


Instructions: 2025 Casinos AML/CFT/CPF Survey

This document provides the definitions and instructions that will help an obliged entity in completing the AML/CFT/CPF 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 may be submitted incomplete when all information on the last tab has been provided, including the reason for submitting incomplete. Failure to provide required information may result in enhanced oversight or other action.

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/CPF regulations in force in Monaco.
- The reporting period is 1st January 2025 to 31st December 2025.
- 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 that are by and on behalf of clients should capture the instances when the reporting entity (1) prepares transactions for clients and instances when the reporting entity (2) carries out transactions on behalf of clients.
- 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.
- If data is not available, do not enter ‘0’, leave blank and provide a reason for incompleteness. Only enter ‘0’ when there is zero of that activity.

Contents

Glossary.....	4
Instructions, Inherent Risk.....	8
1 Customer Risk	8
1.1 Clients Summary	8
1.2 Recurring Clients	8
1.3 Distinguishing Client Types	9
1.4 Distinguishing Client Types	9
1.5 Clients - Legal Persons.....	9
1.6 Beneficial Owners	10
1.7 HNWI's and UHNWI's	11
1.8 Politically Exposed Persons (PEPs)	12
1.9 Virtual Asset Service Providers	13
1.10 2nd Nationalities	14
1.11 Comments & Feedback	15
2 Products & Services Risk	16
2.1 Direct Payments with Clients – Cheques	16
2.2 Direct Payments with Clients - Electronic Transfers	16
2.3 Direct Payments with Clients – Cash.....	17
2.4 Direct Payments with Clients – Summary.....	17
2.5 Virtual Currencies.....	17
2.6 Accounts.....	18
2.7 Returns to Different Accounts	18
2.8 Games offered	19
2.9 Provide Loan / Advance Services	19
2.10 Lines of Credit / Markers.....	19
2.11 Other Services	19
2.12 Comments & Feedback	20
3 Distribution Risk	20
3.1 Identification	20
3.2 Onboarding	21
3.3 Structure	22
3.4 Entity Finances	23
3.5 Rejected Relationships.....	23
3.6 Blocked/Rejected Transactions.....	23
3.6 Terminated Relationships	24
3.7 Comments & Feedback	24

Instructions, Controls	25
Controls.....	25
1.1 Structure	25
1.2 Policies & Procedures.....	25
1.3 Governance	26
1.4 Compliance & Violations.....	28
1.5 Training	28
1.6 CDD.....	29
1.7 EDD.....	32
1.8 Risk Assessments	32
1.9 Audit / Controls.....	33
1.10 Cash Transactions	33
1.11 Monitoring	33
1.12 Record Keeping	35
1.13 Targeted Financial Sanctions (TFS)	35
1.14 Politically Exposed Persons (PEPs).....	38
1.15 Suspicious Transaction Reporting.....	39
1.16 Comments & Feedback	40
Instructions, Signatories	41
Signatories.....	41

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/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> <ul style="list-style-type: none"> - 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, or - the natural person(s) who ultimately exercise effective control over a legal entity or legal arrangement.
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> <ul style="list-style-type: none"> - 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/CPF 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

Term	Definition
	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	<p>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:</p> <ol style="list-style-type: none"> 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. 7. Trading in: <ol 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. 8. Participation in securities issues and the provision of financial services related to such issues. 9. Individual and collective portfolio management. 10. Safekeeping and administration of cash or liquid securities on behalf of other persons. 11. Otherwise investing, administering or managing funds or money on behalf of other persons. 12. Underwriting and placement of life insurance and other investment-related insurance. 13. Money and currency changing.
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

Term	Definition
	or other similar arrangements. Examples of other similar arrangements (for AML/CFT/CPF 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 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 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.

Term	Definition
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.
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 • 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

Instructions, Inherent Risk

Q#	Question Text	Instructions
1 Customer Risk		
1.1 Clients Summary		
Q1	Please provide the total number of unique clients that were at some point active during the reporting period.	<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>For questions referring to ‘unique client’, please consider:</p> <ul style="list-style-type: none"> • If the same client has several accounts, then it is considered one client • If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client • Any other situation where the same client would be double counted, please consider as one client
Q2	Please provide the total number of transactions (both incoming and outgoing) with clients within the reporting period.	This value will be validated against other responses provided to later questions for numbers of transactions with Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive.
Q3	Please provide the total value of funds transferred with clients (both incoming and outgoing) within the reporting period.	Please indicate the total amount of all financial flows. All transactions that result in a flow (in/out) must be recorded. This value will be validated against other answers provided to subsequent questions regarding the number of transactions carried out by individuals, legal entities, trusts, and other legal structures. The answers are mutually exclusive.
Q4	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)
Q5	Total number of resident clients (Natural Persons).	(with deposits or payments greater than or equal to 2,000 Euros)
Q6	Total number of non-resident clients (Natural Persons).	(with deposits or payments greater than or equal to 2,000 Euros)
Q7	Does your entity have any Monegasque nationals or Legal Persons as clients, that participate in gambling activities?	
1.2 Recurring Clients		
Q8	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.

