

Instructions: 2025 Tax and Legal Advisor 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.

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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/CPF	Anti-Money Laundering / Counter Financing of Terrorism / Counter Financing of Proliferation of Weapons of Mass Destruction
AMSF (previously SICCFIN)	Autorité Monégasque de Sécurité Financière (AMSF), The national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. https://amsf.mc
Association	For the purposes of this questionnaire, an association is a freely formed organization (group with members) that has acquired the legal personality; for example to open a bank account, enter contracts, appear in courts, buy estate, and receive donations. Refer to Monaco law n° 1.355 of 2008/12/23 for registered associations. Associations shall also include foreign associations with a similar capacity to act, specifically to open a bank account.
Beneficial Owner	Beneficial Owner is defined in Article 21 of <u>Law 1.362 of 3 August 2009 amended by law 1.503 of 23 December 2020 on the fight against money laundering, terrorist financing and corruption</u> : - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted, or - the natural person(s) who ultimately exercise effective control over a legal entity or legal arrangement.
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 used for the design, development, production or

Term	Definition
	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

Term	Definition
	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/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 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.

Term	Definition
Payment types with clients	Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity, transactions made in person, and deposit taking.
PEPs	PEPs are individuals who are or have been entrusted with prominent public functions, for example, Heads of State or government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials. The PEP regime in Monaco applies to all PEPs, both domestic and foreign.
Primary Nationality	For the purposes of this questionnaire, an individual with multiple nationalities should be reported as having a primary nationality, which should be based on the following ordering: nationality of birth country, nationality that is their country of residence, other nationality.
Resident	For the purpose of this questionnaire, a resident is a Natural Person who is a Monégasque or who has a legal right to work and live in Monaco.
Non-Resident	For the purpose of this questionnaire, a non-resident is a Natural Person who is a non- Monégasque national and does not have residency in Monaco.
Senior management	Senior management is an officer or employee with sufficient knowledge of the institution's money laundering and terrorist financing risk exposure and with sufficient seniority to take decisions affecting its risk exposure, and who need not, in all cases, be a member of the board of directors.
SICCFIN (now AMSF)	Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN) is the national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption.
Sports agent	A sports agent is any person who, whether occasionally or habitually and in consideration of remuneration, brings interested parties together to make a contract, either for the paid exercise of a sporting activity, or for the agreement of an employment contract for the paid exercise of a sporting or training activity.
TFS	Targeted Financial Sanctions
Trust and Company Service Providers	Trust and Company Service Providers refers to all persons or businesses that are not covered elsewhere, and which as a business, provide any of the following services to third parties: <ul style="list-style-type: none"> • Acting as an agent in the creation or establishment of legal persons • 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

Term	Definition
	<ul style="list-style-type: none"> • 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 Subject To Law n° 1.362		
Q1	<p>Does your entity meet any of the following conditions:</p> <ol style="list-style-type: none"> 1. The main activity that you carry out is subject to the provisions of law n° 1.362. 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. 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. 	Link
Q2	Please specify the reason why no activity was carried out during the reporting period.	(when no is answered above)
1.2 Clients Summary		
Q3	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"> • 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 <p>Any other situation where the same client would be double counted, please consider as one client</p>
Q4	<i>Total number of clients</i>	Auto-calculated field
Q5	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.
Q6	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.
Q7	Do you have the authorization legally to represent your client for a transaction?	i.e. does it have power of attorney or a signatory right on their clients' accounts.

Q#	Question Text	Instructions
Q8	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients within the reporting period.	
Q9	Please provide the total value of funds transferred on behalf of clients (both incoming and outgoing) within the reporting period.	
1.3 Beneficial Owners		
Q10	Does your entity record Beneficial Owner information for some or all transactions?	Information relating to beneficial owners: identification details, addresses, etc.
Q11	For what transaction conditions does your entity record Beneficial Owner information?	
Q12	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). <p>This value will be validated in relation to the other answers provided to subsequent questions concerning beneficial owners.</p>
Q13	Can your entity distinguish nationality of clients' BO's?	Indicate whether or not your entity is able to make the distinction.
Q14	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. This involves breaking down beneficial owners by category and then by nationality. These questions thus cover the entire concept of beneficial ownership, in accordance with Article 14
Q15	Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality.	
Q16	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	
Q17	Can your entity distinguish BO's that have 25% or greater ownership?	

