

## Instructions: Insurance Agents and Brokers AML/ CFT Survey 2025

This document provides the definitions and instructions that will help an obliged entity in completing the AML/CFT Risk Assessment Information Request. There are five tabs to be completed: 1) Customer Risk, 2) Products, Services, & Transactional Risk, 3) Distribution Channel Risk, 4) Controls and Quality of Risk Mitigation, 5) Signatories. The questionnaire should be completed in full. The questionnaire may be submitted incomplete when all information on the last tab has been provided, including the reason for submitting incomplete. Failure to provide required information may result in enhanced oversight or other action.

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

- Responses must include all products or services offered to customers that fall within the scope of the AML/CFT regulations in force in Monaco.
- The reporting period is 1<sup>st</sup> January 2024 to 31<sup>th</sup> December 2024.
- Questions related to number of clients shall include clients that are active at the end of the reporting period and clients that were at some point active during the reporting period.
- The term “unique clients” denotes that while a client might have several accounts it should only be counted as one client.
- Questions related to number or value of transactions are relevant for activity performed within the reporting period.
- Questions related to number or value of transactions that are by and on behalf of clients should capture the instances when the reporting entity (1) prepares transactions for clients and instances when the reporting entity (2) carries out transactions on behalf of clients.
- All questions to provide monetary values require an answer in EUR. Only value questions are indicated with the currency symbol € in the survey.
- All questions asking for responses with country breakdown are ISO 3166-1 Country Names or can be answered with the Bulk-paste feature when using country names, or the ISO 2-alpha, 3-alpha, and 3-numeric codes. A link to the acceptable country names and codes exists on the Bulk-paste popup window. This window is accessible for questions having the symbol ⓘ.
- If the nationality, residency, or other requested breakdown is unknown, please select “Unknown” from the dropdown.
- For questions related to legal entity / profession type and business classification types, NIS or NACE code systems may be used, or alternative equivalent. For questions relating to classification types but not specified by the entity’s sector classification system used, please refer to industry practices.
- Responses provided in the survey shall be for the reporting entity only, and should not include any group totals.
- If data is not available, do not enter ‘0’, leave blank and provide a reason for incompleteness. Only enter ‘0’ when there is zero of that activity.

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## Glossary

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

Term	Definition
	<p>(a) money market instruments (cheques, bills, certificates of deposit, derivatives etc.);</p> <p>(b) foreign exchange;</p> <p>(c) exchange, interest rate and index instruments;</p> <p>(d) transferable securities;</p> <p>(e) commodity futures trading.</p> <p>8. Participation in securities issues and the provision of financial services related to such issues.</p> <p>9. Individual and collective portfolio management.</p> <p>10. Safekeeping and administration of cash or liquid securities on behalf of other persons.</p> <p>11. Otherwise investing, administering or managing funds or money on behalf of other persons.</p> <p>12. Underwriting and placement of life insurance and other investment-related insurance.</p> <p>13. Money and currency changing.</p>
Foreign Residents	For the purpose of this questionnaire, is a non-Monégasque national that is a resident in Monaco.
Government / Public Sector	Government/public entity is an organization or body providing services to the public on behalf of the government or another public entity.
High Net Worth Individual (HNWI)	For the purposes of this survey, a High-Net-Worth-Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million.
High Net Worth (HNW) Group	For the purposes of this survey, a HNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 5 million.
Holding Company	A holding company is a financial vehicle for owning and controlling other assets, such as real estate, stocks, or companies. Using a holding company creates legal separation between the assets and the owners.
Legal Arrangement	A relationship established by means of a contract between two or more parties that do not result in the creation of a legal personality such as Trusts or other similar arrangements. Examples of other similar arrangements (for AML/CFT purposes) include fiducie, treuhand and fideicomiso.
Legal Person	Legal persons refer to any entities other than natural persons that can establish a permanent customer relationship with a financial institution or otherwise own property. This can include companies, corporate bodies, foundations, institute, partnerships, or associations and other relevantly similar entities.
ML / TF / PF	Money Laundering / Terrorist Financing / Financing the Proliferation of Weapons of Mass Destruction
Money or value transfer services (MVTs)	Money or value transfer services (MVTs) refers to financial services that involve the acceptance of cash, cheques, other monetary instruments or other stores of value and the payment of a corresponding sum in cash or other forms to a beneficiary by means of communication, message, transfer, or through a clearing network to which the MVTs provider belongs.
More Complex Ownership Structure	For the purposes of this survey, a More Complex Ownership Structure refers to clients in which the reporting entity has increased effort or difficulty in independently verifying the identity of the Beneficial Owner of the customer. For this survey, More Complex Ownership Structures are structures with 3 or more layers of ownership between the Account Holder and the Beneficial Owner, or, structures that are less than 3 layers of ownership but that are difficult to verify the Beneficial Owner due to obscurity or obfuscation, such as when information is not publicly accessible, lacks transparency, involves a foreign company or trust,

