upon expiry of the set duration.

If the company offers such reversals, Question 4.1 should be filled in and provide for the number of requests, made by players, for self-exclusion reversals during the reporting period (1 January – 30 June / 1 July – 31 December).

5. Does your company offer the possibility to **reduce self-exclusion period**?

Question 5 requires the operator to indicate if the company offers players the possibility of reducing the self-exclusion period.

6. Does your company offer the possibility to set **deposit limits**?

6.1 Is your company able to provide quantitative information on deposit limits for the reporting period?

6.2 If Q6.1 is Yes, indicate the **unique number of players** that **set a deposit limit** on their account and the **unique number of players** that **hit this deposit limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 6 requires the operator to indicate whether it allows players to set a personal deposit limit (the amount of money or money's worth the player can deposit is limited for a period of time).

Where the operator is able to provide quantitative information, Question 6.1 should be answered Yes and Question 6.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 6.1.

7. Does your company offer the possibility to set **wagering limits**?

7.1 Is your company able to provide quantitative information on wagering limits for the reporting period?

7.2 If Q7.1 is Yes, indicate the **unique number of players** that **set a wagering limit** on their account and the **unique number of players** that **hit this wagering limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 7 requires the operator to indicate whether it allows players to set a wagering limit (the amount of money or money's worth the player can wager is limited for a period of time).

Where the operator is able to provide quantitative information, Question 7.1 should be answered Yes and Question 7.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 7.1.

8. Does your company offer the possibility to set **loss limits**?

8.1 Is your company able to provide quantitative information on loss limits for the reporting period?

8.2 If Q8.1 is Yes, indicate the **unique number of players** that **set a loss limit** on their account and the **unique number of players** that **hit this loss limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 8 requires the operator to indicate whether it allows players to set a loss limit (the amount of money or money's worth that can be lost by the player is limited for a period of time).

Where the operator is able to provide quantitative information, Question 8.1 should be answered Yes and Question 8.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 8.1.

9. Does your company offer the possibility to set **time/session limits**?

9.1 Is your company able to provide quantitative information on time/session limits for the reporting period?

9.2 If Q9.1 is Yes, indicate the **unique number of players** that **set a time/session limit** on their account and the **unique number of players** that **hit this time/session limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 9 requires the operator to indicate whether it allows players to set a time/session limit (the amount of time which a player spends playing is limited).

Where the operator is able to provide quantitative information, Question 9.1 should be answered Yes and Question 9.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 9.1.

10. Does your company impose **withdrawal limits**?

10.1 If Q10 is Yes, indicate **how often the withdrawal limit applies** and the **withdrawal limit amount**.

Question 10 requires the operator to indicate whether the company imposes withdrawal limits on players. Withdrawal limits refer to restrictions on the amount of money a player can withdraw within a defined timeframe.

Where withdrawal limits are imposed, the operator is required to indicate the **applicable frequency** (per transaction, daily, weekly, monthly, yearly, or where not listed, select "Other" and specify) and the **withdrawal limit amount in euro (€)**.

2.1.4 Financial Info – Section A

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the [Gaming Licence Fees Regulations](#) and the [Directive on the Calculation of Compliance Contribution](#).

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields marked in red in the below screenshot, and the list of verticals will appear on the screen.

Type 1		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 2		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 3		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 4		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

It should be noted that in the Total summary fields (refer to screenshot below) which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.

Total Real Money Wagers (€)	Total Gaming Revenue (€)	Total Gaming Revenue (€) submitted through the Compliance Contribution reports
€ 0.00	€ 0.00	€ 0.00

In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports, an explanation should be provided in Question 1.1.

Question 2 is not applicable to this scenario.

- Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the sole location where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".

Add Location

Office Address Line 1	Office Address Line 2	City	Country
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2.1.5 Financial Info – Section B

This section aims at capturing the GR generated through the activities licensed by the MGA, as defined by the [Gaming Licence Fees Regulations](#) and the [Directive on the Calculation of Compliance Contribution](#) by country during the six-month period under review.

1. Provide the breakdown of the **Gaming Revenue** generated solely through the MGA licences **by country** during the reporting period (1 January – 30 June or 1 July – 31 December).

The GR for each country needs to be added through the field provided separately. Ultimately, the total GR in both Section A and Section B of the Financial Info should tally.

2.1.6 Employment – Section A

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. Data provided should not include persons not employed in relation to the licensed activity.

1. Number of employees **working solely in Malta** on the **remote gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles, excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a workweek, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

2. Out of the total number of non-Maltese employees, indicate how many are **non-EU nationals**?

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1 (Employment – Section A), are non-EU nationals, if any. In case there were not any, this question will not appear on your screen.

3. Do you operate through a **physical office** in Malta?

- If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
- If the licensee operated through a physical office in Malta, it can proceed to question 3.1.

3.1 Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for each office, the size in square meters of the office space together with the corresponding locality. The above information must be added for each office separately by clicking on the red button “Add Office Space”.

Add Office Space

Square Meters

Locality

2.1.7 Employment – Section B

This section has been tweaked to capture any additional staff in Malta which is employed by the company and that does not work on the MGA licensed activities. To this end, the summation of Section A and Section B should reflect the total employment of the company in Malta.

Such typical other staff reported in Section B should include:

- (1) Additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or
- (2) Employees that are employed with another associated/related company that is not licensed by the MGA (employees should not be on the payroll of the licensed entity).

Employees working on MGA–licensed activities but engaged through other group entities

In certain group structures, employees based in Malta may work on gaming activities licensed by the MGA, while being contractually engaged by a related or associated group company that is not itself the holder of the relevant MGA licence.

In such cases, where:

- the employees are based in Malta, and
- the employees carry out MGA–licensed gaming activities, but
- the employees are not directly employed by the MGA–licensed entity, and
- the employees are not employed by another MGA–licensed entity,

these employees do not fall strictly within the standard definitions of *Employment – Section A* or *Employment – Section B*.

For reporting purposes, such employees shall be included under *Employment – Section A* of the relevant MGA–licensed entity, as they are engaged in MGA–licensed activities, notwithstanding that their contractual employment is with another group entity. The name/s of the other group entity/ies

through which they are employed are to be listed in the 'Additional Notes' section at the end of the IPR. This approach ensures that:

- employees carrying out MGA-licensed activities in Malta are appropriately reflected in employment data; and
- total employment figures are not understated due to group engagement structures.

Licensees may be required to provide clarifications on group engagement arrangements where relevant.

For the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in Employment – Section B any employees who work on MGA-licensed activities of any other company; such employees would be included in the Employment – Section A of the other company's IPR.

1. **In addition** to employees working in Malta on the remote gaming activities licensed by the MGA (as reported in the Employment – Section A), does your company employ **any other staff** in Malta who **do not work** on the remote gaming activities licensed by the MGA?

In Question 1, the operator should indicate if such employment exists.

If there is no such employment, the operator can indicate a 'No' and proceed to the next section. However, if such employment exists, then Question 1.1 and 1.2 should be filled in.

1.1 List down **all the entities** through which your company employs any other persons in Malta that were not reported in the Employment – Section A.

1.2 Are any of the entities listed in Question 1.1 above also shared with another MGA-licensed entity submitting an IPR?

1.3 If Question 1.2 is 'Yes', indicate the licensees.

1.4 Provide the aggregate number of **employees working with the entities** listed in Q1.1 as at the end of reporting period (30 June or 31 December).

In Question 1.1, the operator should provide a list of all the entities with which the other staff is employed

In Question 1.2, the operator should indicate whether any of the entities listed in Question 1.1 are shared with another MGA-licensed entity submitting an IPR, by selecting 'Yes' or 'No'.

In Question 1.3, where the response to Question 1.2 is 'Yes', the operator is required to indicate the MGA-licensed entities with which the entities listed in Question 1.1 are shared.

In Question 1.4, the operator is required to report the aggregate number of employees working with the entities listed in Question 1.1. Such employment refers to (1) additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees

should not be on the payroll of the licensed entity). Kindly refer to [Section 2.1.7](#) for clarity on group structures.

In similarity with Section A, the data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management).

2. Out of the total number of non-Maltese employees, indicate how many are **non-EU nationals**.

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1.2 (Employment – Section B), are non-EU nationals, if any. In case there weren't any, this question will not appear on your screen.

2.1.8 Licensing & Jurisdictions

This section captures any other licences that are held by the company, apart from the one offered by the MGA.

1. Do you hold other gaming licences apart from the one offered by the MGA, under the same company?

This question requires a yes or no answer as to whether the licensee holds any gaming licence apart from that granted by the MGA.

1.1 Indicate the jurisdiction(s) under which the company is licensed.

The above information must be added for each country by clicking on the button "Add Country".