Q#	Question Text	Instructions
Q18	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	<p>of OS No. 2.318 as amended, which can be identified 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>
Q19	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q20	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.	
Q21	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.	
1.4 Distinguishing Client Types		
Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:		
Q22	Trusts?	<p>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, etc.).</p> <p>This question aims to determine what your entity is capable of doing, regardless of whether you currently have such clients.</p>
Q23	Associations?	
Q24	Other Legal Arrangements not mentioned above?	
Q25	Insurance Companies?	
Q26	HNWI's?	
Q27	Virtual Assets Service Providers (VASPs)?	
Q28	Lawyers or other Legal Professions?	
Q29	Accountants & Auditors?	
Q30	Nominee Shareholders / Directors?	
Q31	Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
Q32	Real Estate Agents?	
Q33	Dealers in Precious Metals and Stones?	
Q34	Trust and Company Service Providers?	
Q35	Multi-Family Offices?	
Q36	Single Family Offices?	
Q37	More Complex Ownership Structures?	
Q38	Cash Intensive Business (such as bars, restaurants)?	
Q39	Providers of or accept payments from Anonymous Prepaid Cards / Cards with high CDD Threshold?	
Q40	Engaged in Art and Antiques?	
Q41	Engaged in Import-Export?	

Q#	Question Text	Instructions
Q42	Dealing with High-Value Goods?	
Q43	Non-Profit Organization?	
Q44	Casinos/Gambling (including clients that are online casinos)?	
Q45	Engaged in Construction / Real Estate Development?	
Q46	Engaged in Extractive Industries (e.g. Oil and Gas)?	
Q47	Engaged in Defense/Arms, including Dual-use items for proliferation of Weapons of Mass Destruction (WMD)?	
Q48	Engaged in Yachting-related Business?	
Q49	Sports Agents or Intermediaries?	
Q50	Engaged in Fund Management?	
Q51	Holding Companies?	
Q52	Auctioneers?	
Q53	Motor Vehicle Dealers?	
Q54	Government and Public Sector?	
Q55	Engaged in Aircraft Sales / Private Jets / Charters?	
Q56	Engaged in Shipping?	
1.5 Clients - Natural Persons		
Q57	Does your entity have clients that are Natural Persons?	
Q58	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).	<p>If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person should not be counted as a Natural Person client.</p> <p>If you have a total of 2 clients, you must find 2 clients, even if the breakdown is different.</p> <p>Example:</p> <ul style="list-style-type: none"> • Individuals broken down by nationality: 2 clients → 1 Swiss, 1 Japanese • Individuals broken down by residence: 2 clients → 2 residents of Monaco <p>The total number remains the same: 2 clients.</p>
Q59	Please provide the total number of transactions with clients that are Natural Persons, both incoming and outgoing.	
Q60	Please provide the total value of funds transferred with clients that are Natural Persons, both incoming and outgoing.	
Q61	Please provide the total number of transactions on behalf of clients that are Natural Persons, both incoming and outgoing.	
Q62	Please provide the total value of funds transferred on behalf of clients that are Natural Persons, both incoming and outgoing.	

Q#	Question Text	Instructions
1.6 Clients - Legal Persons		
Q63	Does your entity have clients that are Legal Persons?	
Q64	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
Q65	Please provide the total number of transactions with clients that are Legal Persons, both incoming and outgoing.	
Q66	Please provide the total value of funds transferred with clients that are Legal Persons, both incoming and outgoing, in EUR.	
Q67	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Legal Persons.	
Q68	Please provide the total value of funds transferred on behalf of clients that are Legal Persons, both incoming and outgoing, in EUR.	
Q69	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	
Q70	Please provide the number of Monegasque Legal Persons as clients, by type.	<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 • Trusts • Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person
1.7 Clients - Trusts		
Q71	Does your entity have clients that are Trusts?	
Q72	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
Q73	Please provide the total number of transactions (both incoming and outgoing) with clients that are Trusts.	
Q74	Please provide the total value of funds transferred with clients that are Trusts, (both incoming and outgoing).	
Q75	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Trusts.	

Q#	Question Text	Instructions
Q76	Please provide the total value of funds transferred on behalf of clients that are Trusts, (both incoming and outgoing).	
Q77	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q78	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.	
1.8 Clients - Associations		
Q79	Does your entity have clients that are Associations?	
Q80	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
Q81	Does your entity have information related to the number and value of their transactions?	
Q82	Please provide the total number of transactions (both incoming and outgoing) with clients that are Associations.	
Q83	Please provide the total value of funds transferred with clients that are Associations, both incoming and outgoing.	
Q84	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Associations.	
Q85	Please provide the total value of funds transferred on behalf of clients that are Associations, both incoming and outgoing.	
1.9 Clients - Other Legal Arrangements		
Q86	Does your entity have clients that are Other Legal Arrangements?	
Q87	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
Q88	Does your entity have information related to the number and value of their transactions?	
Q89	Please provide the total number of transactions (both incoming and outgoing) with clients that are Other Legal Arrangements.	
Q90	Please provide the total value of funds transferred with clients that are Other Legal Arrangements, both incoming and outgoing.	
Q91	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Other Legal Arrangements.	
Q92	Please provide the total value of funds transferred on behalf of clients that are Other Legal Arrangements, both incoming and outgoing.	

