


Instructions: 2024 Asset Managers 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 provided should include activity related to when your entity provides products or services to clients that fall under the scope of AML/CFT regulation in Monaco.
- The reporting period is 1st January 2023 to 31th December 2023.
- 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. 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 and legal capacity to act; 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 that were provided with a relevant activity or relevant service that falls under AML/CFT regulations by the reporting entity.
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"> 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
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	Within the reporting period, did you / your entity provide any products or services, have any turnover, or participate in or conduct any activities subject to the provisions of law n° 1.362?	
1.2 Clients Summary		
2	Please provide the total number of unique clients that were at some point active during the reporting period, by client's primary nationality, or country of headquarters or incorporation.	<p>If multiple primary nationalities, enter the one most commonly used.</p> <p>If the nationality is unknown, please select "Unknown" from the dropdown.</p> <p>For questions referring to 'unique client', please consider:</p> <ul style="list-style-type: none"> • If the same client has several accounts, then it is considered one client • If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client • Any other situation where the same client would be double counted, please consider as one client
3	Please provide the total number of unique clients that are Nationals.	
4	Please provide the total number of unique clients that are Foreign Residents.	
5	Please provide the total number of unique clients that are Non-Residents.	
6	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients within the reporting period.	
7	Please provide the total value of funds transferred by and on behalf of clients (both incoming and outgoing) within the reporting period.	
1.3 Beneficial Owners		
8	Can your entity distinguish nationality of clients' BO's?	
9	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.
10	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.

Q#	Question Text	Instructions
11	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.
12	Can your entity distinguish BO's that have 25% or greater ownership?	This question is related to ownership of a <u>legal entity</u> .
13	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	This question is related to ownership of a <u>legal entity</u> .
14	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	This question is related to ownership of a <u>legal entity</u> .
15	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.	This question is related to ownership of a <u>legal entity</u> .
16	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.	This question is related to ownership of a <u>legal entity</u> .
1.4 Accounts Summary		
17	Does your entity have any accounts with or for clients?	
18	Please provide the total number of accounts from all client types.	
19	Can your entity distinguish BO's that are account holders that have 25% or greater ownership of an account?	This question is related to ownership of an <u>account</u> .
20	Please provide the total number of Beneficial Owners that are account holders, by BO's primary nationality, for BO's with 25% or greater ownership of an account.	This question is related to ownership of an <u>account</u> .
21	Please provide the total number of Beneficial Owners that are account holders that are Foreign Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership of an account.	This question is related to ownership of an <u>account</u> .
22	Please provide the total number of Beneficial Owners that are account holders that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership of an account.	This question is related to ownership of an <u>account</u> .
1.5 Assets Under Management		
23	Please provide the total value of the assets under management for clients.	
24	Please provide the AUM for portfolio/asset management on behalf of third parties.	
25	Please provide the AUM for the management of undertakings for collective investment governed by Monegasque law.	
26	Please provide the AUM for the management of undertakings for collective investment under foreign law.	
27	Please provide the AUM for trading on own account.	

Q#	Question Text	Instructions
1.6 Distinguishing Client Types		
28	Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are: Banks?	
29	Trusts?	
30	Associations?	
31	Other Legal Arrangements not mentioned above?	
32	HNWI's?	
33	Virtual Assets Service Providers (VASPs)?	
1.7 Clients - Natural Persons		
34	Does your entity have clients that are Natural Persons?	
35	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 should not be counted as a Natural Person client.
36	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the residency of the individual (including domestic clients).	
37	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Natural Persons.	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, it should not be counted as a Natural Person client.
38	Please provide the total value of funds transferred by and on behalf of clients that are Natural Persons, both incoming and outgoing.	
1.8 Clients - Legal Persons		
39	Does your entity have clients that are Legal Persons?	
40	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
41	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Legal Persons.	
42	Please provide the total value of funds transferred by and on behalf of clients that are Legal Persons, both incoming and outgoing.	

