

Instructions: 2025 Casinos 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 must include all products or services offered to customers that fall within the scope of the AML/CFT regulations in force in Monaco.
- The reporting period is 1 January 2024 to 31 December 2024.
- 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 (previously SICCFIN) | 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. https://amsf.mc |
| Association | For the purposes of this questionnaire, an association is a freely formed organization (group with members) that has acquired the legal personality; 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 <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 who have benefited from a product or service falling within the scope of AML/CFT regulation. |
| 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 de Monaco |
| 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). |

| Term | Definition |
|---|---|
| | <p>6. Financial guarantees and commitments.</p> <p>7. Trading in:</p> <ul style="list-style-type: none"> (a) money market instruments (cheques, bills, certificates of deposit, derivatives etc.); (b) foreign exchange; (c) exchange, interest rate and index instruments; (d) transferable securities; (e) commodity futures trading. <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. |
| Holding Company | A holding company is a financial vehicle for owning and controlling other assets, such as real estate, stocks, or companies. Using a holding company creates legal separation between the assets and the owners. |
| 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 |

| Term | Definition |
|-------------------------------------|--|
| | 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 a Monégasque national. |
| 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 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. The PEP regime in Monaco applies to all PEPs, both domestic and foreign. |
| 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 (now 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. |
| 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"> Acting as an agent in the creation or establishment of legal persons |

| Term | Definition |
|---|---|
| | <ul style="list-style-type: none"> • 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 • Providing a registered office, work address, residence, correspondence address, or administrative address for a legal person or legal arrangement • 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 • Acting or arranging for another person to act as a nominee shareholder in favor of another person. |
| 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. | <p>The reporting entity shall provide the <u>number of clients</u>, from business relationships and occasional customers/clients that have used products or services that fall under the scope of AML/CFT regulation in Monaco, 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 transactions (both incoming and outgoing) with clients within the reporting period. | <p>The question should capture the instances when the reporting entity (1) prepares for or (2) carries out transactions with clients.</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> |
| 3 | Please provide the total value of funds transferred with clients (both incoming and outgoing) within the reporting period. | |
| 4 | Please provide the total number of unique clients that were at some point active during the reporting period. | (with deposits or payments greater than or equal to 2,000 Euros) |
| 5 | Total number of resident clients (Natural Persons). | (with deposits or payments greater than or equal to 2,000 Euros) |
| 6 | Total number of non-resident clients (Natural Persons). | (with deposits or payments greater than or equal to 2,000 Euros) |
| 7 | Does your entity have any Monegasque nationals or Legal Persons as clients, that participate in gambling activities? | |

| Q# | Question Text | Instructions |
|--|---|--|
| 1.2 Recurring Clients | | |
| 8 | Total number of recurring clients (regular clients, VIP clients, clients with membership accounts at casino), by client's primary nationality, or country of headquarters or incorporation. | Example of recurring clients: clients enrolled in the loyalty programs sponsored by the entity such as "My Monte-Carlo" card owners. |
| 9 | Total number of recurring clients (regular clients, VIP clients, clients with membership accounts at casino), by client's primary nationality, or country of headquarters or incorporation. | (with deposits or payments greater than or equal to 2,000 Euros) |
| 10 | Total number of resident clients (Natural Persons), that are recurring clients, by client's residency. | (with deposits or payments greater than or equal to 2,000 Euros) |
| 11 | Total number of non-resident clients (Natural Persons), that are regular clients, by client's residency. | (with deposits or payments greater than or equal to 2,000 Euros) |
| 12 | Total number of clients belonging to VIP or membership programs exclusively focused on gaming activities, by client's primary nationality, or country of headquarters or incorporation. | |
| 13 | Total number of clients belonging to VIP or membership programs participating in gaming activities and other attractions/entertainments, such as restaurants or hotels, by client's primary nationality, or country of headquarters or incorporation. | |
| 14 | Please identify the names and types of membership programs in brief. | |
| 15 | Please upload summary documentation for the membership programs offered. | |
| 1.3 Deposits Held | | |
| 16 | Please provide the value of deposits held of gambling accounts, value at the end of the reporting period. | |
| 1.4 Distinguishing Client Types | | |
| 17 | Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are: <ul style="list-style-type: none"> • HNWI's? | |
| 18 | <ul style="list-style-type: none"> • Virtual Assets Service Providers (VASPs)? | |
| 1.5 Clients - Legal Persons | | |
| 19 | Does your entity have clients that are Legal Persons? | |
| 20 | 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"> • Commercial Partnership SNC • Economic Interest Group GIE • Joint Stock Company SAM • Limited Liability Companies SARL • Limited Partnership SCS • Limited Partnership with Shares SCA • Monegasque Foundation • Monegasque Associations |