Add Country

Country ↑

2.1.9 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and/or processes in line with the [Policy on Outsourcing by Authorised Persons](#), where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third-party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if the company had any arrangements of this kind during the said reporting period. If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section. If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based in Malta?**

1.2 Which of the following services, functions and/or processes were outsourced to **companies based abroad?**

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and/or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Problem Gambling Detection Systems
- Risk management services for the operation of a licensable game
- Suspicious Betting Monitoring

2.1.10 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year in relation to the following areas:

- Gaming Revenue
- Employment
- Costs:
 - Legal & Professional Fees
 - Odds & Risk Compiling Services
 - IT, Co-location & Telecommunication

- Travelling & Entertainment
- Marketing Expenditure
- Other Costs

It should be noted that this Section is only applicable for the reporting period 1 July – 31 December.

2.1.11 Skills Gap

In order to obtain a better understanding of the existing skills gap in the gaming industry, the MGA is collecting data on a six-monthly basis, which is then aggregated and presented in a report which is published on an annual basis. To access the latest report, please refer to the [Publication page](#) on the MGA's website.

This section includes a set of questions which should be answered specifically to the licensee's opinion about the Maltese gaming employment market.

In the case where the licensee did not have any vacancies in Malta as at the end of the reporting period, questions 2 and 2.1 should be answered as zero.

In terms of questions 2, 3 and 3.1, the below is a non-exhaustive list of the typical job roles included within the categories listed:

- **Game operation and development:** Head of Poker, Poker Manager, Casino Coordinator, Casino Campaign Manager, Mobile Product Manager, Head of Sportsbook, Sportsbook Manager/Product Development, Odds Compiler Specialist, Senior Bookmaker, Senior Trader.
- **Data and analysis:** Head of Analytics, Analytics Manager, Business Data Analyst, Data Warehouse Architect, Head of BI, BI developer.
- **Marketing (incl. Customer Care):** CRM Manager, Head of Brand, Digital Marketing Manager, Head of Affiliates, Head of SEO, Chief Commercial Officer, Head of Customer Care, Sportsbook Marketing Manager, Digital Content Manager, Copywriter, Social Media Analyst, Graphic Designer.
- **Legal and compliance, risk and fraud:** Legal Compliance Manager, Legal Counsel, Chief Risk Officer, Fraud Manager, Fraud Analyst.
- **Technology:** Senior Software Developer, Front-end Developer, Back-end Developer, Web Developer, Web UX/UI Designer, Senior QA-Engineer, Platform Engineer, Software Engineer.
- **Finance, payment and human resources:** Chief Financial Officer, Payments and Reconciliation Analyst, HR Manager, Recruiter, Trainer.

2.1.12 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made, including any clarification required in relation to employment figures as outlined in the respective guidance. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be

listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

2.2 IPR for B2B – Critical Gaming Supply Licence holders

The following section aims to provide the necessary supporting information on how to fill each request for data which is set out in the IPRs.

2.2.1 Customer Accounts

This section only applies to B2C – Gaming Service licence holders. It does not apply to B2B – Critical Gaming Supply licence holders. Please move to the next section.

2.2.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of “suspicious betting” can vary among companies. To this end, an activity may be considered to be “suspicious” when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term “unusual activity” may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (e.g. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously;
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January – 30 June or 1 July – 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period (1 January – 30 June or 1 July – 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent question should be answered.

3.1 How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1, the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December).

4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January – 30 June / 1 July – 31 December)?

- If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
- If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1 Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) type of Sport; (b) the number of **markets**; (ci) the total **Real Money Wagers**; (cii) the total **Real Money Wagers of players residing in Malta** from the amount reported in (ci); (di) the total **Winnings**; (dii) the total **Winnings of players residing in Malta** from the amount reported in (di); (e) the percentage share of **Real Money Wagers** out of total business; (f) the percentage share of **Gaming Revenue** out of total business; and (g) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport;
- Number of markets offered;
- Total real money wagers;

- Total real money wagers of players residing in Malta
 - The **total real money wagers** reported in (ci) must be greater or equal to the **total real money wagers of players residing in Malta** reported in (cii), since the wagers generated by players residing in Malta form part of the total real money wagers of the sport event held in Malta;
- Total winnings;
- Total winnings of players residing in Malta
 - The **total winnings** reported in (di) must be greater or equal to the **total winnings of players residing in Malta** reported in (dii), since the winnings generated by players residing in Malta form part of the total winnings of the sport event held in Malta;
- Percentage of real money wagers out of total business;
- Percentage of gaming revenue out of total business;
- Percentage share of real money wagers for live events, and for pre-events (separately)
 - The percentage share of real money wagers for live events and pre-events must add up to 100% for each sport event held in Malta.

The above information must be added for each type of sport separately by clicking on the red button "Add Sport".

Add Sport

Type of Sport	No. of Markets Offered	Real Money Wagers (€)	Winnings (€)	Real Money Wagers out of Total Business (%)	Gaming Revenue out of Total Business (%)	Real Money Wagers on live events (%)	Real Money Wagers on pre-events (%)
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2.2.3 Responsible Gambling

This section only applies to B2C – Gaming Service licence holders. It does not apply to B2B – Critical Gaming Supply licence holders. Please move to the next section.

2.2.4 Financial Info – Section A

1. For solely the activity generated through the MGA B2B licence, on the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the [Gaming Licence Fees Regulations](#), where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period, and which revenue shall be determined on the basis of generally accepted accounting principles and practice, as defined in article 2(4) of the Companies Act.

Only revenue generated under the B2B licence for the reporting period under consideration is to be provided.

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the sole location where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".

Add Location

Office Address Line 1

Office Address Line 2

City

Country

2.2.5 Financial Info – Section B

This section only applies to B2C – Gaming Service licence holders. It does not apply to B2B – Critical Gaming Supply licence holders. Please move to the next section.

2.2.6 Employment – Section A

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. Data provided should not include persons not employed in relation to the licensed activity.

1. Number of employees **working solely in Malta** on the **remote gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles, excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a workweek, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

2. Out of the total number of non-Maltese employees, indicate how many are **non-EU nationals**?

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1 (Employment – Section A), are non-EU nationals, if any. In case there were not any, this question will not appear on your screen.

3. Do you operate through a **physical office** in Malta?

- If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
- If the licensee operated through a physical office in Malta, it can proceed to question 3.1.

3.1 Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for each office, the size in square meters of the office space together with the corresponding locality. The above information must be added for each office separately by clicking on the red button “Add Office Space”.

Add Office Space

Square Meters

Locality

2.2.7 Employment – Section B

This section has been tweaked to capture any additional staff in Malta which is employed by the company and that does not work on the MGA licensed activities. To this end, the summation of Section A and Section B should reflect the total employment of the company in Malta.

Such typical other staff reported in Section B should include:

- (1) Additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or
- (2) Employees that are employed with another associated/related company that is not licensed by the MGA (employees should not be on the payroll of the licensed entity).

Employees working on MGA-licensed activities but engaged through other group entities

In certain group structures, employees based in Malta may work on gaming activities licensed by the MGA, while being contractually engaged by a related or associated group company that is not itself the holder of the relevant MGA licence.

In such cases, where:

- the employees are based in Malta, and
- the employees carry out MGA-licensed gaming activities, but
- the employees are not directly employed by the MGA-licensed entity, and

- the employees are not employed by another MGA-licensed entity,

these employees do not fall strictly within the standard definitions of *Employment – Section A* or *Employment – Section B*.

For reporting purposes, such employees shall be included under *Employment – Section A* of the relevant MGA-licensed entity, as they are engaged in MGA-licensed activities, notwithstanding that their contractual employment is with another group entity. The name/s of the other group entity/ies through which they are employed are to be listed in the ‘Additional Notes’ section at the end of the IPR. This approach ensures that:

- employees carrying out MGA-licensed activities in Malta are appropriately reflected in employment data; and
- total employment figures are not understated due to group engagement structures.

Licensees may be required to provide clarifications on group engagement arrangements where relevant.

For the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in *Employment – Section B* any employees who work on MGA-licensed activities of any other company; such employees would be included in the *Employment – Section A* of the other company’s IPR.

1. **In addition** to employees working in Malta on the remote gaming activities licensed by the MGA (as reported in the *Employment – Section A*), does your company employ **any other staff** in Malta who **do not work** on the remote gaming activities licensed by the MGA?

In Question 1, the operator should indicate if such employment exists.

If there is no such employment, the operator can indicate a ‘No’ and proceed to the next section. However, if such employment exists, then Question 1.1 and 1.2 should be filled in.

- 1.1 List down **all the entities** through which your company employs any other persons in Malta that were not reported in the *Employment – Section A*.
- 1.2 Are any of the entities listed in Question 1.1 above also shared with another MGA-licensed entity submitting an IPR?
- 1.3 If Question 1.2 is ‘Yes’, indicate the licensees.
- 1.4 Provide the aggregate number of **employees working with the entities** listed in Q1.1 as at the end of reporting period (30 June or 31 December).

In Question 1.1, the operator should provide a list of all the entities with which the other staff is employed.