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

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



## Instructions, Inherent Risk

Q#	Question Text	Instructions
1 Customer Risk		
1.1 Subject To Law n° 1.362		
1	<p>Does your entity meet any of the following conditions:</p> <ol style="list-style-type: none"> <li>1. The main activity that you carry out is subject to the provisions of law n° 1.362.</li> <li>2. The activity that you carry out subject to the provisions of law n° 1.362 represents more than 5% of your company's overall turnover.</li> <li>3. The activity that you carry out subject to the provisions of law n° 1.362 is performed exclusively for customers of your main activity.</li> </ol>	<p><b>Activities subject to:</b></p> <p>Insurance intermediaries, agents and brokers established in the Principality only when life insurance or other forms of insurance linked to investments are involved.</p>
1.2 Clients Summary		
2	<p>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>	<p>If multiple primary nationalities, enter the one most commonly used.</p> <p>If the nationality is unknown, please select "Unknown" from the dropdown.</p> <p>For questions referring to 'unique client', please consider:</p> <ul style="list-style-type: none"> <li>• If the same client has several accounts, then it is considered one client</li> <li>• If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client</li> <li>• Any other situation where the same client would be double counted, please consider as one client</li> </ul>
3	<p>Please provide the total number of transactions related to premiums paid by clients within the reporting period.</p>	
4	<p>Please provide the total value of premiums paid by clients within the reporting period.</p>	
1.3 Beneficial Owners		
5	<p>Can your entity distinguish nationality of clients' BO's?</p>	
6	<p>Provide the percentage breakdown of primary nationalities of Beneficial Owners.</p>	<p>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.</p>
7	<p>Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality.</p>	<p>The information requested is in relation to number of Beneficial Owners which have direct or indirect control of clients that are legal persons, and trusts and other legal arrangements.</p>
8	<p>Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.</p>	<p>The information requested is in relation to number of Beneficial Owners which represent clients that are legal persons, and trusts and other legal arrangements.</p>

Q#	Question Text	Instructions
9	Can your entity distinguish BO's that have 25% or greater ownership?	
10	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	
11	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	
12	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.	
13	Please provide the total number of Beneficial Owners that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership.	
<b>1.4 Distinguishing Client Types</b>		
14	Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are: Trusts?	
15	Associations?	
16	Other Legal Arrangements not mentioned above?	
17	Insurance Companies?	
18	HNWI's?	
19	Virtual Assets Service Providers (VASPs)?	
20	Lawyers or other Legal Professions?	
21	Accountants & Auditors?	
22	Nominee Shareholders / Directors?	
23	Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
24	Real Estate Agents?	
25	Dealers in Precious Metals and Stones?	
26	Trust and Company Service Providers?	
27	Multi-Family Offices?	
28	Single Family Offices?	
29	More Complex Ownership Structures?	
30	Cash Intensive Business (such as bars, restaurants)?	
31	Providers of or accept payments from Anonymous Prepaid Cards / Cards with high CDD Threshold?	
32	Engaged in Art and Antiques?	
33	Engaged in Import-Export?	
34	Dealing with High-Value Goods?	
35	Non-Profit Organization?	
36	Casinos/Gambling (including clients that are online casinos)?	
37	Engaged in Construction / Real Estate Development?	
38	Engaged in Extractive Industries (e.g. Oil and Gas)?	
39	Engaged in Defense/Arms, including Dual-use items for proliferation of Weapons of Mass Destruction (WMD)?	

Q#	Question Text	Instructions
40	Engaged in Yachting-related Business?	
41	Sports Agents or Intermediaries?	
42	Engaged in Fund Management?	
43	Holding Companies?	
44	Auctioneers?	
45	Motor Vehicle Dealers?	
46	Government and Public Sector?	
47	Engaged in Aircraft Sales / Private Jets / Charters?	
48	Engaged in Shipping?	
1.5 Clients - Natural Persons		
49	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual (including domestic clients).	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person <b>should not</b> be counted as a Natural Person client.
50	Please provide the total number of transactions related to premiums paid by clients that are Natural Persons.	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, it <b>should not</b> be counted as a Natural Person client.
51	Please provide the total value of premiums paid by clients that are Natural Persons, in EUR.	
1.6 Clients - Legal Persons		
52	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
53	Please provide the total number of transactions related to premiums paid by clients that are Legal Persons.	
54	Please provide the total value of premiums paid by clients that are Legal Persons.	
55	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	<p>Legal Persons types include:</p> <ul style="list-style-type: none"> <li>• Commercial Partnership SNC</li> <li>• Economic Interest Group GIE</li> <li>• Joint Stock Company SAM</li> <li>• Limited Liability Companies SARL</li> <li>• Limited Partnership SCS</li> <li>• Limited Partnership with Shares SCA</li> <li>• Monegasque Foundation</li> <li>• Monegasque Associations</li> <li>• Other Civil Companies SC-Autre</li> <li>• Other Commercial Companies</li> <li>• Other Legal Arrangements</li> <li>• Private Domain of the Monegasque State</li> <li>• Property Investment Partnership SCI</li> <li>• Sole Person</li> <li>• Special Civil-law Partnership SCP</li> <li>• Trusts</li> </ul>
56	Please provide the number of Monegasque Legal Persons as clients, by type.	