Q#	Question Text	Instructions
Q9	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)
Q10	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)
Q11	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)
Q12	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.	
Q13	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.	
Q14	Please identify the names and types of membership programs in brief.	
Q15	Please upload summary documentation for the membership programs offered.	
1.3 Distinguishing Client Types		
Q16	Please provide the value of deposits held of gambling accounts, value at the end of the reporting period.	
1.4 Distinguishing Client Types		
Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:		
Q17	HNWI's?	Indicate whether or not your entity is able to identify and record information on the types of customers targeted below (trusts, associations, other legal structures, HNWIs). This question aims to determine what your entity is capable of doing, regardless of whether you currently have such clients.
Q18	Virtual Assets Service Providers (VASPs)?	
1.5 Clients - Legal Persons		
Q19	Does your entity have clients that are Legal Persons?	
Q20	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	<ul style="list-style-type: none"> • Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP • Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE • Private Domain of the Monegasque State

Q#	Question Text	Instructions
		<ul style="list-style-type: none"> • Trusts • Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person
Q21	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.6 Beneficial Owners		
Q22	Does your entity record Beneficial Owner information for some or all transactions?	Information relating to beneficial owners: identification details, addresses, etc.
Q23	For what transaction conditions does your entity record Beneficial Owner information?	
Q24	Please provide the total number of unique beneficial owners that were at some point active during the reporting period.	<p>The complete concept of beneficial owner is referred to in Article 14 of OS No. 2.318, as amended, which can be identified by:</p> <ul style="list-style-type: none"> • Their direct or indirect control (by any means other than holding capital or voting rights, i.e. control over the capital or the management, administrative or executive bodies of the company or over the general meeting of its shareholders or the natural person); • The representative of the company when no natural person could be identified according to the criteria set out in (a) the manager(s) of SNCs, SCSs, SARLs, CSAs and civil companies; (b) the managing director or chief executive officer of public limited companies; c) the trustee appointed in the context of legal proceedings for cessation of payments, judicial settlement or liquidation of assets). • Their direct or indirect ownership (at least 25% of the capital or voting rights of the legal entity).
Q25	Can your entity distinguish nationality of clients' BO's?	Indicate whether or not your entity is able to make the distinction.
Q26	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.
Q27	Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality.	<p>This involves breaking down beneficial owners by category and then by nationality.</p> <p>These questions thus cover the entire concept of beneficial ownership, in accordance with Article 14 of OS No. 2.318 as amended, which can be identified</p>

Q#	Question Text	Instructions
		<p>in accordance with the above-mentioned procedures.</p> <p>Here, you should indicate the number of beneficial owners who have this status through their direct or indirect control (by any means other than holding capital or voting rights, i.e. control over the capital or the management, administrative or executive bodies of the company or over the general meeting of its shareholders or the natural person).</p> <p>This number must be broken down by nationality.</p> <p>If the nationality is unknown, please select 'Unknown' from the drop-down list.</p>
Q28	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	
Q29	Can your entity distinguish BO's that have 25% or greater ownership?	
Q30	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	
Q31	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q32	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.	
Q33	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		
Q34	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?	<p>HNWI: > 5 million UHNWI: > 50 million An UNHWI is necessarily an HNWI. In STRIX, an UNHWI must be counted in both the HNWI and UHNWI categories.</p>
Q35	Please provide the total number of unique clients that are HNWIs or individuals belonging to a HNW Group, broken down by the primary nationality of the individual (including domestic clients).	
Q36	Please provide the total number of transactions (both incoming and outgoing) with clients that are HNWIs or individuals belonging to a HNW Group.	
Q37	Please provide the total value of funds transferred with clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	

Q#	Question Text	Instructions
Q38	Please provide the total number of unique Beneficial Owners of Legal Person clients that are HNWI, broken down by the primary nationality of the HNWI.	
Q39	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?	HNWI: > 5 million UHNWI: > 50 million An UNHWI is necessarily an HNWI. In STRIX, an UNHWI must be counted in both the HNWI and UHNWI categories.
Q40	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).	
Q41	Please provide the total number of transactions (both incoming and outgoing) with clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q42	Please provide the total value of funds transferred with clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
Q43	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 Politically Exposed Persons (PEPs)		
Q44	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.
Q45	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q46	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q47	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
Q48	Please provide the total number of transactions (both incoming and outgoing) with clients that are PEPs.	
Q49	Please provide the total value of funds transferred with clients that are PEPs, (both incoming and outgoing), in EUR.	
Q50	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 exercises effective ultimate control over a Legal Person or Legal Arrangement. 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.

