

## Instructions: 2024 Banking AML/ CFT Survey

This document provides the definitions and instructions that will help an obliged entity in completing the AML/CFT Risk Assessment Information Request. There are five tabs to be completed: 1) Customer Risk, 2) Products, Services, & Transactional Risk, 3) Distribution Channel Risk, 4) Controls and Quality of Risk Mitigation, 5) Signatories. The questionnaire should be completed in full. The questionnaire must be answered completely to submit.

### The following are applicable to all questions, unless otherwise specified:

- Responses provided should include activity related to when your entity provides products or services to clients that fall under the scope of AML/CFT regulation in Monaco.
- The reporting period is 1 January 2023 to 31 December 2023.
- Questions related to number of clients shall include clients that are active at the end of the reporting period and clients that were at some point active during the reporting period.
- The term “unique clients” denotes that while a client might have several accounts it should only be counted as one client.
- Questions related to number or value of transactions are relevant for activity performed within the reporting period.
- Questions related to number or value of transactions should capture the instances when the reporting entity (1) prepares for or (2) carries out transactions for the clients concerning the activities mentioned.
- All questions to provide monetary values require an answer in EUR. Only value questions are indicated with the currency symbol € in the survey.
- All questions asking for responses with country breakdown are ISO 3166-1 Country Names or can be answered with the Bulk-paste feature when using country names, or the ISO 2-alpha, 3-alpha, and 3-numeric codes. A link to the acceptable country names and codes exists on the Bulk-paste popup window. This window is accessible for questions having the symbol ⓘ.
- If the nationality, residency, or other requested breakdown is unknown, please select “Unknown” from the dropdown.
- For questions related to legal entity / profession type and business classification types, NIS or NACE code systems may be used, or alternative equivalent. For questions relating to classification types but not specified by the entity’s sector classification system used, please refer to industry practices.
- Responses provided in the survey shall be for the reporting entity only, and should not include any group totals.

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## Glossary

Term	Definition
Active Account	Only clients that are active for the reporting period or were at some point active during the reporting period.
AML/CFT/CPF	Anti-Money Laundering / Counter Financing of Terrorism / Counter Financing of Proliferation of Weapons of Mass Destruction
AMSF	Autorité Monégasque de Sécurité Financière (AMSF), The national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. <a href="https://amsf.mc">https://amsf.mc</a> (auparavant SICCFIN)
Association	For the purposes of this questionnaire, an association is a freely formed organization (group with members) that has acquired the legal personality and legal capacity to act; for example to open a bank account, enter contracts, appear in courts, buy estate, and receive donations. Refer to Monaco law n° 1.355 of 2008/12/23 for registered associations.  Associations shall also include foreign associations with a similar capacity to act, specifically to open a bank account.
Beneficial Owner	Beneficial Owner is defined in Article 21 of the <u>Law 1.362 of 3 August 2009 amended by law 1.503 of 23 December 2020 on the fight against money laundering, terrorist financing and corruption</u> : - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted.
Client / Customer	A Client (identical meaning to Customer) should be understood as a Natural Person or a Legal Person/entity with whom the reporting entity has a business relationship or for whom the reporting entity carried out an occasional transaction. In this context, clients refer to all existing clients with whom the entity has had a business relationship within the reporting period including occasional (walk-in) clients who have been serviced during the reporting period. Reference to clients is made in respect of those that were provided with a relevant activity or relevant service that falls under AML/CFT regulations by the reporting entity.
Correspondent banking	Correspondent banking is the provision of banking services by one bank as the correspondent to another bank as the respondent, including providing a current or other liability account and related services, such as cash management, international funds transfers, cheque clearing, payable-through accounts and foreign exchange services.
DPMS	Dealers in Precious Metals and Stones
DBT	Direction du Budget et du Trésor
Dual-use items	Dual-use item means items, including software and technology, which can be used for both civil and military purposes, and includes items which can be used for the design, development, production or use of nuclear, chemical or biological weapons or their means of delivery, including all items which can be used for both non-explosive uses and assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices.
FIU	Financial Intelligence Unit
Financial institutions	Financial institutions mean any natural or legal person who conducts as a business one or more of the following activities or operations for or on behalf of a customer: 1. Acceptance of deposits and other repayable funds from the public. 2. Lending. 3. Financial leasing. 4. Money or value transfer services. 5. Issuing and managing means of payment (e.g. credit and debit cards, cheques, traveler's cheques, money orders and bankers' drafts, electronic money). 6. Financial guarantees and commitments.

Term	Definition
	<p>7. Trading in:</p> <ul style="list-style-type: none"> <li>(a) money market instruments (cheques, bills, certificates of deposit, derivatives etc.);</li> <li>(b) foreign exchange;</li> <li>(c) exchange, interest rate and index instruments;</li> <li>(d) transferable securities;</li> <li>(e) commodity futures trading.</li> </ul> <p>8. Participation in securities issues and the provision of financial services related to such issues.</p> <p>9. Individual and collective portfolio management.</p> <p>10. Safekeeping and administration of cash or liquid securities on behalf of other persons.</p> <p>11. Otherwise investing, administering or managing funds or money on behalf of other persons.</p> <p>12. Underwriting and placement of life insurance and other investment-related insurance.</p> <p>13. Money and currency changing.</p>
Foreign Residents	For the purpose of this questionnaire, is a non-Monégasque national that is a resident in Monaco.
Government / Public Sector	Government/public entity is an organization or body providing services to the public on behalf of the government or another public entity.
High Net Worth Individual (HNWI)	For the purposes of this survey, a High-Net-Worth-Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million.
High Net Worth (HNW) Group	For the purposes of this survey, a HNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 5 million.
Legal Arrangement	A relationship established by means of a contract between two or more parties that do not result in the creation of a legal personality such as Trusts or other similar arrangements. Examples of other similar arrangements (for AML/CFT purposes) include fiducie, treuhand and fideicomiso.
Legal Person	Legal persons refer to any entities other than natural persons that can establish a permanent customer relationship with a financial institution or otherwise own property. This can include companies, corporate bodies, foundations, institute, partnerships, or associations and other relevantly similar entities.
ML / TF / PF	Money Laundering / Terrorist Financing / Financing the Proliferation of Weapons of Mass Destruction
Money or value transfer services (MVTs)	Money or value transfer services (MVTs) refers to financial services that involve the acceptance of cash, cheques, other monetary instruments or other stores of value and the payment of a corresponding sum in cash or other forms to a beneficiary by means of communication, message, transfer, or through a clearing network to which the MVTs provider belongs.
More Complex Ownership Structure	For the purposes of this survey, a More Complex Ownership Structure refers to clients in which the reporting entity has increased effort or difficulty in independently verifying the identity of the Beneficial Owner of the customer. For this survey, More Complex Ownership Structures are structures with 3 or more layers of ownership between the Account Holder and the Beneficial Owner, or, structures that are less than 3 layers of ownership but that are difficult to verify the Beneficial Owner due to obscurity or obfuscation, such as when information is not publicly accessible, lacks transparency, involves a foreign company or trust, requires foreign cooperation to verify, or when the recorded owner is a professional (lawyer, accountant, company services business).
Nationals	Natural Person who is Monégasque nationals.

Term	Definition
Non-Profit Organizations (NPOs)	Non-Profit Organizations (NPOs) refers to a legal person or arrangement or organization that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”.
Occasional Transaction	Any Transaction other than a Transaction carried out in the course of an established Business Relationship.
Payment types by clients	Payments by clients are transactions from client accounts initiated and performed by the client. For example, a client makes an electronic transfer to pay a rent.
Payment types on behalf of clients	Payments on behalf of clients are transactions made by the reporting entity to third parties on behalf of clients. Examples of such arrangements may be with power of attorney, Signatory on accounts, or similar.
Payment types with clients	Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity, transactions made in person, and deposit taking.
PEPs	PEPs are individuals who are or have been entrusted domestically with prominent public functions, for example, Heads of State or government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials.
Primary Nationality	For the purposes of this questionnaire, an individual with multiple nationalities should be reported as having a primary nationality, which should be based on the following ordering: nationality of birth country, nationality that is their country of residence, other nationality.
Resident	For the purpose of this questionnaire, a resident is a Natural Person who is a Monégasque or who has a legal right to work and live in Monaco.
Non-Resident	For the purpose of this questionnaire, a non-resident is a Natural Person who is a non-Monégasque national and does not have residency in Monaco.
Senior management	Senior management is an officer or employee with sufficient knowledge of the institution's money laundering and terrorist financing risk exposure and with sufficient seniority to take decisions affecting its risk exposure, and who need not, in all cases, be a member of the board of directors.
SICCFIN (maintenant AMSF)	Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN) is the national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. (now AMSF)
Sports agent	A sports agent is any person who, whether occasionally or habitually and in consideration of remuneration, brings interested parties together to make a contract, either for the paid exercise of a sporting activity, or for the agreement of an employment contract for the paid exercise of a sporting or training activity.
TFS	Targeted Financial Sanctions
Trust and Company Service Providers	Trust and Company Service Providers refers to all persons or businesses that are not covered elsewhere, and which as a business, provide any of the following services to third parties: <ul style="list-style-type: none"> <li>• Acting as an agent in the creation or establishment of legal persons</li> <li>• Acting as a director or secretary of a company, or as a partner in a legal person or arranging for another person to act as the above</li> <li>• Providing a registered office, work address, residence, correspondence address, or administrative address for a legal person or legal arrangement</li> <li>• Performing work (or equipping another person to act) as a trustee for a direct trust or performing a similar function in favor of another form of legal arrangement</li> <li>• Acting or arranging for another person to act as a nominee shareholder in favor of another person.</li> </ul>

Term	Definition
Ultra-High-Net-Worth Individual (UHNWI)	For the purposes of this survey, an Ultra High Net Worth Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 50 million.
Ultra-High-Net-Worth (UHNW) Group	For the purposes of this survey, a UHNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 50 million.
VASP	Virtual Asset Service Provider