In Question 1.2, the operator should indicate whether any of the entities listed in Question 1.1 are shared with another MGA-licensed entity submitting an IPR, by selecting ‘Yes’ or ‘No’.

In Question 1.3, where the response to Question 1.2 is 'Yes', the operator is required to indicate the MGA-licensed entities with which the entities listed in Question 1.1 are shared.

In Question 1.4, the operator is required to report the aggregate number of employees working with the entities listed in Question 1.1. Such employment refers to (1) additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees should not be on the payroll of the licensed entity). Kindly refer to [Section 2.2.7](#) for clarity on group structures.

In similarity with Section A, the data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management).

2. Out of the total number of non-Maltese employees, indicate how many are **non-EU nationals**.

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1.2 (Employment – Section B), are non-EU nationals, if any. In case there weren't any, this question will not appear on your screen.

2.2.8 Licensing & Jurisdictions

This section captures any other licences that are held by the company, apart from the one offered by the MGA.

1. Do you hold other gaming licences apart from the one offered by the MGA, under the same company?

This question requires a yes or no answer as to whether the licensee holds any gaming licence apart from that granted by the MGA.

1.1 Indicate the jurisdiction(s) under which the company is licensed.

The above information must be added for each country by clicking on the button "Add Country".

Add Country

Country ↑

2.2.9 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the [Policy on Outsourcing by Authorised Persons](#), where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third-party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if the company had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based in Malta?**

1.2 Which of the following services, functions and/or processes were outsourced to **companies based abroad?**

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and/or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support

- Risk management services for the operation of a licensable game
- Suspicious Betting Monitoring

2.2.10 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year in relation to the following areas:

- Revenue
- Employment
- Costs:
 - Legal & Professional Fees
 - Odds & Risk Compiling Services
 - IT, Co-location & Telecommunication
 - Travelling & Entertainment
 - Marketing Expenditure
 - Other Costs

It should be noted that this Section is only applicable for the reporting period 1 July – 31 December.

2.2.11 Skills Gap

In order to obtain a better understanding of the existing skills gap in the gaming industry, the MGA is collecting data on a six-monthly basis, which is then aggregated and presented in a report which is published on an annual basis. To access the latest report, please refer to the [Publication page](#) on the MGA's website.

This section includes a set of questions which should be answered specifically to the licensee's opinion about the Maltese gaming employment market.

In the case where the licensee did not have any vacancies in Malta as at the end of the reporting period, questions 2 and 2.1 should be answered as zero.

In terms of questions 2, 3 and 3.1, the below is a non-exhaustive list of the typical job roles included within the categories listed:

- **Game operation and development:** Head of Poker, Poker Manager, Casino Coordinator, Casino Campaign Manager, Mobile Product Manager, Head of Sportsbook, Sportsbook Manager/Product Development, Odds Compiler Specialist, Senior Bookmaker, Senior Trader.
- **Data and analysis:** Head of Analytics, Analytics Manager, Business Data Analyst, Data Warehouse Architect, Head of BI, BI developer.
- **Marketing (incl. Customer Care):** CRM Manager, Head of Brand, Digital Marketing Manager, Head of Affiliates, Head of SEO, Chief Commercial Officer, Head of Customer Care, Sportsbook

Marketing Manager, Digital Content Manager, Copywriter, Social Media Analyst, Graphic Designer.

- **Legal and compliance, risk and fraud:** Legal Compliance Manager, Legal Counsel, Chief Risk Officer, Fraud Manager, Fraud Analyst.
- **Technology:** Senior Software Developer, Front-end Developer, Back-end Developer, Web Developer, Web UX/UI Designer, Senior QA-Engineer, Platform Engineer, Software Engineer.
- **Finance, payment and human resources:** Chief Financial Officer, Payments and Reconciliation Analyst, HR Manager, Recruiter, Trainer.

2.2.12 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made, including any clarification required in relation to employment figures as outlined in the respective guidance. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

2.3 IPR for B2C & B2B – Gaming Service Licence and Critical Gaming Supply Licence holders

The following section aims to provide the necessary supporting information on how to fill each request for data which is set out in the IPRs.

2.3.1 Customer Accounts

1. Number of **all unique registered accounts** as at the end of reporting period (30 June or 31 December) per company licensed by the MGA.

In this question, the data provided should represent the total number of unique registered accounts (irrespective of their status, be it active, suspended, inactive etc.) under the Maltese gaming licence as at the end of June or the end of December for the year under review.

The word unique implies that any accounts that may exist across multiple brands and/or websites are not to be counted more than once.

2. Number of **new registered accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

This question requires the number of player accounts that were registered during the reporting period (1 January – 30 June or 1 July – 31 December).

3. Number of **active player accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

The data submitted in this question should reflect the total number of active player accounts for the MGA licensed activity, defined as:

those accounts for customers that played at least once during the specified reporting period.

It is accepted that there might be an overlap of players which were active in both reporting periods (1 January – 30 June and 1 July – 31 December). To this end, when the IPR refers to the reporting period 1 July – 31 December, the following question applies:

3.1 Number of **unique active player accounts** during the year (1 January – 31 December) per company licensed by the MGA.

The intention of this question is to capture the unique and distinctive number of active player accounts during the entire year that should not include any double counting of accounts.

For example, if an account was active in April, May, July, and October, it is counted as one (1) active account for Question 3 in the Jan–Jun IPR and one (1) active account for Question 3 in the Jul–Dec IPR. For Question 3.1 in the Jul–Dec IPR, it is counted once only, as it is one unique active player account for the year.

4. Number of **new active player accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

The data provided for this question should reflect the total number of new active player accounts under the MGA licensed activity, defined as:

those accounts on which customers played for the first time during their lifetime with the company licensed by the MGA during the specified reporting period.

5. Number of **suspended player accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

The number of suspended player accounts refers to the total number of active accounts that have been suspended/blocked by the operator, for any reason, during the specified reporting period. This should exclude accounts that were suspended due to self-exclusion.

6. In actual terms, indicate the **age distribution of the active players** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

Question 6 requires the age distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

7. In actual terms, indicate the **gender of the active players** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

This question requires the gender distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under the header “not specified”, please report all players that did not indicate their gender upon registration. This field can also be used by the licensees who did not collect information on gender. In such a case, a note in the Additional Notes section should be included.

8. In actual terms, indicate the distribution of the active players based on the amount of money wagered during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA.

This question requires the active customer distribution in actual terms, according to the money wagered by players, based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

9. Does the company offer a mobile application to its players?

This question requires a yes or no answer as to whether the licensee offers games to its players via a mobile application.

10. In monetary terms, indicate the **methods of payment for both deposits and withdrawals** used during the reporting period (1 January – 30 June or 1 July – 31 December).

This question requires in actual monetary terms (€), the methods of payment, for both deposits and withdrawals, broken down by the various methods provided, namely:

- Credit/debit cards
- Pre-paid vouchers
- Pre-paid debit cards
- E-wallet
- Online money remittance services
- Bank transfer
- Mobile Payment services (incl. by telecoms providers)
- Cash
- Virtual Financial Assets
- Other*

*When the category of “Other” is filled in, a description of such method should be provided in the relevant field.

11. Kindly list the exchange used to transfer VFA to and from fiat currency.

In this question, information on the exchange used to transfer VFA to and from fiat currency is required.

In case where different VFA exchanges are used within the reporting period, licensees are requested to specify the exchange/s for each currency and indicate the respective period in which it was used in line with the MGA's [Policy on the use of Distributed Ledger Technology by Authorised Persons](#).

12. Do you operate **betting shops** to provide services to customers?

Question 12 requires information on whether the licensee operates any betting shops.

12.1 Indicate the following information on betting shops per country: (a) **country** where the betting shops are located; (b) **total number of betting shops**; (c) total number of unique registered customers as at the end of the reporting period; (d) total **number of new registered customers**; (e) total number of **active** customers during the reporting period; (f) total **Money Wagers**; (g) total Gaming Revenue.

In the case where betting shops are operated, the following information must be provided in Question 12.1:

- Country where the betting shops are located;
- Total number of betting shops;
- Total number of unique registered customers as at the end of the reporting period;
- Total number of new registered customers;
- Total number of active customers;
- Total Money Wagers;
- Total Gaming Revenue.

The above information must be added for each country separately by clicking on the button "Add Betting Shop".

Add Betting Shop

Country	Betting Shops	Unique Registered Customers	New Registered Customers	No. Active Customers	Money Wagers (€)	Gaming Revenue (€)
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13. For **every entity covered under the Maltese Corporate Licence** indicate: (a) is the child entity currently in operation under the MGA licence; (b) does the child entity operate as a B2B or B2C; (c) if the child entity operates as a B2C, provide the **number of active player accounts** with the child entity during the reporting period (1 January – 30 June / 1 July – 31 December); (d) if the child entity operates as a B2C, provide the **number of unique active player accounts** with the child entity during the year (1 January – 31 December); (e) additional notes.