| Q# | Question Text | Instructions |
|---------------------------------|---|---|
| | | <ul style="list-style-type: none"> Other Civil Companies SC-Autre Other Commercial Companies Other Legal Arrangements Private Domain of the Monegasque State Property Investment Partnership SCI Sole Person Special Civil-law Partnership SCP Trusts |
| 21 | Please provide the number of Monegasque Legal Persons as clients, by type. | |
| 1.6 Clients - Beneficial Owners | | |
| 22 | Can your entity distinguish nationality of clients' BO's? | |
| 23 | Provide the percentage breakdown of primary nationalities of Beneficial Owners. | |
| 24 | Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality. | |
| 25 | Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality. | |
| 26 | Can your entity distinguish BO's that have 25% or greater ownership? | |
| 27 | Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership. | |
| 28 | For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency? | |
| 29 | Please provide the total number of Beneficial Owners that are Foreign Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership. | |
| 30 | Please provide the total number of Beneficial Owners that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership. | |
| 1.7 HNWI's and UHNWI's | | |
| 31 | Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWI's) 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. |
| 32 | Please provide the total number of unique clients that are HNWI's or individuals belonging to a HNW Group, broken down by the primary nationality of the individual (including domestic clients). | |
| 33 | Please provide the total number of transactions (both incoming and outgoing) with clients that are HNWI's or individuals belonging to a HNW Group. | |

| Q# | Question Text | Instructions |
|----------|---|---|
| 34 | Please provide the total value of funds transferred with clients that are HNWI's or individuals belonging to a HNWI Group (both incoming and outgoing). | |
| 35 | 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. | |
| 36 | Does your entity have any Ultra-High-Net-Worth Individuals (UHNWIs) or Ultra-High-Net-Worth (UHNW) Groups as clients or Beneficial Owners (that are UHNWIs) of Legal Persons/Trust/Other 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. |
| 37 | Please provide the total number of unique clients that are UHNWIs or individuals belonging to a UHNW Group, broken down by the primary nationality of the client (including domestic clients). | |
| 38 | Please provide the total number of transactions (both incoming and outgoing) with clients that are UHNWIs or individuals belonging to a UHNW Group. | |
| 39 | Please provide the total value of funds transferred with clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing). | |
| 40 | Please provide the total number of unique Beneficial Owners of Legal Persons/Trusts/other Legal Arrangements clients that are UHNWIs, broken down by the primary nationality of the UHNWI. | |
| 1.8 PEPs | | |
| 41 | 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. |
| 42 | Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients). | |
| 43 | Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients). | |
| 44 | How many foreign PEPs have residency in Monaco, broken down by primary nationality? | |
| 45 | Please provide the total number of transactions (both incoming and outgoing) with clients that are PEPs. | |
| 46 | Please provide the total value of funds transferred with clients that are PEPs, (both incoming and outgoing), in EUR. | |
| 47 | Please provide the total number of unique Beneficial Owners of Legal Persons/Trusts/other Legal Arrangements clients that are PEPs, broken down by the primary nationality of the PEP. | 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 |

| Q# | Question Text | Instructions |
|-------------------------------------|---|---|
| | | <p>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> |
| 48 | Please provide the total number of transactions (both incoming and outgoing) with Beneficial Owners of Legal Persons/Trusts/other Legal Arrangements clients that are PEPs. | |
| 1.9 Virtual Asset Service Providers | | |
| 49 | Does your entity have clients that are VASPs? | |
| 50 | Please provide the total number of unique clients that are VASPs. | |
| 51 | Please provide the total number of transactions (both incoming and outgoing) with clients that are VASPs. | |
| 52 | Please provide the total value of funds transferred with clients that are VASPs (both incoming and outgoing). | |
| 53 | Does your entity distinguish if VASPs clients are Custodian Wallet Providers? | Custodian Wallet Providers |
| 54 | Does your entity have clients that are Custodian Wallet Providers? | Custodian Wallet Providers |
| 55 | Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment. | Custodian Wallet Providers |
| 56 | Please provide the total number of transactions with VASP clients that are Custodian Wallet Providers, both incoming and outgoing. | Custodian Wallet Providers |
| 57 | Please provide the total value of funds transferred with VASP clients that are Custodian Wallet Providers (both incoming and outgoing). | Custodian Wallet Providers |
| 58 | Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers? | Virtual Currency Exchange Providers |
| 59 | Does your entity have clients that are Virtual Currency Exchange Providers? | Virtual Currency Exchange Providers |
| 60 | Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers, broken down by country of establishment. | Virtual Currency Exchange Providers |
| 61 | Please provide the total number of transactions with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing). | Virtual Currency Exchange Providers |
| 62 | Please provide the total value of funds transferred with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing). | Virtual Currency Exchange Providers |
| 63 | Does your entity distinguish if VASPs clients are ICO related service providers? | ICO |