Q#	Question Text	Instructions
<b>1.7 Clients - Trusts</b>		
57	Does your entity have clients that are Trusts?	
58	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
59	Please provide the total number of transactions related to premiums paid by clients that are Trusts.	
60	Please provide the total value of premiums paid by clients that are Trusts.	
61	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
62	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by country in which the trust was created.	
<b>1.8 Clients - Associations</b>		
63	Does your entity have clients that are Associations?	
64	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
65	Please provide the total number of transactions related to premiums paid by clients that are Associations.	
66	Please provide the total value of premiums paid by clients that are Associations.	
<b>1.9 Clients - Other Legal Arrangements</b>		
67	Does your entity have clients that are Other Legal Arrangements?	
68	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
69	Please provide the total number of transactions related to premiums paid by clients that are Other Legal Arrangements.	
70	Please provide the total value of premiums paid by clients that are Other Legal Arrangement.	
71	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
<b>1.10 HNWI's and UHNWI's</b>		
72	Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWI's) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an HNWI or HNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is <u>more than EUR 5 million.</u>
73	Please provide the total number of unique clients that are HNWI's or individuals belonging to a HNW Group, broken down by the primary nationality of the individual (including domestic clients).	

Q#	Question Text	Instructions
74	Please provide the total number of transactions related to premiums paid by clients that are HNWI's or individuals belonging to a HNW Group.	
75	Please provide the total value of premiums paid by clients that are HNWI's or individuals belonging to a HNW Group.	
76	Please provide the total number of <b>Beneficial Owners of Legal Person</b> clients that are HNWI's, broken down by the primary nationality of the HNWI.	
77	Please provide the total number of <b>Beneficial Owners of Trusts</b> (clients) that are HNWI's, broken down by the primary nationality of the HNWI.	
78	Please provide the total number of <b>Beneficial Owners of Other Legal Arrangements</b> clients (that are not Trusts) that are HNWI's, broken down by the primary nationality of the HNWI.	
79	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?	For the purposes of this survey, an UHNWI or UHNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is <u>more than EUR 50 million</u> .
80	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).	
81	Please provide the total number of transactions related to premiums paid by clients that are UHNWIs or individuals belonging to a UHNW Group.	
82	Please provide the total value of premiums paid by clients that are UHNWIs or individuals belonging to a UHNW Group.	
83	Please provide the total number of <b>Beneficial Owners of Legal Person</b> clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
84	Please provide the total number of <b>Beneficial Owners of Trusts</b> (clients) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
85	Please provide the total number of <b>Beneficial Owners of Other Legal Arrangements</b> clients (that are not Trusts) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.11 PEPs		
86	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
87	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
88	Please provide the total number of unique clients that are PEPs, broken down by primary nationality of the PEP (including domestic clients).	

Q#	Question Text	Instructions
89	Please provide the total number of transactions related to premiums paid by clients that are PEPs.	
90	Please provide the total value of premiums paid by clients that are PEPs, in EUR.	
91	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>
<b>1.12 Virtual Asset Service Providers</b>		
92	Does your entity have clients that are VASPs?	
93	Please provide the total number of unique clients that are VASPs.	
94	Please provide the total number of transactions related to premiums paid by clients that are VASPs.	
95	Please provide the total value of premiums paid by clients that are VASPs.	
96	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
97	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
98	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
99	Please provide the total number of transactions related to premiums paid by clients that are Custodian Wallet Providers.	Custodian Wallet Providers
100	Please provide the total value of premiums paid by VASP clients that are Custodian Wallet Providers.	Custodian Wallet Providers
101	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
102	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
103	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
104	Please provide the total number of transactions related to premiums paid by clients that are Virtual Currency Exchange Providers.	Virtual Currency Exchange Providers
105	Please provide the total value of premiums paid by VASP clients that are Virtual Currency Exchange Providers.	Virtual Currency Exchange Providers
106	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO

Q#	Question Text	Instructions
107	Does your entity have clients that are Initial Coin Offering Providers?	ICO
108	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
109	Please provide the total number of transactions related to premiums paid by clients that are ICO related service providers.	ICO
110	Please provide the total value of premiums paid by VASP clients that are ICO related service providers.	ICO
111	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	Other Services
112	Does your entity have clients that are engaged in Other VASP Services?	Other Services
113	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services
114	Please provide the total number of transactions related to premiums paid by clients related to Other Services.	Other Services
115	Please provide the total value of premiums paid by VASP clients that provide Other Services.	Other Services
116	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
<b>1.13 2nd Nationalities</b>		
117	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
118	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).	
119	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.	<p>Concerns:</p> <ul style="list-style-type: none"> <li>• Natural Person clients, and</li> <li>• Natural Persons who are Beneficial Owners having 25% ownership of Legal Person, and Trust and Other Legal Arrangement clients</li> <li>• that have more than one nationality.</li> </ul>
120	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.	
121	For Beneficial Owners that are Non-Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership.	
<b>1.14 Lawyers and other Legal Professions</b>		
122	Does your entity have clients that are Lawyers and Other Legal Professions?	



Q#	Question Text	Instructions
123	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
<b>1.15 Accountants &amp; Auditors</b>		
124	Does your entity have clients that are Accountants & Auditors?	
125	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
<b>1.16 Nominee Shareholders / Directors</b>		
126	Does your entity have clients that are Nominee Shareholders / Directors?	
127	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
<b>1.17 Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments</b>		
128	Does your entity have clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
129	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
<b>1.18 Real Estate Agents</b>		
130	Does your entity have clients that are Real Estate Agents?	
131	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
<b>1.19 DPMS</b>		
132	Does your entity have clients that are Dealers in Precious Metals and Stones?	
133	Please provide the total number of Monegasque unique clients that are DPMS.	
<b>1.20 TCSPs</b>		
134	Does your entity have clients that are Trusts and Corporate Service Providers?	
135	Please provide the total number of Monegasque unique clients that are TCSPs.	
<b>1.21 Multi-Family Offices</b>		
136	Does your entity have clients that are Multi-Family Offices?	
137	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
138	Does your entity have clients that are Single-Family Offices?	
139	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
<b>1.22 More Complex Ownership Structures</b>		
140	Does your entity have clients that are More Complex Ownership Structures?	Please refer to the definition of complex ownership structures.



Q#	Question Text	Instructions
141	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
1.23 Cash Intensive Businesses		
142	How does your entity define a Cash Intensive Business?	
143	Does your entity have clients that are Cash Intensive Businesses?	(such as bars, restaurants)
144	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
1.24 Prepaid Cards		
145	Does your entity have clients that are providers of or accept payments from Anonymous Prepaid Cards with high CDD Threshold?	
146	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		
147	Does your entity have clients that are engaged in Art and Antiques?	
148	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
1.26 Import-Export		
149	Does your entity have clients that are engaged in Import-Export?	
150	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
1.27 High-Value Goods		
151	Does your entity have clients that are High-Value Goods?	
152	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
1.28 NPOs		
153	Does your entity have clients that are Non-Profit Organizations?	
154	Please provide the total number of Monegasque unique clients that are NPOs.	
1.29 Casinos / Gambling		
155	Does your entity have clients that are Casinos/Gambling?	
156	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
1.30 Construction / Real Estate Development		
157	Does your entity have clients that are engaged in Construction / Real Estate Development?	

Q#	Question Text	Instructions
158	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)		
159	Does your entity have clients that are engaged in Extractive Industries?	
160	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
1.32 Defense / Arms		
161	Does your entity have clients that are engaged in Defense / Arms?	The reporting entity should disclose whether it has clients that are engaged in <u>Defense/Arms</u> including Dual-use items for proliferation of Weapons of Mass Destruction (WMD) to whom the reporting entity provides products or services that fall under the scope of AML/CFT regulation in Monaco.
162	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
1.33 Yachting-related Business		
163	Does your entity have clients that are engaged in Yachting related business?	
164	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
1.34 Sports Agents and Intermediaries		
165	Does your entity have clients that are Sports Agents or Intermediaries?	
166	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
1.35 Fund Management		
167	Does your entity have clients that are engaged in Fund Management?	
168	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
1.36 Holding Companies		
169	Does your entity have clients that are Holding Companies?	Holding Companies are financial vehicles for owning and controlling other assets, such as real estate, stocks, or companies.
170	Please provide the total number of Monegasque unique clients that are Holding Companies.	
1.37 Auctioneers		
171	Does your entity have clients that are Auctioneers?	
172	Please provide the total number of Monegasque unique clients that are Auctioneers.	
1.38 Motor Vehicle Dealers		
173	Does your entity have clients that are Motor Vehicle Dealers?	