Q#	Question Text	Instructions
Q51	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		
Q52	Does your entity have clients that are VASPs?	
Q53	Please provide the total number of unique clients that are VASPs.	
Q54	Please provide the total number of transactions (both incoming and outgoing) with clients that are VASPs.	
Q55	Please provide the total value of funds transferred with clients that are VASPs (both incoming and outgoing).	
Q56	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
Q57	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
Q58	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
Q59	Please provide the total number of transactions with VASP clients that are Custodian Wallet Providers, both incoming and outgoing.	Custodian Wallet Providers
Q60	Please provide the total value of funds transferred with VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q61	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q62	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q63	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
Q64	Please provide the total number of transactions with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
Q65	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
Q66	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO
Q67	Does your entity have clients that are Initial Coin Offering Providers?	ICO

Q#	Question Text	Instructions
Q68	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
Q69	Please provide the total number of transactions with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q70	Please provide the total value of funds transferred with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q71	Does your entity distinguish if VASP clients provide Other Services not mentioned above?	Other Services
Q72	Does your entity have clients that are engaged in Other VASP Services?	Other Services
Q73	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services
Q74	Please provide the total number of transactions with VASP clients related to Other Services (both incoming and outgoing).	Other Services
Q75	Please provide the total value of funds transferred with VASP clients that provide Other Services (both incoming and outgoing).	Other Services
Q76	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
Q77	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.
Q78	Please provide the total number of unique clients that have conducted transactions with VASPs from an account with your entity.	
Q79	Please provide the total number of transactions (both incoming and outgoing) with an by clients with VASPs from an account with your entity.	
Q80	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 2nd Nationalities		
Q81	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
Q82	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.
Q83	Please provide the total number of secondary nationalities of unique clients that are HNWI 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.
Q84	Please provide the total number of secondary nationalities of unique clients that are UHNWIs 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.
Q85	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.
Q86	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 .	Concerns: <ul style="list-style-type: none"> • Natural Person clients, and • Natural Persons who are Beneficial Owners having 25% ownership of Legal Person, and • Trust and Other Legal Arrangement clients that have more than one nationality.
Q87	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.	
Q88	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.	
Q89	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person clients that are PEPs, broken down by the secondary nationality(ies) of the PEP.	
1.11 Comments & Feedback		
Q90	Do you have feedback related to any questions in this section?	
Q91	Please provide comments or feedback on this section here.	

Q#	Question Text	Instructions
2 Products & Services Risk		
2.1 Direct Payments with Clients – Cheques		
Direct payments with clients: questions in these subsections concern payments made or received in the course of delivering the entity’s products or services, where payments are either initiated directly <i>by</i> clients or entered into directly <i>with</i> clients, rather than through the entity or third parties acting on the clients’ behalf.		
Q92	Does your entity accept Cheque transactions from clients?	
Q93	Did your entity accept or make payments by Cheque with clients within the reporting period?	
Q94	Please provide the total number of Cheque transactions from clients (incoming).	
Q95	Please provide the total value of Cheque transactions from clients (incoming).	
Q96	Does your entity make Cheque transactions to clients?	
Q97	Please provide the total number of Cheque transactions to clients (outgoing).	
Q98	Please provide the total value of Cheque transactions to clients (outgoing).	
2.2 Direct Payments with Clients - Electronic Transfers		
Q99	Does your entity accept Electronic Transfers from clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, payment service provider (PSP) such as PayPal, debit cards, credit cards, virtual currency payments, etc.
Q100	Did your entity accept or make payments by Electronic Transfers with clients within the reporting period?	
Q101	Please provide the total number of Electronic Transfers from clients (incoming).	
Q102	Please provide the total value of Electronic Transfers from clients (incoming).	
Q103	Does your entity make Electronic Transfers to clients?	
Q104	Please provide the total number of Electronic Transfers to clients (outgoing).	
Q105	Please provide the total value of Electronic Transfers to clients (outgoing).	
Q106	Does your entity accept Prepaid Cards from clients?	
Q107	Did your entity received payments by Prepaid Cards from clients during the reporting period?	
Q108	Among the electronic transfers reported, please indicate the total number of Prepaid Cards transactions received from clients (incoming).	
Q109	Among the electronic transfers reported, please provide the total value of Prepaid Cards transactions received from clients (incoming).	
Q110	Total number of Electronic Transfers	
Q111	Does your entity accept Credit Card transactions with clients?	

