

Instructions: 2025 Real Estate AML/ CFT Survey

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

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

- Responses must include all products or services offered to customers that fall within the scope of the AML/CFT regulations in force in Monaco.
- The reporting period is 1st January 2024 to 31th 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 be involved in several purchases, sales, or rentals, 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.
- 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.

Important

Provide responses **ONLY for activities where you or your entity acted as a professional representative within the meaning of law n° 1.362** for Real Estate purchases, sales, or rentals, **UNLESS** the question specifically states otherwise.

For questions which request number of unique clients: Count clients as the total number of clients represented. For example, if your agency represents both the buy and sell side of a transaction between one Legal Person purchasing a property from two co-owner Natural Persons, the total number of clients would be 3.

For questions which request the number of purchase, sale, or rental transactions: Count transactions as the number of sides of a transaction which were represented. In the example above of one Legal Person purchasing from two Natural Persons, there would be one 'purchase' side transaction and one 'sell' side transaction for a total of 2 transactions represented.

If a client purchases one property but makes 2 transfers to achieve full payment of the purchase price, this shall be counted as 1 property transaction. The purchase of units or shares of a real estate company constitutes as many transactions as there are purchases or sales. For example, a purchase of 10 shares = 1 transaction; a purchase of 10 shares and then another purchase of 15 shares = 2 transactions; sale of 100% of the shares = 1 transaction).

For rentals, one transaction shall mean one month-rent equivalent (only for rentals \geq 10,000 Euros / month). A rental client making monthly payments for one full year would be 12 transactions. A rental client making one payment covering 12 months' rent shall be counted as 12 transactions.

For questions which request the value of purchase, sale, or rental transactions: Count value of purchase, sale, or rental transactions according to the total contract value and the number of sides of a transaction which were represented. Provide the total of the purchase, sale, or rental contract amount, inclusive your commissions, notary fees, any other related costs associated with the contract for purchase, sale, or rental as applied. If the total amount is not available, such as the property value amount alone is known without fees or taxes, please explain your response in the comments section.

For the example of one Legal Person purchasing from two Natural Persons, where both sides are represented by your entity, the value of transactions to be reported should be the contract purchase price by the Legal Person and the contract sale price by the Natural Persons for a total of 2x the purchase price (inclusive notary fees, your agency fees or commissions if applicable, and other costs applied on purchase, sale or rental contract).

For questions which request the number of payments by payment method: Count the total number of payment transactions either by clients, or with clients, as specified.

For the example of one Legal Person purchasing from two Natural Persons, where both sides are represented by your entity, the number of payments would be one payment by client where the Legal Person makes a payment to the counterparty (via notary facilitator, directly, or any other arrangement) for the purchase price (plus notary fee, commissions if applied in the contract, etc.) and two payments with clients for commissions or fees (once with the Legal Person and once with the Natural Persons assuming they paid jointly).

For questions which request the value of payments by payment method: Count value of payments either by clients, or with clients, as specified.

For the example of one Legal Person purchasing from two Natural Persons, where both sides are represented by your entity, the value of payment by client is the purchase price (plus notary fee, commissions if applied in the contract, etc.) and the value of payments with clients is the sum of the commissions or fees.

Provide responses ONLY for the reporting period, UNLESS the question specifically states otherwise.

Report ONLY information for activities which are not being claimed by another entity which you represented and who is also responding to this SICCFIN Real Estate AML/CFT Survey.

It is not compulsory to answer all the questions if you do not have the capacity to answer them. Nevertheless, incomplete answers will be automatically considered higher risk, which could artificially increase the overall residual risk level. We therefore invite you to use this option sparingly and to equip yourself with the necessary tools in the future to be able to answer similar questionnaires. **To submit incomplete answer all questions in the Signatories tab**, including providing a reason for submitting incomplete.

