


## Instructions: 2025 Tax and Legal Advisor AML/ CFT Survey

This document provides the definitions and instructions that will help an obliged entity in completing the AML/CFT Risk Assessment Information Request. There are five tabs to be completed: 1) Customer Risk, 2) Products, Services, & Transactional Risk, 3) Distribution Channel Risk, 4) Controls and Quality of Risk Mitigation, 5) Signatories. The questionnaire should be completed in full. The questionnaire 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 regulations in force in Monaco.
- The reporting period is 1<sup>st</sup> January 2024 to 31<sup>th</sup> December 2024.
- Questions related to number of clients shall include clients that are active at the end of the reporting period and clients that were at some point active during the reporting period.
- The term “unique clients” denotes that while a client might have several accounts it should only be counted as one client.
- Questions related to number or value of transactions are relevant for activity performed within the reporting period.
- Questions related to number or value of transactions 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.

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## Glossary

Term	Definition
Active Account	Only clients that are active for the reporting period or were at some point active during the reporting period.
AML/CFT/CPF	Anti-Money Laundering / Counter Financing of Terrorism / Counter Financing of Proliferation of Weapons of Mass Destruction
AMSF (previously SICCFIN)	Autorité Monégasque de Sécurité Financière (AMSF), The national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. <a href="https://amsf.mc">https://amsf.mc</a>
Association	For the purposes of this questionnaire, an association is a freely formed organization (group with members) that has acquired the legal personality; for example to open a bank account, enter contracts, appear in courts, buy estate, and receive donations. Refer to Monaco law n° 1.355 of 2008/12/23 for registered associations.  Associations shall also include foreign associations with a similar capacity to act, specifically to open a bank account.
Beneficial Owner	Beneficial Owner is defined in Article 21 of <u>Law 1.362 of 3 August 2009 amended by law 1.503 of 23 December 2020 on the fight against money laundering, terrorist financing and corruption:</u> - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted.
Client / Customer	A Client (identical meaning to Customer) should be understood as a Natural Person or a Legal Person/entity with whom the reporting entity has a business relationship or for whom the reporting entity carried out an occasional transaction. In this context, clients refer to all existing clients with whom the entity has had a business relationship within the reporting period including occasional (walk-in) clients who have been serviced during the reporting period. Reference to clients is made in respect of those who have benefited from a product or service falling within the scope of AML/CFT regulation.
Correspondent banking	Correspondent banking is the provision of banking services by one bank as the correspondent to another bank as the respondent, including providing a current or other liability account and related services, such as cash management, international funds transfers, cheque clearing, payable-through accounts and foreign exchange services.
DPMS	Dealers in Precious Metals and Stones
DBT	Direction du Budget et du Trésor de Monaco
Dual-use items	Dual-use item means items, including software and technology, which can be used for both civil and military purposes, and includes items which can be used for the design, development, production or use of nuclear, chemical or biological weapons or their means of delivery, including all items which can be used for both non-explosive uses and assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices.
FIU	Financial Intelligence Unit
Financial institutions	Financial institutions mean any natural or legal person who conducts as a business one or more of the following activities or operations for or on behalf of a customer: 1. Acceptance of deposits and other repayable funds from the public. 2. Lending. 3. Financial leasing. 4. Money or value transfer services. 5. Issuing and managing means of payment (e.g. credit and debit cards, cheques, traveler's cheques, money orders and bankers' drafts, electronic money). 6. Financial guarantees and commitments. 7. Trading in:

Term	Definition
	<p>(a) money market instruments (cheques, bills, certificates of deposit, derivatives etc.);</p> <p>(b) foreign exchange;</p> <p>(c) exchange, interest rate and index instruments;</p> <p>(d) transferable securities;</p> <p>(e) commodity futures trading.</p> <p>8. Participation in securities issues and the provision of financial services related to such issues.</p> <p>9. Individual and collective portfolio management.</p> <p>10. Safekeeping and administration of cash or liquid securities on behalf of other persons.</p> <p>11. Otherwise investing, administering or managing funds or money on behalf of other persons.</p> <p>12. Underwriting and placement of life insurance and other investment-related insurance.</p> <p>13. Money and currency changing.</p>
Foreign Residents	For the purpose of this questionnaire, is a non-Monégasque national that is a resident in Monaco.
Government / Public Sector	Government/public entity is an organization or body providing services to the public on behalf of the government or another public entity.
High Net Worth Individual (HNWI)	For the purposes of this survey, a High-Net-Worth-Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million.
High Net Worth (HNW) Group	For the purposes of this survey, a HNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 5 million.
Holding Company	A holding company is a financial vehicle for owning and controlling other assets, such as real estate, stocks, or companies. Using a holding company creates legal separation between the assets and the owners.
Legal Arrangement	A relationship established by means of a contract between two or more parties that do not result in the creation of a legal personality such as Trusts or other similar arrangements. Examples of other similar arrangements (for AML/CFT purposes) include fiducie, treuhand and fideicomiso.
Legal Person	Legal persons refer to any entities other than natural persons that can establish a permanent customer relationship with a financial institution or otherwise own property. This can include companies, corporate bodies, foundations, institute, partnerships, or associations and other relevantly similar entities.
ML / TF / PF	Money Laundering / Terrorist Financing / Financing the Proliferation of Weapons of Mass Destruction
Money or value transfer services (MVTs)	Money or value transfer services (MVTs) refers to financial services that involve the acceptance of cash, cheques, other monetary instruments or other stores of value and the payment of a corresponding sum in cash or other forms to a beneficiary by means of communication, message, transfer, or through a clearing network to which the MVTs provider belongs.
More Complex Ownership Structure	For the purposes of this survey, a More Complex Ownership Structure refers to clients in which the reporting entity has increased effort or difficulty in independently verifying the identity of the Beneficial Owner of the customer. For this survey, More Complex Ownership 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,