| Q# | Question Text | Instructions |
|-------------------------------------|---|---|
| 64 | Does your entity have clients that are Initial Coin Offering Providers? | ICO |
| 65 | Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment. | ICO |
| 66 | Please provide the total number of transactions with VASP clients that are ICO related service providers (both incoming and outgoing). | ICO |
| 67 | Please provide the total value of funds transferred with VASP clients that are ICO related service providers (both incoming and outgoing). | ICO |
| 68 | Does your entity distinguish if VASP clients provide Other Services not mentioned above? | Other Services |
| 69 | Does your entity have clients that are engaged in Other VASP Services? | Other Services |
| 70 | Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment. | Other Services |
| 71 | Please provide the total number of transactions with VASP clients related to Other Services (both incoming and outgoing). | Other Services |
| 72 | Please provide the total value of funds transferred with VASP clients that provide Other Services (both incoming and outgoing). | Other Services |
| 73 | Please specify what Other Services VASP clients are providing not mentioned above. | Other Services |
| 74 | 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. |
| 75 | Please provide the total number of unique clients that have conducted transactions with VASPs from an account with your entity. | |
| 76 | Please provide the total number of transactions (both incoming and outgoing) with and by clients with VASPs from an account with your entity. | |
| 77 | Please provide the total value of funds transferred with and by clients with VASPs (both incoming and outgoing) from an account with your entity. | |
| 1.10 Secondary Nationalities | | |
| 78 | For clients with Multiple/dual citizenships, does your entity register all nationalities of a client? | |
| 79 | 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 nd 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. |

| Q# | Question Text | Instructions |
|----|---|--|
| | | If existence of a 2 nd nationality is known but the specific country is unknown, please select "Unknown" from the dropdown. |
| 80 | Please provide the total number of secondary nationalities of unique clients that are HNWLs or individuals belonging to a HNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients). | Count individual's 2 nd 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. |
| 81 | Please provide the total number of secondary nationalities of unique clients that are UHNWLs or individuals belonging to a UHNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients). | Count individual's 2 nd 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. |
| 82 | 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 nd 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. |
| 83 | Please provide the total number of secondary nationalities of Beneficial Owners of clients serviced, by Beneficial Owners' secondary nationality(ies), for Beneficial Owners with 25% or greater ownership . | Count individual's 2 nd 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. Only include Beneficial Owners that have 25% or greater ownership of an account. |
| 84 | Please provide the total number of secondary nationalities of Beneficial Owners of clients serviced that are foreign residents, by Beneficial Owner' secondary nationality(ies), for Beneficial Owners with 25% or greater ownership. | Count individual's 2 nd 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. Only include Beneficial Owners that have 25% or greater ownership of an account. |
| 85 | Please provide the total number of secondary nationalities of Beneficial Owners of clients serviced that are non-residents, by Beneficial Owners' secondary nationality(ies), for Beneficial Owners with 25% or greater ownership. | Count individual's 2 nd 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. Only include Beneficial Owners that have 25% or greater ownership of an account. |
| 86 | Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal | Count individual's 2 nd or more nationalities (e.g. an individual with more than one passport). For example, |

| Q# | Question Text | Instructions |
|---|---|---|
| | Person clients that are PEPs, broken down by the secondary nationality(ies) of the PEP. | <p>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 Owners of several Legal Persons/Arrangements it should only be counted as one.</p> |
| 1.11 Comments & Feedback | | |
| 87 | Do you have feedback related to any questions in this section? | |
| 88 | Please provide comments or feedback on this section here. | |
| 2 Products & Services Risk | | |
| 2.1 Payment Types with and by Clients - Cheques | | |
| 89 | Does your entity accept Cheque transactions from clients? | |
| 90 | Please provide the total number of Cheque transactions from clients (incoming). | |
| 91 | Please provide the total value of Cheque transactions from clients (incoming). | |
| 92 | Does your entity make Cheque transactions to clients? | |
| 93 | Please provide the total number of Cheque transactions to clients (outgoing). | |
| 94 | Please provide the total value of Cheque transactions to clients (outgoing). | |
| 2.2 Prepaid Cards | | |
| 95 | Does your entity accept Prepaid Cards from clients? | |
| 96 | Please provide the total number of Prepaid Cards accepted from clients (incoming). | |
| 97 | Please provide the total value of Prepaid Cards accepted from clients (incoming). | |
| 2.3 Payment Types with and by Clients - Electronic Transfers | | |
| 98 | Does your entity accept Electronic Transfers from clients? | |
| 99 | Please provide the total number of Electronic Transfers from clients (incoming). | |
| 100 | Please provide the total value of Electronic Transfers from clients (incoming). | |
| 101 | Does your entity make Electronic Transfers to clients? | |