Q#	Question Text	Instructions
Q93	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.10 HNWI's and UHNWI's		
Q94	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?	HNWI: > 5 million. UHNWI: > 50 million. A UNHWI is necessarily an HNWI. In STRIX, a UNHWI must be counted in both the HNWI and UHNWI categories.
Q95	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).	
Q96	Please provide the total number of transactions (both incoming and outgoing) with clients that are HNWIs or individuals belonging to a HNW Group.	
Q97	Please provide the total value of funds transferred with clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
Q98	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are HNWIs or individuals belonging to a HNW Group.	
Q99	Please provide the total value of funds transferred on behalf of clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
Q100	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.	
Q101	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.	
Q102	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 / Legal Arrangements that are clients?	HNWI: > 5 million. UHNWI: > 50 million. A UNHWI is necessarily an HNWI. In STRIX, a UNHWI must be counted in both the HNWI and UHNWI categories.
Q103	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).	
Q104	Please provide the total number of transactions (both incoming and outgoing) with clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q105	Please provide the total value of funds transferred with clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	

Q#	Question Text	Instructions
Q106	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q107	Please provide the total value of funds transferred on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
Q108	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.	
Q109	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.	
1.11 Politically Exposed Persons (PEPs)		
Q110	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
Q111	Please provide the total number of unique clients that are PEPs, broken down by residency of the PEP (including domestic clients).	
Q112	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q113	Please provide the total number of transactions with clients that are PEPs, both incoming and outgoing.	
Q114	Please provide the total value of funds transferred with clients that are PEPs, both incoming and outgoing.	
Q115	Please provide the total number of transactions on behalf of clients that are PEPs, both incoming and outgoing.	
Q116	Please provide the total value of funds transferred on behalf of clients that are PEPs, both incoming and outgoing.	
Q117	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
Q118	Please provide the total number of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by 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
1.12 Virtual Asset Service Providers		
Q119	Does your entity have clients that are VASPs?	
Q120	Please provide the total number of unique clients that are VASPs.	
Q121	Please provide the total number of transactions (both incoming and outgoing) with clients that are VASPs.	
Q122	Please provide the total value of funds transferred with clients that are VASPs (both incoming and outgoing).	
Q123	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are VASPs.	
Q124	Please provide the total value of funds transferred on behalf of clients that are VASPs (both incoming and outgoing).	
Q125	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
Q126	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
Q127	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
Q128	Please provide the total number of transactions with of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q129	Please provide the total value of funds transferred with VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q130	Please provide the total number of transactions on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q131	Please provide the total value of funds transferred on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q132	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q133	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q134	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
Q135	Please provide the total number of transactions with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
Q136	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
Q137	Please provide the total number of transactions on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers

Q#	Question Text	Instructions
Q138	Please provide the total value of funds transferred on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
Q139	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO
Q140	Does your entity have clients that are Initial Coin Offering Providers?	ICO
Q141	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
Q142	Please provide the total number of transactions with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q143	Please provide the total value of funds transferred with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q144	Please provide the total number of transactions on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q145	Please provide the total value of funds transferred on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q146	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	Other Services
Q147	Does your entity have clients that are engaged in Other VASP Services?	Other Services
Q148	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services
Q149	Please provide the total number of transactions with VASP clients related to Other Services (both incoming and outgoing).	Other Services
Q150	Please provide the total value of funds transferred with VASP clients that provide Other Services (both incoming and outgoing).	Other Services
Q151	Please provide the total number of transactions on behalf of VASP clients related to Other Services (both incoming and outgoing).	Other Services
Q152	Please provide the total value of funds transferred on behalf of VASP clients that provide Other Services (both incoming and outgoing).	Other Services
Q153	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
1.13 2nd Nationalities		
Q154	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
Q155	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).	