Q#	Question Text	Instructions
43	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"> • Limited Liability Companies SARL • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP • Other Civil Law Partnership SC-Others • Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE
44	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.9 Clients - Banks		
45	Does your entity have clients that are Banks?	
46	Please provide the total number of clients that are Banks, by type of bank.	
47	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Banks, by type of bank.	
48	Please provide the total value of funds transferred by and on behalf of clients that are Banks, by type of bank, both incoming and outgoing.	
1.10 Clients - Trusts		
49	Does your entity have clients that are Trusts?	
50	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
51	Does your entity have information related to the number and value of their transactions?	
52	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Trusts.	
53	Please provide the total value of funds transferred by and on behalf of clients that are Trusts, (both incoming and outgoing).	
54	Please provide the total number of Monegasque unique clients that are Trusts.	
55	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
56	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.	

Q#	Question Text	Instructions
1.11 Clients - Associations		
57	Does your entity have clients that are Associations?	
58	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
59	Does your entity have information related to the number and value of their transactions?	
60	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Associations.	
61	Please provide the total value of funds transferred by and on behalf of clients that are Associations, both incoming and outgoing.	
1.12 Clients - Other Legal Arrangements		
62	Does your entity have clients that are Other Legal Arrangements?	
63	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
64	Does your entity have information related to the number and value of their transactions?	
65	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Other Legal Arrangements.	
66	Please provide the total value of funds transferred by and on behalf of clients that are Other Legal Arrangements, both incoming and outgoing.	
67	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.13 HNWI's and UHNWI's		
68	Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWIs) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an HNWI or HNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is <u>more than EUR 5 million.</u>
69	Please provide the total number of unique clients that are HNWIs or individuals belonging to a HNW Group, broken down by the primary nationality of the individual (including domestic clients).	
70	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are HNWIs or individuals belonging to a HNW Group.	
71	Please provide the total value of funds transferred by and on behalf of clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	

Q#	Question Text	Instructions
72	Please provide the total number of unique Beneficial Owners of Legal Person clients that are HNWI, broken down by the primary nationality of the HNWI.	
73	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are HNWI, broken down by the primary nationality of the HNWI.	
74	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>
75	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).	
76	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group.	
77	Please provide the total value of funds transferred by and on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
78	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.	
79	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.14 Politically Exposed Persons (PEPs)		
80	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
81	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
82	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
83	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
84	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are PEPs.	
85	Please provide the total value of funds transferred by and on behalf of clients that are PEPs, both incoming and outgoing.	

Q#	Question Text	Instructions
86	Please provide the total number of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the primary nationality of the PEP.	For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement. The term “unique Beneficial Owners” denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.
87	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
88	Please provide the total value of funds transferred by and on behalf of Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, both incoming and outgoing.	
1.15 2nd Nationalities		
89	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
90	Please provide the total number of Beneficial Owner secondary nationalities, that are account holders, broken down by BO’s secondary nationality(ies), for BO’s with 25% or greater ownership of an account.	Concerns: <ul style="list-style-type: none"> • Natural Person clients, and • Are Beneficial Owners of the account with at least 25% ownership • that have more than one nationality.
91	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).	
92	Please provide the total number of secondary nationalities of unique clients that are HNWI or individuals belonging to a HNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	
93	Please provide the total number of secondary nationalities of unique clients that are UHNWI or individuals belonging to a UHNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	
94	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).	
95	For Beneficial Owners that are account holders and are Foreign Residents, please provide the total number of Beneficial Owner secondary nationalities	

Q#	Question Text	Instructions
	broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership of an account.	
96	For Beneficial Owners that are account holders and 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 of an account.	
97	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are HNWI's, broken down by the secondary nationality(ies) of the HNWI.	
98	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are UHNWI's, broken down by the secondary nationality(ies) of the UHNWI.	
99	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the secondary nationality(ies) of the PEP.	
1.16 Virtual Asset Service Providers		
100	Does your entity have clients that are VASPs?	
101	Please provide the total number of unique clients that are VASPs.	
102	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are VASPs.	
103	Please provide the total value of funds transferred by and on behalf of clients that are VASPs (both incoming and outgoing).	
104	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
105	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
106	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
107	Please provide the total number of transactions by and on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
108	Please provide the total value of funds transferred by and on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
109	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
110	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers

Q#	Question Text	Instructions
111	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
112	Please provide the total number of transactions by and on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
113	Please provide the total value of funds transferred by and on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
114	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO
115	Does your entity have clients that are Initial Coin Offering Providers?	ICO
116	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
117	Please provide the total number of transactions by and on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
118	Please provide the total value of funds transferred by and on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
119	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	Other Services
120	Does your entity have clients that are engaged in Other VASP Services?	Other Services
121	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services
122	Please provide the total number of transactions by and on behalf of VASP clients related to Other Services (both incoming and outgoing).	Other Services
123	Please provide the total value of funds transferred by and on behalf of VASP clients that provide Other Services (both incoming and outgoing).	Other Services
124	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
1.17 Monegasque Client Types		
125	Did you have any Monegasque clients in the reporting period?	
126	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
127	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
128	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	

Q#	Question Text	Instructions
129	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
130	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
131	Please provide the total number of Monegasque unique clients that are DPMS.	
132	Please provide the total number of Monegasque unique clients that are TCSPs.	
133	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
134	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
135	Please provide the total number of Monegasque unique clients that are More Complex Ownership Structures.	
136	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
137	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.	
138	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
139	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
140	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
141	Please provide the total number of Monegasque unique clients that are NPOs.	
142	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
143	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
144	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
145	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
146	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
147	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
148	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	

Q#	Question Text	Instructions
149	Please provide the total number of Monegasque unique clients that are Holding Companies.	
150	Please provide the total number of Monegasque unique clients that are Auctioneers.	
151	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
152	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
153	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
154	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
1.18 Comments & Feedback		
155	Do you have feedback related to any questions in this section?	
156	Please provide comments or feedback on this section here.	
2 Products & Services Risk		
2.1 Payment Types with Clients - Cheques		
157	Does your entity accept or make cheque transactions with clients?	
158	Please provide the total number of cheque transactions with clients (both incoming and outgoing).	
159	Please provide the total value of funds transferred with clients using Cheques within the reporting period.	
2.2 Payment Types with Clients - Electronic Transfers		
160	Does your entity accept or make Electronic Transfers (i.e. wire transfers) with clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, payment service provider (PSP) such as PayPal, debit cards, credit cards, virtual currency payments, etc.
161	Please provide the total number of Electronic Transactions with clients (both incoming and outgoing).	
162	Please provide the total value of Electronic Transfers with clients (both incoming and outgoing).	
2.3 Payment Types with Clients - Cash		
163	Does your entity accept or make Cash transactions with clients?	
164	Please provide the total number of Cash transactions with clients, within the reporting period.	
165	Please provide the total value of funds transferred, Cash payments with clients in the reporting period, both incoming and outgoing.	
166	Please provide the total number of single cash transactions equal to or exceeding 10,000 EUR with clients (both incoming and outgoing) within the reporting period.	

Q#	Question Text	Instructions
2.4 Virtual Currencies		
167	Do you have clients that use cryptocurrencies?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client
168	Please provide the total number of Virtual Assets transactions with and by and on behalf of clients (both incoming and outgoing).	
169	Please provide the value of funds transferred with and by an on behalf of clients using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
170	Does your entity plan to be active, or offer products and services related to virtual assets next year?	
171	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
172	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
2.5 Activity 1 - Portfolio/Asset Management on behalf of Third Parties		
173	Does your entity provide Activity 1 - Portfolio/asset management on behalf of third parties?	
174	Please provide the turnover related to Activity 1 - product/service of portfolio/asset management on behalf of third parties	
175	Please provide the total number of unique clients of Activity 1 - Portfolio/asset management on behalf of third parties by client's primary nationality, or country of headquarters or incorporation.	
176	Please provide the total number of accounts for Activity 1 - Portfolio/asset management on behalf of third parties.	
177	Please provide the total number of transactions for Activity 1 - Portfolio/asset management on behalf of third parties (both incoming and outgoing) within the reporting period.	
178	Please provide the total value of funds transferred related to Activity 1 - Portfolio/asset management on behalf of third parties (both incoming and outgoing) within the reporting period.	