Survey Question Instructions, Inherent Risk

Q#	Question Text	Instructions
1 Customer Risk		
1.1 Clients Summary		
1	Please provide the total number of unique clients that were at some point active during the reporting period, by client's primary nationality, or country of headquarters or incorporation.	<p>The reporting entity shall provide the <u>number of clients</u>, from business relationships and occasional customers/clients, broken down by client's primary nationality (if Natural Person), or country of headquarters or incorporation (if Legal Person or Legal Arrangement), for the reporting period.</p> <p>If multiple primary nationalities, enter the one most commonly used.</p> <p>If the nationality is unknown, please select "Unknown" from the dropdown.</p> <p>The term "unique clients" denotes that while a client might have several accounts it should only be counted as one client.</p> <p>Only clients that are active for the reporting period or were at some point active during the reporting period should be reported.</p>
2	Please provide the total number of unique clients that are Nationals.	The reporting entity shall provide the <u>number of unique national (Monégasque) clients</u> .
3	Please provide the total number of unique clients that are Foreign Residents.	The reporting entity shall provide the <u>number of unique clients that are Foreign Residents</u> (i.e. Natural Person foreigners living in Monaco) that have used products or services that fall under the scope of AML/CFT regulation in Monaco.
4	Please provide the total number of unique clients that are Non-Residents.	The reporting entity shall provide the <u>number of unique non-Monégasque clients that are Non-Residents</u> that have used products or services that fall under the scope of AML/CFT regulation in Monaco.
5	Please provide the total number of transactions (both incoming and outgoing) with and by clients within the reporting period.	<p>The question should capture the instances when the reporting entity (1) prepares for or (2) carries out transactions for the clients.</p> <p>This value will be validated against other responses provided to later questions for numbers of transactions by Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive.</p>
6	Please confirm the total number of transactions provided above.	<p>Repeat the answer from above question.</p> <p>This value will be validated against other responses provided to later questions for numbers of cheque, electronic, and cash transactions, which are mutually exclusive.</p>

Q#	Question Text	Instructions
7	Please provide the total value of funds transferred with and by clients (both incoming and outgoing) within the reporting period.	The question should capture the instances when the reporting entity (1) prepares for or (2) carries out transactions for the clients concerning the activities mentioned above. Provide the response in EUR.
1.2 Funds Flow		
8	Please provide the total value of incoming funds, broken down by originating country, for the reporting period.	
9	Please provide the total value of outgoing funds, broken down by destination country, for the reporting period.	
1.3 Accounts Summary		
10	Please provide the total number of accounts from all client types.	<p>The reporting entity shall provide the total <u>number of accounts</u> from all client types that are related to products or services that fall under the scope of AML/CFT regulation in Monaco.</p> <p>If a client has several accounts, all of them must be counted. E.g.</p> <p>Client A - 4 accounts (2 savings accounts, 1 current account, and 1 securities account),</p> <p>Client B - 2 accounts (2 current accounts). For the purpose of this question</p> <p>This would result in a total of 6 accounts (although the number of Clients will be 2 only).</p>
11	Please provide the total number of accounts with Beneficial Owners.	<p>Any account with at least one Beneficial Owner, should be considered. For example, the below accounts should be counted:</p> <p>Account C – one account of one natural person</p> <p>Account D - one joint account with two natural persons</p> <p>Account E – an account of a legal person or trust or other legal arrangement, with identifiable BO's such as account shareholders, persons with direct or indirect control, or persons who are company representatives</p> <p>This example would result in a total of 3 Accounts with Beneficial Owners.</p>
12	Can your entity distinguish nationality of BO's?	
13	Provide the percentage breakdown of primary nationalities of Beneficial Owners.	Provide the percentage breakdown of all clients' beneficial owner's primary nationalities, including BO's of all % ownership levels, those with direct or indirect control, and those representing a legal entity.

Q#	Question Text	Instructions
		<p>For example, if there are 10 BO's at an entity, with 2 each in countries Monaco, France, Italy, Spain, and Germany, the response would be 20% for each jurisdiction listed.</p> <p>If multiple primary nationalities, enter the one most commonly used.</p>
14	Can your entity distinguish BO's that are account holders that have 25% or greater ownership of an account?	The information requested is in relation to the accounts held at the Bank, and the number of BO's of these accounts which are considered BO's as a result of having 25% or greater ownership of the account.
15	Please provide the total number of Beneficial Owners that are account holders, by Beneficial Owner's primary nationality, for Beneficial Owners with 25% or greater ownership of an account.	<p>If multiple primary nationalities, enter the one most commonly used.</p> <p>Any Beneficial Owners that have 25% or greater ownership of an account (natural persons), or are 25% or greater shareholders of legal persons, trusts, or other legal arrangements with accounts should be counted:</p> <p>Account C – one account of one natural person (1 account, 1 BO)</p> <p>Account D - one joint account with two natural persons (1 account, 2 BOs)</p> <p>Account E – an account of a legal person, trust or other legal arrangement, which has BO's that have 25% or greater ownership of the structure</p>
16	Please provide the total number of Beneficial Owners <del>that are account holders</del> having direct or indirect control of a legal entity, broken down by primary nationality.	The information requested is in relation to the accounts held at the Bank. For these accounts, provide the number of BO's which are considered BO's as a result of having direct or indirect control of the legal person, trust, or other legal arrangement having the account.
17	Please provide the total number of Beneficial Owners <del>that are account holders</del> that represent a legal entity, broken down by primary nationality.	The information requested is in relation to the accounts held at the Bank. For these accounts, provide the number of BO's which are considered BO's as a result of representing the legal person, trust, or other legal arrangement having the account.
18	Please provide the total number of Beneficial Owners that are account holders that are Foreign Residents, by Beneficial Owner's primary nationality, for Beneficial Owners with 25% or greater ownership of an account.	<p>If multiple primary nationalities, enter the one most commonly used.</p> <p>Only include Beneficial Owners that have 25% or greater ownership of an account.</p>
19	Please provide the total number of Beneficial Owners that are account holders that are Non-Residents, by Beneficial Owner's primary nationality, for Beneficial Owners with 25% or greater ownership of an account.	<p>If multiple primary nationalities, enter the one most commonly used.</p> <p>Only include Beneficial Owners that have 25% or greater ownership of an account.</p>
20	Please provide the total number of Signatories of Legal Person accounts, by Signatory's primary nationality.	

Q#	Question Text	Instructions
<b>1.4 Assets Under Management</b>		
21	Please provide the total value (in EUR) of the assets under management for clients.	The reporting entity shall provide the sum of client <u>assets under management</u> that are related to products or services that fall under the scope of AML/CFT regulation in Monaco.  The value at the end of the reporting period should be used.
22	Does your entity provide Retail Banking services to clients?	
23	Please provide the total value (in EUR) of assets under management (deposits and securities) for retail banking.	The reporting entity shall provide the sum of client <u>assets under management</u> (deposits and securities) for <u>Retail Banking</u> , that are related to products or services that fall under the scope of AML/CFT regulation in Monaco.  The value at the end of the reporting period should be used.
24	Does your entity provide Corporate Banking services to clients?	
25	Please provide the total value (in EUR) of assets under management (deposits and securities) for Corporate Banking.	The value at the end of the reporting period should be used.
26	Does your entity provide Private Banking services to clients?	
27	Please provide the total value (in EUR) of assets under management (deposits and securities) for Private Banking.	The reporting entity shall provide the sum of client <u>assets under management</u> (deposits and securities) for <u>Private Banking</u> , that are related to products or services that fall under the scope of AML/CFT regulation in Monaco.  The value at the end of the reporting period should be used.
<b>1.5 Distinguishing Client Types</b>		
28	Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:  Foreign Commercial Companies?	The reporting entity should disclose whether it has <u>Foreign Commercial Companies</u> to whom the reporting entity provides products or services that fall under the scope of AML/CFT regulation in Monaco.
29	Foreign Patrimonial Companies?	The reporting entity should disclose whether it has <u>Foreign Patrimonial Companies</u> (i.e. Non-trading asset management foreign companies), to whom the reporting entity provides products or services that fall under the scope of AML/CFT regulation in Monaco.
30	Trusts?	
31	Associations?	
32	Other Legal Arrangements not mentioned above?	
33	Insurance Companies?	
34	HNWI's?	

Q#	Question Text	Instructions
35	Lawyers or other Legal Professions?	
36	Accountants & Auditors?	
37	Nominee Shareholders / Directors?	
38	Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
39	Real Estate Agents?	
40	Dealers in Precious Metals and Stones?	
41	Trust and Company Service Providers?	
42	Multi-Family Offices?	
43	Single Family Offices?	
44	More Complex Ownership Structures?	
45	Cash Intensive Business?	(such as bars, restaurants)
46	Providers of or accept payments from Anonymous Prepaid Cards / Cards with high CDD Threshold?	
47	Engaged in Art and Antiques?	
48	Engaged in Import-Export?	
49	Dealing with High-Value Goods?	
50	Non-Profit Organization?	
51	Casinos/Gambling (including clients that are online casinos)?	
52	Engaged in Construction / Real Estate Development?	
53	Engaged in Extractive Industries (e.g. Oil and Gas)?	
54	Virtual Assets Service Providers (VASPs)?	
55	Engaged in Defense/Arms, including Dual-use items for proliferation of Weapons of Mass Destruction (WMD)?	
56	Engaged in Yachting-related Business?	
57	Sports Agents or Intermediaries?	
58	Engaged in Fund Management?	
59	Engaged in Asset Holding?	When the client owns an asset indirectly, via ownership of a vehicle (Legal Person/Arrangement, SPV etc) that has legal title of the asset
60	Auctioneers?	
61	Motor Vehicle Dealers?	
62	Government and Public Sector?	
63	Engaged in Aircraft Sales / Private Jets / Charters?	
64	Engaged in Shipping?	
<b>1.6 Clients - Natural Persons</b>		
65	Please provide the total number of unique clients that are Natural Persons (individuals)	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person <b>should not</b> be counted as a Natural Person client.