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Glossary

| Term | Definition |
|---------------------------|--|
| Active Account | Only clients that are active for the reporting period or were at some point active during the reporting period. |
| AML/CFT/CPF | Anti-Money Laundering / Counter Financing of Terrorism / Counter Financing of Proliferation of Weapons of Mass Destruction |
| AMSF (previously SICCFIN) | Autorité Monégasque de Sécurité Financière (AMSF), The national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. https://amsf.mc |
| Association | For the purposes of this questionnaire, an association is a freely formed organization (group with members) that has acquired the legal personality; for example to open a bank account, enter contracts, appear in courts, buy estate, and receive donations. Refer to Monaco law n° 1.355 of 2008/12/23 for registered associations. Associations shall also include foreign associations with a similar capacity to act, specifically to open a bank account. |
| Beneficial Owner | Beneficial Owner is defined in Article 21 of <u>Law 1.362 of 3 August 2009 amended by law 1.503 of 23 December 2020 on the fight against money laundering, terrorist financing and corruption:</u> - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted. |
| Client / Customer | A Client (identical meaning to Customer) should be understood as a Natural Person or a Legal Person/entity with whom the reporting entity has a business relationship or for whom the reporting entity carried out an occasional transaction. In this context, clients refer to all existing clients with whom the entity has had a business relationship within the reporting period including occasional (walk-in) clients who have been serviced during the reporting period. Reference to clients is made in respect of those who have benefited from a product or service falling within the scope of AML/CFT regulation. |
| Correspondent banking | Correspondent banking is the provision of banking services by one bank as the correspondent to another bank as the respondent, including providing a current or other liability account and related services, such as cash management, international funds transfers, cheque clearing, payable-through accounts and foreign exchange services. |
| DPMS | Dealers in Precious Metals and Stones |
| DBT | Direction du Budget et du Trésor de Monaco |
| Dual-use items | Dual-use item means items, including software and technology, which can be used for both civil and military purposes, and includes items which can be used for the design, development, production or use of nuclear, chemical or biological weapons or their means of delivery, including all items which can be used for both non-explosive uses and assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices. |
| FIU | Financial Intelligence Unit |
| Financial institutions | Financial institutions mean any natural or legal person who conducts as a business one or more of the following activities or operations for or on behalf of a customer: 1. Acceptance of deposits and other repayable funds from the public. 2. Lending. 3. Financial leasing. 4. Money or value transfer services. 5. Issuing and managing means of payment (e.g. credit and debit cards, cheques, traveler's cheques, money orders and bankers' drafts, electronic money). 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 |
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| | requires foreign cooperation to verify, or when the recorded owner is a professional (lawyer, accountant, company services business). |
| Nationals | Natural Person who is a Monégasque national. |
| Non-Profit Organizations (NPOs) | Non-Profit Organizations (NPOs) refers to a legal person or arrangement or organization that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”. |
| Occasional Transaction | Any Transaction other than a Transaction carried out in the course of an established Business Relationship. |
| Payment types by clients | Payments by clients are transactions from client accounts initiated and performed by the client. For example, a client makes an electronic transfer to pay a rent. |
| Payment types on behalf of clients | Payments on behalf of clients are transactions made by the reporting entity to third parties on behalf of clients. Examples of such arrangements may be with power of attorney, Signatory on accounts, or similar. |
| Payment types with clients | Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity, transactions made in person, and deposit taking. |
| PEPs | PEPs are individuals who are or have been entrusted with prominent public functions, for example, Heads of State or government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials. The PEP regime in Monaco applies to all PEPs, both domestic and foreign. |
| Primary Nationality | For the purposes of this questionnaire, an individual with multiple nationalities should be reported as having a primary nationality, which should be based on the following ordering: nationality of birth country, nationality that is their country of residence, other nationality. |
| Resident | For the purpose of this questionnaire, a resident is a Natural Person who is a Monégasque or who has a legal right to work and live in Monaco. |
| Non-Resident | For the purpose of this questionnaire, a non-resident is a Natural Person who is a non-Monégasque national and does not have residency in Monaco. |
| Senior management | Senior management is an officer or employee with sufficient knowledge of the institution's money laundering and terrorist financing risk exposure and with sufficient seniority to take decisions affecting its risk exposure, and who need not, in all cases, be a member of the board of directors. |
| SICCFIN (now AMSF) | Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN) is the national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. |
| Sports agent | A sports agent is any person who, whether occasionally or habitually and in consideration of remuneration, brings interested parties together to make a contract, either for the paid exercise of a sporting activity, or for the agreement of an employment contract for the paid exercise of a sporting or training activity. |
| TFS | Targeted Financial Sanctions |
| Trust and Company Service Providers | Trust and Company Service Providers refers to all persons or businesses that are not covered elsewhere, and which as a business, provide any of the following services to third parties: <ul style="list-style-type: none"> Acting as an agent in the creation or establishment of legal persons Acting as a director or secretary of a company, or as a partner in a legal person or arranging for another person to act as the above Providing a registered office, work address, residence, correspondence address, or administrative address for a legal person or legal arrangement Performing work (or equipping another person to act) as a trustee for a direct trust or performing a similar function in favor of another form of legal arrangement Acting or arranging for another person to act as a nominee shareholder in favor of another person. |

| Term | Definition |
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| 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 Active in Reporting Cycle | | |
| 1 | Have you acted as a professional representative within the meaning of law n° 1.362 for Real Estate purchases, sales, or rentals within the reporting period? (link) | Activities subject to the law: Purchases, Sales, and Rentals. For rental, only monthly rents of €10,000 or more. |
| 2 | Specifically in relation to Real Estate purchases or sales completed in the reporting period? | Purchases and Sales. |
| 3 | Specifically in relation to Real Estate rentals which had transactions completed in the reporting period? | Rental of property for a monthly rent of €10,000 or more. |
| 1.2 Clients Summary | | |
| 4 | Please provide the total number of unique clients, that were at some point active during the reporting period, for property purchases, sales, and rentals. | <p>Report only information where you or your entity acted as a professional representative within the meaning of law n° 1.362 for Real Estate purchases, sales, or rentals, within the reporting period.</p> <p>For example, rental clients that have monthly rent of < 10,000 Euro should be excluded from this total.</p> <p>If multiple primary nationalities, enter the one most commonly used.</p> <p>Report only information for activities which are not being claimed by another entity which you represented and who is also responding to this SICCFIN Real Estate AML/CFT Survey.</p> <p>For questions referring to 'unique client', please consider:</p> <ul style="list-style-type: none"> • If the same client has several transactions, then it is considered one client • If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client • Any other situation where the same client would be double counted, please consider as one client |
| 5 | Please provide the total number of property transactions by clients within the reporting period, for property purchases, sales, and rentals. | <p>Purchases, Sales, and Rentals.</p> <p>For clarity:</p> <p>If a client purchases one property but makes 2 transfers to achieve full payment of the property, this shall be counted as 1 property transaction. The purchase of units or shares of a real estate company constitutes as many transactions as there are purchases or sales (e.g. purchase of 10 shares = 1 transaction; a purchase of 10 shares then a another</p> |