Q#	Question Text	Instructions
2.6 Activity 2 - Management of Undertakings for Collective Investment Governed by Monegasque Law		
179	Does your entity provide Activity 2 - Management of undertakings for collective investment governed by Monegasque law?	
180	Please provide the turnover related to Activity 2 - product/service of the management of undertakings for collective investment governed by Monegasque law.	
181	Please provide the total number of unique clients of Activity 2 - Management of undertakings for collective investment governed by Monegasque law by client's primary nationality, or country of headquarters or incorporation.	
182	Please provide the total number of accounts for Activity 2 - Management of undertakings for collective investment governed by Monegasque law.	
183	Please provide the total number of transactions for Activity 2 - Management of undertakings for collective investment governed by Monegasque law (both incoming and outgoing) within the reporting period.	
184	Please provide the total value of funds transferred related to Activity 2 - Management of undertakings for collective investment governed by Monegasque law (both incoming and outgoing) within the reporting period.	
185	Please provide the number of collective investments managed or administered.	
186	Does your entity manage or administer Master Funds governed by Monegasque law?	
187	Does your entity manage or administer Feeder Funds governed by Monegasque law?	
188	Does your entity manage or administer Limited Investor Funds governed by Monegasque law?	
189	Does your entity manage or administer Administered Funds governed by Monegasque law?	
190	Does your entity manage or administer Licensed Funds governed by Monegasque law?	
191	Does your entity manage or administer Private Funds governed by Monegasque law?	
192	Does your entity manage or administer non-funds governed by Monegasque law?	
2.7 Activity 3 - Reception and Transmission of Orders on behalf of Third Parties		
193	Does your entity provide Activity 3 - Reception and transmission of orders on behalf of third parties?	
194	Please provide the turnover related to Activity 3 - product/service of the reception and transmission of orders on behalf of third parties.	
195	Please provide the total number of unique Natural Persons of Activity 3 - Reception and transmission of	

Q#	Question Text	Instructions
	orders on behalf of third parties by client's primary nationality.	
196	Please provide the total number of unique Legal Persons of Activity 3 - Reception and transmission of orders on behalf of third parties by client's country of headquarters or incorporation.	
197	Please provide the total number of unique Legal Arrangements of Activity 3 - Reception and transmission of orders on behalf of third parties by client's country of headquarters or incorporation.	
198	Please provide the total number of transactions for Activity 3 - Reception and transmission of orders on behalf of third parties (both incoming and outgoing) within the reporting period.	
199	Please provide the total value of funds transferred related to Activity 3 - Reception and transmission of orders on behalf of third parties (both incoming and outgoing) within the reporting period.	
2.8 Activity 4.1 - Providing Advice and Assistance in the matters for Portfolio/Asset Management on behalf of Third Parties		
200	Does your entity provide Activity 4.1 - advice and assistance in the matters for Portfolio/asset management on behalf of third parties?	
201	Please provide the turnover related to Activity 4.1 - product/service of providing advice and assistance in the matters referred to in number for Activity 1 of portfolio/asset management on behalf of third parties.	
202	Please provide the total number of unique clients of Activity 4.1 - Providing advice and assistance in the matters for Portfolio/asset management on behalf of third parties by client's primary nationality, or country of headquarters or incorporation.	
203	Number of clients, of which are Portfolio/asset management institutions.	
204	Please provide the total value of funds transferred related to Portfolio/asset management institutions (both incoming and outgoing) within the reporting period.	
205	What are the types of advice and assistance your entity provides?	
2.9 Activity 4.2 - Providing Advice and Assistance in the Matters for Management of Undertakings for Collective Investment Governed by Monegasque Law		
206	Does your entity provide Activity 4.2 - advice and assistance in the matters for Management of undertakings for collective investment governed by Monegasque law?	
207	Please provide the turnover related to Activity 4.2 - product/service of providing advice and assistance in the matters referred to in number for Activity 2 the	