| Q# | Question Text | Instructions |
|---------------------------------------|--|--|
| 102 | Please provide the total number of Electronic Transfers to clients (outgoing). | |
| 103 | Please provide the total value of Electronic Transfers to clients (outgoing). | |
| 2.4 Payment Types with Clients - Cash | | |
| 104 | Does your entity accept or make Cash transactions with clients? | |
| 105 | Please provide the total number of Cash transactions from clients (incoming), within the reporting period. | Incoming |
| 106 | Please provide the total value of Cash transactions from clients (incoming), within the reporting period. | Incoming |
| 107 | Please provide the total number of Cash transactions with clients, outgoing, within the reporting period. | Outgoing |
| 108 | Please provide the total value of Cash transferred with clients, outgoing, within the reporting period. | Outgoing |
| 109 | Please provide the total number of single cash transactions with clients equal to or greater than 10,000 EUR, both incoming and outgoing. | Incoming and Outgoing |
| 110 | Can your entity distinguish cash transactions above EUR 100,000 in your record keeping? | |
| 111 | Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Incoming and Outgoing |
| 112 | Number of physical cash transactions by Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Incoming and Outgoing |
| 2.5 Virtual Currencies | | |
| 113 | Do you have clients that use cryptocurrencies? | |
| 114 | Please provide the total number of Virtual Assets transactions with clients (both incoming and outgoing). | |
| 115 | Please provide the value of funds transferred using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period. | |
| 116 | Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year? | <p>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.</p> <p>This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).</p> |
| 117 | Does your entity have business relationships with Virtual Assets Platforms or Intermediaries? | |

| Q# | Question Text | Instructions |
|-------------------------------------|--|--------------|
| 118 | Please name the Virtual Asset Platforms or Intermediaries with which your entity has business relationships. | |
| 2.6 Accounts | | |
| 119 | Please provide the number of client accounts at your entity. | |
| 120 | Please provide the number of client accounts at your entity that are Natural Persons, by nationality. | |
| 121 | Please provide the number of client accounts at your entity that are Natural Persons, by residency. | |
| 122 | Does your entity allow for Multiple accounts by single client? | |
| 123 | Please provide the number of clients with multiple accounts? | |
| 124 | How many accounts held by clients having multiple accounts? | |
| 125 | Does your entity allow for Multiple clients share an account client? | |
| 126 | How many accounts held by clients are shared accounts? | |
| 2.7 Returns to Different Accounts | | |
| 127 | Does your entity allow of returns to different account than origination account? | |
| 128 | Does your entity allow of returns into 3rd party accounts? | |
| 129 | How many transactions were performed to 3rd party accounts, by location of the account? | |
| 130 | Value of transactions distributed to 3rd party accounts, by location of the account. | |
| 2.8 Games offered | | |
| 131 | Does your entity provide have Slot machines? | |
| 132 | Number of Slot machines. | |
| 133 | Does your entity provide Table games? | |
| 134 | Number of tables. | |
| 135 | What types to table games does you entity provide? | |
| 136 | Does your entity accept cash at Table games? | |
| 137 | Accepts other than euro cash at tables? | |
| 138 | Does your entity provide player-vs-player games? | |
| 139 | Does your entity accept cash at player-vs-player games? | |
| 140 | Does your entity provide Online gaming? | |
| 141 | Please specify the online gaming products and services which are provided by your entity. | |
| 2.9 Provide Loan / Advance Services | | |
| 142 | Does your entity provide financial services related to gaming activities? | |
| 143 | Does your entity provide loan / advance services? | |
| 144 | How many loans / advances have been issued? | |

| Q# | Question Text | Instructions |
|---------------------------------------|---|--------------|
| 145 | How many loans / advances are issued secured by guarantees? | |
| 146 | What is the total value of loans / advances granted, within the reporting period? | |
| 147 | What is the total value of outstanding loans / advances, at the end of the reporting period? | |
| 148 | What is the total value of the guarantees used to secure loans / advances, within the reporting period? | |
| 149 | What is the total value of the outstanding guarantees used to secure loans / advances, at the end of the reporting period? | |
| 150 | Does your entity accept Virtual Currencies as guarantees? | |
| 2.10 Lines of Credit / Markers | | |
| 151 | Does your entity provide lines of credit / markers? | |
| 152 | How many lines of credit / markers have been issued? | |
| 153 | How many lines of credit / markers issued are secured by guarantees? | |
| 154 | What is the total value of lines of credit / markers granted, within the reporting period? | |
| 155 | What is the total value of outstanding lines of credit / markers granted at the end of the reporting period? | |
| 156 | What is the total value of guarantees used to secure lines of credit / markers, within the reporting period? | |
| 157 | What is the total value of outstanding guarantees used to secure lines of credit / markers, at the end of the reporting period? | |
| 2.11 Other Services | | |
| 158 | Does your entity provide Safe Deposit Boxes for gambling clients? | |
| 159 | How many Safe Deposit Boxes does your entity have? | |
| 160 | What is the approximate average duration of usage by clients, in days? | |
| 161 | What are the main purposes of the Safe Deposit Boxes? | |
| 162 | Does your entity provide long-term duration safe deposit boxes? | |
| 163 | Does the entity offer gambling products to clients using currencies other than Euros? | |
| 164 | Does the entity offer currency exchange services? | |
| 165 | Please indicate the total value of cash deposits by clients in foreign currencies, in Euro equivalent. | |
| 166 | Does your entity provide payouts in foreign currencies? | |