| Q# | Question Text | Instructions |
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| | | <p>purchase of 15 shares = 2 transactions; sale of 100% of the shares of an SCI = 1 transaction).</p> <p>For rentals, one transaction shall mean one month-rent equivalent ($\geq 10,000$ Euros). A rental client making monthly payments for one full year would be 12 transactions. A rental client making one payment covering 12 months' rent shall be counted as 12 transactions.</p> |
| 6 | Please provide the total value of funds transferred by clients within the reporting period, for property purchases and sales. | <p>Purchases, Sales, and Rentals.</p> <p>Please provide the total of the purchase / sale contract amounts. If the total amount is not available, such as the amount known is without fees or taxes, please explain your response in the comments section.</p> |
| 7 | Please provide the total value of funds transferred by clients within the reporting period, for property rentals. | <p>Rentals.</p> <p>Please provide the total of the rental contract amount. If the total amount is not available, such as the amount known is without fees or taxes, please explain your response in the comments section.</p> |
| 8 | Please provide the total number of transactions with clients within the reporting period, for property purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 9 | Please provide the total value of funds transferred with clients within the reporting period, for property purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 1.3 Beneficial Owners | | |
| 10 | Can your entity distinguish nationality of clients' Beneficial Owners? | |
| 11 | 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. |
| 12 | Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality. | The information requested is in relation to number of Beneficial Owners which have direct or indirect control of clients that are legal persons, and trusts and other legal arrangements. |
| 13 | Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality. | The information requested is in relation to number of Beneficial Owners which represent clients that are legal persons, and trusts and other legal arrangements. |
| 14 | Can your entity distinguish BO's that have 25% or greater ownership? | |
| 15 | Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership. | |

| Q# | Question Text | Instructions |
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| 16 | For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency? | |
| 17 | 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. | |
| 18 | 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 | | |
| 19 | Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are: HNWIs? | For the purposes of this survey, a HNWI is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million. |
| 20 | UHNWIs? | For the purposes of this survey, an UHNWI is a Natural Person whose sum of all accounts and net assets is more than EUR 50 million. |
| 21 | Trusts and Other Legal Arrangements? | |
| 22 | Virtual Assets Service Providers (VASPs)? | |
| 1.5 Clients - Natural Persons | | |
| 23 | Please provide the total number of unique clients that are Natural Persons that are Nationals, for property purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 24 | Please provide the total number of unique clients that are Natural Persons that are Foreign Residents, for property purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 25 | Please provide the total number of unique clients that are Natural Persons that are Non-Residents, for property purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 26 | Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual for property purchases and sales. | Purchases and Sales. |
| 27 | Please provide the total number of transactions by clients that are Natural Persons for property purchases and sales. | Purchases and Sales. For clarity: If a client purchases one property but makes 2 transfers to achieve full payment of the property, this shall be counted as 1 property transaction. The purchase of units or shares of a real estate company constitutes as many transactions as there are purchases or sales (e.g. purchase of 10 shares = 1 transaction; a purchase of 10 shares then a another purchase of 15 shares = 2 transactions; sale of 100% of the shares of an SCI = 1 transaction). |
| 28 | Please provide the total value of funds transferred by clients that are Natural Persons, for purchases and sales, in EUR. | Purchases and Sales. |
| 29 | Please provide the total number of unique clients that are Natural Persons (individuals) for property rentals. | Rentals. |

| Q# | Question Text | Instructions |
|-----------------------------|--|--|
| 30 | Please provide the total number of transactions by clients that are Natural Persons for property rentals. | Rentals. For rentals, one transaction shall mean one month-rent equivalent ($\geq 10,000$ Euros). A rental client making monthly payments for one full year would be 12 transactions. A rental client making one payment covering 12 months' rent shall be counted as 12 transactions. |
| 31 | Were any of the Real Estate purchases within the reporting period for the purposes of establishing Monaco residency? | |
| 32 | How many purchases were for Monaco residency purposes in the reporting period? | |
| 1.6 Clients - Legal Persons | | |
| 33 | Please provide the total number of unique clients that are Legal Persons, broken down by country of headquarters or incorporation, for property purchases, sales, and rentals. | Purchases and Sales. |
| 34 | Please provide the total number of transactions by clients that are Legal Persons for property purchases and sales. | Purchases and Sales. For clarity: If a client purchases one property but makes 2 transfers to achieve full payment of the property, this shall be counted as 1 property transaction. The purchase of units or shares of a real estate company constitutes as many transactions as there are purchases or sales (e.g. purchase of 10 shares = 1 transaction; a purchase of 10 shares then a another purchase of 15 shares = 2 transactions; sale of 100% of the shares of an SCI = 1 transaction). |
| 35 | Please provide the total value of funds transferred by clients that are Legal Persons for purchases and sales. | Purchases and Sales. |
| 36 | Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person? | Legal Persons types include: <ul style="list-style-type: none"> • Commercial Partnership SNC • Economic Interest Group GIE • Joint Stock Company SAM • Limited Liability Companies SARL • Limited Partnership SCS • Limited Partnership with Shares SCA • Monegasque Foundation • Monegasque Associations • Other Civil Companies SC-Autre • Other Commercial Companies • Other Legal Arrangements • Private Domain of the Monegasque State • Property Investment Partnership SCI • Sole Person • Special Civil-law Partnership SCP • Trusts |