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

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



## Instructions, Inherent Risk

Q#	Question Text	Instructions
<b>1 Customer Risk</b>		
<b>1.1 Subject To Law n° 1.362</b>		
1	<p>Does your entity meet any of the following conditions:</p> <ol style="list-style-type: none"> <li>1. The main activity that you carry out is subject to the provisions of law n° 1.362.</li> <li>2. The activity that you carry out subject to the provisions of law n° 1.362 represents more than 5% of your company's overall turnover.</li> <li>3. The activity that you carry out subject to the provisions of law n° 1.362 is performed exclusively for customers of your main activity.</li> </ol>	
<b>1.2 Clients Summary</b>		
2	Do you have the authorization legally to represent your client for a transaction?	
3	Please provide the total number of unique clients that were at some point active during the reporting period, by client's primary nationality, or country of headquarters or incorporation.	<p>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"> <li>• If the same client has several accounts, then it is considered one client</li> <li>• If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client</li> <li>• Any other situation where the same client would be double counted, please consider as one client</li> </ul>
4	Please provide the total number of transactions (both incoming and outgoing) with clients within the reporting period.	
5	Please provide the total value of funds transferred with clients (both incoming and outgoing) within the reporting period.	Holding funds for others for the sole purpose of guarantee is not to be taken into account until the guarantee is activated. If it is actually activated, it is indeed counted in the transactions' flow.
6	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients within the reporting period.	<p>The answer should include instances when the reporting entity (1) prepares transactions for clients and instances when the reporting entity (2) carries out transactions on behalf of clients.</p> <p>This value will be validated against other responses provided to later questions for numbers of transactions by Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive.</p>

Q#	Question Text	Instructions
7	Please repeat the total number of transactions provided above.	This value will be validated against other responses provided to later questions for numbers of cheque, electronic, and cash transactions, which are mutually exclusive.
8	Please provide the total value of funds transferred by and on behalf of clients (both incoming and outgoing) within the reporting period.	
<b>1.3 Beneficial Owners</b>		
9	Can your entity distinguish nationality of BO's?	
10	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.
11	Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality.	The information requested is in relation to number of Beneficial Owners which have direct or indirect control of clients that are legal persons, and trusts and other legal arrangements.
12	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	The information requested is in relation to number of Beneficial Owners which represent clients that are legal persons, and trusts and other legal arrangements.
13	Can your entity distinguish BO's that have 25% or greater ownership?	
14	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	
15	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	
16	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.	
17	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.	
<b>1.4 Distinguishing Client Types</b>		
18	Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are: Trusts?	
19	Associations?	
20	Other Legal Arrangements not mentioned above?	
21	Insurance Companies?	
22	HNWI's?	
23	Virtual Assets Service Providers (VASPs)?	
24	Lawyers or other Legal Professions?	
25	Accountants & Auditors?	
26	Nominee Shareholders / Directors?	

Q#	Question Text	Instructions
27	Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
28	Real Estate Agents?	
29	Dealers in Precious Metals and Stones?	
30	Trust and Company Service Providers?	
31	Multi-Family Offices?	
32	Single Family Offices?	
33	More Complex Ownership Structures?	
34	Cash Intensive Business (such as bars, restaurants)?	
35	Providers of or accept payments from Anonymous Prepaid Cards / Cards with high CDD Threshold?	
36	Engaged in Art and Antiques?	
37	Engaged in Import-Export?	
38	Dealing with High-Value Goods?	
39	Non-Profit Organization?	
40	Casinos/Gambling (including clients that are online casinos)?	
41	Engaged in Construction / Real Estate Development?	
42	Engaged in Extractive Industries (e.g. Oil and Gas)?	
43	Engaged in Defense/Arms, including Dual-use items for proliferation of Weapons of Mass Destruction (WMD)?	
44	Engaged in Yachting-related Business?	
45	Sports Agents or Intermediaries?	
46	Engaged in Fund Management?	
47	Holding Companies?	
48	Auctioneers?	
49	Motor Vehicle Dealers?	
50	Government and Public Sector?	
51	Engaged in Aircraft Sales / Private Jets / Charters?	
52	Engaged in Shipping?	
<b>1.5 Clients - Natural Persons</b>		
53	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual (including domestic clients).	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person <b>should not</b> be counted as a Natural Person client.
54	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Natural Persons.	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, it <b>should not</b> be counted as a Natural Person client.
55	Please provide the total value of funds transferred by and on behalf of clients that are Natural Persons, (both incoming and outgoing), in EUR.	
<b>1.6 Clients - Legal Persons</b>		
56	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
57	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Legal Persons.	

Q#	Question Text	Instructions
58	Please provide the total value of funds transferred by and on behalf of clients that are Legal Persons, both incoming and outgoing, in EUR.	
59	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	<p>Legal Persons types include:</p> <ul style="list-style-type: none"> <li>• Commercial Partnership SNC</li> <li>• Economic Interest Group GIE</li> <li>• Joint Stock Company SAM</li> <li>• Limited Liability Companies SARL</li> <li>• Limited Partnership SCS</li> <li>• Limited Partnership with Shares SCA</li> <li>• Monegasque Foundation</li> <li>• Monegasque Associations</li> <li>• Other Civil Companies SC-Autre</li> <li>• Other Commercial Companies</li> <li>• Other Legal Arrangements</li> <li>• Private Domain of the Monegasque State</li> <li>• Property Investment Partnership SCI</li> <li>• Sole Person</li> <li>• Special Civil-law Partnership SCP</li> <li>• Trusts</li> </ul>
60	Please provide the number of Monegasque Legal Persons as clients, by type.	
<b>1.7 Clients - Trusts</b>		
61	Does your entity have clients that are Trusts?	
62	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
63	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Trusts.	
64	Please provide the total value of funds transferred with and by clients that are Trusts, (both incoming and outgoing).	
65	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
66	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by country in which the trust was created.	
<b>1.8 Clients - Associations</b>		
67	Does your entity have clients that are Associations?	
68	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
69	Does your entity have information related to the number and value of their transactions?	