Q#	Question Text	Instructions
174	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
<b>1.39 Government and Public Sector</b>		
175	Does your entity have clients that are Government and Public Sector?	
176	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
<b>1.40 Aircraft Sales / Private Jets / Charters</b>		
177	Does your entity have clients that are engaged in Aircraft Sales / Private Jets / Charters?	
178	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
<b>1.41 Shipping</b>		
179	Does your entity have clients that are engaged in Shipping?	
180	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
<b>1.42 Comments &amp; Feedback</b>		
181	Do you have feedback related to any questions in this section?	
182	Please provide comments or feedback on this section here.	
<b>2 Products &amp; Services Risk</b>		
<b>2.1 Payment Types with Clients - Cheques</b>		
183	Does your entity accept Cheque transactions with clients related to Fees and Commissions?	
184	Please provide the total number of Cheque transactions with clients related to Fees and Commissions.	
185	Please provide the total value of Cheque transactions with clients within the reporting period.	
<b>2.2 Payment Types with Clients - Electronic Transfers</b>		
186	Does your entity accept Electronic Transfers with clients related to Fees and Commissions?	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.
187	Please provide the total number of Electronic Transfers with clients related to Fees and Commissions.	
188	Please provide the total value of Electronic Transfers with clients (both incoming and outgoing) within the reporting period.	
<b>2.3 Payment Types with Clients - Cash</b>		
189	Does your entity accept cash transactions with clients related to Fees and Commissions?	
190	Please provide the total number of Cash transactions with clients related to Fees and Commissions, within the reporting period.	

Q#	Question Text	Instructions
191	Please provide the total value of funds transferred with clients related to Fees and Commissions, Cash payments within the reporting period.	
192	Please provide the total value of funds transferred with clients, cash payments in currencies other than Euro, during the reporting period, both incoming and outgoing.	
193	Please provide the total number of single cash transactions equal to or exceeding 10,000 euros with clients (both incoming and outgoing) within the reporting period.	
194	Can your entity distinguish cash transactions with clients related to Fees and Commissions above EUR 100,000 in your record keeping?	
195	Number of physical cash transactions related to Fees and Commissions with Natural Persons in excess of EUR 100.000, within the reporting period.	
196	Number of physical cash transactions related to Fees and Commissions with Monegasque Legal Persons in excess of EUR 100.000, within the reporting period.	
197	Number of physical cash transactions related to Fees and Commissions with Foreign Legal Persons in excess of EUR 100.000, within the reporting period.	
<b>2.4 Virtual Currencies</b>		
198	Do you have clients that use cryptocurrencies?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs on behalf of the client
199	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?	
200	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	This should include not only virtual assets related to payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
201	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	
<b>2.5 Insurance Agent/Broker</b>		
202	Is your entity acting as Insurance Agent?	
203	Please specify the name of the main company(ies) for which acting as an Insurance Agent.	
204	Is your entity acting as Insurance Broker?	
205	Please specify the name of companies for which acting as an Insurance Broker.	
<b>2.6 Insurance Products</b>		
206	Please indicate the percentage of turnover related to Life Insurance, Capitalization Products, IARD, and 'Other'.	
207	Does your entity provide Life Insurance products?	

Q#	Question Text	Instructions
208	Number of clients related to Life Insurance.	
209	Value of premiums – Life Insurance.	
210	Please specify Life insurance products offered within the reporting period.	
211	Does your entity provide Capitalization products?	
212	Number of clients related to Capitalization.	
213	Value of premiums – Capitalization.	
214	Please specify Capitalization products offered within the reporting period.	
215	Does your entity provide IARD products?	
216	Number of clients related to IARD.	
217	Value of premiums – IARD.	
218	Please specify IARD products offered within the reporting period.	
219	Does your entity provide Other Insurance products?	
220	Number of clients related to Other Insurance.	
221	Value of premiums – Other Insurance.	
222	Please specify Other Insurance Products offered within the reporting period.	
2.7 Comments & Feedback		
223	Do you have feedback related to any questions in this section?	
224	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
225	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.
226	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.	
227	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
228	Please provide the total number of clients which <u>Foreign Third Parties</u> were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client.	
229	Please provide the total number of clients which <u>Foreign Third Parties</u> were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party.	

Q#	Question Text	Instructions
3.2 Onboarding		
230	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	
231	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	
232	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	
233	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	
234	Does your entity onboard clients on a non-face-to-face basis, i.e. not physically present?	The reporting entity should disclose whether clients are onboarded (for CDD purposes) on a non-face-to-face basis (not physically present).
235	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	
236	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	
237	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	
238	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
239	Does your entity accept clients through Introducers?	An introducer is a Financial Institution / Designated Non-Financial Businesses and Professions who has a direct relationship with a client but delegates the financial transaction execution to another obliged entity (i.e. an introducer is a company that brings a client to the licensed entity).
240	Can the entity provide client nationality information for clients onboarded through introducers?	
241	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).	
242	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).	
243	Can the entity provide introducers residency information?	