| Q# | Question Text | Instructions |
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| 37 | Please provide the number of Monegasque Legal Persons as clients, by type. | Purchases and Sales. Only clients that are active for the reporting period or were at some point active during the reporting period should be reported. |
| 38 | 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. | Purchases and Sales. The term “unique Beneficial Owner” denotes that while a Beneficial Owner might have been involved with several properties it should only be counted as one Beneficial Owner. For the purposes of this survey, a HNWI is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million. |
| 39 | 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. | Purchases and Sales. The term “unique Beneficial Owner” denotes that while a Beneficial Owner might have been involved with several properties it should only be counted as one Beneficial Owner. For the purposes of this survey, an UHNWI is a Natural Person whose sum of all accounts and net assets is more than EUR 50 million. |
| 1.7 Clients – Trusts and Other Legal Arrangements | | |
| 40 | Does your entity have clients that are Trusts or Other Legal Arrangements? | |
| 41 | Please provide the total number of unique clients that are Trusts and Other Legal Arrangements for purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 42 | Please provide the total number of Monegasque unique clients that are Trusts and Other Legal Arrangements for purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 43 | Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality, for purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 44 | 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, for purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 45 | Does your entity have information related to the number and value of their transactions? | |
| 46 | Please provide the total number of transactions by clients that are Trusts and Other Legal Arrangements, for property purchases and sales. | Purchases and Sales. |
| 47 | Please provide the total value of funds transferred by clients that are Trusts and Other Legal Arrangements, for property purchases and sales. | Purchases and Sales. |

| Q# | Question Text | Instructions |
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| 48 | Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients. | |
| 1.8 PEPs | | |
| 49 | Do you have any PEPs as clients? | |
| 50 | Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients), for property purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 51 | Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients), for property purchases, sales, and rentals. | Purchases, Sales, and Rentals. |
| 52 | Please provide the total number of transactions by clients that are PEPs for purchases and sales. | Purchases and Sales. |
| 53 | Please provide the total value of funds transferred by clients that are PEPs, for purchases and sales, in EUR. | Purchases and Sales. |
| 54 | Please provide the total number of unique Beneficial Owners of Legal Person/Trusts and Other Legal Arrangement clients that are PEPs, broken down by the primary nationality of the PEP. | <p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term “unique Beneficial Owners” denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.</p> |
| 55 | Please provide the total number of transactions (both incoming and outgoing) by Beneficial Owners of Legal Person/Trusts and Other Legal Arrangement clients that are PEPs. | |
| 1.9 Virtual Asset Service Providers | | |
| 56 | Does your entity have clients that are VASPs? | |
| 57 | Does your entity distinguish if VASPs clients are Custodian Wallet Providers? | Custodian Wallet Providers |
| 58 | Does your entity have clients that are Custodian Wallet Providers? | Custodian Wallet Providers |
| 59 | Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment, for purchases, sales, and rentals. | <p>Custodian Wallet Providers</p> <p>Purchases, Sales, and Rentals.</p> |
| 60 | Please provide the total number of transactions by VASP clients that are Custodian Wallet Providers for property purchases, sales, and rentals. | <p>Custodian Wallet Providers</p> <p>Purchases, Sales, and Rentals.</p> |
| 61 | Please provide the total value of funds transferred by VASP clients that are Custodian Wallet Providers for property purchases, sales, and rentals. | <p>Custodian Wallet Providers</p> <p>Purchases, Sales, and Rentals.</p> |
| 62 | Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers? | Virtual Currency Exchange Providers |

| Q# | Question Text | Instructions |
|-------------------------------|---|--|
| 63 | Does your entity have clients that are Virtual Currency Exchange Providers? | Virtual Currency Exchange Providers |
| 64 | Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers, broken down by country of establishment, for purchases, sales, and rentals. | Virtual Currency Exchange Providers Purchases, Sales, and Rentals. |
| 65 | Please provide the total number of transactions with and by VASP clients that are Virtual Currency Exchange Providers for property purchases, sales, and rentals. | Virtual Currency Exchange Providers Purchases, Sales, and Rentals. |
| 66 | Please provide the total value of funds transferred by VASP clients that are Virtual Currency Exchange Providers for property purchases, sales, and rentals. | Virtual Currency Exchange Providers Purchases, Sales, and Rentals. |
| 67 | Does your entity distinguish if VASPs clients are ICO related service providers? | ICO |
| 68 | Does your entity have clients that are Initial Coin Offering Providers? | ICO |
| 69 | Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment, for purchases, sales, and rentals. | ICO Purchases, Sales, and Rentals. |
| 70 | Please provide the total number of transactions by VASP clients that are ICO related service providers for property purchases, sales, and rentals. | ICO Purchases, Sales, and Rentals. |
| 71 | Please provide the total value of funds transferred by VASP clients that are ICO related service providers for property purchases, sales, and rentals. | ICO Purchases, Sales, and Rentals. |
| 72 | Does your entity distinguish if VASPs clients provide Other Services not mentioned above? | Other Services |
| 73 | Does your entity have clients that are engaged in Other VASP Services? | Other Services |
| 74 | Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment, for purchases, sales, and rentals. | Other Services Purchases, Sales, and Rentals. |
| 75 | Please provide the total number of transactions by VASP clients related to Other Services for property purchases, sales, and rentals. | Other Services Purchases, Sales, and Rentals. |
| 76 | Please provide the total value of funds transferred by VASP clients that provide Other Services for property purchases, sales, and rentals. | Other Services Purchases, Sales, and Rentals. |
| 77 | Please specify what Other Services VASP clients are providing not mentioned above. | Other Services |
| 1.10 2nd Nationalities | | |
| 78 | For clients with Multiple/dual citizenships, does your entity register all nationalities of a client? | |
| 79 | Please provide the total number of secondary nationalities of Natural Person clients, broken down by secondary nationalities of the client, if applicable (including domestic clients). | |