Q#	Question Text	Instructions
70	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Associations.	
71	Please provide the total value of funds transferred by and on behalf of clients that are Associations, both incoming and outgoing.	
<b>1.9 Clients - Other Legal Arrangements</b>		
72	Does your entity have clients that are Other Legal Arrangements?	
73	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
74	Does your entity have information related to the number and value of their transactions?	
75	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Other Legal Arrangements.	
76	Please provide the total value of funds transferred by and on behalf of clients that are Other Legal Arrangements, both incoming and outgoing.	
77	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
<b>1.10 HNWI's and UHNWI's</b>		
78	Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWIs) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an HNWI or HNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is <u>more than EUR 5 million</u> .
79	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).	
80	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are HNWIs or individuals belonging to a HNW Group.	
81	Please provide the total value of funds transferred by and on behalf of clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
82	Please provide the total number of unique Beneficial Owners of Legal Person clients that are HNWIs, broken down by the primary nationality of the HNWI.	If you have a beneficial owner common to several legal entities clients, you only need to count it once.
83	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are HNWIs, broken down by the primary nationality of the HNWI.	
84	Does your entity have any Ultra-High-Net-Worth Individuals (UHNWIs) or Ultra-High-Net-Worth (UHNW) Groups as clients or Beneficial Owners (that	For the purposes of this survey, an UHNWI or UHNW Group is a Natural Person or Group of family-related

Q#	Question Text	Instructions
	are UHNWIs) of Legal Persons / Legal Arrangements that are clients?	Natural Persons whose sum of all accounts and net assets is <u>more than EUR 50 million.</u>
85	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).	
86	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group.	
87	Please provide the total value of funds transferred by and on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
88	Please provide the total number of unique Beneficial Owners of Legal Person clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
89	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
<b>1.11 PEPs</b>		
90	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
91	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
92	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
93	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are PEPs.	
94	Please provide the total value of funds transferred by and on behalf of clients that are PEPs, (both incoming and outgoing), in EUR.	
95	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
96	Please provide the total number of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the primary nationality of the PEP.	<p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term “unique Beneficial Owners” denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.</p>

Q#	Question Text	Instructions
<b>1.12 Virtual Asset Service Providers</b>		
97	Does your entity have clients that are VASPs?	
98	Please provide the total number of unique clients that are VASPs.	
99	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are VASPs.	
100	Please provide the total value of funds transferred by and on behalf of clients that are VASPs (both incoming and outgoing).	
101	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
102	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
103	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
104	Please provide the total number of transactions by and on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
105	Please provide the total value of funds transferred by and on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
106	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
107	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
108	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
109	Please provide the total number of transactions by and on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
110	Please provide the total value of funds transferred by and on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
111	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO
112	Does your entity have clients that are Initial Coin Offering Providers?	ICO
113	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
114	Please provide the total number of transactions by and on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
115	Please provide the total value of funds transferred by and on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	ICO

Q#	Question Text	Instructions
116	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	Other Services
117	Does your entity have clients that are engaged in Other VASP Services?	Other Services
118	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services
119	Please provide the total number of transactions by and on behalf of VASP clients related to Other Services (both incoming and outgoing).	Other Services
120	Please provide the total value of funds transferred by and on behalf of VASP clients that provide Other Services (both incoming and outgoing).	Other Services
121	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
<b>1.13 2nd Nationalities</b>		
122	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
123	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).	
124	Please provide the total number of Beneficial Owner secondary nationalities, broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership.	Concerns: <ul style="list-style-type: none"> <li>• Natural Person clients, and</li> <li>• Natural Persons who are Beneficial Owners having 25% ownership of Legal Person, and Trust and Other Legal Arrangement clients</li> <li>• that have more than one nationality.</li> </ul>
125	For Beneficial Owners that are Foreign Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership.	
126	For Beneficial Owners that are Non-Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership.	
<b>1.14 Lawyers and other Legal Professions</b>		
127	Does your entity have clients that are Lawyers and Other Legal Professions?	
128	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
<b>1.15 Accountants &amp; Auditors</b>		
129	Does your entity have clients that are Accountants & Auditors?	
130	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	



Q#	Question Text	Instructions
<b>1.16 Nominee Shareholders / Directors</b>		
131	Does your entity have clients that are Nominee Shareholders / Directors?	
132	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
<b>1.17 Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments</b>		
133	Does your entity have clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
134	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
<b>1.18 Real Estate Agents</b>		
135	Does your entity have clients that are Real Estate Agents?	
136	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
<b>1.19 DPMS</b>		
137	Does your entity have clients that are Dealers in Precious Metals and Stones?	
138	Please provide the total number of Monegasque unique clients that are DPMS.	
<b>1.20 TCSPs</b>		
139	Does your entity have clients that are Trusts and Corporate Service Providers?	
140	Please provide the total number of Monegasque unique clients that are TCSPs.	
<b>1.21 Multi-Family Offices</b>		
141	Does your entity have clients that are Multi-Family Offices?	
142	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
143	Does your entity have clients that are Single-Family Offices?	
144	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
<b>1.22 More Complex Ownership Structures</b>		
145	Does your entity have clients that are More Complex Ownership Structures?	Please refer to the definition of complex ownership structures.
146	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
<b>1.23 Cash Intensive Businesses</b>		
147	How does your entity define a Cash Intensive Business?	
148	Does your entity have clients that are Cash Intensive Businesses?	(such as bars, restaurants)