Q#	Question Text	Instructions
	broken down by the primary nationality of the individual (including domestic clients).	
66	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Natural Persons.	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, it <b>should not</b> be counted as a Natural Person client.
67	Please provide the total value of funds transferred with and by clients that are Natural Persons, (both incoming and outgoing), in EUR.	
<b>1.7 Clients - Legal Persons</b>		
68	Please provide the total number of unique clients that are Legal Persons.	
69	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Legal Persons.	
70	Please provide the total value of funds transferred with and by clients that are Legal Persons, both incoming and outgoing.	
71	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	<p>Legal Persons types include:</p> <ul style="list-style-type: none"> <li>• Limited Liability Companies SARL</li> <li>• Limited Partnership SCS</li> <li>• Commercial Partnership SNC</li> <li>• Joint Stock Company SAM</li> <li>• Limited Partnership with Shares SCA</li> <li>• Property Investment Partnership SCI</li> <li>• Special Civil-law Partnership SCP</li> <li>• Other Civil Law Partnership SC-Autre</li> <li>• Monegasque Foundation</li> <li>• Monegasque Associations</li> <li>• Economic Interest Group GIE</li> </ul>
72	Please provide the number of Monegasque Legal Persons as clients, by type.	
<b>1.8 Clients - Foreign Commercial Companies</b>		
73	Does your entity have clients that are Foreign Commercial Companies?	
74	Please provide the total number of unique clients that are Foreign Commercial Companies.	
75	Does your entity have information related to the number and value of their transactions?	
76	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Foreign Commercial Companies.	

Q#	Question Text	Instructions
77	Please provide the total value of funds transferred with and by clients that are Foreign Commercial Companies, (both incoming and outgoing).	
<b>1.9 Clients - Foreign Patrimonial Companies</b>		
78	Does your entity have clients that are Foreign Patrimonial Companies?	
79	Please provide the total number of unique clients that are Foreign Patrimonial companies.	The reporting entity shall provide the <u>number of unique clients</u> that are <u>Foreign Patrimonial Companies</u> (i.e. Non-trading asset management foreign companies), that have used products or services that fall under the scope of AML/CFT regulation in Monaco.
80	Does your entity have information related to the number and value of their transactions?	
81	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Foreign Patrimonial Companies.	
82	Please provide the total value of funds transferred with and by clients that are Foreign Patrimonial Companies (both incoming and outgoing).	
<b>1.10 Clients - Trusts</b>		
83	Does your entity have clients that are Trusts?	
84	Please provide the total number of unique clients that are Trusts.	
85	Does your entity have information related to the number and value of their transactions?	
86	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Trusts.	
87	Please provide the total value of funds transferred with and by clients that are Trusts, (both incoming and outgoing).	
88	Please provide the total number of Monegasque unique clients that are Trusts.	
89	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
90	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by country in which the trust was created.	
<b>1.11 Clients - Associations</b>		
91	Does your entity have clients that are Associations?	
92	Please provide the total number of unique clients that are Associations.	



Q#	Question Text	Instructions
93	Does your entity have information related to the number and value of their transactions?	
94	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Associations.	
95	Please provide the total value of funds transferred with and by clients that are Associations, both incoming and outgoing.	
<b>1.12 Clients - Other Legal Arrangements</b>		
96	Does your entity have clients that are Other Legal Arrangements?	
97	Please provide the total number of unique clients that are Other Legal Arrangements.	
98	Does your entity have information related to the number and value of their transactions?	
99	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Other Legal Arrangements.	
100	Please provide the total value of funds transferred with and by clients that are Other Legal Arrangements, both incoming and outgoing.	
101	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
<b>1.13 Clients - Insurance Companies</b>		
102	Does your entity have clients that are Insurance Companies?	
103	Please provide the total number of unique clients that are Insurance Companies.	
104	Does your entity have information related to the number and value of their transactions?	
105	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Insurance Companies.	
106	Please provide the total value of funds transferred with and by clients that are Insurance Companies (both incoming and outgoing).	
<b>1.14 HNWI's and UHNWI's</b>		
107	Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWIs) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an HNWI or HNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is more than EUR 5 million.



Q#	Question Text	Instructions
108	Please provide the total number of unique clients that are HNWI's or individuals belonging to a HNWI Group, broken down by the primary nationality of the individual (including domestic clients).	
109	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are HNWI's or individuals belonging to a HNWI Group.	
110	Please provide the total value of funds transferred with and by clients that are HNWI's or individuals belonging to a HNWI Group (both incoming and outgoing).	
111	Please provide the total number of unique Beneficial Owners of Legal Person clients that are HNWI's, broken down by the primary nationality of the HNWI.	
112	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are HNWI's, broken down by the primary nationality of the HNWI.	
113	Does your entity have any Ultra-High-Net-Worth Individuals (UHNWI's) or Ultra-High-Net-Worth (UHNW) Groups as clients or Beneficial Owners (that are UHNWI's) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an UHNWI or UHNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is more than EUR 50 million.
114	Please provide the total number of unique clients that are UHNWI's or individuals belonging to a UHNW Group, broken down by the primary nationality of the client (including domestic clients).	
115	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are UHNWI's or individuals belonging to a UHNW Group.	
116	Please provide the total value of funds transferred with and by clients that are UHNWI's or individuals belonging to a UHNW Group (both incoming and outgoing).	
117	Please provide the total number of unique Beneficial Owners of Legal Person clients that are UHNWI's, broken down by the primary nationality of the UHNWI.	
118	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are UHNWI's, broken down by the primary nationality of the UHNWI.	

Q#	Question Text	Instructions
<b>1.15 PEPs</b>		
119	Does your entity have any PEPs as clients?	The reporting entity should disclose whether it has <u>PEPs</u> to whom the reporting entity provides products or services that fall under the scope of AML/CFT regulation in Monaco.
120	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
121	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
122	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
123	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are PEPs.	
124	Please provide the total value of funds transferred with and by clients that are PEPs, (both incoming and outgoing), in EUR.	
125	Please provide the total number of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the primary nationality of the PEP.	<p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term “unique Beneficial Owners” denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.</p>
126	Please provide the total number of transactions (both incoming and outgoing) with and by Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
127	Please provide the total value of funds transferred with and by Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, (both incoming and outgoing), in EUR.	
<b>1.16 Secondary Nationalities</b>		
128	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
129	Please provide the total number of Beneficial Owner secondary nationalities, that are account holders, broken down by BO’s secondary nationality(ies), for BO’s with 25% or greater ownership of an account.	<p>Concerns clients that have all the following traits:</p> <ol style="list-style-type: none"> <li>Are account holders</li> <li>Have at least 25% beneficial ownership of the account</li> <li>Have more than one nationality</li> </ol> <p>Count secondary nationalities only. For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The</p>

Q#	Question Text	Instructions
		<p>response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p> <p>If existence of a 2<sup>nd</sup> nationality is known but the specific country is unknown, please select "Unknown" from the dropdown.</p>
130	For Beneficial Owners that are account holders and are Foreign Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership of an account.	<p>Count individual's 2<sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p> <p>Only include Beneficial Owners that have 25% or greater ownership of an account.</p>
131	For Beneficial Owners that are account holders and are Non-Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership of an account.	<p>Count individual's 2<sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p> <p>Only include Beneficial Owners that have 25% or greater ownership of an account.</p>
132	Please provide the total number of secondary nationalities of Natural Person clients, broken down by secondary nationalities of the client, if applicable (including domestic clients).	Count individual's 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
133	Please provide the total number of secondary nationalities of unique clients that are HNWI's or individuals belonging to a HNWI Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	Count individual's 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
134	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are HNWI's, broken down by the secondary nationality(ies) of the HNWI.	<p>Concerns individuals that have all the following traits:</p> <ol style="list-style-type: none"> <li>Are BO of one or more Legal Person/Legal Arrangement clients</li> <li>Have more than one nationality</li> </ol> <p>Count individual's 2<sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p>
135	Please provide the total number of secondary nationalities of unique clients that are UHNWI's or individuals belonging to a UHNWI Group,	Count individual's 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia)

Q#	Question Text	Instructions
	broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
136	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are UHNWIs, broken down by the secondary nationality(ies) of the UHNWI.	Count individual's 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
137	Please provide the total number of secondary nationalities of unique clients that are PEPs, broken down by secondary nationality(ies) of the PEP (including domestic clients).	Count individual's 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
138	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the secondary nationality(ies) of the PEP.	<p>Count individual's 2<sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p> <p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term "unique Beneficial Owners" denotes that while a Natural Person might be the Beneficial Owner of several Legal Persons/Arrangements it should only be counted as one.</p>
<b>1.17 Lawyers and other Legal Professions</b>		
139	Does your entity have clients that are Lawyers and Other Legal Professions?	
140	Please provide the total number of unique clients that are Lawyers and Other Legal Professions.	
141	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
<b>1.18 Accountants &amp; Auditors</b>		
142	Does your entity have clients that are Accountants & Auditors?	
143	Please provide the total number of unique clients that are Auditors/Accountants.	