| Q# | Question Text | Instructions |
|--------------------------|---|---|
| 167 | Please indicate the total value of cash payments to clients in foreign currencies, in Euro equivalent. | |
| 168 | If Other Currencies are accepted or provided, please specify the other currencies accepted or provided. | if not applicable, please enter NA. |
| 169 | Does your entity provide Gift Certificates for clients? | |
| 170 | Number of gift certificates issued in the reporting period. | |
| 171 | Value of gift certificates issued in the reporting period. | |
| 2.12 Comments & Feedback | | |
| 172 | Do you have feedback related to any questions in this section? | |
| 173 | Please provide comments or feedback on this section here. | |
| 3 Distribution Risk | | |
| 3.1 Identification | | |
| 174 | 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. |
| 175 | Please provide the total number of clients which Domestic Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client. | |
| 176 | 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. |
| 177 | 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. | |
| 178 | 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. | |
| 3.2 Onboarding | | |
| 179 | Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period. | |
| 180 | Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period. | |
| 181 | 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). |
| 182 | Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes. | Within the reporting period. |

| Q# | Question Text | Instructions |
|----------------------|---|--|
| 183 | Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes. | Within the reporting period. |
| 184 | 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). |
| 185 | Can the entity provide client nationality information for clients onboarded through introducers? | |
| 186 | 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). | Cumulative over time. |
| 187 | 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. |
| 188 | Can the entity provide introducers residency information? | |
| 189 | Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party. | Cumulative over time. |
| 190 | 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. |
| 191 | Does your entity use junket marketing programs to introduce clients to the casino? | |
| 3.3 Structure | | |
| 192 | Please provide the total number of employees at your entity, plus non-employee partners and owners, at the end of the reporting period. | The reporting entity should disclose the number of employees, partners, and owners irrespective of their function. |
| 193 | Does your Entity have any Branches, Subsidiaries, or Agencies? | 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". |
| 194 | Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country. | |
| 195 | Is your entity a Branch or Subsidiary of another Entity? | |

| Q# | Question Text | Instructions |
|-----|---|---|
| 196 | Is your entity a Branch or Subsidiary of a Foreign Entity? | 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. |
| 197 | If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking? | 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". |
| 198 | Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco). | |
| 199 | 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) | |
| 200 | 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. | |
| 201 | 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> |
| 202 | Please indicate the development or modification. | |
| 203 | Total value of Incoming payments related gambling from clients. | |
| 204 | Total value of outgoing payments related gambling to clients. | |
| 205 | Total Number of Wagers in the reporting period. | |
| 206 | Total value of winning wagers in the reporting period. | |
| 207 | Do your entity Cooperates with other casinos (accepts other chips, casino checks, client credit, etc., also the reverse – honors chips / casino checks) | |
| 208 | Do your entity Cooperates with in-group casinos? | |
| 209 | Do your entity Cooperates with out-of-group casinos? | |
| 210 | Are chips or tokens allowed for use for other purposes (internal to entity or external)? | |
| 211 | Please specify which other purposes where chips or tokens may be used. | |

| Q# | Question Text | Instructions |
|-----------------------------------|---|--------------|
| 3.4 Entity Finances | | |
| 212 | Turnover for the reporting period. | |
| 213 | Turnover for the reporting period realized in the Principality of Monaco. | |
| 214 | Turnover for the reporting period realized outside the Principality of Monaco. | |
| 215 | Please provide the amount of your last annual VAT return. | |
| 3.5 Rejected Relationships | | |
| 216 | Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period. | |
| 3.6 Blocked/Rejected Transactions | | |
| 217 | Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period. | |
| 3.7 Terminated Relationships | | |
| 218 | Please provide the total number of client business relationships that have been terminated due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period. | |
| 3.8 Comments & Feedback | | |
| 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, Controls

| C# | Question Text | Instructions |
|---------------------------|---|--|
| 1 Controls | | |
| 1.1 Structure | | |
| 1 | Please provide the total number of employees at your entity, plus non-employee partners and owners, at the end of the reporting period. | Repeat the response from Q192. The reporting entity should disclose the number of employees, partners, and owners irrespective of their function. |
| 2 | Please provide the total number of full-time equivalent employees at your entity, at the end of the reporting period. | The reporting entity should disclose the number of full-time equivalent employees and non-employee partners and owners, irrespective of their function. Provide the estimate as a decimal of FTE time. For example if there is one full time employee and two ¼ time employees, then the total would be 1.5 FTE. 1 full-time employee = 1 FTE. One half-time employee = 0,5 FTE. One ¼ time employee = 0,25 FTE. |
| 3 | Please provide the number of employees in AML/CFT Compliance at your entity, at the end of the reporting period. | |
| 4 | Please provide the number of full-time equivalent employees in AML/CFT Compliance at your entity, at the end of the reporting period. | |
| 5 | Does your entity have a compliance department? | |
| 6 | Does the MLRO fulfil any other role or job function? | |
| 7 | What percentage of time does the MLRO spend on additional functions? | |
| 8 | Please provide the number of employees leaving employment with the entity, within the reporting period? | |
| 1.2 Policies & Procedures | | |
| 9 | 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. |
| 10 | 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). |
| 11 | Did your Entity circulate these policies and procedures to all its employees? | |
| 12 | Did your Entity ensure awareness of these policies and procedures to all its employees? | |