Q#	Question Text	Instructions
	management of undertakings for collective investment governed by Monegasque law.	
208	Please provide the total number of unique clients of Activity 4.2 - Providing advice and assistance in the matters for Management of undertakings for collective investment governed by Monegasque law by client's primary nationality, or country of headquarters or incorporation.	
209	Please provide the total value of funds transferred related to Activity 4.2 - Providing advice and assistance in the matters for Management of undertakings for collective investment governed by Monegasque law (both incoming and outgoing) within the reporting period.	
210	Does your entity provide advice or assistance related to Master Funds governed by Monegasque law?	
211	Does your entity provide advice or assistance related to Feeder Funds governed by Monegasque law?	
212	Does your entity provide advice or assistance related to Limited Investor Funds governed by Monegasque law?	
213	Does your entity provide advice or assistance related to Administered Funds governed by Monegasque law?	
214	Does your entity provide advice or assistance related to Licensed Funds governed by Monegasque law?	
215	Does your entity provide advice or assistance related to Private Funds governed by Monegasque law?	
216	What other types of advice and assistance does your entity provide? Include other fund types if any.	
2.10 Activity 4.3 - Providing Advice and Assistance in the Matters for the Reception and Transmission of Orders on behalf of Third Parties		
217	Does your entity provide Activity 4.3 - advice and assistance in the matters for the reception and transmission of orders on behalf of third parties?	
218	Please provide the turnover related to Activity 4.3 - product/service of providing advice and assistance in the matters referred to in number for Activity 3 of the reception and transmission of orders on behalf of third parties.	
219	Please provide the total number of unique Natural Persons of Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties by client's primary nationality.	
220	Please provide the total number of unique Legal Persons of Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties, by client's country of headquarters or incorporation.	

Q#	Question Text	Instructions
221	Please provide the total number of unique Legal Arrangements of Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties, by client's country of headquarters or incorporation.	
222	What are the types of advice and assistance your entity provides related to Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties?	
2.11 Activity 5 - Execution of Orders on behalf of Third Parties		
223	Does your entity provide Activity 5 - Execution of orders on behalf of third parties?	
224	Please provide the turnover related to Activity 5 - product/service of the execution of orders on behalf of third parties.	
225	Please provide the total number of unique Natural Persons of Activity 5 - Execution of orders on behalf of third parties, by client's primary nationality.	
226	Please provide the total number of unique Legal Persons of Activity 5 - Execution of orders on behalf of third parties, by client's country of headquarters or incorporation.	
227	Please provide the total number of unique Legal Arrangements of Activity 5 - Execution of orders on behalf of third parties, by client's country of headquarters or incorporation.	
228	Please provide the total value of funds transferred related to Activity 5 - Execution of orders on behalf of third parties both incoming and outgoing) within the reporting period.	
2.12 Activity 6 - Management of Undertakings for Collective Investment under Foreign Law		
229	Does your entity provide Activity 6 - Management of undertakings for collective investment under foreign law?	
230	Please provide the turnover related to Activity 6 - product/service of the management of undertakings for collective investment under foreign law.	
231	Please provide the total number of unique clients of Activity 6 - Management of undertakings for collective investment under foreign law by client's primary nationality, or country of headquarters or incorporation.	
232	Please provide the total number of accounts for Activity 6 - Management of undertakings for collective investment under foreign law.	
233	Please provide the total number of transactions for Activity 6 - Management of undertakings for collective investment under foreign law (both incoming and outgoing) within the reporting period.	

Q#	Question Text	Instructions
234	Please provide the total value of funds transferred related to Activity 6 - Management of undertakings for collective investment under foreign law (both incoming and outgoing) within the reporting period.	
235	Please provide the number of collective investments managed or administered, by the location (country) of where the product / service is registered / established.	
236	Does your entity manage or administer Master Funds governed by foreign law?	
237	Does your entity manage or administer Feeder Funds governed by foreign law?	
238	Does your entity manage or administer Limited Investor Funds governed by foreign law?	
239	Does your entity manage or administer Administered Funds governed by foreign law?	
240	Does your entity manage or administer Licensed Funds governed by foreign law?	
241	Does your entity manage or administer Private Funds governed by foreign law?	
242	Does your entity manage or administer non-funds governed by foreign law?	
2.13 Activity 7 - Trading on Own Account		
243	Does your entity conduct Activity 7 - Trading on own account?	
244	Please provide the turnover related to Activity 7 - product/service of trading on own account.	
245	Please provide the total number of accounts for Activity 7 - Trading on own account.	
246	Please provide the total number of transactions for Activity 7 - Trading on own account (both incoming and outgoing) within the reporting period.	
247	Please provide the total value of funds transferred related to Activity 7 - Trading on own account (both incoming and outgoing) within the reporting period.	
2.14 Comments & Feedback		
249	Do you have feedback related to any questions in this section?	
250	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
250	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.
251	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.	