Q#	Question Text	Instructions
Q112	Did your entity accept or make payments by Credit Card with clients within the reporting period?	
Q113	Among the electronic transfers reported, please indicate the total number of Credit Card transactions with clients, both incoming and outgoing.	
Q114	<i>Total number of Electronic Transfers</i>	Auto-calculated
Q115	Among the electronic transfers reported, please provide the total value of Credit Card transactions with clients within the reporting period, both incoming and outgoing.	
Q116	<i>Total value of Electronic Transfers</i>	Auto-calculated
2.3 Direct Payments with Clients – Cash		
Q117	Does your entity accept or make Cash transactions with clients?	
Q118	Did your entity accept or make Cash payments with clients within the reporting period?	
Q119	Please provide the total number of Cash transactions from clients (incoming), within the reporting period.	
Q120	Please provide the total value of Cash transactions from clients (incoming), within the reporting period.	
Q121	Please provide the total number of Cash transactions with clients (outgoing), within the reporting period.	
Q122	Please provide the total value of Cash transferred with clients (outgoing), within the reporting period.	
Q123	Please provide the total number of single cash transactions with clients equal to or greater than 10,000 EUR, both incoming and outgoing.	
Q124	Can your entity distinguish cash transactions above EUR 100,000 in your record keeping?	
Q125	Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q126	Number of physical cash transactions by Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
2.4 Direct Payments with Clients – Summary		
Q127	<i>Sum of # Transactions with clients</i>	Auto-calculated field
Q128	<i># Transactions with clients (Repeat of Q2)</i>	Repeat field, used for data validation
Q129	<i>Sum of Value Transactions with clients</i>	Auto-calculated field
Q130	<i>Value Transactions with clients (Repeat of Q3)</i>	Repeat field, used for data validation
2.5 Virtual Currencies		
Q131	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

Q#	Question Text	Instructions
		This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
Q132	Please provide the total number of Virtual Assets transactions with clients (both incoming and outgoing).	
Q133	Please provide the value of funds transferred using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
Q134	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?	The reporting entity should declare whether it intends to be active or offer products and services relating to virtual assets in the following years, accept or make payments to/from customers, or invest in virtual assets.
Q135	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q136	Please name the Virtual Asset Platforms or Intermediaries with which your entity has business relationships.	
2.6 Accounts		
Q137	Please provide the number of client accounts at your entity.	
Q138	Please provide the number of client accounts at your entity that are Natural Persons, by nationality.	
Q139	Please provide the number of client accounts at your entity that are Natural Persons, by residency.	
Q140	<i>Total number of client accounts.</i>	Auto-calculated
Q141	<i>Difference between number of client accounts Total by Nationality and Total by Residency.</i>	Auto-calculated. When correctly entered, the difference between these (Q139 and Q140) should be '0'.
Q142	Does your entity allow for Multiple accounts by single client?	
Q143	Please provide the number of clients with multiple accounts?	
Q144	How many accounts held by clients having multiple accounts?	
Q145	Does your entity allow for Multiple clients share an account client?	
Q146	How many accounts held by clients are shared accounts?	
2.7 Returns to Different Accounts		
Q147	Does your entity allow of returns to different account than origination account?	
Q148	Does your entity allow of returns into 3rd party accounts?	
Q149	How many transactions were performed to 3rd party accounts, by location of the account?	
Q150	Value of transactions distributed to 3rd party accounts, by location of the account.	

Q#	Question Text	Instructions
2.8 Games offered		
Q151	Does your entity provide have Slot machines?	
Q152	Number of Slot machines.	
Q153	Does your entity provide Table games?	
Q154	Number of tables.	
Q155	What types to table games does you entity provide?	
Q156	Does your entity accept cash at Table games?	
Q157	Accepts other than euro cash at tables?	
Q158	Does your entity provide player-vs-player games?	
Q159	Does your entity accept cash at player-vs-player games?	
Q160	Does your entity provide Online gaming?	
Q161	Please specify the online gaming products and services which are provided by your entity.	
2.9 Provide Loan / Advance Services		
Q162	Does your entity provide financial services related to gaming activities?	
Q163	Does your entity provide loan / advance services?	
Q164	How many loans / advances have been issued?	
Q165	How many loans / advances are issued secured by guarantees?	
Q166	What is the total value of loans / advances granted, within the reporting period?	
Q167	What is the total value of outstanding loans / advances, at the end of the reporting period?	
Q168	What is the total value of the guarantees used to secure loans / advances, within the reporting period?	
Q169	What is the total value of the outstanding guarantees used to secure loans / advances, at the end of the reporting period?	
Q170	Does your entity accept Virtual Currencies as guarantees?	
2.10 Lines of Credit / Markers		
Q171	Does your entity provide lines of credit / markers?	
Q172	How many lines of credit / markers have been issued?	
Q173	How many lines of credit / markers issued are secured by guarantees?	
Q174	What is the total value of lines of credit / markers granted, within the reporting period?	
Q175	What is the total value of outstanding lines of credit / markers granted at the end of the reporting period?	
Q176	What is the total value of guarantees used to secure lines of credit / markers, within the reporting period?	
Q177	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		
Q178	Does your entity provide Safe Deposit Boxes for gambling clients?	