| Q# | Question Text | Instructions |
|--|---|---|
| 1.11 Monegasque Client Types - Purchases and Sales | | |
| 80 | Did you have any Monegasque clients for purchases and sales in the reporting period? | Purchases and Sales. For persons with Monegasque nationality. |
| 81 | Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions. | Purchases and Sales. |
| 82 | Please provide the total number of Monegasque unique clients that are Auditors/Accountants. | Purchases and Sales. |
| 83 | Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors. | Purchases and Sales. |
| 84 | Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments. | Purchases and Sales. |
| 85 | Please provide the total number of Monegasque unique clients that are Real Estate Agents. | Purchases and Sales. |
| 86 | Please provide the total number of Monegasque unique clients that are DPMS. | Purchases and Sales. |
| 87 | Please provide the total number of Monegasque unique clients that are TCSPs. | Purchases and Sales. |
| 88 | Please provide the total number of Monegasque unique clients that are Multi-Family Offices. | Purchases and Sales. |
| 89 | Please provide the total number of Monegasque unique clients that are Single-Family Offices. | Purchases and Sales. |
| 90 | Please provide the total number of Monegasque unique clients with More Complex Ownership Structures. | Purchases and Sales. |
| 91 | Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business. | Purchases and Sales. |
| 92 | 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. | Purchases and Sales. |
| 93 | Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques. | Purchases and Sales. |
| 94 | Please provide the total number of Monegasque unique clients that are engaged in Import-Export. | Purchases and Sales. |
| 95 | Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods. | Purchases and Sales. |
| 96 | Please provide the total number of Monegasque unique clients that are NPOs. | Purchases and Sales. |
| 97 | Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling. | Purchases and Sales. |
| 98 | Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development. | Purchases and Sales. |

| Q# | Question Text | Instructions |
|--|---|--|
| 99 | Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries. | Purchases and Sales. |
| 100 | Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms. | Purchases and Sales. |
| 101 | Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business. | Purchases and Sales. |
| 102 | Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries. | Purchases and Sales. |
| 103 | Please provide the total number of Monegasque unique clients that are engaged in Fund Management. | Purchases and Sales. |
| 104 | Please provide the total number of Monegasque unique clients that are Holding Companies. | Purchases and Sales. |
| 105 | Please provide the total number of Monegasque unique clients that are Auctioneers. | Purchases and Sales. |
| 106 | Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers. | Purchases and Sales. |
| 107 | Please provide the total number of Monegasque unique clients that are Government and Public Sector. | Purchases and Sales. |
| 108 | Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters. | Purchases and Sales. |
| 109 | Please provide the total number of Monegasque unique clients that are engaged in Shipping. | Purchases and Sales. |
| 1.12 Comments & Feedback | | |
| 110 | Do you have feedback related to any questions in this section? | |
| 111 | Please provide comments or feedback on this section here. | |
| 2 Products & Services Risk | | |
| 2.1 Payment Types <u>with</u> Clients - Cheques | | |
| 112 | Does your entity accept or make Cheque transactions with clients? | Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity. |
| 113 | Did your entity accept or make cheque transactions with clients within the reporting period? | |
| 114 | Please provide the total number of Cheque transactions with clients (both incoming and outgoing). | Purchases, Sales, and Rentals. |
| 115 | Please provide the total value of Cheque transactions with clients (both incoming and outgoing) within the reporting period. | Purchases, Sales, and Rentals. |
| 2.2 Payment Types <u>by</u> Clients - Cheques | | |
| 116 | Based on your knowledge of contracts issued for purchases, sales, and rentals, did your clients accept or make Cheque transactions within the reporting period? | Payments by clients are transactions initiated and performed by the client. For example, a client makes rental payment using a cheque. |

| Q# | Question Text | Instructions |
|---|---|--|
| 117 | Please provide the total number of Cheque transactions by clients (both incoming and outgoing). | Purchases, Sales, and Rentals. |
| 118 | Please provide the total value of Cheque transactions by clients (both incoming and outgoing) within the reporting period. | Purchases, Sales, and Rentals. |
| 2.3 Payment Types <u>with Clients</u> - Electronic Transfers | | |
| 119 | Does your entity accept or make Electronic Transfers with clients? | <p>Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity.</p> <p>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.</p> |
| 120 | Did your entity accept or make Electronic Transfers with clients within the reporting period? | |
| 121 | Please provide the total number of Electronic Transfers with clients (both incoming and outgoing). | Purchases, Sales, and Rentals. |
| 122 | Please provide the total value of Electronic Transfers with clients (both incoming and outgoing) within the reporting period. | Purchases, Sales, and Rentals. |
| 2.4 Payment Types <u>by Clients</u> - Electronic Transfers | | |
| 123 | Based on your knowledge of contracts issued for purchases, sales, and rentals, did your clients accept or make Electronic Transfers within the reporting period? | <p>Payments by clients are transactions initiated and performed by the client. For example, a client makes bank transfer to a seller.</p> <p>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.</p> |
| 124 | Please provide the total number of Electronic Transfers by clients (both incoming and outgoing). | Purchases, Sales, and Rentals. |
| 125 | Please provide the total value of Electronic Transfers by clients (both incoming and outgoing) within the reporting period. | Purchases, Sales, and Rentals. |
| 2.5 Payment Types <u>with Clients</u> - Cash | | |
| 126 | Does your entity accept or make Cash transactions with clients? | Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity. |
| 127 | Did your entity accept or make Cash transactions with clients within the reporting period? | |
| 128 | Please provide the total number of Cash transactions with clients, within the reporting period. | Purchases, Sales, and Rentals. |
| 129 | Please provide the total value of funds transferred, Cash payments in the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 130 | Please provide the total value of funds transferred with clients, cash payments in currencies other than the Euro, during the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |

| Q# | Question Text | Instructions |
|--|--|---|
| 131 | Please provide the total number of single cash transactions with clients equal to or greater than 10,000 euros (both incoming and outgoing) within the reporting period. | Purchases, Sales, and Rentals. |
| 132 | Can your entity distinguish cash transactions above EUR 100,000 in your record keeping? | Purchases, Sales, and Rentals. |
| 133 | Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 134 | Number of physical cash transactions with Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 135 | Number of physical cash transactions with Foreign Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 2.6 Payment Types by Clients - Cash | | |
| 136 | Based on your knowledge of contracts issued for purchases, sales, and rentals, did your clients accept or make Cash transactions within the reporting period? | Payments by clients are transactions initiated and performed by the client. For example, a client makes rental payment in cash. |
| 137 | Please provide the total number of Cash transactions by clients, within the reporting period. | Purchases, Sales, and Rentals. |
| 138 | Please provide the total value of funds transferred, Cash payments in the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 139 | Please provide the total value of funds transferred by clients, cash payments in foreign currency, during the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 140 | Please provide the total number of single cash transactions by clients equal to or greater than 10,000 euros (both incoming and outgoing) within the reporting period. | Purchases, Sales, and Rentals. |
| 141 | Can your entity distinguish cash transactions above EUR 100,000 in your record keeping? | Purchases, Sales, and Rentals. |
| 142 | Number of physical cash transactions by Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 143 | Number of physical cash transactions by Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 144 | Number of physical cash transactions by Foreign Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing. | Purchases, Sales, and Rentals. |
| 2.7 Virtual Currencies | | |
| 145 | Do you accept or make transactions using Virtual Currencies with clients? | Purchases, Sales, and Rentals. |
| 146 | Does you plan to accept payment, or offer Real Estate products and services, using Virtual Currencies in the next year? | |

| Q# | Question Text | Instructions |
|--|---|---|
| 147 | Does your entity have business relationships with Virtual Assets Platforms or Intermediaries? | |
| 148 | Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with. | This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.). |
| 2.8 Services Offered, Agent for Purchases & Sales | | |
| 149 | Please provide the total number of unique clients, broken down by the primary nationality of the individual, or country of headquarters or incorporation, for property purchases and sales within the reporting period. | Purchases and Sales. |
| 150 | How many unique clients were buyers? | Purchases and Sales. |
| 151 | How many unique clients were sellers? | Purchases and Sales. |
| 152 | Please provide the total number of transactions by clients, broken down by client's primary nationality, or country of headquarters or incorporation, for property purchases and sales within the reporting period. | Purchases and Sales. |
| 153 | For how many purchases / sales did you represent the buyer? | Purchases and Sales. |
| 154 | For how many purchases / sales did you represent the seller? | Purchases and Sales. |
| 155 | Please provide the total number of transactions by clients, broken down by client's primary nationality, or country of headquarters or incorporation, for property purchases and sales for the reporting period and the previous 4 years. | Purchases and Sales. |
| 156 | Please provide the total value of funds transferred by clients for purchases and sales (in EUR) within the reporting period, broken down by client's primary nationality, or country of headquarters or incorporation. | Purchases and Sales. |
| 157 | Please provide the total value of funds transferred by clients for purchases and sales (in EUR) within the reporting period, broken down by client's primary nationality, or country of headquarters or incorporation. | Purchases and Sales. |
| 158 | How many Real Estate purchases and sales within the reporting period were for the purposes of investment, excluding properties used as a primary residence by purchaser or purchaser's related persons? | Purchases, Sales, and Rentals. A related person should be considered a family relation, such as a child or parent. |
| 159 | Were any sales made preemptive to the State of Monaco? | |
| 160 | How many properties were purchased by the State of Monaco preemptive? | |
| 161 | What was the total value of property purchased by the State of Monaco preemptive? | |
| 2.9 Services Offered, Agent for Rentals | | |
| 162 | Please provide the total number of unique properties rented within the reporting period. | Rentals. |

| Q# | Question Text | Instructions |
|-------------------------------------|---|---|
| 163 | Please provide the total number of rental transactions within the reporting period. | Rentals. |
| 164 | Please provide the total number of unique rental properties, >= 10.000 € per month, that were rented at some point within the reporting period. | Rentals. |
| 165 | Please provide the total number of unique rental properties, < 10.000 € per month, that were rented at some point within the reporting period. | Rentals. |
| 2.10 Comments & Feedback | | |
| 166 | Do you have feedback related to any questions in this section? | |
| 167 | Please provide comments or feedback on this section here. | |
| 3 Distribution Risk | | |
| 3.1 Identification | | |
| 168 | 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. |
| 169 | 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. | |
| 170 | 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. |
| 171 | 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. | |
| 172 | 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 | | |
| 173 | Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period. | |
| 174 | Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period. | |
| 175 | Please provide the number of new unique clients, that are Trusts and Other Legal Arrangements, that have been onboarded within the reporting period. | |
| 176 | Does your Entity onboard clients on a non-face-to-face basis, i.e. not physically present? | |

| Q# | Question Text | Instructions |
|---------------|---|--|
| 177 | Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes. | The reporting entity should disclose whether clients are onboarded (for CDD purposes) on a non-face-to-face basis (not physically present). |
| 178 | Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes. | |
| 179 | Please provide the number of new unique clients, that are Trusts and Other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes. | |
| 180 | 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). |
| 181 | Can the entity provide client nationality information for clients onboarded through introducers? | |
| 182 | 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). | |
| 183 | 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). | |
| 184 | Can the entity provide introducers residency information? | |
| 185 | Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party. | |
| 186 | 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 | | |
| 187 | What is the legal form of your entity? | <p>Legal Persons types include:</p> <ul style="list-style-type: none"> • Commercial Partnership SNC • Economic Interest Group GIE • Joint Stock Company SAM • Limited Liability Companies SARL • Limited Partnership SCS • Limited Partnership with Shares SCA • Monegasque Foundation • Monegasque Associations • Other Civil Companies SC-Autre • Other Commercial Companies • Other Legal Arrangements |