Q#	Question Text	Instructions
252	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.
253	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.	
254	Please provide the total number of clients which <u>Foreign Third Parties</u> were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party.	
3.2 Onboarding		
255	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	
256	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	
257	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	
258	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	
259	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).
260	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	
261	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	
262	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	
263	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
264	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).
265	Can the entity provide client nationality information for clients onboarded through introducers?	

Q#	Question Text	Instructions
266	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).	Over time.
267	Please provide the total number of clients onboarded that were Introduced through Third Parties, within the reporting period, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement).	Within the reporting period.
268	Can the entity provide introducers residency information?	
269	Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party.	Over time.
270	Please provide the total number of clients onboarded that were Introduced through Third Parties within the reporting period, broken down by residency of the Third Party.	Within the reporting period.
3.3 Structure		
271	What is the legal form of your entity?	
272	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).	
273	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.	
274	Please provide the total number of employees of the licensed domestic entity.	
275	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".
276	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
277	Is your entity a Branch or Subsidiary of another entity?	
278	Is your entity a Branch or Subsidiary of a Foreign entity?	
279	If a Foreign entity Branch or Subsidiary, in which country is the parent undertaking?	
280	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
281	Is your entity part of an international business network or group?	
282	If so, please specify.	

Q#	Question Text	Instructions
283	Is your entity a member of a professional association or society?	
284	If so, please specify.	
285	Do you work with depositories located abroad?	
286	Please provide the number of depositories, by country in which they are operating.	
287	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>
288	Please indicate the development or modification.	
3.4 Entity Finances		
289	Turnover for the reporting period.	
290	Turnover for the reporting period realized in the Principality of Monaco.	
291	Turnover for the reporting period realized outside the Principality of Monaco.	
292	Please provide the amount of your last annual VAT return.	Total of twelve monthly payments.
3.5 Rejected Relationships		
293	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.	
294	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p>The entity should identify if it is possible to determine if the reason for new client rejection was due to both:</p> <p>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other</p>

Q#	Question Text	Instructions
		<p>commercial reasons related to AML/CFT/CPF),</p> <p>and</p> <p>b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction.</p>
295	Please provide the total number of new client business relationships that have been rejected due to Money Laundering considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
296	Please provide the total number of new client business relationships that have been rejected due to Terrorism Financing considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
297	Please provide the total number of new client business relationships that have been rejected due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
3.6 Blocked/Rejected Transactions		
298	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
299	Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p>The entity should identify if it is possible to determine if the reason for blocking/rejecting a transaction was due to both:</p> <p>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other</p>

Q#	Question Text	Instructions
		<p>commercial reasons related to AML/CFT/CPF),</p> <p>and</p> <p>b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction</p>
300	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering considerations due to client attributes / activities / deficiencies within the reporting period.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
301	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Terrorism Financing considerations due to client attributes / activities / deficiencies within the reporting period.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
302	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Financing the Proliferation of Weapons of Mass Destruction considerations due to client attributes / activities / deficiencies within the reporting period.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
3.7 Terminated Relationships		
303	Please provide the total number of client business relationships (clients) that have been terminated due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
304	Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p>The entity should identify if it is possible to determine if the reason for terminating a client business relationship was due to both:</p> <p>a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other</p>

Q#	Question Text	Instructions
		<p>commercial reasons related to AML/CFT/CPF),</p> <p>and</p> <p>b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction</p>
305	Please provide the total number of client business relationships that have been terminated due to Money Laundering considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
306	Please provide the total number of client business relationships that have been terminated due to Terrorism Financing considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
307	Please provide the total number of client business relationships that have been terminated due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to bank dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
3.8 Comments & Feedback		
308	Do you have feedback related to any questions in this section?	
309	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 at your entity, at the end of the reporting period.	<p>The reporting entity should disclose the number of full-time equivalent employees irrespective of their function.</p> <p>The number at the end of the reporting period should be used.</p>
2	Please provide the total number of full-time equivalent employees at your entity.	<p>The reporting entity should disclose the number of full-time equivalent employees and non-employee partners and owners, irrespective of their function.</p> <p>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.</p>
3	Please provide an estimate of time spent related to AML/CFT Compliance at your entity, in Full-Time Equivalent terms.	<p>The reporting entity should disclose an estimation of the time spent by the licensed individual/entity related to AML/CFT Compliance. Provide the answer in Full-Time Equivalent (FTE) terms.</p> <p>If a licensed individual, provide the estimate as a decimal of FTE time. For example if an average of 10% of a standard work week is spent related to AML/CFT Compliance, provide a value of 0.1.</p> <p>If a licensed entity, provide the sum of time by all employees spent on AML/CFT Compliance, in FTE terms.</p>
4	Does your entity have a compliance department?	
5	Does the MLRO fulfil any other role or job function?	
6	What percentage of time does the MLRO spend on other than AML/CFT compliance functions?	
7	Is your entity part of a Group?	
1.2 Policies & Procedures		
8	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.
9	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).
10	Did your entity circulate these policies and procedures to all its employees?	
11	Did your entity ensure awareness of these policies and procedures to all its employees?	