Q#	Question Text	Instructions
Q179	How many Safe Deposit Boxes doe your entity have?	
Q180	What is the approximate average duration of usage by clients, in days?	
Q181	What are the main purposes of the Safe Deposit Boxes?	
Q182	Does your entity provide long-term duration safe deposit boxes?	
Q183	Does the entity offer gambling products to clients using currencies other than Euros?	
Q184	Does the entity offer currency exchange services?	
Q185	Please indicate the total value of cash deposits by clients in foreign currencies, in Euro equivalent.	
Q186	Does your entity provide payouts in foreign currencies?	
Q187	Please indicate the total value of cash payments to clients in foreign currencies, in Euro equivalent.	
Q188	If Other Currencies are accepted or provided, please specify the other currencies accepted or provided.	if not applicable, please enter NA.
Q189	Does your entity provide Gift Certificates for clients?	
Q190	Number of gift certificates issued in the reporting period.	
Q191	Value of gift certificates issued in the reporting period.	
2.12 Comments & Feedback		
Q192	Do you have feedback related to any questions in this section?	
Q193	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q194	Does your entity rely on Domestic Third Parties to undertake some/all CDD measures towards clients?	Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
Q195	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.	
Q196	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q197	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.	Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
Q198	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.	

Q#	Question Text	Instructions
3.2 Onboarding		
Q199	Did your entity onboard clients within the reporting period?	
Q200	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	<p>This refers to the number of new unique natural person clients who entered into a relationship during the reporting period.</p> <p>New clients are those who were not clients during the previous reporting period.</p>
Q201	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	<p>This refers to the number of new unique legal person clients who entered into a relationship during the reporting period.</p> <p>New clients are those who were not clients during the previous reporting period.</p>
Q202	Does your entity onboard clients on a non-face-to-face basis, i.e. not physically present?	This section indicates whether the entity agrees to establish a relationship without a physical meeting with the client.
Q203	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique natural person clients should be indicated here.
Q204	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique legal person clients should be indicated here.
Q205	Does your entity accept clients through Introducers?	A business introducer is a natural or legal person (financial institution or designated non-financial business or profession) who acts as an intermediary between the regulated entity and potential clients or partners. In this sense, they maintain a direct relationship with a customer but delegate the execution of the transaction to the regulated entity. As such, the business introducer brings clients to the entity.
Q206	Does the entity record information on the nationality of clients approached by the business introducer?	
Q207	Can the entity provide introducers residency information?	
Q208	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.
Q209	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.
Q210	<i>Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Reporting Period.</i>	Validate your inputs , when correctly entered, the total between these should be '0'. If this is not the case, please modify your answers.

Q#	Question Text	Instructions
Q211	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.
Q212	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.
Q213	<i>Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Cumulative.</i>	Validate your inputs , when correctly entered, the total between these should be '0'. If this is not the case, please modify your answers.
Q214	Does your entity use junket marketing programs to introduce clients to the casino?	
3.3 Structure		
Q215	Please provide the total number of salaried and non-salaried persons within your entity including, where applicable, managers, partners or owner-operators, at the end of the reporting period.	The reporting entity is required to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.
Q216	Does your entity have any Branches, Subsidiaries, or Agencies?	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".
Q217	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
Q218	Is your entity a Branch or Subsidiary of another Entity?	
Q219	Is your entity a Branch or Subsidiary of a Foreign Entity?	
Q220	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.
Q221	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".
Q222	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)	
Q223	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.	
Q224	Within the reporting period, has your entity experienced any of the following:	A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners,

Q#	Question Text	Instructions
		any other person exercising direct or indirect control over your entity or the conduct of its activity? Undergone a significant evolution or modification of activities? Any other statutory changes? Change of AML/CFT/CPF responsible persons?
Q225	Please indicate the development or modification.	
Q226	Total value of Incoming payments related gambling from clients.	
Q227	Total value of outgoing payments related gambling to clients.	
Q228	Total Number of Wagers in the reporting period.	
Q229	Total value of winning wagers in the reporting period.	
Q230	Do your entity Cooperates with other casinos (accepts other chips, casino checks, client credit, etc., also the reverse – honors chips / casino checks)	
Q231	Do your entity Cooperates with in-group casinos?	
Q232	Do your entity Cooperates with out-of-group casinos?	
Q233	Are chips or tokens allowed for use for other purposes (internal to entity or external)?	
Q234	Please specify which other purposes where chips or tokens may be used.	
3.4 Entity Finances		
Q235	Turnover for the reporting period.	
Q236	Turnover for the reporting period realized in the Principality of Monaco.	
Q237	Turnover for the reporting period realized outside the Principality of Monaco.	
Q238	Please provide the amount of your last annual VAT return.	The declarations for the 12 months must be added together to obtain the net VAT (net VAT = VAT collected – VAT paid).
3.5 Rejected Relationships		
Q239	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q240	Please provide the total number of new client business relationships (potential clients) that have been rejected due to ML/TF/PF considerations during the reporting period.	
3.6 Blocked/Rejected Transactions		
Q241	Did you reject block / reject any client transactions (incoming or outgoing) due to concerns about ML/TF/PF during the reporting period?	
Q242	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	