Q#	Question Text	Instructions
244	Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party.	
245	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.	
3.3 Structure		
246	What is the legal form of your entity?	
247	Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, at the end of the reporting period.	
248	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".
249	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
250	Is your entity a Branch or Subsidiary of another entity?	
251	Is your entity a Branch or Subsidiary of a Foreign entity?	
252	If a Foreign entity Branch or Subsidiary, in which country is the parent undertaking?	
253	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
254	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)	
255	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.	
256	Within the reporting period, has your entity experienced any of the following:	<p>A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners, any other person exercising direct or indirect control over your entity or the conduct of its activity?</p> <p>Undergone a significant evolution or modification of activities?</p> <p>Any other statutory changes?</p> <p>Change of AML/CFT/CPF responsible persons?</p>
257	Please indicate the development or modification.	

Q#	Question Text	Instructions
3.4 entity Finances		
258	Turnover for the reporting period.	
259	Turnover for the reporting period realized in the Principality of Monaco.	
260	Turnover for the reporting period realized outside the Principality of Monaco.	
261	Please provide the amount of your last annual VAT return.	Total of twelve monthly payments.
3.5 Rejected Relationships		
262	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
3.6 Terminated Relationships		
263	Please provide the total <b>number of client business relationships that have been terminated</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
3.7 Comments & Feedback		
264	Do you have feedback related to any questions in this section?	
265	Please provide comments or feedback on this section here.	



## Instructions, Controls

C#	Question Text	Instructions
1 Controls		
1.1 Structure		
1	Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, at the end of the reporting period.	<b><u>Reuse the response from Q247.</u></b> The reporting entity has to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.
2	Please provide the total number of full-time equivalent employees at your entity, at the end of the reporting period.	The reporting entity should disclose the number of full-time equivalent employees and non-employee partners and owners, irrespective of their function.  Provide the estimate as a decimal of FTE time. For example if there is one full time employee and two ¼ time employees, then the total would be 1.5 FTE.  1 full-time employee = 1 FTE. One half-time employee = 0,5 FTE. One ¼ time employee = 0,25 FTE.
3	Please provide the number of employees in AML/CFT Compliance at your entity, at the end of the reporting period.	
4	Please provide the number of full-time equivalent employees in AML/CFT Compliance at your entity, at the end of the reporting period.	
5	Does your entity have a compliance department?	
6	Does the MLRO fulfil any other role or job function?	
7	What percentage of time does the MLRO spend on additional functions?	
8	Is your entity part of a Group?	
9	Does your entity have a board and/or senior management?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility.  Examples of a board or senior management, would be an entity having: <ul style="list-style-type: none"> <li>• Chief Officers (CEO, CFO, CTO...)</li> <li>• Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists</li> <li>• Policies or procedures which require approval by a specified role or individual</li> <li>• A legal requirement for a board or specific role needed to achieve compliance</li> </ul> Examples of an entity that does not have a board or senior management: <ul style="list-style-type: none"> <li>• A sole proprietor</li> <li>• A partnership</li> <li>• A small business with a single layer of management</li> </ul>

C#	Question Text	Instructions
1.2 Policies & Procedures		
10	Did your entity prepare a documented set of AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT legal requirements.
11	Were these policies and procedures approved by the board and/or senior management of your entity?	The reporting entity should disclose whether its written AML/CFT policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
12	Did your entity circulate these policies and procedures to all its employees?	
13	Did your entity ensure awareness of these policies and procedures to all its employees?	
14	Did your entity update their written AML/CFT Policies and Procedures in the last year?	
15	Please provide the date of the last update to your entity's written AML/CFT Policies and Procedures.	
16	Does your entity have a systematic practice of tracking and managing changes to the AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.
17	Does your entity have a group-wide AML/CFT/CPF programme?	
18	Has your entity conducted an analysis to identify whether the group AML/CFT/CPF programme complies with Monaco's legislation and regulatory framework for each branch/subsidiary?	
19	Who prepared your entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors?  Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
20	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures?	
21	Under art. 33, did you establish internal procedures and did you establish and communicate the report referred to in article 33 L. n° 1.362 ? (except for 15, 15 bis, 15 ter of art. 1 L. n° 1.362)	
22	Has your entity previously submitted AML/CFT Procedures to AMSF?	
23	Please provide the last date of transmission of your AML/CFT procedures manual to AMSF.	