| Q# | Question Text | Instructions |
|-----|---|---|
| | | <ul style="list-style-type: none"> • Private Domain of the Monegasque State • Property Investment Partnership SCI • Sole Person • Special Civil-law Partnership SCP • Trusts |
| 188 | Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, at the end of the reporting period. | The reporting entity has to disclose the number of all personnel employed: employees, associates and owners, regardless of their function. |
| 189 | Is the licensed holder conducting Real Estate Agent activities a Legal Person? | |
| 190 | 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) | |
| 191 | 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. | |
| 192 | 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". |
| 193 | Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country. | |
| 194 | Is your entity a Branch or Subsidiary of another Entity? | |
| 195 | Is your entity a Branch or Subsidiary of a Foreign Entity? | |
| 196 | If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking? | |
| 197 | Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco). | |
| 198 | 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> |
| 199 | Please indicate the development or modification. | |
| 200 | Is your entity part of an international business network or group? | |
| 201 | If so, please specify. | |

| Q# | Question Text | Instructions |
|------------------------------|--|--|
| 202 | Is your entity a member of a professional association or society? | |
| 203 | If so, please specify. | |
| 3.4 Entity Finances | | |
| 204 | Turnover for the reporting period. | |
| 205 | Turnover for the reporting period realized in the Principality of Monaco. | |
| 206 | Turnover for the reporting period realized outside the Principality of Monaco. | |
| 207 | Please provide the amount of your last annual VAT return. | Total of twelve monthly payments. In case of negative VAT, provide details in the next comment box. |
| 3.5 Rejected Relationships | | |
| 208 | Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period. | |
| 209 | Can your entity distinguish whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice? | |
| 210 | Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, due to client attributes / activities / deficiencies. | |
| 3.6 Terminated Relationships | | |
| 211 | Please provide the total number of client business relationships that have been terminated due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period. | |
| 212 | Can your entity distinguish whether client relationship was terminated due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice? | |
| 213 | Please provide the total number of client business relationships that have been terminated due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period due to client attributes / activities / deficiencies. | |

| Q# | Question Text | Instructions |
|-------------------------|--|--------------|
| 3.7 Comments & Feedback | | |
| 214 | Do you have feedback related to any questions in this section? | |
| 215 | 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. | <u>Reuse the response from Q188.</u> 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, plus non-employee partners and owners, 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 | Approximately how many hours are spent on AML/CFT per month? | |
| 4 | 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"> • 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 • A legal requirement for a board or specific role needed to achieve compliance Examples of an entity that does not have a board or senior management: <ul style="list-style-type: none"> • A sole proprietor • A partnership • A small business with a single layer of management |
| 5 | Does your entity have a compliance department? | |
| 6 | Is your entity part of a Group? | |
| 1.2 Policies & Procedures | | |

| C# | Question Text | Instructions |
|-----------------------|---|---|
| 7 | 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. |
| 8 | 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). |
| 9 | Did your Entity circulate these policies and procedures to all its employees? | If only one employee, answer Yes. |
| 10 | Did your Entity ensure awareness of these policies and procedures to all its employees? | If only one employee, answer Yes. |
| 11 | Did your entity update their written AML/CFT Policies and Procedures in the last year? | |
| 12 | Please provide the date of the last update to your entity's written 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. |
| 13 | Does your entity have a systematic practice of tracking and managing changes to the 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. |
| 14 | Does your entity have a group-wide AML/CFT/CPF programme? | |
| 15 | 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? | |
| 16 | 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> |
| 17 | Did your entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures? | |
| 1.3 Governance | | |
| 18 | Does the board and/or senior management of your entity demonstrate overall responsibility for AML/CFT? | <p>Actions taken by the Board and/or 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> |

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| | | <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> |
| 19 | 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/or 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> |
| 20 | 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 employees' knowledge and expertise through training, seminars, certifications</p> <p>(b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions,</p> <p>(c) prioritizing AML/CFT area for internal audit, etc.</p> |

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| 21 | 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 | | |
| 22 | 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. |
| 23 | 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. |
| 24 | Please identify the number and types of AML/CFT violations. | |
| 1.5 Training | | |
| 25 | Did your entity conduct AML/CFT training for its Directors / Management in the reporting period? | |
| 26 | Did your entity conduct AML/CFT training for its Office employees in the reporting period? | |
| 27 | Please provide the total number of employees trained on AML/CFT matters in Reporting Cycle. | Employees, inclusive Directors / Management. |
| 1.6 CDD | | |
| 28 | When the client transaction is by an individual, does your entity record the individual's Identity Card? | |
| 29 | When the client transaction is by an individual, does your entity record the individual's Passport? | |
| 30 | When the client transaction is by an individual, does your entity record the individual's Residence Card? | |
| 31 | When the client transaction is by an individual, does your entity record the individual's Proof of Address? | |
| 32 | When the client transaction is by an individual, does your entity record any other data of the individual? | |
| 33 | Please specify what other information is included in your database. | |
| 34 | Is all of the following client data (Individual) kept on file: <ul style="list-style-type: none"> • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of residence • Level of Risk | If any of these items are not kept on file, answer 'No'. |