C#	Question Text	Instructions
12	Did your entity update their written AML/CFT Policies and Procedures in the last year?	
13	Please provide the date of the last update to your entity's written AML/CFT Policies and Procedures.	
14	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.
15	Does your entity have a group-wide AML/CFT/CPF programme?	
16	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?	
17	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.
18	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures?	
19	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)	
20	Has your entity previously submitted AML/CFT Procedures to AMSF?	
21	Please provide the last date of transmission of your AML/CFT procedures manual to AMSF.	
1.3 Governance		
22	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/or 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>

C#	Question Text	Instructions
		<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>
23	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/FT risk and trends.</p>
24	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>
25	Does the senior management of your entity review (give approval) for taking on high-risk clients?	<p>In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship.</p>

C#	Question Text	Instructions
		The reporting entity should disclose whether the senior management undertakes these responsibilities.
1.4 Compliance & Violations		
26	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.
27	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.
28	Please identify the number and types of AML/CFT violations.	
1.5 CDD		
29	<p>Does your entity record all of the following in your customer database:</p> <ul style="list-style-type: none"> • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence • Tax Residence • Activity • Source of Wealth • Source of Funds 	
30	If your entity does not collect all of the above mentioned items, please specify which items are not collected?	If all are collected respond "NA".

C#	Question Text	Instructions
31	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> • Account Holder • Representative of Company or Client • Beneficial Owner • Administrators/Directors • Shareholders • Legal Representatives • Settlor/Constituent • Trustee • Beneficiary of a Trust or other Legal Arrangement • Founders • Donors • Person who directly or indirectly exercises control of the foundation • Protector • More Complex Ownership Structures • Introducers 	
32	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> • Credit Card Holders • Complex Ownership Structure • Depositors/3rd Party Guarantors • Occasional Customers • Prospective Customers • Insurance Policy Payee • Insurance Policy Holder • Insurance Policy Beneficiary • Insurance Policy Insured? 	
33	<p>If your entity does not collect the items in the two above questions, please specify which items are not collected?</p>	<p>If all are collected respond "NA".</p>
34	<p>Does your entity record other client information or register client activity information in their database?</p>	<p>The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly</p>

C#	Question Text	Instructions
		exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?
35	Please specify what other information is included in your database, specify all that apply.	
36	Does your entity research clients on the Internet?	
37	Does your entity research client using the Journal de Monaco?	
38	Does your entity research client using sites specializing in services of risk detection?	
39	Does your entity research client using business websites?	
40	Does your entity research client's organization, board members, etc.?	
41	Does your entity research clients in the press?	
42	What other information is used to research the client?	
43	Are the results of the research systematically recorded?	
44	Does the evolution of the clients services requested contribute to the identification of red flags?	
45	Is past 5 years of client relationship data accessible by AMSF upon request?	
46	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
47	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
48	Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?	The reporting entity should indicate whether it has written policies and procedures in place that specify the difference in simplified, standard and enhanced due diligence documentation and requirements.
49	Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period.	Please repeat the answer provided in Q2.
50	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
51	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
52	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
53	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
54	Does your entity undertake other measures for high-risk clients, before customer take-on?	
55	Please specify other measures taken for high-risk clients, before customer take-on.	