| C# | Question Text | Instructions |
|----------------|--|--|
| 13 | Did your Entity update their written AML/CFT Policies and Procedures in the last year? | |
| 14 | Please provide the date of the last update to your entity's written AML/CFT Policies and Procedures. | |
| 15 | 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. |
| 16 | Who prepared your Entity's Policies and Procedures? | The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors? Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group. |
| 17 | Did your Entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures? | |
| 18 | Under art. 33 did you establish internal procedures and did you establish and communicate the report referred to in article 33 L. n° 1.362 ? (except for 15, 15 bis, 15 ter of art. 1 L. n° 1.362) | |
| 1.3 Governance | | |
| 19 | Does the board and senior management of your Entity demonstrate overall responsibility for AML/CFT? | Does the board and senior management of your Entity demonstrate overall responsibility for AML/CFT? Actions taken by the Board and senior management that could demonstrate board's and senior management's engagement in AML/CFT matters could include: (1) senior management includes AML/CFT matters into the daily/ weekly/monthly/quarterly/yearly agenda; (2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks; (3) senior management requests ad-hoc reporting on AML/CFT matters whenever issues arise; orders internal or external audit to test AML/CFT controls; (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.; |

| C# | Question Text | Instructions |
|-----------------------------|---|---|
| | | <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> |
| 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/TF 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> |
| 1.4 Compliance & Violations | | |
| 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. | |

| C# | Question Text | Instructions |
|--------------|--|--------------|
| 1.5 Training | | |
| 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? | |
| 29 | Did your entity conduct AML/CFT training for its Office employees in the reporting period? | |
| 30 | Did your entity conduct AML/CFT training for its Compliance Employees 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 any Other Activities? | |
| 45 | What other AML/CFT training/awareness raising activities did it include? Please specify all that apply. | |
| 46 | Did any of the training/awareness raising activities cover topics related to Internal AML Procedures? | |
| 47 | Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures? | |
| 48 | Did any of the AML/CFT training/awareness raising activities cover topics related to Typologies? | |
| 49 | Did any of the AML/CFT training/awareness raising activities cover topics related to Practical Cases? | |
| 50 | Did any of the AML/CFT training/awareness raising activities cover topics related to News? | |
| 51 | Did any of the AML/CFT training/awareness raising activities cover topics related to Corruption? | |
| 52 | Did any of the AML/CFT training/awareness raising activities cover topics related to Financing of Terrorism? | |
| 53 | Did any of the AML/CFT training/awareness raising activities cover topics related to Cryptocurrency? | |
| 54 | Did any of the AML/CFT training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction? | |
| 55 | Did any of the AML/CFT training/awareness raising activities cover topics related to Tax Evasion? | |
| 56 | Did any of the AML/CFT training/awareness raising activities cover topics related to Fraud? | |
| 57 | Did any of the AML/CFT training/awareness raising activities cover other topics not mentioned above? | |
| 58 | What other topics did the AML/CFT training/awareness raising activities cover? | |
| 1.6 CDD | | |
| 59 | <p>Does your entity record all of the following in your customer database:</p> <ul style="list-style-type: none"> • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence • Tax Residence • Activity • Wealth | |
| 60 | Please specify which items are not collected? | |

| C# | Question Text | Instructions |
|----|--|--|
| 61 | Does the entity's database contain all of the following, when applicable: <ul style="list-style-type: none"> • Account Holder • Representative of Company or Client • Beneficial Owner • Administrators/Directors • Shareholders • Legal Representatives • Settlor/Constituent • Trustee • Protector • Renters of Safe Deposit Boxes • Introducers? | |
| 62 | Does the entity's database contain all of the following, when applicable: <ul style="list-style-type: none"> • 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? | |
| 63 | If your entity does not collect the items in the two above questions, please specify which items are not collected? | If all are collected respond "NA". |
| 64 | Does your entity record other client information or register client activity information in their database? | 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? |
| 65 | Please specify what other information is included in your database, specify all that apply. | |
| 66 | Is past 5 years of client relationship data accessible by AMSF upon request? | |
| 67 | Does your Entity identify and verify its clients using reliable and independent information in all cases of CDD? | |