Q#	Question Text	Instructions
149	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
<b>1.24 Prepaid Cards</b>		
150	Does your entity have clients that are providers of or accept payments from Anonymous Prepaid Cards with high CDD Threshold?	
151	Please provide the total number of Monegasque unique clients that are providers of or accept payments from Anonymous Prepaid Cards / Cards with a high CDD Threshold.	
<b>1.25 Art and Antiques</b>		
152	Does your entity have clients that are engaged in Art and Antiques?	
153	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
<b>1.26 Import-Export</b>		
154	Does your entity have clients that are engaged in Import-Export?	
155	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
<b>1.27 High-Value Goods</b>		
156	Does your entity have clients that are High-Value Goods?	
157	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
<b>1.28 NPOs</b>		
158	Does your entity have clients that are Non-Profit Organizations?	
159	Please provide the total number of Monegasque unique clients that are NPOs.	
<b>1.29 Casinos / Gambling</b>		
160	Does your entity have clients that are Casinos/Gambling?	
161	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
<b>1.30 Construction / Real Estate Development</b>		
162	Does your entity have clients that are engaged in Construction / Real Estate Development?	
163	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
<b>1.31 Extractive Industries (e.g. Oil and Gas)</b>		
164	Does your entity have clients that are engaged in Extractive Industries?	
165	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	

Q#	Question Text	Instructions
<b>1.32 Defense / Arms</b>		
166	Does your entity have clients that are engaged in Defense / Arms?	The reporting entity should disclose whether it has clients that are engaged in <u>Defense/Arms</u> including Dual-use items for proliferation of Weapons of Mass Destruction (WMD) to whom the reporting entity provides products or services that fall under the scope of AML/CFT regulation in Monaco.
167	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
<b>1.33 Yachting-related Business</b>		
168	Does your entity have clients that are engaged in Yachting related business?	
169	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
<b>1.34 Sports Agents and Intermediaries</b>		
170	Does your entity have clients that are Sports Agents or Intermediaries?	
171	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
<b>1.35 Fund Management</b>		
172	Does your entity have clients that are engaged in Fund Management?	
173	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
<b>1.36 Asset Holding</b>		
174	Does your entity have clients that are Holding Companies?	
175	Please provide the total number of Monegasque unique clients that are Holding Companies.	
<b>1.37 Auctioneers</b>		
176	Does your entity have clients that are Auctioneers?	
177	Please provide the total number of Monegasque unique clients that are Auctioneers.	
<b>1.38 Motor Vehicle Dealers</b>		
178	Does your entity have clients that are Motor Vehicle Dealers?	
179	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
<b>1.39 Government and Public Sector</b>		
180	Does your entity have clients that are Government and Public Sector?	
181	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
<b>1.40 Aircraft Sales / Private Jets / Charters</b>		
182	Does your entity have clients that are engaged in Aircraft Sales / Private Jets / Charters?	

Q#	Question Text	Instructions
183	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
<b>1.41 Shipping</b>		
184	Does your entity have clients that are engaged in Shipping?	
185	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
<b>1.42 Comments &amp; Feedback</b>		
186	Do you have feedback related to any questions in this section?	
186	Do you have feedback related to any questions in this section?	
<b>2 Products &amp; Services Risk</b>		
<b>2.1 Payment Types with Clients - Cheques</b>		
188	Does your entity accept or make Cheque transactions with clients?	
189	Please provide the total number of Cheque transactions with clients (both incoming and outgoing).	
190	Please provide the total Value of Cheques transactions with clients (both incoming and outgoing) within the reporting period.	
<b>2.2 Payment Types by and on behalf of Clients - Cheques</b>		
191	Does your entity accept or make Cheque transactions by or on behalf of clients?	
192	Please provide the total number of Cheque transactions by and on behalf of clients (both incoming and outgoing).	
193	Please provide the total Value of Cheques transactions by and on behalf of clients (both incoming and outgoing) within the reporting period.	
<b>2.3 Payment Types with Clients - Electronic Transfers</b>		
194	Does your entity accept or make Electronic Transfers with clients?	
195	Please provide the total number of Electronic Transfers with clients (both incoming and outgoing).	
196	Please provide the total Value of Electronic Transfers with clients (both incoming and outgoing) within the reporting period.	
<b>2.4 Payment Types by and on behalf of Clients - Electronic Transfers</b>		
197	Does your entity accept or make Electronic Transfers by and on behalf of clients?	
198	Please provide the total number of Electronic Transfers by and on behalf of clients (both incoming and outgoing).	
199	Please provide the total Value of Electronic Transfers by and on behalf of clients (both incoming and outgoing) within the reporting period.	

Q#	Question Text	Instructions
<b>2.5 Payment Types with Clients - Cash</b>		
200	Does your entity accept or make Cash transactions with clients?	
201	Please provide the total number of Cash transactions with clients, within the reporting period.	
202	Please provide the total value of funds transferred, Cash payments with clients in the reporting period, both incoming and outgoing.	
203	Please provide the total value of funds transferred with clients, cash payments in currencies other than Euro, during the reporting period, both incoming and outgoing.	
204	Please provide the total number of single cash transactions equal to or exceeding 10,000 euros with clients (both incoming and outgoing) within the reporting period.	
205	Can your entity distinguish cash transactions with clients above EUR 100,000 in your record keeping?	
206	Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
207	Number of physical cash transactions with Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
208	Number of physical cash transactions with Foreign Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
<b>2.6 Payment types by and on behalf of Clients - Cash</b>		
209	Does your entity accept or make Cash transactions by or on behalf of clients?	
210	Please provide the total number of Cash transactions by and on behalf of clients, within the reporting period.	
211	Please provide the total value of funds transferred by and on behalf of clients, Cash payments in the reporting period, both incoming and outgoing.	
212	Please provide the total value of funds transferred by and on behalf of clients, cash payments in foreign currency, during the reporting period, both incoming and outgoing.	
213	Please provide the total number of single cash transactions equal to or exceeding 10,000 euros by and on behalf of clients (both incoming and outgoing). within the reporting period.	
214	Can your entity distinguish cash transactions by or on behalf of clients above EUR 100,000 in your record keeping?	