Q#	Question Text	Instructions
Q156	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.	
Q157	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.	
Q158	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.	
1.14 Lawyers and other Legal Professions		
Q159	Does your entity have clients that are Lawyers and Other Legal Professions?	
Q160	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
1.15 Accountants & Auditors		
Q161	Does your entity have clients that are Accountants & Auditors?	
Q162	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
1.16 Nominee Shareholders / Directors		
Q163	Does your entity have clients that are Nominee Shareholders / Directors?	
Q164	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
1.17 Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments		
Q165	Does your entity have clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
Q166	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
1.18 Real Estate Agents		
Q167	Does your entity have clients that are Real Estate Agents?	
Q168	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
1.19 DPMS		
Q169	Does your entity have clients that are Dealers in Precious Metals and Stones?	
Q170	Please provide the total number of Monegasque unique clients that are DPMS.	

Q#	Question Text	Instructions
1.20 TCSPs		
Q171	Does your entity have clients that are Trusts and Corporate Service Providers?	
Q172	Please provide the total number of Monegasque unique clients that are TCSPs.	
1.21 Single-Family Offices and Multi-Family Offices		
Q173	Does your entity have clients that are Multi-Family Offices?	
Q174	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
Q175	Does your entity have clients that are Single-Family Offices?	
Q176	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
1.22 More Complex Ownership Structures		
Q177	Does your entity have clients that are More Complex Ownership Structures?	
Q178	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
1.23 Cash Intensive Businesses		
Q179	How does your entity define a Cash Intensive Business?	
Q180	Does your entity have clients that are Cash Intensive Businesses?	
Q181	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
1.24 Prepaid Cards		
Q182	Does your entity have clients that are providers of or accept payments from Anonymous Prepaid Cards with high CDD Threshold?	
Q183	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.	
1.25 Art and Antiques		
Q184	Does your entity have clients that are engaged in Art and Antiques?	
Q185	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
1.26 Import-Export		
Q186	Does your entity have clients that are engaged in Import-Export?	
Q187	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	

Q#	Question Text	Instructions
1.27 High-Value Goods		
Q188	Does your entity have clients that are High-Value Goods?	
Q189	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
1.28 NPOs		
Q190	Does your entity have clients that are Non-Profit Organizations?	
Q191	Please provide the total number of Monegasque unique clients that are NPOs.	
1.29 Casinos / Gambling		
Q192	Does your entity have clients that are Casinos/Gambling?	
Q193	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
1.30 Construction / Real Estate Development		
Q194	Does your entity have clients that are engaged in Construction / Real Estate Development?	
Q195	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
1.31 Extractive Industries (e.g. Oil and Gas)		
Q196	Does your entity have clients that are engaged in Extractive Industries?	
Q197	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
1.32 Defense / Arms		
Q198	Does your entity have clients that are engaged in Defense / Arms?	
Q199	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
1.33 Yachting-Related Business		
Q200	Does your entity have clients that are engaged in Yachting related business?	
Q201	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
1.34 Sports Agents and Intermediaries		
Q202	Does your entity have clients that are Sports Agents or Intermediaries?	
Q203	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
1.35 Fund Management		
Q204	Does your entity have clients that are engaged in Fund Management?	
Q205	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	

Q#	Question Text	Instructions
1.36 Holding Companies		
Q206	Does your entity have clients that are Holding Companies?	
Q207	Please provide the total number of Monegasque unique clients that are Holding Companies.	
1.37 Auctioneers		
Q208	Does your entity have clients that are Auctioneers?	
Q209	Please provide the total number of Monegasque unique clients that are Auctioneers.	
1.38 Motor Vehicle Dealers		
Q210	Does your entity have clients that are Motor Vehicle Dealers?	
Q211	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
1.39 Government and Public Sector		
Q212	Does your entity have clients that are Government and Public Sector?	
Q213	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
1.40 Aircraft Sales / Private Jets / Charters		
Q214	Does your entity have clients that are engaged in Aircraft Sales / Private Jets / Charters?	
Q215	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
1.41 Shipping		
Q216	Does your entity have clients that are engaged in Shipping?	
Q217	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
1.42 Comments & Feedback		
Q218	Do you have feedback related to any questions in this section?	
Q219	Please provide comments or feedback on this section here.	
2 Products & Services Risk		
2.1 Payments On Behalf of 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.		
Q220	Does your entity accept or make Cheque transactions with clients?	
Q221	Did your entity accept or make payments by Cheque with clients within the reporting period?	
Q222	Please provide the total number of Cheque transactions with clients, both incoming and outgoing.	
Q223	Please provide the total value of Cheque transactions with clients within the reporting period, both incoming and outgoing.	