Q#	Question Text	Instructions
3.6 Terminated Relationships		
Q243	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q244	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
3.7 Comments & Feedback		
Q245	Do you have feedback related to any questions in this section?	
Q246	Please provide comments or feedback on this section here.	

Instructions, Controls

C#	Question Text	Instructions
Controls		
1.1 Structure		
C1	Please provide the total number of salaried and non-salaried persons within your entity including, where applicable, managers, partners or owner-operators, at the end of the reporting period.	<p>Repeat the response from Q215.</p> <p>The reporting entity should disclose the number of employees, partners, and owners irrespective of their function.</p> <p>The number at the end of the reporting period should be used.</p>
C2	Please provide the total number of full-time equivalent persons working at your entity, at the end of the reporting period.	<p>The reporting entity should disclose the number of full-time equivalent persons, including salaried and non-salaried persons including, where applicable, managers, partners or owner-operators irrespective of their function.</p> <p>Provide the estimate as a decimal of FTE time. For example if there is one full time person and two ¼ time persons, then the total would be 1.5 FTE.</p> <p>1 full-time person = 1 FTE. One half-time person = 0,5 FTE. One ¼ time person = 0,25 FTE.</p>
C3	Please provide the number of persons in AML/CFT/CPF Compliance at your entity, at the end of the reporting period.	
C4	Please provide the number of full-time equivalent persons in AML/CFT/CPF Compliance at your entity, at the end of the reporting period.	
C5	Does your entity have a compliance department?	
C6	Does the MLRO fulfil any other role or job function?	
C7	What percentage of time does the MLRO spend on additional functions?	
C8	Please provide the number of employees leaving employment with the entity, within the reporting period?	
C9	Do you use external service providers for AML/CFT/CPF?	
C10	What is the purpose of your contract with these external service providers?	
C11	Please provide the total number of full-time equivalent of external AML/CFT/CPF service providers within your entity, at the end of the reporting period.	
C12	Approximately how many hours do external service providers spend each month on AML/CFT/CPF compliance?	
1.2 Policies & Procedures		
C13	Did your entity prepare a documented set of AML/CFT/CPF 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/CPF legal requirements.

C#	Question Text	Instructions
C14	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/CPF 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).
C15	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C16	Did your entity ensure awareness of these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C17	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C18	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C19	Does your entity have a systematic practice of tracking and managing changes to the AML/CFT/CPF Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT/CPF Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.
C20	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.
C21	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
C22	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		
C23	Does the board and senior management of your entity demonstrate overall responsibility for AML/CFT/CPF?	Actions taken by the Board and/or senior management that could demonstrate board's and senior management's engagement in AML/CFT/CPF matters could include: (1) senior management includes AML/CFT/CPF 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/CPF matters whenever issues arise;

C#	Question Text	Instructions
		<p>orders internal or external audit to test AML/CFT/CPF 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/CPF), buying AML/CFT/CPF 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/CPF 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>
C24	Does the board and senior management of your entity regularly receive AML/CFT/CPF reports?	<p>The reporting entity should disclose whether the board and/or senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT/CPF 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>
C25	Does the board and senior management of your entity ensure that AML/CFT/CPF 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/CPF 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/CPF 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/CPF 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/CPF area for internal audit, etc.</p>
C26	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</p>

C#	Question Text	Instructions
		business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.
1.4 Compliance & Violations		
C27	Has your entity had any AML/CFT/CPF related violations in the past 5 years?	The reporting entity should disclose whether it had any AML/CFT/CPF related compliance failures, including minor shortcomings, within the past 5 years.
C28	Please provide the total number of AML/CFT/CPF related violations in the past 5 Years.	Any AML/CFT/CPF related compliance failures, including minor shortcomings, should be counted under this question.
C29	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C30	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C31	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C32	Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period?	
C33	Did your entity conduct AML/CFT/CPF training for its Office employees in the reporting period?	
C34	Did your entity conduct AML/CFT/CPF training for its Compliance Employees in the reporting period?	
C35	Please provide the total number of persons trained on AML/CFT/CPF matters during the reporting period.	
C36	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?	
C37	Provide the estimated average number of hours per person spent on Initial Training.	
C38	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
C39	Provide the number of staff that have received Refresher Training within the reporting period.	
C40	Provide the estimated average number of hours per person spent on Refresher Training.	
C41	Does the entity provide specialized training for employees working in high-risk areas, such as compliance and customer due diligence?	
C42	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
C43	Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)?	