Q#	Question Text	Instructions
215	Number of physical cash transactions by and on behalf of Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
216	Number of physical cash transactions by and on behalf of Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
217	Number of physical cash transactions by and on behalf of Foreign Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
<b>2.7 Virtual Currencies</b>		
218	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
219	Please provide the total number of Virtual Assets transactions with, by, or on behalf of clients (both incoming and outgoing).	
220	Please provide the value of funds transferred using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
221	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client  This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
222	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
223	Please name the Virtual Asset Platforms or Intermediaries with which your entity has business relationships.	
<b>2.8 Tax Services Offered</b>		
224	Are you providing tax advisory services?	
225	Do you provide tax advice to Individuals?	
226	Do you provide tax advice to Individuals that are Monegasque residents?	
227	Do you provide tax advice to Individuals that are not Monegasque residents?	
228	Do you provide tax advice to Legal Persons?	
229	Do you provide tax advice to Monegasque Legal Persons?	
230	Do you provide tax advice to Legal Persons established outside of Monaco?	

Q#	Question Text	Instructions
231	Do you provide tax advice to Foundations?	
232	Do you provide tax advice to Associations?	
233	Do you provide tax advice to Trusts and Other Legal Arrangements?	
234	Do you provide tax advice to Legal Arrangements established outside of Monaco?	
235	Please provide the top three tax advice topics by estimation of percentage of total tax advice given.	<p>Please provide the estimated percentage of tax advice given by the following top areas:</p> <ul style="list-style-type: none"> <li>• Unknown</li> <li>• Capital Gains</li> <li>• Corporate</li> <li>• Income</li> <li>• Inheritance</li> <li>• Mutations</li> <li>• Place of Transfer</li> <li>• VAT</li> </ul>
<b>2.9 Legal Services Offered</b>		
236	Are you providing legal advisory services?	
237	Do you create companies on behalf of your clients?	
238	Do you provide advice for buying or selling of Real Estate?	
239	Do you provide advice for managing funds, interests or other assets?	
240	Do you provide advice for managing current or investment accounts with banks?	
241	Do you provide advice for managing cryptocurrencies?	
242	Do you provide advice for the creation, management, or administration of Legal Persons?	
243	Do you create, manage, or administer Legal Persons?	
244	Do you provide advice for domiciliation?	
245	Do you participate in sale or takeover of businesses?	
246	Do you provide advice for the creation or administration or management of any type of foundations?	
247	Do you provide advice for the creation or administration or management of any type of associations?	
248	Do you provide advice for the creation or administration or management of any type of trusts and Other Legal Arrangements?	
<b>2.10 Comments &amp; Feedback</b>		
249	Do you have feedback related to any questions in this section?	
250	Please provide comments or feedback on this section here.	

Q#	Question Text	Instructions
3 Distribution Risk		
3.1 Identification		
251	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.
252	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.	
253	Does your entity rely on Foreign 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.
254	Please provide the total number of clients which <u>Foreign Third Parties</u> were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client.	
255	Please provide the total number of clients which <u>Foreign Third Parties</u> were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party.	
3.2 Onboarding		
256	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	
257	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	
258	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	
259	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	
260	Does your entity onboard clients on a non-face-to-face basis, i.e. not physically present?	The reporting entity should disclose whether clients are onboarded (for CDD purposes) on a non-face-to-face basis (not physically present).
261	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	
262	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	
263	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	



Q#	Question Text	Instructions
264	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
265	Does your entity accept clients through Introducers?	An introducer is a Financial Institution / Designated Non-Financial Businesses and Professions who has a direct relationship with a client but delegates the financial transaction execution to another obliged entity (i.e. an introducer is a company that brings a client to the licensed entity).
266	Can the entity provide client nationality information for clients onboarded through introducers?	
267	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).	
268	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).	
269	Can the entity provide introducers residency information?	
270	Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party.	
271	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.	
<b>3.3 Structure</b>		
272	Does your entity mainly Identify as Tax Advisor or Legal Advisor	
273	Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, at the end of the reporting period.	The reporting entity has to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.
274	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".
275	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
276	Is your entity a Branch or Subsidiary of an Other entity?	
277	Is your entity a Branch or Subsidiary of a Foreign entity?	

Q#	Question Text	Instructions
278	If a Foreign entity Branch or Subsidiary, in which country is the parent undertaking?	
279	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
280	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)	
281	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.	
282	Within the reporting period, has your entity experienced any of the following:	<p>A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners, any other person exercising direct or indirect control over your entity or the conduct of its activity?</p> <p>Undergone a significant evolution or modification of activities?</p> <p>Any other statutory changes?</p> <p>Change of AML/CFT/CPF responsible persons?</p>
283	Please indicate the development or modification.	
<b>3.4 entity Finances</b>		
284	Turnover for the reporting period.	
285	Turnover for the reporting period realized in the Principality of Monaco.	
286	Turnover for the reporting period realized outside the Principality of Monaco.	
287	Please provide the amount of your last annual VAT return.	Total of twelve monthly payments.
<b>3.5 Rejected Relationships</b>		
288	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
<b>3.6 Terminated Relationships</b>		
289	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
<b>3.7 Terminated Relationships</b>		
290	Please provide the total number of client business relationships that have been terminated due to Money Laundering, Terrorism Financing, or Financing the	

Q#	Question Text	Instructions
	Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
<b>3.8 Comments &amp; Feedback</b>		
291	Do you have feedback related to any questions in this section?	
292	Please provide comments or feedback on this section here.	