Q#	Question Text	Instructions
2.2 Direct Payments with Clients - Electronic Transfers		
Q224	Does your entity accept or make Electronic Transfers with 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.
Q225	Did your entity accept or make payments by Electronic Transfers with clients within the reporting period?	
Q226	Please provide the total number of Electronic Transfers with clients, both incoming and outgoing.	
Q227	Please provide the total value of Electronic Transfers with clients within the reporting period, both incoming and outgoing.	
Q228	Does your entity accept Credit Card transactions with clients?	
Q229	Did your entity accept or make payments by Credit Card with clients within the reporting period?	
Q230	Please provide the total number of Credit Card transactions with clients, both incoming and outgoing.	
Q231	Please provide the total value of Credit Card transactions with clients within the reporting period, both incoming and outgoing.	
2.3 Direct Payments with Clients – Cash		
Q232	Does your entity accept or make Cash transactions with clients?	
Q233	Did your entity accept or make Cash payments with clients within the reporting period?	
Q234	Please provide the total number of cash transactions with clients, within the reporting period.	
Q235	Please provide the total value of funds transferred, cash payments with clients in the reporting period, both incoming and outgoing.	
Q236	Please provide the total value of funds transferred with clients, cash payments in currency other than EUR, during the reporting period.	
Q237	Please provide the total number of single cash transactions of 10,000 EUR and above with clients (both incoming and outgoing) within the reporting period.	
Q238	Can your entity distinguish cash transactions with clients above EUR 100,000 in your record keeping?	
Q239	Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q240	Number of physical cash transactions with Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q241	Number of physical cash transactions with Foreign Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	

Q#	Question Text	Instructions
2.4 Direct Payments with Clients – Summary		
Q242	Sum of # Transactions with clients	Auto-calculated field
Q243	# Transactions with clients (Repeat of Q5)	Repeat field, used for data validation
Q244	Sum of Value Transactions with clients	Auto-calculated field
Q245	Value Transactions with clients (repeat of Q6)	Repeat field, used for data validation
2.5 Payments On Behalf of Clients - Cheques		
Payments on behalf of clients: questions in these subsections concern payments made or received by the entity in the course of delivering its products or services, where the entity executes or intermediates payments for the benefit of clients, including cases of indirect client involvement.		
Q246	Does your entity accept or make Cheque transactions on behalf of clients?	For example, payments made into or out of the represented person's accounts using cheques.
Q247	Did your entity accept or make payments by Cheque on behalf of clients within the reporting period?	
Q248	Please provide the total number of Cheque transactions on behalf of clients, both incoming and outgoing.	
Q249	Please provide the total value of Cheque transactions on behalf of clients within the reporting period, both incoming and outgoing.	
2.6 Payments On Behalf of Clients - Electronic Transfers		
Q250	Does your entity accept or make Electronic Transfers on behalf of 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.
Q251	Did your entity accept or make payments by Electronic Transfers on behalf of clients within the reporting period?	
Q252	Please provide the total number of Electronic Transfers on behalf of clients, both incoming and outgoing.	
Q253	Please provide the total value of Electronic Transfers on behalf of clients within the reporting period, both incoming and outgoing.	
Q254	Does your entity accept Credit Card transactions on behalf of clients?	
Q255	Did your entity accept or make payments by Credit Card on behalf of clients within the reporting period?	
Q256	Please provide the total number of Credit Card transactions on behalf of clients, within the reporting period.	
Q257	Please provide the total value of Credit Card transactions on behalf of clients, within the reporting period.	
2.7 Payments On Behalf of Clients – Cash		
Q258	Does your entity accept or make Cash transactions on behalf of clients?	
Q259	Did your entity accept or make Cash payments on behalf of clients within the reporting period?	

Q#	Question Text	Instructions
Q260	Please provide the total number of cash transactions on behalf of clients, within the reporting period.	
Q261	Please provide the total value of funds transferred on behalf of clients, Cash payments in the reporting period, both incoming and outgoing.	
Q262	Please provide the total value of funds transferred on behalf of clients, Cash payments in foreign currency, during the reporting period, both incoming and outgoing.	
Q263	Please provide the total number of single cash transactions of 10,000 EUR and above on behalf of clients (both incoming and outgoing) within the reporting period.	
Q264	Can your entity distinguish cash transactions on behalf of clients above EUR 100,000 in your record keeping?	
Q265	Number of physical cash transactions on behalf of Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q266	Number of physical cash transactions on behalf of Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q267	Number of physical cash transactions on behalf of Foreign Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
2.8 Payments On Behalf of Clients – Summary		
Q268	<i>Sum of # Transactions on behalf of clients</i>	Auto-calculated field
Q269	<i># Transactions on behalf of clients (repeat of Q8)</i>	Repeat field, used for data validation
Q270	<i>Sum of Value Transactions on behalf of clients</i>	Auto-calculated field
Q271	<i>Value Transactions on behalf of clients (repeat of Q9)</i>	Repeat field, used for data validation
2.9 Virtual Currencies		
Q272	Do you have clients that use cryptocurrencies?	
Q273	Please provide the total number of Virtual Assets transactions with or on behalf of clients, both incoming and outgoing.	<p>In any of the following forms:</p> <ul style="list-style-type: none"> 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 <p>This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).</p>
Q274	Please provide the value of funds transferred using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
Q275	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.