This question is applicable to licensees holding a Maltese Corporate Licence. The information below must be provided for each entity covered under the Maltese Corporate Licence:

- Is the child entity currently in operation under the MGA licence? Indicate 'Yes' or 'No'. For the purpose of this question:
 - A **B2C entity is considered to be in operation** when, during the reporting period, the entity services customers by providing them with the potential of gaming services (including registration of account, hold customer funds and provision of gambling services) in terms of its licence. This excludes situations where the business is

holding customer funds pending settlement of customer balance dues during an orderly winding down of business;

- A **B2B entity is considered to be in operation** when the entity is currently providing a B2B service to B2B customer in terms of ongoing services that require a B2B licence.
- Does the child entity operate as a B2B or B2C? Indicate ‘B2B’ or ‘B2C’.
- Where the child entity operates as a B2C, provide the number of active player accounts with the child entity during the reporting period (1 January – 30 June, 1 July – 31 December). The definition of an active player account set out in Question 3 applies.
- Where the child entity operates as a B2C, provide the number of unique active player accounts with the child entity during the year (1 January – 31 December). This question applies for the reporting period 1 July – 31 December, using the definition set out in Question 3.1.
- Any additional notes, where necessary, to clarify or contextualise the information provided for the entity.

2.3.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of “suspicious betting” can vary among companies. To this end, an activity may be considered to be “suspicious” when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term “unusual activity” may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (e.g. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously;
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.

- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2, the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January – 30 June or 1 July – 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period (1 January – 30 June or 1 July – 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent question should be answered.

3.1. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1, the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December).

4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January – 30 June / 1 July – 31 December)?

- If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
- If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1 Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) type of sport; (b) the number of **markets**; (ci) the total **Real Money Wagers**; (cii) the total **Real Money Wagers of players residing in Malta** from the amount reported in (ci); (di) the total **Winnings**; (dii) the total **Winnings of players residing in Malta** from the amount reported in (di); (e) the percentage share of **Real Money Wagers** out of total business; (f) the percentage share of **Gaming Revenue** out of total business; and (g) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport;

- Number of markets offered;
- Total real money wagers;
- Total real money wagers of players residing in Malta
 - The **total real money wagers** reported in (ci) must be greater or equal to the **total real money wagers of players residing in Malta** reported in (cii), since the wagers generated by players residing in Malta form part of the total real money wagers of the sport event held in Malta;
- Total winnings;
- Total winnings of players residing in Malta
 - The **total winnings** reported in (di) must be greater or equal to the **total winnings of players residing in Malta** reported in (dii), since the winnings generated by players residing in Malta form part of the total winnings of the sport event held in Malta;
- Percentage of real money wagers out of total business;
- Percentage of gaming revenue out of total business;
- Percentage share of real money wagers for live events, and for pre-events (separately)
 - The percentage share of real money wagers for live events and pre-events must add up to 100% for each sport event held in Malta.

The above information must be added for each type of sport separately by clicking on the red button "Add Sport".

Add Sport

Type of Sport	No. of Markets Offered	Real Money Wagers (€)	Winnings (€)	Real Money Wagers out of Total Business (%)	Gaming Revenue out of Total Business (%)	Real Money Wagers on live events (%)	Real Money Wagers on pre-events (%)
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2.3.3 Responsible Gambling

This section aims to provide further insights to the MGA on the responsible gambling tools implemented by the operators. This will assist the Authority to further consolidate its knowledge on the subject and impact of gambling, and ensure the regulation is updated accordingly in the area.

1. Number of self-exclusion requests (sign-ups) by player.

The data provided in this question should reflect the number of self-exclusion requests made by players residing in Malta and players residing outside of Malta within the reporting period, each categorised by age and duration (definite/indefinite).

The data provided under "definite" must **not** include time/session limits as these should be reported separately under Questions 9 and 9.1 within this section.

2. Number of exclusions imposed by the B2C licensee.

The data provided in this question should reflect the number of self-exclusion requests imposed by the licensee for players residing in Malta and players residing outside of Malta within the reporting period,

each categorised by age and duration (definite/indefinite). It is important to note that the exclusions imposed by the B2C licensee refer **solely** to exclusions that relate to Responsible Gambling and exclude any other exclusions imposed for other reasons, such as AML issues.

The data provided under “definite” must **not** include time/session limits, as these should be reported separately under Questions 9 and 9.1 within this section.

3. Is your company able to provide the number of players who communicated that they were suffering from gambling addiction during the reporting period?

3.1 If Q3 is yes, indicate in actual terms, the number of players who communicated to the operator that they were suffering from gambling addiction problems during the reporting period (1 January – 30 June or 1 July – 31 December).

This will require the operator to specify the number of players who have communicated to the operator that they were suffering from issues related to gambling addiction. Where the operator is able to provide quantitative information, Question 3 should be answered Yes and Question 3.1 should be completed. Where such information cannot be provided, the operator should answer ‘No’ to Question 3.

4. Does your company offer **self-exclusion reversals/cancellations** (excluding removals upon expiry) on player’s request?

4.1 Indicate the **number of requests, made by players, for self-exclusion reversals/cancellations** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 4 starts with a leading question in order to establish whether the company offers self-exclusion reversals on player’s request. Such requests refer to cancellations of self-exclusions which are solely by the relevant player and exclude those requests which are upon expiry of the set duration.

If the company offers such reversals, Question 4.1 should be filled in and provide for the number of requests, made by players, for self-exclusion reversals during the reporting period (1 January – 30 June or 1 July – 31 December).

5. Does your company offer the possibility to **reduce self-exclusion period**?

Question 5 requires the operator to indicate if the company offers players the possibility of reducing the self-exclusion period.

6. Does your company offer the possibility to set **deposit limits**?

6.1 Is your company able to provide quantitative information on deposit limits for the reporting period?

6.2 If Q6.1 is Yes, indicate the **unique number of players** that **set a deposit limit** on their account and the **unique number of players** that **hit this deposit limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 6 requires the operator to indicate whether it allows players to set a personal deposit limit (the amount of money or money’s worth the player can deposit is limited for a period of time).

Where the operator is able to provide quantitative information, Question 6.1 should be answered Yes and Question 6.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 6.1.

7. Does your company offer the possibility to set **wagering limits**?

7.1 Is your company able to provide quantitative information on wagering limits for the reporting period?

7.2 If Q7.1 is Yes, indicate the **unique number of players** that **set a wagering limit** on their account and the **unique number of players** that **hit this wagering limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 7 requires the operator to indicate whether it allows players to set a wagering limit (the amount of money or money's worth the player can wager is limited for a period of time).

Where the operator is able to provide quantitative information, Question 7.1 should be answered Yes and Question 7.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 7.1.

8. Does your company offer the possibility to set **loss limits**?

8.1 Is your company able to provide quantitative information on loss limits for the reporting period?

8.2 If Q8.1 is Yes, indicate the **unique number of players** that **set a loss limit** on their account and the **unique number of players** that **hit this loss limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 8 requires the operator to indicate whether it allows players to set a loss limit (the amount of money or money's worth that can be lost by the player is limited for a period of time).

Where the operator is able to provide quantitative information, Question 8.1 should be answered Yes and Question 8.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 8.1.

9. Does your company offer the possibility to set **time/session limits**?

9.1 Is your company able to provide quantitative information on time/session limits for the reporting period?

9.2 If Q9.1 is Yes, indicate the **unique number of players** that **set a time/session limit** on their account and the **unique number of players** that **hit this time/session limit** during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 9 requires the operator to indicate whether it allows players to set a time/session limit, (the amount of time which a player spends playing is limited).

Where the operator is able to provide quantitative information, Question 9.1 should be answered Yes and Question 9.2 should be completed. Where such information cannot be provided, the operator should answer 'No' to Question 9.1.

10. Does your company impose **withdrawal limits**?

10.1 If Q10 is Yes, indicate **how often the withdrawal limit applies** and the **withdrawal limit amount**.

Question 10 requires the operator to indicate whether the company imposes withdrawal limits on players. Withdrawal limits refer to restrictions on the amount of money a player can withdraw within a defined timeframe.

Where withdrawal limits are imposed, the operator is required to indicate the **applicable frequency** (per transaction, daily, weekly, monthly, yearly, or where not listed, select "Other" and specify) and the **withdrawal limit amount in euro (€)**.

2.3.4 Financial Info – Section A

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the [Gaming Licence Fees Regulations](#) and the [Directive on the Calculation of Compliance Contribution](#).

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields marked in red in the below screenshot, and the list of verticals will appear on the screen.

Type 1		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 2		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 3		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 4		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

It should be noted that in the Total summary fields (refer to screenshot below), which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.

Total Real Money Wagers (€)	Total Gaming Revenue (€)	Total Gaming Revenue (€) submitted through the Compliance Contribution reports
€ 0.00	€ 0.00	€ 0.00

In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports an explanation should be provided in Question 1.1.