Q#	Question Text	Instructions
144	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
<b>1.19 Nominee Shareholders / Directors</b>		
145	Does your entity have clients that are Nominee Shareholders / Directors?	
146	Please provide the total number of unique clients that are Nominee Shareholders / Directors.	
147	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
<b>1.20 Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments</b>		
148	Does your entity have clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
149	Please provide the total number of unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
150	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
<b>1.21 Real Estate Agents</b>		
151	Does your entity have clients that are Real Estate Agents?	
152	Please provide the total number of unique clients that are Real Estate Agents.	
153	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
<b>1.22 DPMS</b>		
154	Does your entity have clients that are Dealers in Precious Metals and Stones?	
155	Please provide the total number of unique clients that are DPMS.	
156	Please provide the total number of Monegasque unique clients that are DPMS.	
<b>1.23 TCSPs</b>		
157	Does your entity have clients that are Trusts and Corporate Service Providers?	
158	Please provide the total number of unique clients that are TCSPs.	
159	Please provide the total number of Monegasque unique clients that are TCSPs.	
<b>1.24 Single-Family Offices and Multi-Family Offices</b>		
160	Does your entity have clients that are Multi-Family Offices?	

Q#	Question Text	Instructions
161	Please provide the total number of unique clients that are Multi-Family Offices.	
162	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
163	Does your entity have clients that are Single-Family Offices?	
164	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
<b>1.25 More Complex Ownership Structures</b>		
165	Does your entity have clients that are More Complex Ownership Structures?	Refer to the definition of complex ownership structures.
166	Please provide the total number of unique clients with More Complex Ownership Structures.	
167	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
168	Does your entity have information related to the number and value of their transactions?	
169	Please provide the total number of transactions (both incoming and outgoing) with and by More Complex Ownership Structures.	
170	Please provide the total value of funds transferred with and by clients with More Complex Ownership Structures, (both incoming and outgoing).	
<b>1.26 Cash Intensive Businesses</b>		
171	How does your entity define a Cash Intensive Business?	
172	Does your entity have clients that are Cash Intensive Businesses?	(such as bars, restaurants)
173	Please provide the total number of unique clients that are engaged in Cash Intensive Business.	
174	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
<b>1.27 Prepaid Cards</b>		
175	Does your entity have clients that are providers of or accept payments from Anonymous Prepaid Cards with high CDD Threshold?	
176	Please provide the total number of unique clients that are providers of or accept payments from Anonymous Prepaid Cards / Cards with a high CDD Threshold.	
177	Please provide the total number of Monegasque unique clients that are providers	

Q#	Question Text	Instructions
	of or accept payments from Anonymous Prepaid Cards / Cards with a high CDD Threshold.	
<b>1.28 Art and Antiques</b>		
178	Does your entity have clients that are engaged in Art and Antiques?	
179	Please provide the total number of unique clients that are engaged in Art and Antiques.	
180	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
181	Does your entity have information related to the number and value of their transactions?	
182	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Art and Antiques.	
183	Please provide the total value of funds transferred with and by clients that are engaged in Art and Antiques (both incoming and outgoing).	
<b>1.29 Import-Export</b>		
184	Does your entity have clients that are engaged in Import-Export?	
185	Please provide the total number of unique clients that are engaged in Import-Export.	
186	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
187	Does your entity have information related to the number and value of their transactions?	
188	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Import-Export.	
189	Please provide the total value of funds transferred with and by clients that are engaged in Import-Export (both incoming and outgoing).	
<b>1.30 High-Value Goods</b>		
190	Does your entity have clients that are High-Value Goods?	
191	Please provide the total number of unique clients that are engaged in dealing with High-Value Goods.	
192	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
193	Does your entity have information related to the number and value of their transactions?	



Q#	Question Text	Instructions
194	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in dealing with High-Value Goods.	
195	Please provide the total value of funds transferred with and by clients that are engaged in dealing with High-Value Goods (both incoming and outgoing).	
<b>1.31 NPOs</b>		
196	Does your entity have clients that are Non-Profit Organizations?	
197	Please provide the total number of unique clients that are NPOs.	
198	Please provide the total number of Monegasque unique clients that are NPOs.	
<b>1.32 Casinos / Gambling</b>		
199	Does your entity have clients that are Casinos/Gambling?	
200	Please provide the total number of unique clients that are engaged in Casinos/Gambling.	
201	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
<b>1.33 Construction / Real Estate Development</b>		
202	Does your entity have clients that are engaged in Construction / Real Estate Development?	
203	Please provide the total number of unique clients that are engaged in Construction/Real Estate Development.	
204	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
205	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Construction/Real Estate Development.	
206	Please provide the total value of funds transferred with and by clients that are engaged in Construction/Real Estate Development (both incoming and outgoing).	
<b>1.34 Extractive Industries (e.g. Oil and Gas)</b>		
207	Does your entity have clients that are engaged in Extractive Industries?	
208	Please provide the total number of unique clients that are engaged in Extractive Industries.	



Q#	Question Text	Instructions
209	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
210	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Extractive Industries.	
211	Please provide the total value of funds transferred with and by clients that are engaged in Extractive industries (both incoming and outgoing).	
<b>1.35 Virtual Asset Service Providers</b>		
212	Does your entity have clients that are VASPs?	
213	Please provide the total number of unique clients that are VASPs.	
214	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are VASPs.	
215	Please provide the total value of funds transferred with and by clients that are VASPs (both incoming and outgoing).	
216	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	
217	Does your entity have clients that are Custodian Wallet Providers?	
218	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	
219	Please provide the total number of transactions with and by VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	
220	Please provide the total value of funds transferred with and by VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	
221	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	
222	Does your entity have clients that are Virtual Currency Exchange Providers?	
223	Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers, broken down by country of establishment.	
224	Please provide the total number of transactions with and by VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	

Q#	Question Text	Instructions
225	Please provide the total value of funds transferred with and by VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	
226	Does your entity distinguish if VASPs clients are ICO related service providers?	
227	Does your entity have clients that are Initial Coin Offering Providers?	
228	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	
229	Please provide the total number of transactions with and by VASP clients that are ICO related service providers (both incoming and outgoing).	
230	Please provide the total value of funds transferred with and by VASP clients that are ICO related service providers (both incoming and outgoing).	
231	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	
232	Does your entity have clients that are engaged in Other VASP Services?	
233	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	
234	Please provide the total number of transactions with and by VASP clients related to Other Services (both incoming and outgoing).	
235	Please provide the total value of funds transferred with and by VASP clients that provide Other Services (both incoming and outgoing).	
236	Please specify what Other Services VASP clients are providing not mentioned above.	
237	Does your entity record if clients conduct transfers to or from VASPs from an account with your entity?	The reporting entity should disclose <u>whether it records if its clients conduct transactions with VASPs</u> . I.e. if clients send or receive funds to VASPs (such as Binance) from its accounts with your entity.
238	Please provide the total number of unique clients that have conducted transactions with VASPs from an account with your entity.	
239	Please provide the total number of transactions (both incoming and outgoing) with and by clients with VASPs from an account with your entity.	
240	Please provide the total value of funds transferred with and by clients with VASPs (both incoming and outgoing) from an account with your entity.	

Q#	Question Text	Instructions
<b>1.36 Defense / Arms</b>		
241	Does your entity have clients that are engaged in Defense / Arms?	The reporting entity should disclose whether it has clients that are engaged in <u>Defense/Arms</u> including Dual-use items for proliferation of Weapons of Mass Destruction (WMD) to whom the reporting entity provides products or services that fall under the scope of AML/CFT regulation in Monaco.
242	Please provide the total number of unique clients that are engaged in Defense/Arms.	
243	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
<b>1.37 Yachting-related Business</b>		
244	Does your entity have clients that are engaged in Yachting related business?	
245	Please provide the total number of unique clients that are engaged in Yachting-related Business.	
246	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
<b>1.38 Sports Agents and Intermediaries</b>		
247	Does your entity have clients that are Sports Agents or Intermediaries?	
248	Please provide the total number of unique clients that are Sports Agents or Intermediaries.	
249	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
<b>1.39 Fund Management</b>		
250	Does your entity have clients that are engaged in Fund Management?	
251	Please provide the total number of unique clients that are engaged in Fund Management.	
252	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
253	Does your entity have information related to the number and value of their transactions?	
254	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Fund Management.	
255	Please provide the total value of funds transferred with and by clients that are engaged in Fund Management (both incoming and outgoing).	
<b>1.40 Asset Holding</b>		
256	Does your entity have clients that are engaged in Asset Holding?	

Q#	Question Text	Instructions
257	Please provide the total number of unique clients that are engaged in Asset Holding.	
258	Please provide the total number of Monegasque unique clients that are engaged in Asset Holding.	
259	Does your entity have information related to the number and value of their transactions?	
260	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Asset Holding.	
261	Please provide the total value of funds transferred with and by clients that are engaged in Asset Holding (both incoming and outgoing).	
<b>1.41 Auctioneers</b>		
262	Does your entity have clients that are Auctioneers?	
263	Please provide the total number of unique clients that are Auctioneers.	
264	Please provide the total number of Monegasque unique clients that are Auctioneers.	
<b>1.42 Motor Vehicle Dealers</b>		
265	Does your entity have clients that are Motor Vehicle Dealers?	
266	Please provide the total number of unique clients that are Motor Vehicle Dealers.	
267	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
268	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Motor Vehicle Dealers.	
269	Please provide the total value of funds transferred with and by clients that are Motor Vehicle Dealers (both incoming and outgoing).	
<b>1.43 Government and Public Sector</b>		
270	Does your entity have clients that are Government and Public Sector?	
271	Please provide the total number of unique clients that are Government and Public Sector.	
272	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
273	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Government and Public Sector.	
274	Please provide the total value of funds transferred with and by clients that are	

Q#	Question Text	Instructions
	Government and Public Sector (both incoming and outgoing).	
<b>1.44 Aircraft Sales / Private Jets / Charters</b>		
275	Does your entity have clients that are engaged in Aircraft Sales / Private Jets / Charters?	
276	Please provide the total number of unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
277	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
278	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Aircraft Sales / Private Jets / Charters.	
279	Please provide the total value of funds transferred with and by clients that are engaged in Aircraft Sales / Private Jets / Charters (both incoming and outgoing).	
<b>1.45 Shipping</b>		
280	Does your entity have clients that are engaged in Shipping?	
281	Please provide the total number of unique clients that are engaged in Shipping.	
282	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
283	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Shipping.	
284	Please provide the total value of funds transferred with and by clients that are engaged in Shipping (both incoming and outgoing).	
<b>1.46 Comments &amp; Feedback</b>		
285	Do you have feedback related to any questions in this section?	
286	Please provide comments or feedback on this section here.	
<b>2 Products &amp; Services Risk</b>		
<b>2.1 Payment Types with and by Clients - Cheques</b>		
287	Does your entity accept or make Cheque transactions with or by clients?	
288	Please provide the total number of Cheque transactions with and by clients (both incoming and outgoing).	