C#	Question Text	Instructions
C44	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C45	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	
C46	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C47	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	
C48	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C49	What other AML/CFT/CPF training/awareness raising activities did it include?	
C50	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C51	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
C52	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C53	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C54	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C55	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C56	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C57	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C58	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C59	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C60	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C61	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C62	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	
1.6 CDD		
C63	Does your entity record all of the following in your customer database: <ul style="list-style-type: none"> • First Name 	

C#	Question Text	Instructions
	<ul style="list-style-type: none"> • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence 	
C64	Please specify which items are not collected.	
C65	<p>Does the entity's database contain all of the following, when applicable:</p> <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 	
C66	<p>Does the entity's database contain all of the following, when applicable:</p> <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 	
C67	If your entity does not collect the items in the two above questions, please specify which items are not collected?	
C68	Does your entity record other client information or register client activity information in their database?	<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, Source of Wealth, Source of Funds, and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?</p>

C#	Question Text	Instructions
C69	Please specify what other information is included in your database, specify all that apply.	
C70	Is past 5 years of client relationship data accessible by AMSF upon request?	
C71	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C72	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C73	Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?	The reporting entity should indicate whether it has implemented written policies and procedures that specify the difference in documentation and requirements for simplified, standard, and enhanced due diligence.
C74	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.	Repeat the response from Q1.
C75	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C76	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C77	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.
C78	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C79	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C80	Please specify other measures taken for high-risk clients, before customer take-on.	
C81	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C82	What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity?	Law No. 1.362, as amended, sets a threshold of 25% ownership above which a person is automatically considered a beneficial owner. So, what is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity? It may be lower than the legal threshold, depending on your risk appetite.
C83	Does your entity examine the source of wealth before customer take-on?	
C84	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
C85	How does the company verify the Beneficial Owners of Virtual Assets?	If not applicable, state 'NA'.
C86	Does your entity ever rely on third parties to collect CDD information about clients?	Third parties means any other entity / service provider which performs elements of CDD on behalf of the entity.

C#	Question Text	Instructions
C87	Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed?	
C88	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).	
C89	Does your entity identify all customers regardless of payment method?	
C90	Does the evolution of the clients services requested contribute to the identification of red flags?	
C91	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		
C92	Did you apply enhanced due diligence measures to clients during the reporting period?	
C93	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C94	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C95	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.
C96	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C97	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		
C98	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C99	How many AML/CFT/CPF risk levels does your entity have for clients?	
C100	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C101	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C102	Do you have clients whose risk level has not yet been determined?	
C103	Please provide the total number of unique clients that are without a risk level determined yet.	
C104	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 	

C#	Question Text	Instructions
	<ul style="list-style-type: none"> • Products & Services • Transaction Types • Distribution Channels 	
C105	Please specify which items are not considered.	
C106	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
C107	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
C108	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C109	Does your entity use a list of sensitive countries for AML/CFT/CPF risk assessment?	(client assessments)
C110	Does your entity use a list of sensitive activities for AML/CFT/CPF risk assessment?	(client assessments)
C111	What client activities does your entity associate with High-Risk clients?	
C112	Does your entity consider ML and TF risks separately?	(entity's own assessment)
C113	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
1.9 Audit / Controls		
C114	When did your entity last have a SICCFIN/AMSF audit?	
C115	Has your entity had an on-site AMSF audit?	
C116	Date of last AMSF on-site audit.	
C117	Did your entity have any Other Audits not mentioned above?	(AML/CFT/CPF related audits only)
C118	Specify the types of Other Audits, and provide the year of the last audit of each kind.	(AML/CFT/CPF related audits only)
1.10 Cash Transactions		
C119	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C120	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C121	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Monitoring		
C122	Does your entity have in place a system for monitoring transactions for potential suspicion and reporting suspicious transactions?	<p>All entities subject to these requirements are required to monitor their operations in order to detect any suspicious activity. This monitoring must be tailored to the nature and activity of the entity; it may be carried out using an automated system (e.g., an automatic tool) or a manual system (e.g., an Excel tracking file).</p> <p>Only certain entities strictly referred to in Article 28 of Sovereign Order No. 2.318, as amended, are required to implement an automated monitoring system.</p>

C#	Question Text	Instructions
		If you have not implemented a transaction monitoring system, please indicate the reason in the comment field at the bottom of this section.
C123	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	Please repeat the answer provided in Q3.
C124	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
C125	Has the automated system been adapted to the entity in Monaco?	
C126	Do you have a system that generates alerts related to Money Laundering?	
C127	Please provide the total number of Alerts in Reporting Period by the system related to Money Laundering.	
C128	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
C129	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
C130	Do you have a system that generates alerts related to Terrorism Financing?	
C131	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing.	
C132	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
C133	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
C134	Is monitoring performed real time?	
C135	Is monitoring performed post-event?	
C136	Are all transactions screened?	
C137	If no, which transactions are screened?	
C138	Does your entity have a transaction profile for each client?	
C139	Does the profile detect disproportionate deposit and spending patterns with an individual's profile?	
C140	Does the profile detect changes in spending patterns with an individual's profile?	
C141	Does the profile detect deposits vs. withdrawal imbalances?	
C142	Does the profile detect multiple same day cashouts?	