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| | <ul style="list-style-type: none"> Client Activity Heritage | |
| 35 | Specify which items are not collected? | |
| 36 | When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's commercial register extract? | |
| 37 | When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's statutes? | |
| 38 | When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's Meeting Minutes? | |
| 39 | When the transaction is by a Legal Person/Legal Arrangement, does your entity record the client's identity documents of all effective Beneficial Owners (owning 25% or more of the entity)? | |
| 40 | When the client transaction is by a Legal Person/Legal Arrangement, does your entity record any other data? | |
| 41 | Please specify other data of Legal Persons / Legal Arrangements recorded. | |
| 42 | Is past 5 years of client relationship data accessible by AMSF upon request? | |
| 43 | Are all of these documents systematically kept? | This question relates to the license holder having an organized system to retain records, and that records are centrally stored (not widely distributed), such that records can be easily retrieved and provided upon request. |
| 44 | Does your entity keep summary records of all of the above data? | |
| 45 | Does your entity keep these summary records in an electronic database? | |
| 46 | Does your entity use tools to perform CDD? | |
| 47 | Which tools? | |
| 48 | Are the CDD tool's results systematically stored? | |
| 49 | Does your Entity apply a risk-based approach to customer due diligence measures (CDD)? | |
| 50 | 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) |
| 51 | Please provide the total number of unique clients, that were at some point active during the reporting period, for property purchases, sales, and rentals. | <u>Please repeat the answer provided in Q4.</u> |
| 52 | Has your entity performed Simplified Due Diligence on any clients within the reporting period? | Please note that Simplified Due Diligence (SDD) constitute a specific framework defined in articles 11 et seq. of law 1.362. |
| 53 | Please provide the total number of unique clients that are subject to Simplified Due Diligence measures. | |

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| 54 | Does your entity identify and verify its clients using reliable and independent information in all cases of CDD? | |
| 55 | Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity? | |
| 56 | Does your entity rely on third parties to collect CDD information about clients? | |
| 57 | Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed? | |
| 58 | 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). | |
| 59 | Does your Entity apply enhanced identification and verification on all high-risk clients before customer take-on? | |
| 60 | Does your Entity examine the source of wealth before customer take-on? | |
| 61 | How often is ongoing due diligence done on clients of real estate purchases and sales that are classified as High-Risk for ML/FT? | |
| 62 | How often is ongoing due diligence done on rental clients classified as High-Risk for ML/FT? | |
| 63 | Does your entity undertake other measures for high-risk clients, before customer take-on? | |
| 64 | Please specify other measures taken for high-risk clients, before customer take-on. | |
| 65 | Do your clients make real estate purchases, sales, or rental transactions using Virtual Currencies? | |
| 66 | How does the company verify the Beneficial Owners of Virtual Assets? | |
| 1.7 EDD | | |
| 67 | Please provide the total number of unique clients where enhanced due diligence was applied at onboarding. | |
| 68 | Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships. | Within the reporting period. |
| 69 | 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. |
| 1.8 Risk Assessments | | |
| 70 | Does your entity apply AML/CFT risk ratings to its clients? | |
| 71 | How many AML/CFT risk levels does your entity have for clients? | |
| 72 | Please provide the number of unique clients, that are rated as High-Risk for AML/CFT. | |

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| 73 | <p>Does your entity's High-Risk Assignment Considerations include ALL of the following:</p> <ul style="list-style-type: none"> • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types • Distribution Channels • Accounts with Conventional Title • Assets Under Management • Volume of Operations • Nature of Operations • Trigger Events | If any of these items are not included, answer 'No'. |
| 74 | Please specify which items are not considered? | |
| 75 | Does your entity use a list of Sensitive Countries for AML/CFT risk assessment? | (client assessments) |
| 76 | Does your entity use a list of Sensitive Activities for AML/CFT risk assessment? | (client assessments) |
| 77 | What client activities does your entity associate with High-Risk clients? | (For reference, consider the client types of section 1.11) |
| 78 | Does your entity consider ML and TF risks separately? | |
| 1.9 Audit / Controls | | |
| 79 | When did your entity last have a SICCFIN/AMSF audit? | |
| 1.10 Record Keeping | | |
| 80 | Does your Entity keep transaction records for at least 5 years? | |
| 81 | Does your Entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship? | |
| 82 | Does your Entity keep these records and documents in a safe and secure place? | |
| 83 | 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. |
| 84 | Does your Entity have backups for CDD and business correspondence information with a disaster recovery plan? | |

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| 1.11 Targeted Financial Sanctions (TFS) | | |
| 85 | 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> |
| 86 | Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated? | |
| 87 | Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period. | |
| 88 | Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing. | |
| 89 | Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction. | |
| 1.12 PEPs | | |
| 90 | Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)? | |
| 91 | What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs? | |
| 92 | 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> |
| 93 | Does PEP screening occur as part of the CDD process for new customers? | |

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| 94 | Does screening for PEPs occur on an ongoing basis? | |
| 95 | Are PEPs subject to increased monitoring? | |
| 96 | Does your Entity consider all PEP relationships as High-Risk for AML/CFT? | |
| 1.13 Cash Transactions | | |
| 97 | Does your entity conduct cash transactions with clients? | Incoming or outgoing. |
| 98 | Does your entity apply any specific AML/CFT controls and procedures for cash transactions? | |
| 99 | Please describe the specific controls and procedures for cash transactions your entity applies. | |
| 1.14 Suspicious Transaction Reporting | | |
| 100 | Did your entity file any STRs/SARs to the FIU within the reporting period? | (not necessarily filed to the FIU) |
| 101 | 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). |
| 102 | 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). |
| 103 | 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? | |
| 1.15 Comments & Feedback | | |
| 104 | Do you have feedback related to any questions in this section? | |
| 105 | Please provide comments or feedback on this section here. | |

Instructions, Signatories

| S# | Question Text | Instructions |
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| 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. |