Q#	Question Text	Instructions
<b>2.2 Payment Types with and by Clients - Electronic Transfers</b>		
289	Does your entity accept or make Electronic Transfers (i.e. wire transfers) with and by clients?	
290	Please provide the total number of Electronic Transactions with and by clients (both incoming and outgoing).	
<b>2.3 Payment Types with Clients - Cash</b>		
291	Does your entity accept or make Cash transactions with clients?	
292	Please provide the total number of Cash transactions with clients, within the reporting period.	The reporting entity shall provide the <u>number of transactions</u> made with <u>Cash</u> , both incoming and outgoing, within the reporting period.
293	Please provide the total value of funds transferred, Cash payments in the reporting period, both incoming and outgoing.	
294	Please provide the total number of single cash transactions exceeding 10,000 EUR (both incoming and outgoing) within the reporting period.	
295	Can your entity distinguish cash transactions above EUR 100,000 in your record keeping?	
296	Number of physical cash transactions by Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
297	Number of physical cash transactions by Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
298	Number of physical cash transactions by Foreign Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
<b>2.4 Virtual Currencies</b>		
299	Do you have clients that use cryptocurrencies?  In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client	
300	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?  In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets	The reporting entity shall disclose whether or not it plans to be active in, or offer products and services in, <u>Virtual Assets</u> in the next years, accepts or makes payments to/from clients, or made investments in Virtual Assets.  This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).

Q#	Question Text	Instructions
	II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client	
301	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
302	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with. Name all the apply.	
<b>2.5 Services Offered</b>		
303	Does your entity conduct correspondent-type business relationships, where your entity acts as the correspondent? (applicable to custodians only)	Applicable to custodian correspondent-type business relationships only. i.e. where your entity is providing financial services to another financial institution (the respondent) by carrying out activities or business at or through permanent establishments in different countries.  The correspondent generally does not have direct relationships with the clients of the respondent.
304	Please provide the total number of correspondent-type transactions, both incoming and outgoing, where your entity acts as the correspondent. (applicable to custodians only)	Applicable to custodian correspondent-type business relationships only. i.e. where your entity is providing financial services to another financial institution (the respondent) by carrying out activities or business at or through permanent establishments in different countries.  The correspondent generally does not have direct relationships with the clients of the respondent.
305	Please provide the total value of funds transferred for correspondent-type transactions where your entity acts as the correspondent. Sum of both incoming and outgoing transactions from/to the respondent. (applicable to custodians only)	Applicable to custodian correspondent-type business relationships only. i.e. where your entity is providing financial services to another financial institution (the respondent) by carrying out activities or business at or through permanent establishments in different countries.  The correspondent generally does not have direct relationships with the clients of the respondent.
306	Does your entity have client accounts that are Conventional Titles?	
307	Please provide the total number of transactions (both incoming and outgoing) with and by client accounts that have Conventional Titles.	
308	Please provide the total value of funds transferred by client accounts that have Conventional Titles, (both incoming and outgoing).	
309	Does your entity Deal in Precious Metals and Stones?	



Q#	Question Text	Instructions
310	Please provide the total number of transactions (both bought and sold) related to Dealings of Precious Metals and Stones.	
311	Please provide the total value of funds transferred, both buying and selling, related to Dealings of Precious Metals and Stones.	
312	Does your entity provide financial products in the form of Cash Bonds?	
313	Please provide the total number of transactions (both bought and sold) of Cash Bonds.	
314	Please provide the total value of funds transferred, both buying and selling, of Cash Bonds.	
315	Does your entity provide financial products in the form of Treasury Bills?	
316	Please provide the total number of transactions (both bought and sold) of Treasury Bills.	
317	Please provide the total value of funds transferred, both buying and selling, of Treasury Bills.	
318	Does your entity provide financial products in the form of Life Insurance Contracts?	
319	Please provide the total number of transactions (both bought and sold) of Life Insurance Contracts.	
320	Please provide the total value of funds transferred, both buying and selling, of Life Insurance Contracts.	
321	Does your entity provide Safe Deposit Rental Services?	
322	Please provide the total number of transactions related to Safe Deposit Rental Services.	For example, the number of rentals or other fee payments.
323	Must the customer be an account holder at your entity to use Safe Deposit Rental Services?	
324	Does your entity accept or make transactions from/to Occasional Customers?	An <u>Occasional Transaction</u> is any Transaction other than a Transaction carried out in the course of an established Business Relationship.
325	Please provide the total number of transactions (both incoming and outgoing) with Occasional Customers.	
326	Please provide the total value of funds transferred with Occasional Customers (both incoming and outgoing).	
327	Does your entity provide Family Office services?	
328	Please provide the total number of transactions (both incoming and outgoing) related to Family Office Services.	



Q#	Question Text	Instructions
329	Please provide the total value of funds transferred, both incoming and outgoing, related to Family Office Services.	
330	Does your entity offer trade financing products or services?	
331	Does your entity offer prepaid cards for sale?	
332	Please provide the total number of cards sold within the reporting period.	
333	Please provide the total value of cards sold within the reporting period.	
<b>2.6 Lending</b>		
334	Please provide the total number of loans provided to clients.	This should include all loans types, including ATF, Mortgage, Lombard, Overdraft in Current Accounts, Issuance of Payment Guarantees, and other loan products.
335	Please provide the total value of loans provided to clients.	
336	Does your entity provide loan products in the form of Fixed Term Advance (ATF)?	
337	Does your entity provide loan products in the form of Mortgage loans?	
338	Does your entity provide loan products in the form of Lombard loans?	
339	Does your entity provide products for Overdraft in Current Accounts?	
340	Does your entity provide Issuance of Payment Guarantees?	
341	Does your entity have any Other Loan Products, not mentioned above, that it offers to clients?	
342	Please specify the type of Other Loan Products at your entity not mentioned above it offers to clients (name all that apply).	
<b>2.7 Comments &amp; Feedback</b>		
343	Do you have feedback related to any questions in this section?	
344	Please provide comments or feedback on this section here.	
<b>3 Distribution Risk</b>		
<b>3.1 Identification</b>		
345	Does your entity rely on Domestic Third Parties to undertake some/all CDD measures towards clients?	Financial institutions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
346	Please provide the total number of clients which Domestic Third Parties were used to undertake some/all CDD measures within the	

Q#	Question Text	Instructions
	reporting period, broken down by primary nationality of the client.	
347	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	Financial institutions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
348	Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client.	
349	Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party.	
<b>3.2 Onboarding</b>		
350	Does your entity accept clients through Introducers?	An introducer is a Financial Institution / Designated Non-Financial Businesses and Professions who has a direct relationship with a client but delegates the financial transaction execution to another Financial Institution (i.e. an introducer is a company that brings a client to the licensed entity).
351	Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement).	<b>Cumulative over time.</b>
352	Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party.	<b>Cumulative over time.</b>
353	Please provide the total number of clients onboarded that were Introduced through Third Parties, within the reporting period, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement).	Within the reporting period.
354	Please provide the total number of clients onboarded that were Introduced through Third Parties within the reporting period, broken down by residency of the Third Party.	Within the reporting period.
355	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	
356	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	

Q#	Question Text	Instructions
357	Please provide the number of new unique clients, that are Legal Arrangements, that have been onboarded within the reporting period.	
358	Does your Entity onboard clients on a non-face-to-face basis, i.e. not physically present?	The reporting entity should disclose whether clients are onboarded (for CDD purposes) on a non-face-to-face basis (not physically present).
359	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	
360	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	
361	Please provide the number of new unique clients, that are Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
<b>3.3 Structure</b>		
362	Please provide the total number of employees of the licensed domestic Entity.	
363	Does your Entity have any Branches, Subsidiaries, or Agencies?	
364	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	For the purpose of this question, branch should be understood as a secondary entity of the parent company. Please do not include offices/client service locations which are sometimes informally referred to as "branches".
365	Is your entity a Branch or Subsidiary of a Foreign Entity?	
366	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	If the reporting entity is a branch or subsidiary of another entity that is established in a foreign country, identify the parent undertaking country of establishment.
367	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	For the purpose of this question, branch should be understood as a secondary establishment of the parent company. Please do not include offices/client service locations which are sometimes informally referred to as "branches".
368	Please provide the number of shareholders with 25% or greater shareholding, broken down by primary nationality (Natural Person) or country of establishment (Legal Persons and Arrangements)	
369	Please provide the number of beneficial owners with 25% or greater shareholding, direct or indirect control of the company, or is a senior managing official, broken down by primary nationality.	
370	Does your entity have foreign correspondent bank relationships?	

Q#	Question Text	Instructions
371	Please provide the number of foreign bank respondent relationships, broken down by respondent country, at the end of the reporting period.	
372	Within the reporting period, has your entity experienced any of the following:	<p>A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners, any other person exercising direct or indirect control over your entity or the conduct of its activity?</p> <p>Undergone a significant evolution or modification of activities?</p> <p>Any other statutory changes?</p> <p>Change of AML/CFT/CPF responsible persons?</p>
373	Please indicate the development or modification.	
<b>3.4 Rejected Relationships</b>		
374	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
375	Can your entity distinguish whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	The entity should identify if it is possible to determine if the reason for new client rejection was due to a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF).
376	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, <u>due to client attributes / activities / deficiencies.</u>	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.