## Instructions, Controls

C#	Question Text	Instructions
1 Controls		
1.1 Structure		
1	Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, at the end of the reporting period.	<b><u>Reuse the response from Q273.</u></b>  The reporting entity has to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.
2	Please provide the total number of full-time equivalent employees at your entity, at the end of the reporting period.	The reporting entity should disclose the number of full-time equivalent employees and non-employee partners and owners, irrespective of their function.  Provide the estimate as a decimal of FTE time. For example if there is one full time employee and two ¼ time employees, then the total would be 1.5 FTE.  1 full-time employee = 1 FTE. One half-time employee = 0,5 FTE. One ¼ time employee = 0,25 FTE.
3	Please provide the number of employees in AML/CFT Compliance at your entity, at the end of the reporting period.	
4	Please provide the number of full-time equivalent employees in AML/CFT Compliance at your entity, at the end of the reporting period.	
5	Does your entity have a compliance department?	
6	Does the MLRO fulfil any other role or job function?	
7	What percentage of time does the MLRO spend on additional functions?	
8	Is your entity part of a Group?	
9	Does your entity have a board and/or senior management?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility.  Examples of a board or senior management, would be an entity having: <ul style="list-style-type: none"> <li>• Chief Officers (CEO, CFO, CTO...)</li> <li>• Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists</li> <li>• Policies or procedures which require approval by a specified role or individual</li> <li>• A legal requirement for a board or specific role needed to achieve compliance</li> </ul> Examples of an entity that does not have a board or senior management: <ul style="list-style-type: none"> <li>• A sole proprietor</li> <li>• A partnership</li> <li>• A small business with a single layer of management</li> </ul>

C#	Question Text	Instructions
<b>1.2 Policies &amp; Procedures</b>		
10	Did your entity prepare a documented set of AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT legal requirements.
11	Were these policies and procedures approved by the board and senior management of your entity?	The reporting entity should disclose whether its written AML/CFT policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
12	Did your entity circulate these policies and procedures to all its employees?	
13	Did your entity ensure awareness of these policies and procedures to all its employees?	
14	Did your entity update their written AML/CFT Policies and Procedures in the last year?	
15	Please provide the date of the last update to your entity's written AML/CFT Policies and Procedures.	
16	Does your entity have a systematic practice of tracking and managing changes to the AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.
17	Does your entity have a group-wide AML/CFT/CPF programme?	
18	Has your entity conducted an analysis to identify whether the group AML/CFT/CPF programme complies with Monaco's legislation and regulatory framework for each branch/subsidiary?	
19	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.
20	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures?	
21	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)	
22	Has your entity previously submitted AML/CFT Procedures to AMSF?	
23	Please provide the last date of transmission of your AML/CFT procedures manual to AMSF.	
<b>1.3 Governance</b>		
24	Does the board and senior management of your entity demonstrate overall responsibility for AML/CFT?	Does the board and senior management of your entity demonstrate overall responsibility for AML/CFT?

C#	Question Text	Instructions
		<p>Actions taken by the Board and senior management that could demonstrate board's and senior management's engagement in AML/CFT matters could include:</p> <p>(1) senior management includes AML/CFT matters into the daily/ weekly/monthly/quarterly/yearly agenda;</p> <p>(2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks;</p> <p>(3) senior management requests ad-hoc reporting on AML/CFT matters whenever issues arise; orders internal or external audit to test AML/CFT controls;</p> <p>(4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT), buying AML/CFT monitoring software or sanction screening software, etc.;</p> <p>(5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT legislation are introduced;</p> <p>(6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.</p>
25	Does the board and senior management of your entity regularly receive AML/CFT reports?	<p>The reporting entity should disclose whether the board and senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT compliance.</p> <p>Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/TF risk and trends.</p>
26	Does the board and senior management of your entity ensure that AML/CFT shortcomings are rectified?	<p>The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control, take actions to rectify shortcomings in AML/CFT compliance areas and mitigate ML/TF risks.</p> <p>The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT reporting, supervisory onsite examination reports, etc. Examples of such actions might include:</p> <p>(a) approving budgetary resources to hire more employees for AML/CFT Compliance, investing in employees' knowledge and expertise through training, seminars, certifications</p>

C#	Question Text	Instructions
		(b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions, (c) prioritizing AML/CFT area for internal audit, etc.
27	Does the senior management of your entity review (give approval) for taking on high-risk clients?	In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.
<b>1.4 Compliance &amp; Violations</b>		
28	Has your entity had any AML/CFT related violations in the past 5 years?	The reporting entity should disclose whether it had any AML/CFT related compliance failures, including minor shortcomings, within the past 5 years.
29	Please provide the total number of AML/CFT related violations in the past 5 Years.	Any AML/CFT related compliance failures, including minor shortcomings, should be counted under this question.
30	Please identify the number and types of AML/CFT violations.	
<b>1.5 Training</b>		
31	Did your entity conduct AML/CFT training for its Directors / Management in the reporting period?	
32	Did your entity conduct AML/CFT training for its client-facing employees in the reporting period?	
33	Did your entity conduct AML/CFT training for its non-client-facing employees in the reporting period?	
34	Please provide the total number of employees trained on AML/CFT matters in Reporting Cycle.	
35	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?	
36	Provide the estimated average number of hours per person spent on Initial Training.	
37	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
38	Provide the number of staff that have received Refresher Training within the reporting period.	
39	Provide the estimated average number of hours per person spent on Refresher Training.	
40	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters within the reporting period.	
41	Did any of the AML/CFT training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)?	