Q#	Question Text	Instructions
Q276	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q277	Please name the Virtual Asset Platforms or Intermediaries with which your entity has business relationships.	
2.10 Tax Services Offered		
Q278	Are you providing tax advisory services?	
Q279	Do you provide tax advice to Individuals?	
Q280	Do you provide tax advice to Individuals that are Monegasque residents?	
Q281	Do you provide tax advice to Individuals that are not Monegasque residents?	
Q282	Do you provide tax advice to Legal Persons?	
Q283	Do you provide tax advice to Monegasque Legal Persons?	
Q284	Do you provide tax advice to Legal Persons established outside of Monaco?	
Q285	Do you provide tax advice to Foundations?	
Q286	Do you provide tax advice to Associations?	
Q287	Do you provide tax advice to Trusts and Other Legal Arrangements?	
Q288	Do you provide tax advice to Legal Arrangements established outside of Monaco?	
Q289	Please provide the top three tax advice topics by estimation of percentage of total tax advice given.	
2.11 Legal Services Offered		
Q290	Are you providing legal advisory services?	
Q291	Do you create companies on behalf of your clients?	
Q292	Do you provide advice for buying or selling of Real Estate?	
Q293	Do you provide advice for managing funds, interests or other assets?	
Q294	Do you provide advice for managing current or investment accounts with banks?	
Q295	Do you provide advice for managing cryptocurrencies?	
Q296	Do you provide advice for the creation, management, or administration of Legal Persons?	
Q297	Do you create, manage, or administer Legal Persons?	
Q298	Do you provide advice for domiciliation?	
Q299	Do you participate in sale or takeover of businesses?	
Q300	Do you provide advice for the creation or administration or management of any type of foundations?	
Q301	Do you provide advice for the creation or administration or management of any type of associations?	
Q302	Do you provide advice for the creation or administration or management of any type of trusts and Other Legal Arrangements?	

Q#	Question Text	Instructions
2.12 Comments & Feedback		
Q303	Do you have feedback related to any questions in this section?	
Q304	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q305	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.
Q306	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.	
Q307	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q308	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.
Q309	Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party.	
3.2 Onboarding		
Q310	Did your entity onboard clients within the reporting period?	These questions refers to new unique clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q311	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	
Q312	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	
Q313	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	
Q314	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	
Q315	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.
Q316	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	
Q317	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	

Q#	Question Text	Instructions
Q318	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	
Q319	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
Q320	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.
Q321	Can the entity provide client nationality information for clients onboarded through introducers?	
Q322	Can the entity provide introducers residency information?	
Q323	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).	Reporting Period.
Q324	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.	Reporting Period.
Q325	Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Reporting Period.	Validate your inputs , when correctly entered, the total between these should be '0'. If this is not the case, please modify your answers.
Q326	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.
Q327	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.
Q328	<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.
3.3 Structure		
Q329	Does your entity mainly Identify as Tax Advisor or Legal Advisor?	If performing both select the primary business.
Q330	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.

Q#	Question Text	Instructions
Q331	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".
Q332	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
Q333	Is your entity a Branch or Subsidiary of an Other Entity?	
Q334	Is your entity a Branch or Subsidiary of a Foreign Entity?	
Q335	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
Q336	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q337	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)	
Q338	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.	
Q339	Within the reporting period, has your entity experienced any of the following:	<ul style="list-style-type: none"> • A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders (25% or greater shareholding), beneficial owners, 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?
Q340	Please indicate the development or modification.	
3.4 Entity Finances		
Q341	Turnover for the reporting period.	
Q342	Turnover for the reporting period realized in the Principality of Monaco.	
Q343	Turnover for the reporting period realized outside the Principality of Monaco.	
Q344	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		
Q345	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	