Q#	Question Text	Instructions
377	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p>The entity should identify if it is possible to determine if the reason for new client rejection was due to both:</p> <ul style="list-style-type: none"> <li>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF),</li> <li>and</li> <li>b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction.</li> </ul>
378	Please provide the total <b>number of new client business relationships that have been rejected</b> due to <u>Money Laundering</u> considerations during the reporting period <u>due to client attributes / activities / deficiencies</u> .	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
379	Please provide the total <b>number of new client business relationships that have been rejected</b> due to <u>Terrorism Financing</u> considerations during the reporting period <u>due to client attributes / activities / deficiencies</u> .	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
380	Please provide the total <b>number of new client business relationships that have been rejected</b> due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the reporting period <u>due to client attributes / activities / deficiencies</u> .	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
<b>3.5 Blocked/Rejected Transactions</b>		
381	Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
382	Can your entity distinguish whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	The entity should identify if it is possible to determine if the reason a transaction was blocked/rejected was due to a client attribute / activity / deficiency (such as presence on a sanctions list or missing key documentation) or was mainly

Q#	Question Text	Instructions
		<p>due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF).</p>
383	<p>Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period <u>due to client attributes / activities / deficiencies</u>.</p>	
384	<p>Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?</p>	<p>The entity should identify if it is possible to determine if the reason for blocking/rejecting a transaction was due to both:</p> <ul style="list-style-type: none"> <li>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF),</li> <li>and</li> <li>b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction</li> </ul>
385	<p>Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to <u>Money Laundering</u> considerations <u>due to client attributes / activities / deficiencies</u> within the reporting period.</p>	<p>Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.</p>
386	<p>Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to <u>Terrorism Financing</u> considerations <u>due to client attributes / activities / deficiencies</u> within the reporting period.</p>	<p>Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.</p>



Q#	Question Text	Instructions
387	Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations <u>due to client attributes / activities / deficiencies</u> within the reporting period.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
<b>3.6 Terminated Relationships</b>		
388	Please provide the total <b>number of client business relationships (clients) that have been terminated</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
389	Can your entity distinguish whether client relationship was terminated due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	The entity should identify if it is possible to determine if the reason for terminating a client relationship was due to a client attribute / activity / deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF).
390	Please provide the total <b>number of client business relationships that have been terminated</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period <u>due to client attributes / activities / deficiencies</u> .	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
391	Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	The entity should identify if it is possible to determine if the reason for terminating a client business relationship was due to both: <ul style="list-style-type: none"> <li>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF),</li> </ul> <p style="text-align: center;">and</p>

Q#	Question Text	Instructions
		b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
392	Please provide the total <b>number of client business relationships that have been terminated</b> due to <u>Money Laundering</u> considerations during the reporting period <u>due to client attributes / activities / deficiencies</u> .	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
393	Please provide the total <b>number of client business relationships that have been terminated</b> due to <u>Terrorism Financing</u> considerations during the reporting period <u>due to client attributes / activities / deficiencies</u> .	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
394	Please provide the total <b>number of client business relationships that have been terminated</b> due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the reporting period <u>due to client attributes / activities / deficiencies</u> .	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
<b>3.7 Comments &amp; Feedback</b>		
395	Do you have feedback related to any questions in this section?	
396	Please provide comments or feedback on this section here.	



## Survey Question Instructions, Controls

C#	Question Text	Instructions
<b>1 Controls</b>		
<b>1.1 Structure</b>		
1	Please provide the total number of employees at your entity.	The reporting entity should disclose the number of employees irrespective of their function.  The number at the end of the reporting period should be used.
2	Please provide the total number of full-time equivalent employees at your entity.	The reporting entity should disclose the number of full-time equivalent employees irrespective of their function.  The number at the end of the reporting period should be used.
3	Please provide the number of employees in AML/CFT Compliance at your entity.	The number at the end of the reporting period should be used.
4	Please provide the number of full-time equivalent employees in AML/CFT Compliance at your entity.	The number at the end of the reporting period should be used.
5	Does the MLRO fulfil any other role or job function?	
6	What percentage of time does the MLRO spend on additional functions?	
7	Is your entity part of a Group?	
<b>1.2 Policies &amp; Procedures</b>		
8	Did your Entity prepare a documented set of AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT legal requirements.
9	Were these policies and procedures approved by the board and senior management of your Entity?	The reporting entity should disclose whether its written AML/CFT policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
10	Did your Entity circulate these policies and procedures to all its employees?	
11	Did your Entity ensure awareness of these policies and procedures to all its employees?	
12	Did your Entity update their written AML/CFT Policies and Procedures in the last year?	
13	Please provide the date of the last update to your entity's written AML/CFT Policies and Procedures.	
14	Does your Entity have a systematic practice of tracking and managing changes to the AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.

C#	Question Text	Instructions
15	Does your entity have a group-wide AML/CFT/CPF programme?	
16	Has your entity conducted an analysis to identify whether the group AML/CFT/CPF programme complies with Monaco's legislation and regulatory framework for each branch/subsidiary?	
17	Who prepared your Entity's Policies and Procedures?	<p>The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors?</p> <p>Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.</p>
18	Did your Entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures?	
<b>1.3 Governance</b>		
19	Does the board and senior management of your Entity demonstrate overall responsibility for AML/CFT?	<p>Does the board and senior management of your Entity demonstrate overall responsibility for AML/CFT?</p> <p>Actions taken by the Board and senior management that could demonstrate board's and senior management's engagement in AML/CFT matters could include:</p> <p>(1) senior management includes AML/CFT matters into the daily/weekly/monthly/quarterly/yearly agenda;</p> <p>(2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks;</p> <p>(3) senior management requests ad-hoc reporting on AML/CFT matters whenever issues arise; orders internal or external audit to test AML/CFT controls;</p> <p>(4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT), buying AML/CFT monitoring software or sanction screening software, etc.;</p> <p>(5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT legislation are introduced;</p> <p>(6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.</p>

C#	Question Text	Instructions
20	Does the board and senior management of your Entity regularly receive AML/CFT reports?	<p>The reporting entity should disclose whether the board and senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT compliance.</p> <p>Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/FT risk and trends.</p>
21	Does the board and senior management of your Entity ensure that AML/CFT shortcomings are rectified?	<p>The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control, take actions to rectify shortcomings in AML/CFT compliance areas and mitigate ML/TF risks.</p> <p>The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT reporting, supervisory onsite examination reports, etc. Examples of such actions might include:</p> <p>(a) approving budgetary resources to hire more employees for AML/CFT Compliance, investing in employees' knowledge and expertise through training, seminars, certifications</p> <p>(b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions,</p> <p>(c) prioritizing AML/CFT area for internal audit, etc.</p>
22	Does the senior management of your Entity review (give approval) for taking on high-risk clients?	<p>In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.</p>
<b>1.4 Compliance &amp; Violations</b>		
23	Has your entity had any AML/CFT related violations in the past 5 years?	<p>The reporting entity should disclose whether it had any AML/CFT related compliance failures, including minor shortcomings, within the past 5 years.</p>
24	Please provide the total number of AML/CFT related violations in the past 5 Years.	<p>Any AML/CFT related compliance failures, including minor shortcomings, should be counted under this question.</p>
25	Please identify the number and types of AML/CFT violations.	
<b>1.5 Training</b>		
26	Did your entity conduct AML/CFT training for its Directors / Management in the reporting period?	
27	Did your entity conduct AML/CFT training for its client-facing employees in the reporting period?	
28	Did your entity conduct AML/CFT training for its non-client-facing employees in the reporting period?	

C#	Question Text	Instructions
29	Did your entity conduct AML/CFT training for its Compliance Department Employees in the reporting period?	
30	Did your entity conduct AML/CFT training for its Internal Audit Department in the reporting period?	
31	Please provide the total number of employees trained on AML/CFT matters in Reporting Cycle.	
32	Are employees required to participate in AML/CFT/CPF training prior to their assignment to customer-facing or other duties of relevance for AML/CFT/CPF?	
33	Provide the estimated average number of hours per person spent on Initial Training.	
34	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
35	Provide the number of staff that have received Refresher Training within the reporting period.	
36	Provide the estimated average number of hours per person spent on Refresher Training.	
37	Does the entity provide specialized training for employees working in high-risk areas, such as compliance and customer due diligence?	
38	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
39	Did any of the AML/CFT training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)?	
40	Did any of the AML/CFT training/awareness raising activities include Internal Meetings?	
41	Did any of the AML/CFT training/awareness raising activities include Consultation of AMSF's Website?	
42	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider in Monaco?	
43	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider outside Monaco?	

C#	Question Text	Instructions
44	Did any of the AML/CFT training/awareness raising activities include Training by Another Group Member?	
45	Did any of the AML/CFT training/awareness raising activities include any Other Activities?	
46	What other AML/CFT training/awareness raising activities did it include? Please specify all that apply.	
47	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
48	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
49	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
50	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
51	Did any of the AML/CFT training/awareness raising activities cover topics related to Typologies?	
52	Did any of the AML/CFT training/awareness raising activities cover topics related to Practical Cases?	
53	Did any of the AML/CFT training/awareness raising activities cover topics related to News?	
54	Did any of the AML/CFT training/awareness raising activities cover topics related to Corruption?	
55	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing of Terrorism?	
56	Did any of the AML/CFT training/awareness raising activities cover topics related to Cryptocurrency?	
57	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
58	Did any of the AML/CFT training/awareness raising activities cover topics related to Tax Evasion?	