C#	Question Text	Instructions
C143	Does the profile detect cashouts shortly after deposits?	
C144	Does your entity detect chips brought into casino?	
C145	What controls are in place to prevent collusion between players?	
C146	What controls are in place to prevent winnings being collected by a third party?	
C147	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.
C148	What other AML/CFT/CPF typologies are detected by the entity?	
1.12 Record Keeping		
C149	Does your entity keep transaction records for at least 5 years?	
C150	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C151	Does your entity keep these records and documents in a safe and secure place?	
C152	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> <ol 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 systems are not configured to enable easy access to the required data.
C153	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.13 Targeted Financial Sanctions (TFS)		
C154	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>

C#	Question Text	Instructions
		<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>
C155	<p>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>	<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>
C156	<p>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>	<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>
C157	<p>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>	
C158	<p>Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?</p>	
C159	<p>Does your entity have a System to Check the Customer Database?</p>	
C160	<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"> • Account Holder • Representative of Company or Client • Beneficial Owner • Administrators/Directors 	

C#	Question Text	Instructions
	<ul style="list-style-type: none"> • Shareholders • Legal Representatives • Settlor/Constituent • Trustee • Protector • Renters of Safe Deposit Boxes • Introducers 	
C161	Please specify which items are not collected.	
C162	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".
C163	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	Reference Sovereign Ordinance no. 8.664.
C164	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.
C165	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	Reference Sovereign Ordinance no. 8.664.
C166	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	Reference Sovereign Ordinance no. 8.664.
C167	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	Reference Sovereign Ordinance no. 8.664.
C168	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	Reference Sovereign Ordinance no. 8.664.
C169	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	Reference Sovereign Ordinance no. 8.664.
C170	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	Reference Sovereign Ordinance no. 8.664.
C171	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	Reference Sovereign Ordinance no. 8.664.
C172	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Renters of Safe Deposit Boxes?	Reference Sovereign Ordinance no. 8.664.
C173	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	Reference Sovereign Ordinance no. 8.664.
C174	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	
C175	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant	

C#	Question Text	Instructions
	to the full chain of payments to the ultimate beneficiary?	
C176	Have you entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period?	
C177	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
C178	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.	
C179	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C180	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
C181	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	If none reply "NA".
1.14 Politically Exposed Persons (PEPs)		
C182	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C183	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
C184	What additional AML/CFT/CPF procedures are applied for PEPs (compared to a standard risk client)?	<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>
C185	Did you enter into any relationships with PEPs during the reporting period?	
C186	Does PEP screening occur as part of the CDD process for new customers?	
C187	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C188	Provide the estimated percentage of self-declared information matching with PEP status determinations during the reporting period.	
C189	Does screening for PEPs occur on an ongoing basis?	

C#	Question Text	Instructions
C190	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C191	Are PEPs subject to increased monitoring?	
C192	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C193	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?	
C194	Among your clientele, are there any individuals who became PEPS during the course of the business relationship during the reporting period?	
1.15 Suspicious Transaction Reporting		
C195	Is your entity registered with goAML?	
C196	Please describe why.	In case the above question is answered "No".
C197	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C198	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)
C199	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C200	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C201	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).
C202	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).
C203	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C204	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.	
C205	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.
C206	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	

C#	Question Text	Instructions
C207	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C208	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.	
C209	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C210	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
C211	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
C212	Please provide the total number of STRs/ SARs related to other reasons not mentioned above that your entity reported to the FIU within the reporting period.	
C213	Please provide the total number of unsuccessful transactions attempts reported to the FIU, within the reporting period.	
C214	Did your entity respond internally to the suspicious transactions? (e.g. modification of the client relationship, modification of the client risk's assessment)	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
C215	Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	
1.16 Comments & Feedback		
C216	Do you have feedback related to any questions in this section?	
C217	Please provide comments or feedback on this section here.	

Instructions, Signatories

S#	Question Text	Instructions
Signatories		
S1	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.	
S2	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.	
S3	Do you need to submit your survey in an Incomplete state?	If no, please write 'Complete'. If yes, provide the reason for submitting incomplete. An incomplete submission may result in enhanced oversight or other action.