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

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

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

C#	Question Text	Instructions
1.6 CDD		
64	<p>Does your entity record all of the following in your customer database:</p> <ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Date of Birth</li> <li>• Place of Birth</li> <li>• Nationality</li> <li>• Country of Residence</li> <li>• Tax Residence</li> <li>• Activity</li> <li>• Source of Wealth</li> <li>• Source of Funds</li> </ul>	
65	Please specify which items are not collected.	
66	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> <li>• Account Holder</li> <li>• Representative of Company or Client</li> <li>• Beneficial Owner</li> <li>• Administrators/Directors</li> <li>• Shareholders</li> <li>• Legal Representatives</li> <li>• Settlor/Constituent</li> <li>• Trustee</li> <li>• Beneficiary of a Trust or other Legal Arrangement</li> <li>• Founders</li> <li>• Donors</li> <li>• Person who directly or indirectly exercises control of a Foundation</li> <li>• Protector</li> <li>• More Complex Ownership Structures</li> <li>• Introducers?</li> </ul>	
67	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> <li>• Insurance Policy Payee</li> <li>• Insurance Policy Holder</li> <li>• Insurance Policy Beneficiary</li> <li>• Insurance Policy Insured?</li> </ul>	
68	If your entity does not collect the items in the two above questions, please specify which items are not collected?	If all are collected respond "NA".
69	Does your entity record other client information or register client activity information in their database?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder,

C#	Question Text	Instructions
		Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?
70	Please specify what other information is included in your database.	
71	Is past 5 years of client relationship data accessible by AMSF upon request?	
72	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
73	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
74	Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?	(e.g. simplified, standard and enhanced due diligence)
75	Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period.	<b>Please repeat the answer provided in Q2.</b>
76	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
77	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
78	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
79	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
80	Did you select "Trigger Event" in the previous question?	
81	Please name all trigger events for ongoing due diligence done on clients classified as High-Risk for ML/FT.	
82	Does your entity undertake other measures for high-risk clients, before customer take-on?	
83	Please specify other measures taken for high-risk clients, before customer take-on.	
84	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	If not applicable, state 'NA'.
85	For when BO info is recorded, at what % shareholding threshold does your entity use for recording Beneficial Owner information?	
86	Does your entity examine the source of wealth before customer take-on?	



C#	Question Text	Instructions
87	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
88	How does the company verify the Beneficial Owners of Virtual Assets?	
89	Does your entity ever rely on third parties to collect CDD information about clients?	Third parties means any other entity / service provider which performs elements of CDD on behalf of the entity.
90	Does your entity ever conduct tests on third parties regarding their willingness and ability to provide information during the relationship on request and without delay?	
91	Please provide the main reason for the difficulties (e.g. legal reason, commercial reason, unavailability of information, other) and the type of third parties (e.g. financial institution, DNFBP).	
92	Does the evolution of the clients services requested contribute to the identification of red flags?	
1.7 EDD		
93	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
94	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
95	Please provide the percentage of unique clients that have been subjected to enhanced due diligence.	i.e. number of enhanced due diligence clients (at start or during course of business relationship) ÷ total number of clients.
96	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
97	Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	i.e. number of enhanced due diligence <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements ÷ total number of <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements.
1.8 Risk Assessments		
98	Does your entity apply AML/CFT risk ratings to its clients?	
99	How many AML/CFT risk levels does your entity have for clients?	
100	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT.	
101	Please provide the total number of unique clients that are without a risk level determined yet.	
102	Does your entity's High-Risk Assignment Considerations include ALL of the following: <ul style="list-style-type: none"> <li>Country of Residence</li> <li>Activity</li> <li>PEP status</li> <li>Type of Customer</li> <li>Products &amp; Services</li> </ul>	



C#	Question Text	Instructions
	<ul style="list-style-type: none"> <li>• Transaction Types</li> <li>• Distribution Channels</li> <li>• Accounts with Conventional Title</li> <li>• Assets Under Management</li> <li>• Volume of Operations</li> <li>• Nature of Operations</li> <li>• Trigger Events</li> </ul>	
103	Please specify which items are not considered.	If all are considered respond "NA".
104	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
105	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
106	Does your entity have a tool or process for making AML/CFT risk assessments?	(client assessments)
107	Does your entity use a list of Sensitive Countries for AML/CFT risk assessment?	
108	Does your entity use a list of Sensitive Activities for AML/CFT risk assessment?	
109	What client activities does your entity associate with High-Risk clients?	
110	Does your entity consider ML and TF risks separately?	(entity's own assessment)
111	Does your entity have a tool or process for making AML/CFT risk assessments?	(entity's own assessment)
1.9 Audit / Controls		
112	When did your entity last have a SICCFIN/AMSF audit?	
113	Did your entity have any Other Audits not mentioned above?	(AML/CFT related audits only)
114	Specify the types of Other Audits, and provide the year of the last audit of each kind.	(AML/CFT related audits only)
1.10 Cash Transactions		
115	Does your entity conduct cash transactions with clients?	Incoming or outgoing.
116	Does your entity apply any specific AML/CFT controls and procedures for cash transactions?	
117	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Monitoring		
115	Do the activities you perform put you in a position or provide access to monitor ongoing transactions from clients to the insurance company?	
116	Does your entity have in place a system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
117	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	