C#	Question Text	Instructions
59	Did any of the AML/CFT training/awareness raising activities cover topics related to Fraud?	
60	Did any of the AML/CFT training/awareness raising activities cover other topics not mentioned above?	
61	What other topics did the AML/CFT training/awareness raising activities cover? Please specify all that apply.	
<b>1.6 CDD</b>		
62	<p>Does your entity record all of the following in your customer database:</p> <ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Date of Birth</li> <li>• Place of Birth</li> <li>• Nationality</li> <li>• Country of Residence</li> <li>• Tax Residence</li> <li>• Activity</li> <li>• Wealth</li> </ul>	
63	If your entity does not collect all of the above mentioned items, please specify which items are not collected? If all are collected respond "NA"	
64	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> <li>• Account Holder</li> <li>• Representative of Company or Client</li> <li>• Beneficial Owner</li> <li>• Administrators/Directors</li> <li>• Shareholders</li> <li>• Legal Representatives</li> <li>• Settlor/Constituent</li> <li>• Trustee</li> <li>• Protector</li> <li>• Renters of Safe Deposit Boxes</li> <li>• Introducers?</li> </ul>	

C#	Question Text	Instructions
65	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> <li>• Credit Card Holders</li> <li>• Complex Ownership Structure</li> <li>• Depositors/3rd Party Guarantors</li> <li>• Occasional Customers</li> <li>• Prospective Customers</li> <li>• Insurance Policy Payee</li> <li>• Insurance Policy Holder</li> <li>• Insurance Policy Beneficiary</li> <li>• Insurance Policy Insured?</li> </ul>	
66	<p>If your entity does not collect the items in the two above questions, please specify which items are not collected?</p>	<p>If all are collected respond "NA".</p>
67	<p>Does your entity record other client information or register client activity information in their database?</p>	<p>The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Wealth and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Protector, Renters of Safe Deposit Boxes, Introducers, Credit Card Holders, Complex Ownership Structure, Depositors/3rd Party Guarantors, Occasional Customers, Prospective Customers, Insurance Policy Payee, Insurance Policy Holder, Insurance Policy Beneficiary, Insurance Policy Insured?</p>
68	<p>Please specify what other information is included in your database, specify all that apply.</p>	
69	<p>Is past 5 years of client relationship data accessible by AMSF upon request?</p>	
70	<p>Does your Entity apply a risk-based approach to customer due diligence measures (CDD)?</p>	
71	<p>Does your Entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD? (e.g. simplified, standard and enhanced due diligence).</p>	
72	<p>Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period.</p>	<p><b>Please repeat the answer provided in Q1.</b></p>
73	<p>Has your entity performed Simplified Due Diligence on any clients within the reporting period?</p>	



C#	Question Text	Instructions
74	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
75	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
76	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
77	What % shareholding threshold does your entity use for recording Beneficial Owner information?	
78	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
79	Does your entity examine the source of wealth before customer take-on?	
80	Does your entity undertake other measures for high-risk clients, before customer take-on?	
81	Please specify other measures taken for high-risk clients, before customer take-on.	
82	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	The reporting entity should disclose whether all high-risk clients are subject to enhanced CDD measures before customer take-on.
83	How does the company verify the Beneficial Owners of Virtual Assets?	If not applicable, state 'NA'.
84	Does your entity ever conduct tests on third parties regarding their willingness and ability to provide information during the relationship on request and without delay?	Third parties has the meaning of any other entity / service provider which performs elements of CDD on behalf of the entity.
<b>1.7 EDD</b>		
85	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
86	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
87	Please provide the percentage of unique clients that have been subjected to enhanced due diligence.	i.e. number of enhanced due diligence clients (at start or during course of business relationship) ÷ total number of clients.
88	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	

C#	Question Text	Instructions
89	Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	i.e. number of enhanced due diligence <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements ÷ total number of <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements.
<b>1.8 Risk Assessments</b>		
90	How many AML/CFT risk levels does your entity have for clients?	
91	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT.	
92	Please provide the total number of unique clients that are without a risk level determined yet.	
93	Does your entity's High-Risk Assignment Considerations include ALL of the following: <ul style="list-style-type: none"> <li>• Country of Residence</li> <li>• Activity</li> <li>• PEP status</li> <li>• Type of Customer</li> <li>• Products &amp; Services</li> <li>• Transaction Types</li> <li>• Distribution Channels</li> <li>• Accounts with Conventional Title</li> <li>• Assets Under Management</li> <li>• Volume of Operations</li> <li>• Nature of Operations</li> </ul>	
94	If your entity does not take into consideration all of the above-mentioned elements, please specify which items are not considered?	If all are considered respond "NA".
95	Does your entity's High-Risk Assignment Considerations include any additional measures not mentioned above?	
96	Please specify what additional measure not mentioned above are included your entity's High-Risk Assignment Considerations.	Name all that apply.
97	Does your entity have a tool or process for making AML/CFT risk assessments?	
98	Does your entity use a list of sensitive countries for AML/CFT risk assessment?	
99	Does your entity use a list of Sensitive Activities for AML/CFT risk assessment?	
100	What client activities does your entity associate with High-Risk clients?	

C#	Question Text	Instructions
101	Does your entity consider ML and TF risks separately?	
102	Does your entity have a tool or process for making AML/CFT risk assessments?	
<b>1.9 Internal Audit / Controls</b>		
103	Does your entity's internal control process include a Permanent Controller?	
104	Is the permanent controller a different person from the AML/CFT Manager?	
105	Does your entity's internal control process include an Internal Audit Department?	
106	How many significant audit issues were identified in the latest audit report (relating to AML/CFT/CPF)?	
107	When did your entity last have a SICCFIN/AMSF audit?	
108	When did your entity last have an ACPR audit?	
109	When did your entity last have a CCAF audit?	
110	When did your entity last have an Internal AML/CFT audit?	
111	When did your entity last have a Group AML/CFT audit?	
112	Did your entity have any Other Audits not mentioned above?	
113	Specify the types of Other Audits, and provide the year of the last audit of each kind.	
114	Does your entity have an Annual Cheque Control program?	The reporting entity should disclose whether it has an annual <u>Cheque Control Program</u> according to Article 4 of Arrêté Ministériel n°2003-503.
<b>1.10 Monitoring</b>		
115	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
116	Has the automated system been adapted to the entity in Monaco?	
117	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	<b>Please repeat the answer provided in Q5.</b>
118	Please provide the total number of Alerts in Reporting Period by the automated system related to Money Laundering.	

C#	Question Text	Instructions
119	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
120	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
121	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing.	
122	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
123	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
124	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	
125	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	
126	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
127	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	
<b>1.11 Monitoring - Rejected Potential Clients</b>		
128	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period (i.e. not entering into a business relationship).	<b>Please repeat the answer provided in Q374.</b>
129	Can your entity distinguish whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practices?	<b>Please repeat the answer provided in Q375.</b>  The entity should identify if it is possible to determine if the reason for new client rejection was due to a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group

C#	Question Text	Instructions
		politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF).
130	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period (i.e. not entering into a business relationship), that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices.</u>	For this question, a bank's discretionary AML/CFT/CPF practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.
131	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p><b>Please repeat the answer provided in Q377.</b></p> <p>The entity should identify if it is possible to determine if the reason for new client rejection was due to both:</p> <ul style="list-style-type: none"> <li>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF),</li> <li>and</li> <li>b. Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction</li> </ul>
132	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to <u>Money Laundering</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices.</u>	
133	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to <u>Terrorism Financing</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices.</u>	

C#	Question Text	Instructions
134	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	
<b>1.12 Monitoring - Blocked/Rejected Transactions</b>		
135	Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	<b>Please repeat the answer provided in Q381.</b>
136	Can your entity distinguish whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	<b>Please repeat the answer provided in Q382.</b>  The entity should identify if it is possible to determine if the reason for new client rejection was due to a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF).
137	Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to Money Laundering, Terrorism Financing, Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, a bank's discretionary AML/CFT/CPF practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.
138	Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to Money Laundering, Terrorism Financing, Financing the Proliferation of Weapons of Mass Destruction?	<b>Please repeat the answer provided in Q384.</b>  The entity should identify if it is possible to determine if the reason for blocking/rejecting a transaction was due to both:  a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate

C#	Question Text	Instructions
		<p>monitoring, or other commercial reasons related to AML/CFT/CPF),</p> <p>and</p> <p>b. Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction</p>
139	<p>Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to <u>Money Laundering</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u>.</p>	
140	<p>Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to <u>Terrorism Financing</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u>.</p>	
141	<p>Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u>.</p>	
<b>1.13 Monitoring - Terminated Relationships</b>		
142	<p>Please provide the total <b>number of client business relationships (clients) that have been terminated</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period. (i.e. existing business relationship terminated)</p>	<p><b>Please repeat the answer provided in Q388.</b></p>
143	<p>Can your entity distinguish whether a business relationship was terminated due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?</p>	<p><b>Please repeat the answer provided in Q389.</b></p> <p>The entity should identify if it is possible to determine if the reason for client termination was due to a client attribute/activity/deficiency (such as an addition to a sanctions list or becoming a PEP) or was mainly due to changes in the bank's discretionary AML/CFT/CPF practices (such as decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as</p>



C#	Question Text	Instructions
		HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF).
144	Please provide the total <b>number of client business relationships (clients) that have been terminated</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, termination of a client would generally be related to a change in discretionary AML/CFT/CPF practices, or an ongoing implementation thereof. This is opposed to terminations due to reasons related to non-discretionary client attributes, activities or deficiencies, such as being added to a sanctions list, becoming a PEP, etc.
145	Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p><b>Please repeat the answer provided in Q391.</b></p> <p>The entity should identify if it is possible to determine if the reason for terminating a client business relationship was due to both:</p> <ul style="list-style-type: none"> <li>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF),</li> <li>and</li> <li>b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction</li> </ul>
146	Please provide the total <b>number of client business relationships (clients) that have been terminated</b> due to <u>Money Laundering</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	
147	Please provide the total <b>number of client business relationships (clients) that have been terminated</b> due to <u>Terrorism Financing</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	
148	Please provide the total <b>number of client business relationships (clients) that have been terminated</b> due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the	