- For solely the activity generated through the MGA B2B licence, the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the [Gaming Licence Fees Regulations](#), where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period and which revenue shall be determined on the basis of generally accepted accounting principles and practice as defined in article 2(4) of the Companies Act. Such revenue needs to be provided for the reporting period under consideration.

- Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the sole location where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".

Add Location

Office Address Line 1

Office Address Line 2

City

Country

2.3.5 Financial Info – Section B

This section aims at capturing the GR generated through the activities licensed by MGA, as defined by the [Gaming Licence Fees Regulations](#) and the [Directive on the Calculation of Compliance Contribution](#) by country during the six-month period under review.

1. Provide the breakdown of the **Gaming Revenue** generated solely through the MGA licences **by country** during the reporting period (1 January – 30 June or 1 July – 31 December).

The GR for each country needs to be added through the field provided separately. Ultimately, the total GR in both Section A and Section B of the Financial Info should tally.

2.3.6 Employment – Section A

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. Data provided should not include persons not employed in relation to the licensed activity.

1. Number of employees **working solely in Malta** on the **remote gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles, excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a workweek, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

2. Out of the total number of non-Maltese employees, indicate how many are **non-EU nationals**?

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1 (Employment – Section A), are non-EU nationals, if any. In case there were not any, this question will not appear on your screen.

3. Do you operate through a **physical office** in Malta?

- If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
- If the licensee operated through a physical office in Malta, it can proceed to question 3.1.

3.1 Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for each office, the size in square meters of the office space together with the corresponding locality. The above information must be added for each office separately by clicking on the red button “Add Office Space”.

Add Office Space

Square Meters

Locality

2.3.7 Employment – Section B

This section has been tweaked to capture any additional staff in Malta which is employed by the company and that does not work on the MGA licensed activities. To this end, the summation of Section A and Section B should reflect the total employment of the company in Malta.

Such typical other staff reported in Section B should include:

- (1) Additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or
- (2) Employees that are employed with another associated/related company that is not licensed by the MGA (employees should not be on the payroll of the licensed entity).

Employees working on MGA-licensed activities but engaged through other group entities

In certain group structures, employees based in Malta may work on gaming activities licensed by the MGA, while being contractually engaged by a related or associated group company that is not itself the holder of the relevant MGA licence.

In such cases, where:

- the employees are based in Malta, and
- the employees carry out MGA-licensed gaming activities, but
- the employees are not directly employed by the MGA-licensed entity, and

- the employees are not employed by another MGA-licensed entity,

these employees do not fall strictly within the standard definitions of *Employment – Section A* or *Employment – Section B*.

For reporting purposes, such employees shall be included under *Employment – Section A* of the relevant MGA-licensed entity, as they are engaged in MGA-licensed activities, notwithstanding that their contractual employment is with another group entity. The name/s of the other group entity/ies through which they are employed are to be listed in the 'Additional Notes' section at the end of the IPR. This approach ensures that:

- employees carrying out MGA-licensed activities in Malta are appropriately reflected in employment data; and
- total employment figures are not understated due to group engagement structures.

Licensees may be required to provide clarifications on group engagement arrangements where relevant.

For the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in *Employment – Section B* any employees who work on MGA-licensed activities of any other company; such employees would be included in the *Employment – Section A* of the other company's IPR.

1. **In addition** to employees working in Malta on the remote gaming activities licensed by the MGA (as reported in the *Employment – Section A*), does your company employ **any other staff** in Malta who **do not work** on the remote gaming activities licensed by the MGA?

In Question 1, the operator should indicate if such employment exists.

If there is no such employment, the operator can indicate a 'No' and proceed to the next section. However, if such employment exists, then Question 1.1 and 1.2 should be filled in.

1.1 List down **all the entities** through which your company employs any other persons in Malta that were not reported in the *Employment – Section A*.

1.2 Are any of the entities listed in Question 1.1 above also shared with another MGA-licensed entity submitting an IPR?

1.3 If Question 1.2 is 'Yes', indicate the licensees.

1.4 Provide the aggregate number of **employees working with the entities** listed in Q1.1 as at the end of reporting period (30 June or 31 December).

In Question 1.1, the operator should provide a list of all the entities with which the other staff is employed.

In Question 1.2, the operator should indicate whether any of the entities listed in Question 1.1 are shared with another MGA-licensed entity submitting an IPR, by selecting 'Yes' or 'No'.

In Question 1.3, where the response to Question 1.2 is 'Yes', the operator is required to indicate the MGA-licensed entities with which the entities listed in Question 1.1 are shared.

In Question 1.4, the operator is required to report the aggregate number of employees working with the entities listed in Question 1.1. Such employment refers to (1) additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees should not be on the payroll of the licensed entity). Kindly refer to [Section 2.3.7](#) for clarity on group structures.

In similarity with Section A, the data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management).

2. Out of the total number of non-Maltese employees, indicate how many are **non-EU nationals**.

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1.2 (Employment – Section B), are non-EU nationals, if any. In case there weren't any, this question will not appear on your screen.

2.3.8 Licensing & Jurisdictions

This section captures any other licences that are held by the company, apart from the one offered by the MGA.

1. Do you hold other gaming licences apart from the one offered by the MGA, under the same company?

This question requires a yes or no answer as to whether the licensee holds any gaming licence apart from that granted by the MGA.

1.1 Indicate the jurisdiction(s) under which the company is licensed.

The above information must be added for each country by clicking on the button "Add Country".

Add Country

Country ↑

2.3.9 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and/or processes in line with the [Policy on Outsourcing by Authorised Persons](#), where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third-party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if the company had any arrangements of this kind during the said reporting period. If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section. If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based in Malta**?

1.2 Which of the following services, functions and/or processes were outsourced to **companies based abroad**?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and/or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Problem Gambling Detection Systems
- Risk management services for the operation of a licensable game
- Suspicious Betting Monitoring

2.3.10 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year in relation to the following areas:

- Gaming Revenue
- Employment
- Costs:
 - Legal & Professional Fees
 - Odds & Risk Compiling Services
 - IT, Co-location & Telecommunication
 - Travelling & Entertainment
 - Marketing Expenditure
 - Other Costs

It should be noted that this Section is only applicable for the reporting period 1 July – 31 December.

2.3.11 Skills Gap

In order to obtain a better understanding of the existing skills gap in the gaming industry, the MGA is collecting data on a six-monthly basis, which is then aggregated and presented in a report which is published on an annual basis. To access the latest report, please refer to the [Publication page](#) on the MGA's website.

This section includes a set of questions which should be answered specifically to the licensee's opinion about the Maltese gaming employment market.

In the case where the licensee did not have any vacancies in Malta as at the end of the reporting period, questions 2 and 2.1 should be answered as zero.

In terms of questions 2, 3 and 3.1, the below is a non-exhaustive list of the typical job roles included within the categories listed:

- **Game operation and development:** Head of Poker, Poker Manager, Casino Coordinator, Casino Campaign Manager, Mobile Product Manager, Head of Sportsbook, Sportsbook Manager/Product Development, Odds Compiler Specialist, Senior Bookmaker, Senior Trader.
- **Data and analysis:** Head of Analytics, Analytics Manager, Business Data Analyst, Data Warehouse Architect, Head of BI, BI developer.
- **Marketing (incl. Customer Care):** CRM Manager, Head of Brand, Digital Marketing Manager, Head of Affiliates, Head of SEO, Chief Commercial Officer, Head of Customer Care, Sportsbook Marketing Manager, Digital Content Manager, Copywriter, Social Media Analyst, Graphic Designer.
- **Legal and compliance, risk and fraud:** Legal Compliance Manager, Legal Counsel, Chief Risk Officer, Fraud Manager, Fraud Analyst.

- **Technology:** Senior Software Developer, Front-end Developer, Back-end Developer, Web Developer, Web UX/UI Designer, Senior QA-Engineer, Platform Engineer, Software Engineer.
- **Finance, payment and human resources:** Chief Financial Officer, Payments and Reconciliation Analyst, HR Manager, Recruiter, Trainer.

2.3.12 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made, including any clarification required in relation to employment figures as outlined in the respective guidance. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

3 Guidelines on Required Data – Land-based Channel

3.1 IPR for B2C – Gaming Service Licence holders

3.1.1 Players' Visits

This section focuses on obtaining information pertaining to the players, in terms of the total number of visits, as well as their age, gender, nationality, the number of new registrations and junket players (for casinos' operators only). This data should be provided separately for each operator category that the licensee holds, namely casino, gaming parlours and commercial bingo halls, through the designated field.

For each relevant operator category data should be provided for the following questions:

1. Total number of unique players' visits the reporting period (1 January – 30 June or 1 July – 31).

The data provided in this question should capture the total number of unique player visits in the particular operator category during the reporting period under review. The total provided for the six-month period needs to be aligned with the licensee's monthly players' visits submissions.