C#	Question Text	Instructions
42	Did any of the AML/CFT training/awareness raising activities include Internal Meetings?	
43	Did any of the AML/CFT training/awareness raising activities include Consultation of AMSF's Website?	
44	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider in Monaco?	
45	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider outside Monaco?	
46	Did any of the AML/CFT training/awareness raising activities include Training by Another Group Member?	
47	Did any of the AML/CFT training/awareness raising activities include any Other Activities?	
48	What other AML/CFT training/awareness raising activities did it include?	
49	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
50	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
51	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
52	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
53	Did any of the AML/CFT training/awareness raising activities cover topics related to Typologies?	
54	Did any of the AML/CFT training/awareness raising activities cover topics related to Practical Cases?	
55	Did any of the AML/CFT training/awareness raising activities cover topics related to News?	
56	Did any of the AML/CFT training/awareness raising activities cover topics related to Corruption?	
57	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing of Terrorism?	
58	Did any of the AML/CFT training/awareness raising activities cover topics related to Cryptocurrency?	
59	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
60	Did any of the AML/CFT training/awareness raising activities cover topics related to Tax Evasion?	
61	Did any of the AML/CFT training/awareness raising activities cover topics related to Fraud?	
62	Did any of the AML/CFT training/awareness raising activities cover other topics not mentioned above?	
63	What other topics did the AML/CFT training/awareness raising activities cover?	



C#	Question Text	Instructions
1.6 CDD		
64	<p>Does your entity record all of the following in your customer database:</p> <ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Date of Birth</li> <li>• Place of Birth</li> <li>• Nationality</li> <li>• Country of Residence</li> <li>• Tax Residence</li> <li>• Activity</li> <li>• Source of Wealth</li> <li>• Source of Funds</li> </ul>	
65	Please specify which items are not collected.	
66	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> <li>• Account Holder</li> <li>• Representative of Company or Client</li> <li>• Beneficial Owner</li> <li>• Administrators/Directors</li> <li>• Shareholders</li> <li>• Legal Representatives</li> <li>• Settlor/Constituent</li> <li>• Trustee</li> <li>• Beneficiary of a Trust or other Legal Arrangement</li> <li>• Founders</li> <li>• Donors</li> <li>• Person who directly or indirectly exercises control of a Foundation</li> <li>• Protector</li> <li>• More Complex Ownership Structures</li> <li>• Introducers</li> </ul>	
67	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> <li>• Credit Card Holders</li> <li>• Complex Ownership Structure</li> <li>• Depositors/3rd Party Guarantors</li> <li>• Occasional Customers</li> <li>• Prospective Customers</li> <li>• Insurance Policy Payee</li> <li>• Insurance Policy Holder</li> <li>• Insurance Policy Beneficiary</li> <li>• Insurance Policy Insured</li> </ul>	
68	If your entity does not collect the items in the two above questions, please specify which items are not collected?	If all are collected respond "NA".

C#	Question Text	Instructions
69	Does your entity record other client information or register client activity information in their database?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, 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?
70	Please specify what other information is included in your database.	
71	Is past 5 years of client relationship data accessible by AMSF upon request?	
72	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
73	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
74	Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?	(e.g. simplified, standard and enhanced due diligence)
75	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.	<b>Please repeat the answer provided in Q3.</b>
76	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
77	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
78	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
79	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
80	Did you select "Trigger Event" in the previous question?	
81	Please name all trigger events for ongoing due diligence done on clients classified as High-Risk for ML/FT.	
82	Does your entity examine the source of wealth of high-risk clients before customer take-on?	
83	Does your entity undertake other measures for high-risk clients, before customer take-on?	If not applicable, state 'NA'.
84	Please specify other measures taken for high-risk clients, before customer take-on.	

C#	Question Text	Instructions
85	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
86	For when BO info is recorded, at what % shareholding threshold does your entity use for recording Beneficial Owner information?	
87	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
88	How does the company verify the Beneficial Owners of Virtual Assets?	
89	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.
90	Does your entity ever conduct tests on third parties regarding their willingness and ability to provide information during the relationship on request and without delay?	
91	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).	
92	Does the evolution of the clients services requested contribute to the identification of red flags?	
<b>1.7 EDD</b>		
93	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
94	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
95	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.
96	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
97	Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	i.e. number of enhanced due diligence <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements ÷ total number of <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements.
<b>1.8 Risk Assessments</b>		
98	Does your entity apply AML/CFT risk ratings to its clients?	
99	How many AML/CFT risk levels does your entity have for clients?	
100	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT.	
101	Please provide the total number of unique clients that are without a risk level determined yet.	