Q#	Question Text	Instructions
Q346	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		
Q347	Did you reject block / reject any client transactions (incoming or outgoing) due to concerns about ML/TF/PF during the reporting period?	
Q348	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	
3.7 Terminated Relationships		
Q349	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q350	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
3.8 Comments & Feedback		
Q351	Do you have feedback related to any questions in this section?	
Q352	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 Q330.</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 charge of AML/CFT/CPF compliance within 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	Is your entity part of a Group?	
C9	Does your entity have a board and/or senior management?	<p>This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility.</p> <p>Examples of a board or senior management, would be an entity having:</p> <ul style="list-style-type: none"> • Chief Officers (CEO, CFO, CTO...) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual

C#	Question Text	Instructions
		<ul style="list-style-type: none"> A legal requirement for a board or specific role needed to achieve compliance <p>Examples of an entity that does not have a board or senior management:</p> <ul style="list-style-type: none"> A sole proprietor A partnership A small business with a single layer of management
C10	Do you use external service providers for AML/CFT/CPF?	
C11	What is the purpose of your contract with these external service providers?	
C12	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.	
C13	Approximately how many hours do external service providers spend each month on AML/CFT/CPF compliance?	
1.2 Policies & Procedures		
C14	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.
C15	Were these policies and procedures approved by the board and/or 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).
C16	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C17	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.
C18	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C19	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C20	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.
C21	Does your entity have a group-wide AML/CFT/CPF programme?	
C22	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?	

C#	Question Text	Instructions
C23	Who prepared your entity's Policies and Procedures?	<p>The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors?</p> <p>Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.</p>
C24	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
C25	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)	
C26	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C27	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C28	Does the board and/or senior management of your entity demonstrate overall responsibility for AML/CFT/CPF?	<p>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:</p> <p>(1) senior management includes AML/CFT/CPF 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/CPF matters whenever issues arise; 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>

C#	Question Text	Instructions
		<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>
C29	<p>Does the board and/or senior management of your entity regularly receive AML/CFT/CPF reports?</p>	<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>
C30	<p>Does the board and/or senior management of your entity ensure that AML/CFT/CPF shortcomings are rectified?</p>	<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>
C31	<p>Does the senior management of your entity review (give approval) for taking on high-risk clients?</p>	<p>In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.</p>

C#	Question Text	Instructions
1.4 Compliance & Violations		
C32	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.
C33	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.
C34	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C35	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C36	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C37	Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period?	
C38	Please provide the total number of persons trained on AML/CFT/CPF matters in Reporting Cycle.	
C39	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?	
C40	Provide the estimated average number of hours per person spent on Initial Training.	
C41	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
C42	Provide the number of staff that have received Refresher Training within the reporting period.	
C43	Provide the estimated average number of hours per person spent on Refresher Training.	
C44	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters within the reporting period.	
C45	Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)?	
C46	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C47	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	
C48	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C49	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	

C#	Question Text	Instructions
C50	Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member?	
C51	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C52	What other AML/CFT/CPF training/awareness raising activities did it include?	
C53	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C54	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
C55	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
C56	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
C57	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C58	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C59	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C60	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C61	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C62	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C63	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C64	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C65	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C66	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C67	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	

C#	Question Text	Instructions
1.6 CDD		
C68	<p>Does your entity record all of the following in your customer database:</p> <ul style="list-style-type: none"> • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence • Tax Residence • Activity • Source of Wealth • Source of Funds 	
C69	Please specify which items are not collected?	
C70	<p>Does the entity's database contain all of the following information, 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 • Beneficiary of a Trust or other Legal Arrangement • Founders • Donors • Person who directly or indirectly exercises control of the foundation • Protector • More Complex Ownership Structures • Introducers 	
C71	<p>Does the entity's database contain all of the following information, 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 	
C72	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".
C73	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

C#	Question Text	Instructions
		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?
C74	Please specify what other information is included in your database.	
C75	Is past 5 years of client relationship data accessible by AMSF upon request?	
C76	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C77	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C78	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)
C79	Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period.	Please repeat the answer provided in Q4.
C80	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C81	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C82	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C83	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C84	Did you select "Trigger Event" in the previous question?	
C85	Please name all trigger events for ongoing due diligence done on clients classified as High-Risk for ML/FT.	
C86	Does your entity examine the source of wealth of high-risk clients before customer take-on?	
C87	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C88	Please specify other measures taken for high-risk clients, before customer take-on.	