C#	Question Text	Instructions
	reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices.</u>	
<b>1.14 Record Keeping</b>		
149	Does your entity keep transaction records for at least 5 years?	
150	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
151	Does your entity keep these records and documents in a safe and secure place?	
152	Are these records and documents available promptly to the relevant authorities upon request?	<p>When providing its response, the reporting entity should consider the following factors:</p> <ul style="list-style-type: none"> <li>(1) is the above data collected in electronic format and easily retrievable from the IT systems?</li> <li>(2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly?</li> <li>(3) is there manual effort required to find clients' data, e.g., if files are stored only in paper format; or, when they are stored in electronic format, IT systems are not configured to enable easy access to the required data.</li> </ul>
153	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
<b>1.15 Targeted Financial Sanctions (TFS)</b>		
154	Do entity policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements.</p> <p>Policies and procedures should cover targeted financial sanctions-related requirements of at least the following:</p> <ul style="list-style-type: none"> <li>(a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons;</li> <li>(b) Frequency and scope of screening;</li> <li>(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).</li> </ul>

C#	Question Text	Instructions
155	Are the board and senior management of your entity engaged in overseeing risks and compliance matters related to TFS for Terrorist Financing and Proliferation Financing?	<p>The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include:</p> <p>(1) approval of TFS-related policies, procedures and instructions by the board or senior management;</p> <p>(2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.;</p> <p>(3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities,</p> <p>(4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.</p>
156	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures cover:</p> <p>(a) direct control and</p> <p>(b) indirect control of assets by designated persons;</p> <p>(c) internal processes and systems designed to detect persons who exercise direct and indirect control over assets owned by designated persons.</p>
157	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	<p>The reporting entity should disclose whether its policies and procedures cover concrete steps to:</p> <p>(1) freeze assets without delay of designated persons and</p> <p>(2) to report the case(s) to the competent authority(ies)?</p>
158	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
159	Does your entity have an automated System to Check the Customer Database in accordance with Article 16 of Sovereign Ordinance no. 8.664 of 26 May 2021?	<p>The reporting entity should disclose whether it has an automated system to screen its customer database against lists published as an annex to Ministerial Decisions relating to Sovereign Ordinance no. 8,664 of 26 May 2021, a national list of all individuals, legal entities, and organizations subject to the freezing of funds and economic resources in the Principality.</p> <p><a href="https://geldefonds.gouv.mc/">https://geldefonds.gouv.mc/</a></p>

C#	Question Text	Instructions
		Sovereign Order No. 8.664 of 26 May 2021 on procedures for freezing funds and economic resources in application of international economic sanctions (UN, EU and France) replaces Sovereign Orders No. 15.321 of 8 April 2002 on procedures for freezing funds in order to combat terrorism, as amended, and No. 1.675 of 10 June 2008 on procedures for freezing funds implementing economic sanctions, as amended.
160	<p>Does the entity's automated System perform checks on Entry into Relationship for all of the following (When applicable by client / activity type):</p> <ul style="list-style-type: none"> <li>• Account Holder,</li> <li>• Representative of Company or Client,</li> <li>• Beneficial Owner,</li> <li>• Administrators/Directors,</li> <li>• Shareholders, Legal Representatives,</li> <li>• Settlor/Constituent,</li> <li>• Trustee,</li> <li>• Protector,</li> <li>• Renters of Safe Deposit Boxes,</li> <li>• Introducers.</li> </ul>	
161	<p>Does the entity's automated System perform checks on Entry into Relationship for all of the following (When applicable by client / activity type):</p> <ul style="list-style-type: none"> <li>• Introducers,</li> <li>• Credit Card Holders,</li> <li>• Complex Ownership Structure,</li> <li>• Depositors/3rd Party Guarantors,</li> <li>• Occasional Customers,</li> <li>• Prospective Customers,</li> <li>• Insurance Policy Payee,</li> <li>• Insurance Policy Holder,</li> <li>• Insurance Policy Beneficiary,</li> <li>• Insurance Policy Insured.</li> </ul>	
162	If your entity does not collect the items mentioned in the above two questions, please specify which items are not collected?	If all are collected respond "NA".
163	Does the entity's automated System perform any Other Checks on Entry into	If Yes, please specify. If No, please put "NA".

C#	Question Text	Instructions
	Relationship, not already mentioned above?	
164	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Account Holders (Titulaires)?	Reference Sovereign Ordinance no. 8.664.
165	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Representative of Company or Client (Mandataires)?	Reference Sovereign Ordinance no. 8.664.
166	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Beneficial Owners (and Beneficiaries)?	Reference Sovereign Ordinance no. 8.664.
167	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Administrators / Directors?	Reference Sovereign Ordinance no. 8.664.
168	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Shareholders?	Reference Sovereign Ordinance no. 8.664.
169	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Legal Representatives?	Reference Sovereign Ordinance no. 8.664.
170	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Settlor / Constituent?	Reference Sovereign Ordinance no. 8.664.
171	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Trustees?	Reference Sovereign Ordinance no. 8.664.
172	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Protectors?	Reference Sovereign Ordinance no. 8.664.
173	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Renters of Safe Deposit Boxes?	Reference Sovereign Ordinance no. 8.664.
174	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Introducers?	Reference Sovereign Ordinance no. 8.664.
175	How frequently does your entity undertake regular screenings (terrorism,	Reference Sovereign Ordinance no. 8.664.

C#	Question Text	Instructions
	proliferation, financial sanctions) for Credit Card Holders?	
176	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	Reference Sovereign Ordinance no. 8.664.
177	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Depositors / 3rd Party Guarantors?	Reference Sovereign Ordinance no. 8.664.
178	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Payee?	Reference Sovereign Ordinance no. 8.664.
179	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Holder?	Reference Sovereign Ordinance no. 8.664.
180	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Beneficiary?	Reference Sovereign Ordinance no. 8.664.
181	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Insured?	Reference Sovereign Ordinance no. 8.664.
182	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Recipients of Funds?	Reference Sovereign Ordinance no. 8.664.
183	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary.	Reference Sovereign Ordinance no. 8.664.
184	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
185	Please provide the total number of persons identified by your entity related to financing of the Proliferation of Weapons of Mass Destruction within the reporting period.	
186	Please provide the total value of assets frozen (in EUR) related to Terrorism Financing within the reporting period.	
187	Please provide the total value of assets frozen (in EUR) related to financing of	

C#	Question Text	Instructions
	Proliferation of Weapons of Mass Destruction within the reporting period.	
188	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
189	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
190	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	
191	What other actions has your entity taken related to Terrorism Financing?	If none reply "NA".
192	What other actions has your entity taken related to financing of Proliferation of Weapons of Mass Destruction?	If none reply "NA".
<b>1.16 PEPs</b>		
193	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
194	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	Please specify all that apply.
195	What additional AML/CFT procedures are applied for PEPs (compared to a standard risk client)? Please specify all that may apply.	<p>The reporting entity should provide a list of specific and enhanced measures that are additionally being taken for PEPs, compared to standard risk clients. For example:</p> <p>(a) before establishing a business relationship</p> <p>(b) during the course of a business relationship.</p> <p>If the above measures differ for domestic and foreign PEPs, please indicate which measure applies to a domestic PEP and which to a foreign PEP.</p>
196	Does PEP screening occur as part of the CDD process for new customers?	
197	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
198	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
199	Does screening for PEPs occur on an ongoing basis?	



C#	Question Text	Instructions
200	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
201	Are PEPs subject to increased monitoring?	
202	Does your entity consider all PEP relationships as High-Risk for AML/CFT?	
203	Does your entity always require senior management approval to onboard a Client or Beneficial Owner or beneficiary of an insurance policy that is a PEP and to continue such relationship when the Client, Beneficial Owner, or beneficiary becomes a PEP after the business relationship was established?	
<b>1.17 Cash Transactions</b>		
204	Does your entity conduct cash transactions with clients?	Incoming or outgoing.
205	Does your entity apply any specific AML/CFT controls and procedures for cash transactions?	
206	Please describe the specific controls and procedures for cash transactions your entity applies.	
<b>1.18 Suspicious Transaction Reporting</b>		
207	Please provide the total number of suspicious transactions and activities identified and reported internally (at your entity) to the Compliance Officer within the reporting period.	(not necessarily filed to the FIU)
208	Please provide the total number of STRs/SARs related to Terrorism Financing that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Terrorism Financing</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
209	Please provide the total number of STRs/SARs related to Money Laundering that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Money Laundering</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
210	Please provide the total number of STRs/SARs related to Virtual Assets or Virtual Asset Service Providers provided to the FIU within the reporting period.	
211	Please provide the total number of STRs/SARs related to a Monegasque Legal Person provided to the FIU within the reporting period.	

C#	Question Text	Instructions
212	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
213	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
214	Please provide the total number of STRs/SARs related to a Foreign Tax Offenses (criminal or administrative) provided to the FIU within the reporting period.	
215	Please provide the total number of STRs/SARs related to a Organized Crime provided to the FIU within the reporting period.	
216	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	The reporting entity should disclose the number of Suspicious Transactions, related to attempted Transactions, it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
217	Did your entity respond internally to the suspicious transactions?	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
218	Did your entity take any steps to strengthen internal controls for AML/CFT, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	
<b>1.19 Comments &amp; Feedback</b>		
219	Do you have feedback related to any questions in this section?	
220	Please provide comments or feedback on this section here.	

### Survey Question Instructions, Signatories

S#	Question Text	Instructions
Attestation		
1	The person or persons name(s) added here attests that she/he/they have provided accurate responses to questions, to the best of their ability.	
2	The person's name added here attests that she/he is duly authorized to represent the reporting entity and has ensured the submitted data has been adequately reviewed and is an accurate representation, to the best of their ability.	