C#	Question Text	Instructions
118	Please provide the total number of transactions <b>related to premiums paid</b> by clients within the reporting period.	<b>Please repeat the answer provided in Q3.</b>
119	Please provide the total number of Alerts in Reporting Period by the system related to Money Laundering.	
120	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
121	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
122	Please provide the total number of Alerts in Reporting Period by the system related to Terrorism Financing.	
123	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
124	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
125	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	
126	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	
127	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
128	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	
<b>1.12 Record Keeping</b>		
132	Does your entity keep transaction records for at least 5 years?	
133	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
134	Does your entity keep these records and documents in a safe and secure place?	
135	Are these records and documents available promptly to the relevant authorities upon request?	<p>When providing its response, the reporting entity should consider the following factors:</p> <ul style="list-style-type: none"> <li>(1) is the above data collected in electronic format and easily retrievable from the IT systems?</li> <li>(2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly?</li> <li>(3) is there manual effort required to find clients' data, e.g., if files are stored only in paper</li> </ul>

C#	Question Text	Instructions
		format; or, when they are stored in electronic format, IT systems are not configured to enable easy access to the required data.
136	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
<b>1.13 Targeted Financial Sanctions (TFS)</b>		
137	Do entity's policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements.</p> <p>Policies and procedures should cover targeted financial sanctions-related requirements of at least the following:</p> <ul style="list-style-type: none"> <li>(a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons;</li> <li>(b) Frequency and scope of screening;</li> <li>(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).</li> </ul>
138	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> <ul style="list-style-type: none"> <li>(1) approval of TFS-related policies, procedures and instructions by the board or senior management;</li> <li>(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.;</li> <li>(3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities,</li> <li>(4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.</li> </ul>
139	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures cover:</p> <ul style="list-style-type: none"> <li>(a) direct control and</li> <li>(b) indirect control of assets by designated persons;</li> <li>(c) internal processes and systems designed to detect persons who exercise direct and indirect control over assets owned by designated persons.</li> </ul>

C#	Question Text	Instructions
140	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
141	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	Reference Sovereign Ordinance no. 8.664.
142	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	Reference Sovereign Ordinance no. 8.664.
143	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	Reference Sovereign Ordinance no. 8.664.
144	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	Reference Sovereign Ordinance no. 8.664.
145	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	Reference Sovereign Ordinance no. 8.664.
146	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	Reference Sovereign Ordinance no. 8.664.
147	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	Reference Sovereign Ordinance no. 8.664.
148	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	Reference Sovereign Ordinance no. 8.664.
149	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	Reference Sovereign Ordinance no. 8.664.
150	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	Reference Sovereign Ordinance no. 8.664.
151	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	Reference Sovereign Ordinance no. 8.664.
152	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
153	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
154	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.	

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

C#	Question Text	Instructions
170	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		
171	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)
172	Did your entity file any STRs/SARs to the FIU within the reporting period?	
173	Please provide the total number of STRs/ SARs related to <u>Terrorism Financing</u> that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Terrorism Financing</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
174	Please provide the total number of STRs/ SARs related to <u>Money Laundering</u> that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Money Laundering</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
175	Please provide the total number of STRs/SARs related to <u>Virtual Assets or Virtual Asset Service Providers</u> provided to the FIU within the reporting period.	
176	Please provide the total number of STRs/SARs related to a <u>Monegasque Legal Person</u> provided to the FIU within the reporting period.	
177	Please provide the total number of STRs/SARs related to a <u>Foreign Legal Person</u> provided to the FIU within the reporting period.	
178	Please provide the total number of STRs/SARs related to a <u>Foreign Trust</u> provided to the FIU within the reporting period.	
179	Please provide the total number of STRs/SARs related to a <u>Foreign Tax Offenses</u> (criminal or administrative) provided to the FIU within the reporting period.	
180	Please provide the total number of STRs/SARs related to <u>Organized Crime</u> provided to the FIU within the reporting period.	
181	Please provide the total number of STRs/SARs related to <u>Rejected Relationships</u> provided to the FIU within the reporting period.	
182	Please provide the total number of STRs/SARs related to <u>Rejected Transactions</u> provided to the FIU within the reporting period.	
183	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	

C#	Question Text	Instructions
184	Did your entity respond internally to the suspicious transactions?	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
185	Did your entity take any steps to strengthen internal controls for AML/CFT, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	
1.16 Comments & Feedback		
186	Do you have feedback related to any questions in this section?	
187	Please provide comments or feedback on this section here.	

## Instructions, Signatories

S#	Question Text	Instructions
Attestation		
1	The person or persons name(s) added here attests that she/he/they have provided accurate responses to questions, to the best of their ability.	
2	The person's name added here attests that she/he is duly authorized to represent the reporting entity and has ensured the submitted data has been adequately reviewed and is an accurate representation, to the best of their ability.	
3	Do you need to submit your survey in an Incomplete state?	If no, please write 'Complete'. If yes, provide the reason for submitting incomplete. An incomplete submission may result in enhanced oversight or other action.