C#	Question Text	Instructions
C89	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C90	What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity?	
C91	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
C92	How does the company verify the Beneficial Owners of Virtual Assets?	
C93	Does your entity ever rely on third parties to collect CDD information about clients?	
C94	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?	
C95	Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed?	
C96	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).	
C97	Does the evolution of the clients services requested contribute to the identification of red flags?	
1.7 EDD		
C98	Did you apply enhanced due diligence measures to clients during the reporting period?	
C99	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C100	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C101	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.
C102	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C103	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		
C104	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C105	How many AML/CFT/CPF risk levels does your entity have for clients?	
C106	Did you have clients presenting a high risk in terms of AML/CFT during the reporting period?	

C#	Question Text	Instructions
C107	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C108	Do you have clients whose risk level has not yet been determined?	
C109	Please provide the total number of unique clients that are without a risk level determined yet.	
C110	Does your entity's High-Risk assignment considerations include ALL of the following: <ul style="list-style-type: none"> • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types • Distribution Channels 	
C111	Please specify which items are not considered?	
C112	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
C113	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
C114	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C115	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)
C116	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C117	What client activities does your entity associate with High-Risk clients?	
C118	Does your entity consider ML and TF risks separately?	(entity's own assessment)
C119	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
1.9 Audit / Controls		
C120	When did your entity last have a SICCFIN/AMSF audit?	
C121	Has your entity had an on-site AMSF audit?	
C122	Date of last AMSF on-site audit.	
C123	Did your entity have any Other Audits not mentioned above?	(AML/CFT/CPF related audits only)
C124	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		
C125	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C126	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C127	Please describe the specific controls and procedures for cash transactions your entity applies.	

C#	Question Text	Instructions
1.11 Monitoring		
C128	Do you have the authorization legally to represent your client for a transaction?	Please repeat the answer provided in Q7.
C129	Have you rejected transactions due to insufficient originator or beneficiary information?	
C130	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	
C131	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	
C132	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
C133	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	
1.12 Record Keeping		
C134	Does your entity keep transaction records for at least 5 years?	
C135	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C136	Does your entity keep these records and documents in a safe and secure place?	
C137	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.
C138	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	

C#	Question Text	Instructions
1.13 Targeted Financial Sanctions (TFS)		
C139	Do entity's policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements.</p> <p>Policies and procedures should cover targeted financial sanctions-related requirements of at least the following:</p> <p>(a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons;</p> <p>(b) Frequency and scope of screening;</p> <p>(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).</p>
C140	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>
C141	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	
C142	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	

C#	Question Text	Instructions
C143	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C144	Does your entity have a system to check the customer database?	
C145	Does your entity have an automated system to check the customer database?	
C146	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	
C147	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	
C148	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	
C149	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	
C150	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	
C151	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	
C152	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	
C153	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	
C154	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	
C155	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	
C156	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	
C157	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	
C158	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary?	
C159	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of	

C#	Question Text	Instructions
	Weapons of Mass Destruction within the reporting period.	
C160	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
C161	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.	
C162	Please provide the total value of assets frozen (in EUR) related to Terrorism Financing within the reporting period.	
C163	Please provide the total value of assets frozen (in EUR) related to financing of Proliferation of Weapons of Mass Destruction within the reporting period.	
C164	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C165	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
C166	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	
C167	Has your entity taken any other actions related to Terrorism Financing?	
C168	Has your entity taken any other actions related to financing of Proliferation of Weapons of Mass Destruction?	
1.14 Politically Exposed Persons (PEPs)		
C169	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C170	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
C171	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>
C172	Does PEP screening occur as part of the CDD process for new customers?	

C#	Question Text	Instructions
C173	Did you enter into any relationships with PEPs during the reporting period?	
C174	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C175	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C176	Does screening for PEPs occur on an ongoing basis?	
C177	Among your clientele, are there any individuals who became PEPs during the course of the business relationship during the reporting period?	
C178	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C179	Are PEPs subject to increased monitoring?	
C180	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C181	Does your entity always require senior management approval to onboard a Client or Beneficial Owner or beneficiary of an insurance policy that is a PEP and to continue such relationship when the Client, Beneficial Owner, or beneficiary becomes a PEP after the business relationship was established?	
1.15 Suspicious Transaction Reporting		
C182	Is your entity registered with goAML?	
C183	Please describe why.	
C184	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C185	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)
C186	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C187	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C188	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).
C189	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).
C190	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	

C#	Question Text	Instructions
C191	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.	
C192	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.
C193	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C194	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C195	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.	
C196	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C197	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
C198	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
C199	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.	
C200	Please provide the total number of unsuccessful transactions attempts reported to the FIU, within the reporting period.	
C201	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.
C202	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		
C203	Do you have feedback related to any questions in this section?	
C204	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.