REPUBLIC OF ESTONIA
FINANCIAL INTELLIGENCE UNIT

Emile Navickaite
Gabnys Law Firm
emile.navickaite@gabnys.com

Your ref 23.12.2020

Our ref 22.01.2021 no 1.2-2/5-1

Dear Mr. Navickaite,

We thank you for your letter. We hereby forward Estonian FIU answers for your questions, received on the December 23, 2020, regarding the Estonian Money Laundering and Terrorist Financing Prevention Act.

1. The gambling operators are obliged to apply due diligence measures (except the identification of a person) at least upon payment of winnings, making of a bet or on both occasions where the sum given or receivable by a person is at least 2000 euros or an equal sum in another currency. The obligation is stipulated in the paragraph 19 of the Money Laundering and Terrorist Financing Prevention Act. However if the obliged entity has suspicion of money laundering or terrorist financing it is required to apply due diligence measures regardless of any derogations, exceptions or limits provided in the mentioned Act.

2. The duty to report has changed and it stipulates as follows:

> "*A report is submitted to the Financial Intelligence Unit of the contracting state of the European Economic Area on whose territory the obliged entity has been established.*"

If the company is established in Malta, the reports must be submitted to the FIU of Malta. We hope that the answers are in help to you and if you have any further questions regarding the matter please do not hesitate to contact us.

Yours sincerely

Marget Lundava

Acting Head of FIU Estonia