A unique visit is defined to be the single count of a distinct player that visited the gaming establishment during a business day, irrespective of the number of times a player frequented the gaming establishment during the same business day.

Furthermore, a Business Day is defined as follows:

- In the case of a casinos gaming establishment, a casino business day is defined to be the twenty-four hours ranging from 0800 of the preceding day to 0800 of the following day.
- In the case of Controlled Gaming Premises, in accordance with Article 16 (2) (h) of the Gaming Premises Regulations, a business day is defined to be the twelve hours ranging from 1100 to 2300 of the same day.

- In the case of other authorised land-based gaming establishments, namely commercial bingo halls and national lottery outlets, a business day is defined to be the daily hours when such establishments are open for players.

2. In actual terms, indicate the **age distribution** of players based on their visits, during the reporting period (1 January – 30 June or 1 July – 31 December).

Based on the total number of player visits reported in the previous question, Question 2 requires the age distribution of players. The total of the two questions should tally.

3. In actual terms, indicate the **gender of players** based on their visits, during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 3 requires the gender distribution of players. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under “not specified”, please report all players that did not indicate their gender.

4. In actual terms, indicate/split the no. of visits based on the **players’ nationality**, during the reporting period (1 January – 30 June or 1 July – 31 December)

Question 4 requires the nationality of players, split between Maltese and Non-Maltese. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

5. Number of **new (unique) customer registrations** during the reporting period (January – 30 June or 1 July – 31 December).

Question 5 requires the number of new (unique) customer registrations made during the reporting period. It is generally accepted that there might be an overlap of players which registered more than once during the reporting period. In such cases exclude any double counting and provide the unique and distinctive number of new registrations during the reporting period.

6. Indicate the total number of **junket players**, in-house and with junket leader, visiting your premises during the reporting period (1 January – 30 June or 1 July – 31 December).

This question is solely applicable in the case when the operator category is Casinos. The data provided should reflect the number of junket players, split between in-house and with junket leader, for the reporting period in question.

3.1.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of “suspicious betting” can vary among companies. To this end, an activity may be considered to be “suspicious” when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term “unusual activity” may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (e.g. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously;
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January – 30 June or 1 July – 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period (1 January – 30 June or 1 July – 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent question should be answered.

3.1. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1, the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December).

4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January – 30 June / 1 July – 31 December)?

- If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
- If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1 Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) type of Sport; (b) the number of **markets**; (ci) the total **Real Money Wagers**; (cii) the total **Real Money Wagers of players residing in Malta** from the amount reported in (ci); (di) the total **Winnings**; (di) the total **Winnings of players residing in Malta** from the amount reported in (di); (e) the percentage share of **Real Money Wagers** out of total business; (f) the percentage share of **Gaming Revenue** out of total business; and (g) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport;
- Number of markets offered;
- Total real money wagers;
- Total real money wagers of players residing in Malta
 - The **total real money wagers** reported in (ci) must be greater or equal to the **total real money wagers of players residing in Malta** reported in (cii), since the wagers generated by players residing in Malta form part of the total real money wagers of the sport event held in Malta;
- Total winnings;
- Total winnings of players residing in Malta
 - The **total winnings** reported in (di) must be greater or equal to the **total winnings of players residing in Malta** reported in (dii), since the winnings generated by players residing in Malta form part of the total winnings of the sport event held in Malta;
- Percentage of real money wagers out of total business;
- Percentage of gaming revenue out of total business;

- Percentage share of real money wagers for live events, and for pre-events (separately)
 - The percentage share of real money wagers for live events and pre-events must add up to 100% for each sport event held in Malta.

The above information must be added for each type of sport separately by clicking on the red button "Add Sport".

Add Sport

Type of Sport	No. of Markets Offered	Real Money Wagers (€)	Winnings (€)	Real Money Wagers out of Total Business (%)	Gaming Revenue out of Total Business (%)	Real Money Wagers on live events (%)	Real Money Wagers on pre-events (%)
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3.1.3 Tables & Gaming Devices

This section aims at collecting information about the number of tables and the number of gaming devices as at the end of the reporting period.

Question 1 needs to be answered by all licensees holding a B2C licence.

1. Indicate the **number of gaming devices** (slot-type gaming machines and sports betting devices) as at the end of reporting period (30 June or 31 December).

The number of gaming devices, as at the end of the period under consideration, should be provided in this question. The data should be split between slot-type gaming machines and sports betting devices.

2. Indicate the **number of tables** as at the end of reporting period (30 June or 31 December) for the following games.

Question 2 should only be answered if the operator category is that of a Casino. The data provided in this question should be broken down further as per the following games:

- Blackjack
- Baccarat
- Casino Poker
- Casino Stud Poker
- Craps
- Punto Banco
- Roulette
- Russian Poker
- Super Pairs
- Texas Hold'em
- Three Card Poker
- Three Card Prime
- WPT - Heads up Hold'em

- Other*

*When the category of "Other" is filled in, a description of such method should be provided in the relevant field.

3.1.4 Financial Information

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the [Gaming Licence Fees Regulations](#) and the [Directive on the Calculation of Compliance Contribution](#).

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields marked in red in the below screenshot, and the list of verticals will appear on the screen.

Type 1

Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 2

Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 3

Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 4

Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

It should be noted that in the Total summary fields (refer to screenshot below), which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.

Total Real Money Wagers (€)	Total Gaming Revenue (€)	Total Gaming Revenue (€) submitted through the Compliance Contribution reports
€ 0.00	€ 0.00	€ 0.00

In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports, an explanation should be provided in Question 1.1.

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the sole location where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".

[Add Location](#)

Office Address Line 1	Office Address Line 2	City	Country
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3.1.5 Employment

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. Data provided should not include persons not employed in relation to the licensed activity. The data provided should be split further by each operator category that the licensee holds, namely casino, gaming parlours and commercial bingo halls, through the designated field

1. Number of employees **working solely in Malta on land-based gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles, excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a workweek, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

Question 2 is not applicable to this scenario.

3. Do you operate through a **physical office** in Malta?

- If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
- If the licensee operated through a physical office in Malta, it can proceed to question 3.1.

3.1 Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for each office, the size in square meters of the office space together with the corresponding locality. The above information must be added for each office separately by clicking on the red button "Add Office Space".

Add Office Space

Square Meters

Locality

3.1.6 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the [Policy on Outsourcing by Authorised Persons](#), where outsourcing is defined as:

an authorised person’s use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third-party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if the company had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based in Malta?**

1.2 Which of the following services, functions and/or processes were outsourced to **companies based abroad?**

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and/or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Problem Gambling Detection Systems
- Risk management services for the operation of a licensable game
- Suspicious Betting Monitoring

3.1.7 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year in relation to the following areas:

- Gaming Revenue
- Employment
- Costs:
 - Legal & Professional Fees
 - Odds & Risk Compiling Services
 - IT, Co-location & Telecommunication
 - Travelling & Entertainment
 - Marketing Expenditure
 - Other Costs

It should be noted that this Section is only applicable for the reporting period 1 July – 31 December.

3.1.8 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure

whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

3.2 IPR for B2B – Gaming Service Licence holders

3.2.1 Players' Visits

This section only applies to B2C – Gaming Service licence holders. It does not apply to B2B – Critical Gaming Supply licence holders. Please move to the next section.

3.2.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of “suspicious betting” can vary among companies. To this end, an activity may be considered to be “suspicious” when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term “unusual activity” may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (e.g. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously;
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January – 30 June or 1 July – 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period (1 January – 30 June or 1 July – 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent question should be answered.

3.1 How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1 the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December).

4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January – 30 June / 1 July – 31 December)?

- If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
- If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1 Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) type of Sport; (b) the number of **markets**; (ci) the total **Real Money Wagers**; (cii) the total **Real Money Wagers of players residing in Malta** from the amount reported in (ci); (di) the total **Winnings**; (dii) the total **Winnings of players residing in Malta** from the amount reported in (di); (e) the percentage share of **Real Money Wagers** out of total business; (f) the percentage share of **Gaming Revenue** out of total business; and (g) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport;
- Number of markets offered;
- Total real money wagers;
- Total real money wagers of players residing in Malta
 - The **total real money wagers** reported in (ci) must be greater or equal to the **total real money wagers of players residing in Malta** reported in (cii), since the wagers generated

by players residing in Malta form part of the total real money wagers of the sport event held in Malta;

- Total winnings;
- Total winnings of players residing in Malta
 - The **total winnings** reported in (di) must be greater or equal to the **total winnings of players residing in Malta** reported in (dii), since the winnings generated by players residing in Malta form part of the total winnings of the sport event held in Malta;
- Percentage of real money wagers out of total business;
- Percentage of gaming revenue out of total business;
- Percentage share of real money wagers for live events, and for pre-events (separately)
 - The percentage share of real money wagers for live events and pre-events must add up to 100% for each sport event held in Malta.