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| 68 | Does your Entity apply a risk-based approach to customer due diligence measures (CDD)? | |
| 69 | 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. |
| 70 | 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. | Please repeat the answer provided in Q1. |
| 71 | Has your entity performed Simplified Due Diligence on any clients within the reporting period? | |
| 72 | Please provide the total number of unique clients that are subject to Simplified Due Diligence measures. | |
| 73 | Does your Entity apply enhanced identification and verification on all high-risk clients before customer take-on? | |
| 74 | How often is ongoing due diligence done on clients classified as High-Risk for ML/FT? | |
| 75 | Does your entity undertake other measures for high-risk clients, before customer take-on? | |
| 76 | Please specify other measures taken for high-risk clients, before customer take-on. | |
| 77 | Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity? | |
| 78 | For when BO info is recorded, at what % shareholding threshold does your entity use for recording Beneficial Owner information? | |
| 79 | Does your Entity examine the source of wealth before customer take-on? | The reporting entity should disclose whether all high-risk clients are subject to enhanced CDD measures before customer take-on. |
| 80 | Does your entity conduct Virtual Assets transactions with or on behalf of clients? | |
| 81 | How does the company verify the Beneficial Owners of Virtual Assets? | If not applicable, state 'NA'. |
| 82 | Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed? | Third parties has the meaning of any other entity / service provider which performs elements of CDD on behalf of the entity. |
| 83 | Please provide the main reason for the difficulties (e.g. legal reason, commercial reason, unavailability of information, other) and the type of third parties (e.g. financial institution, DNFBP). | |
| 84 | Does your entity identify all customers regardless of payment method? | |
| 85 | Does the evolution of the clients services requested contribute to the identification of red flags? | |

| C# | Question Text | Instructions |
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| 86 | Is CDD completed prior to a client being able to use services in all cases? | (for deposits or payments greater than or equal to 2,000 Euros) |
| 1.7 EDD | | |
| 87 | Please provide the total number of unique clients where enhanced due diligence was applied at onboarding. | |
| 88 | Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships. | |
| 89 | 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. |
| 90 | Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied. | |
| 91 | 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. |
| 1.8 Risk Assessments | | |
| 92 | How many AML/CFT risk levels does your entity have for clients? | |
| 93 | Please provide the number of unique clients, that are rated as High-Risk for AML/CFT. | |
| 94 | Please provide the total number of unique clients that are without a risk level determined yet. | |
| 95 | Does your entity's High-Risk Assignment Considerations include ALL of the following: <ul style="list-style-type: none"> Country of Residence Activity PEP status Type of Customer Products & Services Transaction Types Distribution Channels | |
| 96 | Please specify which items are not considered? | |
| 97 | Does your entity's High-Risk assignment consideration include any additional measures not mentioned above? | |
| 98 | Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations. | |
| 99 | Does your entity have a tool or process for making AML/CFT risk assessments? | (client assessments) |
| 100 | Does your entity use a list of sensitive countries for AML/CFT risk assessment? | (client assessments) |
| 101 | Does your entity use a list of Sensitive Activities for AML/CFT risk assessment? | (client assessments) |

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| 102 | What client activities does your entity associate with High-Risk clients? | |
| 103 | Does your entity consider ML and TF risks separately? | |
| 104 | Does your entity have a tool or process for making AML/CFT risk assessments? | (entity's own assessment) |
| 1.9 Audit / Controls | | |
| 105 | When did your entity last have a SICCFIN/AMSF audit? | |
| 106 | Did your entity have any Other Audits not mentioned above? | (AML/CFT related audits only) |
| 107 | Specify the types of Other Audits, and provide the year of the last audit of each kind. | (AML/CFT related audits only) |
| 1.10 Cash Transactions | | |
| 108 | Does your entity conduct cash transactions with clients? | Incoming or outgoing. |
| 109 | Does your Entity apply any specific AML/CFT controls and procedures for cash transactions? | |
| 110 | Please describe the specific controls and procedures for cash transactions your entity applies. | |
| 1.11 Monitoring | | |
| 111 | Does your Entity have in place a system for monitoring transactions for potential suspicion and reporting suspicious transactions? | |
| 112 | Does your Entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions? | |
| 113 | Has the automated system been adapted to the entity in Monaco? | |
| 114 | Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period. | Please repeat the answer provided in Q2. |
| 115 | Please provide the total number of Alerts in Reporting Period by the system related to Money Laundering. | |
| 116 | Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering. | |
| 117 | Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering. | |
| 118 | Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing. | |
| 119 | Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing. | |

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| 120 | Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing. | |
| 121 | Is monitoring performed real time? | |
| 122 | Is monitoring performed post-event? | |
| 123 | All Transactions Screened? | |
| 124 | If no, which transactions are screened? | If all are screened respond "NA". |
| 125 | Does your entity have a transaction profile for each client? | |
| 126 | Does the profile detect disproportionate deposit and spending patterns with an individual's profile? | |
| 127 | Does the profile detect changes in spending patterns with an individual's profile? | |
| 128 | Does the profile detect deposits vs. withdrawal imbalances? | |
| 129 | Does the profile detect multiple same day cashouts? | |
| 130 | Does the profile detect cashouts shortly after deposits? | |
| 131 | Does your entity detect chips brought into casino? | |
| 132 | What controls are in place to prevent collusion between players? | |
| 133 | What controls are in place to prevent winnings being collected by a third party? | |
| 134 | If Chips or Tokens are allowed for use for other purposes (internal to entity or external), how is the use / redemption of those Chips or Tokens monitored and tracked? | If not applicable, please enter NA. |
| 135 | What other AML/CFT typologies are detected by the entity? | |
| 1.12 Record Keeping | | |
| 136 | Does your Entity keep transaction records for at least 5 years? | |
| 137 | Does your Entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship? | |
| 138 | Does your Entity keep these records and documents in a safe and secure place? | |
| 139 | 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"> (1) is the above data collected in electronic format and easily retrievable from the IT systems? (2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly? (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 |