C#	Question Text	Instructions
102	Does your entity's High-Risk Assignment Considerations include ALL of the following: <ul style="list-style-type: none"> <li>Country of Residence</li> <li>Activity</li> <li>PEP status</li> <li>Type of Customer</li> <li>Products &amp; Services</li> <li>Transaction Types</li> <li>Distribution Channels</li> </ul>	
103	Please specify which items are not considered.	
104	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
105	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
106	Does your entity have a tool or process for making AML/CFT risk assessments?	(client assessments)
107	Does your entity use a list of Sensitive Countries for AML/CFT risk assessment?	
108	Does your entity use a list of Sensitive Activities for AML/CFT risk assessment?	
109	What client activities does your entity associate with High-Risk clients?	
110	Does your entity consider ML and TF risks separately?	(entity's own assessment)
111	Does your entity have a tool or process for making AML/CFT risk assessments?	(entity's own assessment)
<b>1.9 Audit / Controls</b>		
112	When did your entity last have a SICCFIN/AMSF audit?	
113	Did your entity have any Other Audits not mentioned above?	(AML/CFT related audits only)
114	Specify the types of Other Audits, and provide the year of the last audit of each kind.	(AML/CFT related audits only)
<b>1.10 Cash Transactions</b>		
115	Does your entity conduct cash transactions with clients?	Incoming or outgoing.
116	Does your entity apply any specific AML/CFT controls and procedures for cash transactions?	
117	Please describe the specific controls and procedures for cash transactions your entity applies.	
<b>1.11 Monitoring</b>		
118	Do you have the authorization legally to represent your client for a transaction?	
119	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	

C#	Question Text	Instructions
120	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	
121	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
122	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	
<b>1.12 Record Keeping</b>		
123	Does your entity keep transaction records for at least 5 years?	
124	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
125	Does your entity keep these records and documents in a safe and secure place?	
126	Are these records and documents available promptly to the relevant authorities upon request?	<p>When providing its response, the reporting entity should consider the following factors:</p> <ul style="list-style-type: none"> <li>(1) is the above data collected in electronic format and easily retrievable from the IT systems?</li> <li>(2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly?</li> <li>(3) is there manual effort required to find clients' data, e.g., if files are stored only in paper format; or, when they are stored in electronic format, IT systems are not configured to enable easy access to the required data.</li> </ul>
127	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
<b>1.13 Targeted Financial Sanctions (TFS)</b>		
128	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> <ul style="list-style-type: none"> <li>(a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons;</li> <li>(b) Frequency and scope of screening;</li> <li>(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).</li> </ul>

C#	Question Text	Instructions
129	Are the board and senior management of your entity engaged in overseeing risks and compliance matters related to TFS for Terrorist Financing and Proliferation Financing?	<p>The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include:</p> <p>(1) approval of TFS-related policies, procedures and instructions by the board or senior management;</p> <p>(2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.;</p> <p>(3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities,</p> <p>(4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.</p>
130	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures cover:</p> <p>(a) direct control and</p> <p>(b) indirect control of assets by designated persons;</p> <p>(c) internal processes and systems designed to detect persons who exercise direct and indirect control over assets owned by designated persons.</p>
131	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
132	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
133	Does your entity have a system to check the customer database?	
134	Does your entity have an automated system to check the customer database?	
135	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	Reference Sovereign Ordinance no. 8.664.
136	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.

C#	Question Text	Instructions
137	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	Reference Sovereign Ordinance no. 8.664.
138	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	Reference Sovereign Ordinance no. 8.664.
139	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	Reference Sovereign Ordinance no. 8.664.
140	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	Reference Sovereign Ordinance no. 8.664.
141	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	Reference Sovereign Ordinance no. 8.664.
142	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	Reference Sovereign Ordinance no. 8.664.
143	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	Reference Sovereign Ordinance no. 8.664.
144	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	Reference Sovereign Ordinance no. 8.664.
145	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	Reference Sovereign Ordinance no. 8.664.
146	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	
147	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary?	
148	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
149	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
150	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.	
151	Please provide the total value of assets frozen (in EUR) related to Terrorism Financing within the reporting period.	

C#	Question Text	Instructions
152	Please provide the total value of assets frozen (in EUR) related to financing of Proliferation of Weapons of Mass Destruction within the reporting period.	
153	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
154	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
155	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	
156	Has your entity taken any other actions related to Terrorism Financing?	
157	Has your entity taken any other actions related to financing of Proliferation of Weapons of Mass Destruction?	
<b>1.14 PEPs</b>		
158	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
159	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
160	What additional AML/CFT procedures are applied for PEPs (compared to a standard risk client)?	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: (a) before establishing a business relationship (b) during the course of a business relationship. 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.
161	Does PEP screening occur as part of the CDD process for new customers?	
162	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
163	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
164	Does screening for PEPs occur on an ongoing basis?	
165	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
166	Are PEPs subject to increased monitoring?	
167	Does your entity consider all PEP relationships as High-Risk for AML/CFT?	



C#	Question Text	Instructions
168	Does your entity always require senior management approval to onboard a Client or Beneficial Owner or beneficiary of an insurance policy that is a PEP and to continue such relationship when the Client, Beneficial Owner, or beneficiary becomes a PEP after the business relationship was established?	
<b>1.15 Suspicious Transaction Reporting</b>		
169	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)
170	Did your entity file any STRs/SARs to the FIU within the reporting period?	
171	Please provide the total number of STRs/ SARs related to Terrorism Financing that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Terrorism Financing</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
172	Please provide the total number of STRs/ SARs related to Money Laundering that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Money Laundering</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
173	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.	
174	Please provide the total number of STRs/SARs related to a Monegasque Legal Person provided to the FIU within the reporting period.	
175	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
176	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
177	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.	
178	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
179	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
180	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
181	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	
182	Did your entity respond internally to the suspicious transactions?	e.g. modification of the client relationship, modification of the client risk's assessment.

C#	Question Text	Instructions
183	Did your entity take any steps to strengthen internal controls for AML/CFT, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	
1.16 Comments & Feedback		
184	Do you have feedback related to any questions in this section?	
185	Please provide comments or feedback on this section here.	

## Instructions, Signatories

S#	Question Text	Instructions
Attestation		
1	The person or persons name(s) added here attests that she/he/they have provided accurate responses to questions, to the best of their ability.	
2	The person's name added here attests that she/he is duly authorized to represent the reporting entity and has ensured the submitted data has been adequately reviewed and is an accurate representation, to the best of their ability.	
3	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.