The above information must be added for each type of sport separately by clicking on the red button "Add Sport".

Add Sport

Type of Sport	No. of Markets Offered	Real Money Wagers (€)	Winnings (€)	Real Money Wagers out of Total Business (%)	Gaming Revenue out of Total Business (%)	Real Money Wagers on live events (%)	Real Money Wagers on pre-events (%)
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3.2.3 Tables & Gaming Devices

This section only applies to B2C – Gaming Service licence holders. It does not apply to B2B – Critical Gaming Supply licence holders. Please move to the next section.

3.2.4 Financial Info – Section A

1. For solely the activity generated through the MGA B2B licence, on the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the [Gaming Licence Fees Regulations](#), where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period and which revenue shall be determined on the basis of generally accepted accounting principles and practice as defined in article 2(4) of the Companies Act.

Only revenue generated under the B2B licence for the reporting period under consideration is to be provided.

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the sole location where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".

Add Location

Office Address Line 1	Office Address Line 2	City	Country
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3.2.5 Employment

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA located in Malta. Data provided should not include persons not employed in relation to the licensed activity. The data provided should be split further by each operator category that the licensee holds, namely casino, gaming parlours and commercial bingo halls, through the designated field.

1. Number of employees **working solely in Malta** on the **land-based gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles, excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a workweek, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

Question 2 is not applicable to this scenario.

3. Indicate the **location and relative office space** from where the company operates in Malta, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

Question 3 requires the addresses of the location/s where the company holds the accounting records. The above information must be added for each location separately by clicking on the red button "Add Location".

Add Location

Office Address Line 1

Office Address Line 2

City

Country

3.2.6 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the [Policy on Outsourcing by Authorised Persons](#), where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third-party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if the company had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based in Malta**?

1.2 Which of the following services, functions and/or processes were outsourced to **companies based abroad**?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management

- General risk management services
- Holding and/or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Risk management services for the operation of a licensable game
- Suspicious Betting Monitoring

3.2.7 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year in relation to the following areas:

- Revenue
- Employment
- Costs:
 - Legal & Professional Fees
 - Odds & Risk Compiling Services
 - IT, Co-location & Telecommunication
 - Travelling & Entertainment
 - Marketing Expenditure
 - Other Costs

It should be noted that this Section is only applicable for the reporting period 1 July – 31 December

3.2.8 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

3.3 IPR for B2C & B2B – Gaming Service Licence and Critical Gaming Supply Licence holders

3.3.1 Players' Visits

This section focuses on obtaining information pertaining to the players, in terms of the total number of visits, as well as their age, gender, nationality, the number of new registrations and junket players (for

casinos' operators only). This data should be provided separately for each operator category that the licensee holds, namely casino, gaming parlours and commercial bingo halls, through the designated field.

For each relevant operator, category data should be provided for the following questions:

1. Total number of **unique players' visits** the reporting period (1 January – 30 June or 1 July – 31).

The data provided in this question should capture the total number of unique player visits in the particular operator category during the reporting period under review. The total provided for the six-month period needs to be aligned with the licensee's monthly players' visits submissions.

A unique visit is defined to be the single count of a distinct player that visited the gaming establishment during a business day, irrespective of the number of times a player frequented the gaming establishment during the same business day.

Furthermore, a Business Day is defined as follows:

- In the case of a Casinos gaming establishment, a casino business day is defined to be the twenty-four hours ranging from 0800 of the preceding day to 0800 of the following day.
- In the case of Controlled Gaming Premises, in accordance with Article 16 (2) (h) of the Gaming Premises Regulations, a business day is defined to be the twelve hours ranging from 1100 to 2300 of the same day.
- In the case of other authorised land-based gaming establishments, namely commercial bingo halls and national lottery outlets, a business day is defined to be the daily hours when such establishments are open for players.

2. In actual terms, indicate the **age distribution** of players based on their visits, during the reporting period (1 January – 30 June or 1 July – 31 December).

Based on the total number of player visits reported in the previous question, Question 2 requires the age distribution of players. The total of the two questions should tally.

3. In actual terms, indicate the **gender of players** based on their visits, during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 3 requires the gender distribution of players. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under "not specified", please report all players that did not indicate their gender.

4. In actual terms, indicate/split the no. of visits based on the **players' nationality**, during the reporting period (1 January – 30 June or 1 July – 31 December).

Question 4 requires the nationality of players, split between Maltese and Non-Maltese. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

5. Number of **new (unique) customer registrations** during the reporting period (January – 30 June or 1 July – 31 December).

Question 5 requires the number of new (unique) customer registrations made during the reporting period. It is generally accepted that there might be an overlap of players which registered more than once during the reporting period. In such cases, exclude any double counting and provide the unique and distinctive number of new registrations during the reporting period.

6. Indicate the total number of **junket players**, in-house and with junket leader, visiting your premises during the reporting period (1 January – 30 June or 1 July – 31 December).

This question is solely applicable in the case when the operator category is Casinos. The data provided should reflect the number of junket players, split between in-house and with junket leader, for the reporting period in question.

3.3.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of “suspicious betting” can vary among companies. To this end, an activity may be considered to be “suspicious” when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term “unusual activity” may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (e.g. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously;
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2, the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January – 30 June or 1 July – 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January – 30 June or 1 July – 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent question should be answered.

3.1. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1, the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December).

4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January – 30 June / 1 July – 31 December)?

- If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
- If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1 Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) type of Sport; (b) the number of **markets**; (ci) the total **Real Money Wagers**; (cii) the total **Real Money Wagers of players residing in Malta** from the amount reported in (ci); (di) the total **Winnings**; (dii) the total **Winnings of players residing in Malta** from the amount reported in (di); (e) the percentage share of **Real Money Wagers** out of total business; (f) the percentage share of **Gaming Revenue** out of total business; and (g) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport;
- Number of markets offered;
- Total real money wagers;
- Total real money wagers of players residing in Malta
 - The **total real money wagers** reported in (ci) must be greater or equal to the **total real money wagers of players residing in Malta** reported in (cii), since the wagers generated by players residing in Malta form part of the total real money wagers of the sport event held in Malta;
- Total winnings;
- Total winnings of players residing in Malta
 - The **total winnings** reported in (di) must be greater or equal to the **total winnings of players residing in Malta** reported in (dii), since the winnings generated by players residing in Malta form part of the total winnings of the sport event held in Malta;
- Percentage of real money wagers out of total business;
- Percentage of gaming revenue out of total business;
- Percentage share of real money wagers for live events, and for pre-events (separately)
 - The percentage share of real money wagers for live events and pre-events must add up to 100% for each sport event held in Malta.

The above information must be added for each type of sport separately by clicking on the red button "Add Sport".

Add Sport

Type of Sport	No. of Markets Offered	Real Money Wagers (€)	Winnings (€)	Real Money Wagers out of Total Business (%)	Gaming Revenue out of Total Business (%)	Real Money Wagers on live events (%)	Real Money Wagers on pre-events (%)
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3.3.3 Tables & Gaming Devices

This section aims at collecting information about the number of tables and the number of gaming devices as at the end of the reporting period.

Question 1 needs to be answered by all licensees holding a B2C licence.

1. Indicate the **number of gaming devices** (slot-type gaming machines and sports betting devices) as at the end of reporting period (30 June or 31 December).

The number of gaming devices, as at the end of the period under consideration, should be provided in this question. The data should be split between slot-type gaming machines and sports betting devices.

2. Indicate the **number of tables** as at the end of reporting period (30 June or 31 December) for the following games.

Question 2 should only be answered if the operator category is that of a Casino. The data provided in this question should be broken down further as per the following games:

- Blackjack
- Baccarat
- Casino Poker
- Casino Stud Poker
- Craps
- Punto Banco
- Roulette
- Russian Poker
- Super Pairs
- Texas Hold'em
- Three Card Poker
- Three Card Prime
- WPT - Heads up Hold'em
- Other*

*When the category of "Other" is filled in, a description of such method should be provided in the relevant field.

3.3.4 Financial Information

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the [Gaming Licence Fees Regulations](#) and the [Directive on the Calculation of Compliance Contribution](#).

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields marked in red in the below screenshot, and the list of verticals will appear on the screen.

Type 1		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 2		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 3		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

Type 4		
Name ↑	Total Real Money Wagers	Total Gaming Revenue
[Redacted]	€0.00	€0.00

It should be noted that in the Total summary fields (refer to screenshot below), which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.

Total Real Money Wagers (€)	Total Gaming Revenue (€)	Total Gaming Revenue (€) submitted through the Compliance Contribution reports
€ 0.00	€ 0.00	€ 0.00

In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports, an explanation should be provided in Question 1.1.

- For solely the activity generated through the MGA B2B licence, the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31).

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the [Gaming Licence Fees Regulations](#), where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period and which revenue shall be determined on the basis of generally accepted accounting principles and practice as defined in article 2(4) of the Companies Act.