| C# | Question Text | Instructions |
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| | | systems are not configured to enable easy access to the required data. |
| 140 | Does your Entity have backups for CDD and business correspondence information with a disaster recovery plan? | |
| 1.13 Targeted Financial Sanctions (TFS) | | |
| 141 | Do Entity's 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> <p>(a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons;</p> <p>(b) Frequency and scope of screening;</p> <p>(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).</p> |
| 142 | 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> |
| 143 | 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> |

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| | | (b) indirect control of assets by designated persons; (c) internal processes and systems designed to detect persons who exercise direct and indirect control over assets owned by designated persons. |
| 144 | Does your Entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)? | |
| 145 | Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated? | |
| 146 | Does your entity have a System to Check the Customer Database? | |
| 147 | Does the entity's automated System perform checks on Entry into Relationship for all of the following (When applicable by client / activity type): <ul style="list-style-type: none"> • Account Holder, • Representative of Company or Client, • Beneficial Owner, • Administrators/Directors, • Shareholders, Legal Representatives, • Settlor/Constituent, • Trustee, • Protector, • Renters of Safe Deposit Boxes, • Introducers. | |
| 148 | Please specify which items are not collected? | |
| 149 | Does the entity's System perform any Other Checks on entry into relationship, not already mentioned above? | If Yes, please specify. If No, please put "NA". |
| 150 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)? | Reference Sovereign Ordinance no. 8.664. |
| 151 | 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. |
| 152 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)? | Reference Sovereign Ordinance no. 8.664. |
| 153 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors? | Reference Sovereign Ordinance no. 8.664. |

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| 154 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders? | Reference Sovereign Ordinance no. 8.664. |
| 155 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives? | Reference Sovereign Ordinance no. 8.664. |
| 156 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent? | Reference Sovereign Ordinance no. 8.664. |
| 157 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees? | Reference Sovereign Ordinance no. 8.664. |
| 158 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors? | Reference Sovereign Ordinance no. 8.664. |
| 159 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Renters of Safe Deposit Boxes? | Reference Sovereign Ordinance no. 8.664. |
| 160 | How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers? | Reference Sovereign Ordinance no. 8.664. |
| 161 | Do you have clients which have chains of payments to or from Ultimate Beneficiaries? | |
| 162 | Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary? | |
| 163 | Have you entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period? | |
| 164 | Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period. | |
| 165 | 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. | |
| 166 | Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing. | |
| 167 | Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction. | |
| 168 | Has your Entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction? | If none reply "NA". |

| C# | Question Text | Instructions |
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| 1.14 PEPs | | |
| 169 | Does your Entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)? | |
| 170 | What measures does your Entity apply to determine whether Clients and Beneficial Owners are PEPs? | |
| 171 | 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> |
| 172 | Does PEP screening occur as part of the CDD process for new customers? | |
| 173 | Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client. | |
| 174 | Provide the estimated percentage of self-declared information matching with PEP status determinations. | |
| 175 | Does screening for PEPs occur on an ongoing basis? | |
| 176 | Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes). | |
| 177 | Are PEPs subject to increased monitoring? | |
| 178 | Does your Entity consider all PEP relationships as High-Risk for AML/CFT? | |
| 179 | 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? | |
| 1.15 Suspicious Transaction Reporting | | |
| 180 | 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) |
| 181 | Did your entity file any STRs/SARs to the FIU within the reporting period? | |

| C# | Question Text | Instructions |
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| 182 | 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 (https://amsf.mc). |
| 183 | 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 (https://amsf.mc). |
| 184 | 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. | |
| 185 | Please provide the total number of STRs/SARs related to a Monegasque Legal Person provided to the FIU within the reporting period. | Where the Monegasque Legal Person is the subject of the STR/SAR. |
| 186 | Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period. | |
| 187 | Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period. | |
| 188 | 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. | |
| 189 | Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period. | |
| 190 | Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period. | |
| 191 | Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period. | |
| 192 | Please provide the total number of attempted transactions reported to the FIU, within the reporting period. | The reporting entity should disclose the number of attempted Transactions (transactions not performed), it has reported to Monaco's FIU (www.siccfm.mc). |
| 193 | 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. |
| 194 | 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? | |
| 1.16 Comments & Feedback | | |
| 195 | Do you have feedback related to any questions in this section? | |
| 196 | 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. | |