Only revenue generated under the B2B licence for the reporting period under consideration is to be provided.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the sole location where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".

Add Location

Office Address Line 1

Office Address Line 2

City

Country

3.3.5 Employment

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. Data provided should not include persons not employed in relation to the licensed activity. The data provided should be split further by each operator category that the licensee holds, namely casino, gaming parlours and commercial bingo halls, through the designated field.

1. Number of employees **working solely in Malta on land-based gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories: Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles, excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a workweek, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

Question 2 is not applicable to this scenario.

2. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the addresses of the location/s where the company holds the accounting records. The above information must be added for each location separately by clicking on the red button "Add Location".

Add Location			
Office Address Line 1	Office Address Line 2	City	Country

3.3.6 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the [Policy on Outsourcing by Authorised Persons](#), where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third-party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if the company had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based in Malta**?

1.2 Which of the following services, functions and/or processes were outsourced to **companies based abroad**?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and/or managing player funds
- Internal Audit

- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Problem Gambling Detection Systems
- Risk management services for the operation of a licensable game
- Suspicious Betting Monitoring

3.3.7 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year in relation to the following areas:

- Gaming Revenue
- Employment
- Costs:
 - Legal & Professional Fees
 - Odds & Risk Compiling Services
 - IT, Co-location & Telecommunication
 - Travelling & Entertainment
 - Marketing Expenditure
 - Other Costs

It should be noted that this Section is only applicable for the reporting period 1 July – 31 December

3.3.8 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

4 Frequently Asked Questions (FAQs)

4.1 When are the IPRs due?

The MGA's BI & Data Analytics unit approaches the industry on a bi-annual basis with the aim of collecting industry performance data. Data is collected for the following periods:

Time frame	Due Date
1 January – 30 June	7 September
1 July – 31 December	28 February

4.2 How do I submit the IPR?

The IPR is available on the MGA portal, which can be accessed through <https://portal.mga.org.mt/>, and all operators are required to fill in and submit the IPR through that portal. The MGA will not be accepting any submissions made via other sources, like excel files, email or physical copies.

4.3 Do I have to complete the IPR?

Yes, all companies having an MGA's licence must complete the IPR form in a correct, complete and accurate manner, and submission is due every six months as requested by the Authority. This request for information is being made in terms of Article 7(2)(d) of the Gaming Act (Chapter 583 of the Laws of Malta).

4.4 Am I required to fill in a separate form for each licence type held with the MGA?

Once you log into the MGA online portal, the system will automatically provide you with the forms which need to be filled in and cover B2C – Gaming Service licence holders, B2B – Critical Gaming Supply licence holders, as well as those holding both.

4.5 If I am a Corporate Licence holder, do I need to fill in a separate form for each company falling under the group?

In the case of Corporate Licence, you are requested to fill in and submit one form covering all the group companies, with aggregate data for the entities falling under the group.

4.6 I am having trouble with filling in or submitting the IPR, who should I contact?

You can contact the BI & Data Analytics department via email on bi-analytics.mga@mga.org.mt if any difficulty is encountered.

4.7 Am I required to send a copy of the original Return by post?

No, there is no need to send a copy of the original IPR by post. The MGA will not be accepting any submissions if they are not made via the MGA portal.

4.8 Will I receive a confirmation of my submission from the MGA?

Once you submit the IPR, you will not be receiving a message, however the status of the Industry Performance Return will change to “Submitted” on the MGA portal timeline.

Please note that after the IPR has been submitted, the MGA may still need to contact you for any further information it deems necessary in order to process your submission. The status of the submission will update accordingly on the MGA portal.

4.9 My company was not operational during the period under review. Do I still need to submit the IPR?

Yes, if a licence holder has ceased trading in a particular activity but still holds a valid licence at the time when a Return is due, a NIL Return must be submitted. A note to this effect should be included in the Additional Notes section.

4.10 We did not have any revenue during the period under review. Do I still need to submit the IPR?

Yes, kindly complete all other required fields and indicate “0” in the relevant fields. A note to this effect should be included in the Additional Notes section.

4.11 Our company is in the termination process. Do I still need to submit the IPR?

The MGA still requires your submission if the company had a valid licence (which was not yet terminated) during the period under review.

4.12 The company is in the application stage / has not gone live yet. Do I need to submit IPR?

If the company has not yet commenced any operation or has not gone live, but has received a general email from the BI & Data Analytics team to submit the IPR and the IPR form appeared on the licensee’s timeline on the MGA portal, you are still requested to submit the Return by going through the following steps:

Step 1: Click Next on the following screen

General Industry Performance Return Details Confirm Submit

GENERAL

The Malta Gaming Authority (MGA) collects data concerning gaming activities in Malta through the Industry Performance Return (Return/IPR). Data is collected for the following periods:

- (1) 1 January - 30 June and
- (2) 1 July - 31 December.

The MGA utilises information provided by the industry to assess any changes in the gambling landscape amongst others, with regard to, money wagers, gaming revenue, overall participation in gaming activities, responsible gambling and much more. Statistics collected through the Return enable the Authority to understand better the dynamics of the market and provide the necessary support to the decision making processes.

The MGA is empowered to request such information as per Article 7(2)(d) of the Gaming Act (Chapter 583 of the Laws of Malta).

Should you require any assistance in completing the Industry Performance Return, please feel free to contact us at research.mga@mga.org.mt or by phone on 00356 2546 9000.

Points to consider when replying to the Industry Performance Return:

- questions included in the Return refer solely to the activities licensed by the MGA;
- whenever the reference is being made to the end of reporting period, it refers to a snapshot as at the end of June (30 June) or as at the end of December (31 December);
- whenever the reference is being made to the period under review, it refers to the following: 1 January - 30 June or 1 July - 31 December.

Files available to download:

Click [HERE](#) to download the following files which are available to download from the Authority's website:

- the **excel version of the Industry Performance Return** which was prepared to facilitate data gathering from different units of your company. Kindly note that only online submissions via portal are considered valid. The Authority will not accept any Returns sent via email.
- the **Guidance for Completion of the Industry Performance Return** which includes definitions of various terms and explanation on how to fill in the Return. Furthermore, we have gathered the answers to the most commonly asked questions on the IPR found in Chapter 4 of Guidance document – Frequently Asked Questions (FAQ).

Company * Reporting Period *
Licence Type Reporting Year *

Next

Step 2: Click Next on the following screen

Home > Gaming Services > Industry Performance Return

INDUSTRY PERFORMANCE RETURN

General ✓ Industry Performance Return Details Confirm Submit

INDUSTRY PERFORMANCE RETURN DETAILS

Name ↑	Company	Channel	Reporting Period	Reporting Year	Status Reason	Submitted By
Se7en Gaming Limited - 1 January - 30 June 2024	Se7en Gaming Limited	Remote	1 January - 30 June	2024	Draft	⌵

Previous Next

Step 3: Include a note explaining that the Company has not yet commenced any operation or has not gone live and click Submit.

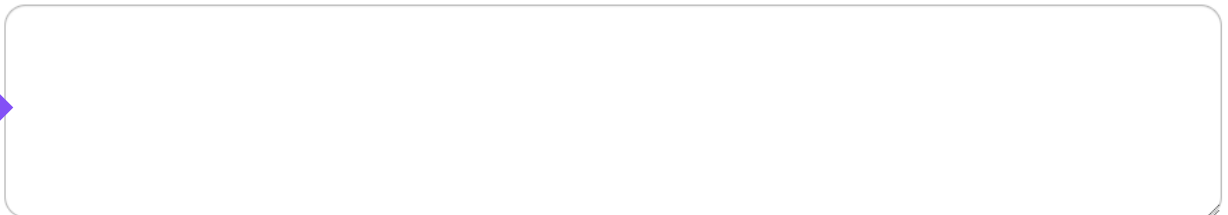
[Home](#) > [Gaming Services](#) > [Industry Performance Return](#)

INDUSTRY PERFORMANCE RETURN

General ✓ Industry Performance Return Details ✓ **Confirm** Submit

CONFIRM

Please provide any additional feedback or information which is necessary to support the submission made.



[Previous](#) **Next**

4.13 Since our business cycle differs from the time frame of the IPR, our financial information will not be audited. How should we report our numbers?

The Authority accepts that financial information is unlikely to have been audited. Hence, you need to provide us with the most accurate information that you can generate for the given time frames.

4.14 How does the MGA use the information collected through the IPR?

The data collected is mainly utilised for regulatory, statistical and reporting purposes, with aggregate information being used for the publishing of both Interim and Annual Reports. In addition, the data collected assists the Authority to better regulate the sector and carry out its functions based on updated industry performance. It is believed that such industry performance reporting is beneficial and value adding to all stakeholders.

4.15 I am unable to provide the MGA with all the information requested. What should I do?

If you are unable to provide complete information or are uncertain that your information meets the requirements of the IPR, you should record this in the Additional Notes section. Kindly ensure that you record the question number to which your comment relates.