C#	Question Text	Instructions
56	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
57	For when BO info is recorded, at what % shareholding threshold does your entity use for recording Beneficial Owner information?	
58	Does your entity examine the source of wealth before customer take-on?	
59	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
60	How does the company verify the Beneficial Owners of Virtual Assets?	If not applicable, state 'NA'.
61	Does your entity perform or arrange its own CDD activities?	
62	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.
63	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?	
64	Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed?	
65	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).	
1.6 EDD		
66	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
67	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
68	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.
69	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
70	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.
1.7 Risk Assessments		
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.	

C#	Question Text	Instructions
73	Please provide the total number of unique clients that are without a risk level determined yet.	
74	Does your entity's High-Risk Assignment Considerations include ALL of the following: <ul style="list-style-type: none"> • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types • Distribution Channels • Accounts with Conventional Title • Assets Under Management • Volume of Operations • Nature of Operations • Trigger Events 	
75	If your entity does not take into consideration all of the above mentioned elements, please specify which items are not considered?	If all are considered respond "NA".
76	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
77	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	Name all that apply.
78	Does your entity have a tool or process for making AML/CFT risk assessments?	(client assessments)
79	Does your entity use a list of Sensitive Countries for AML/CFT risk assessment?	
80	Does your entity use a list of Sensitive Activities for AML/CFT risk assessment?	
81	What client activities does your entity associate with High-Risk clients?	
82	Does your entity consider ML and TF risks separately?	(entity's own assessment)
83	Does your entity have a tool or process for making AML/CFT risk assessments?	(entity's own assessment)
1.8 Internal Audit / Controls		
84	Does your entity's internal control process include a Permanent Controller?	
85	Is the permanent controller a different person from the AML/CFT Manager?	
86	Does your entity's internal control process include an Internal Audit Department?	
87	How many significant audit issues were identified in the latest audit report (relating to AML/CFT/CPF)?	
88	When did your entity last have a SICCFIN/AMSF audit?	

C#	Question Text	Instructions
89	When did your entity last have an Internal AML/CFT audit?	
90	When did your entity last have a Group AML/CFT audit?	
91	Did your entity have any Other Audits not mentioned above?	(AML/CFT related audits only)
92	Specify the types of Other Audits, and provide the year of the last audit of each kind.	(AML/CFT related audits only)
1.9 Training		
93	Did your entity conduct AML/CFT training for its Directors / Management in the reporting period?	
94	Did your entity conduct AML/CFT training for its client-facing employees in the reporting period?	
95	Did your entity conduct AML/CFT training for its Compliance Employees in the reporting period?	
96	Did your entity conduct AML/CFT training for its Internal Audit Department in the reporting period?	
97	Please provide the total number of employees trained on AML/CFT matters in Reporting Cycle.	
98	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters within the reporting period.	
99	Did any of the AML/CFT training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)?	
100	Did any of the AML/CFT training/awareness raising activities include Internal Meetings?	
101	Did any of the AML/CFT training/awareness raising activities include Consultation of AMSF's Website?	
102	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider in Monaco?	
103	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider outside Monaco?	
104	Did any of the AML/CFT training/awareness raising activities include Training by Another Group Member?	
105	Did any of the AML/CFT training/awareness raising activities include any Other Activities?	
106	What other AML/CFT training/awareness raising activities did it include? Please specify all that apply.	
107	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
108	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
109	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	

C#	Question Text	Instructions
110	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
111	Did any of the AML/CFT training/awareness raising activities cover topics related to Typologies?	
112	Did any of the AML/CFT training/awareness raising activities cover topics related to Practical Cases?	
113	Did any of the AML/CFT training/awareness raising activities cover topics related to News?	
114	Did any of the AML/CFT training/awareness raising activities cover topics related to Corruption?	
115	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing of Terrorism?	
116	Did any of the AML/CFT training/awareness raising activities cover topics related to Cryptocurrency?	
117	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
118	Did any of the AML/CFT training/awareness raising activities cover topics related to Tax Evasion?	
119	Did any of the AML/CFT training/awareness raising activities cover topics related to Fraud?	
120	Did any of the AML/CFT training/awareness raising activities cover other topics not mentioned above?	
121	What other topics did the AML/CFT training/awareness raising activities cover? Please specify all that apply.	
1.10 Monitoring		
122	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
123	Has the automated system been adapted to the entity in Monaco?	
124	Please provide the total number of transactions (both incoming and outgoing) by or on behalf of clients within the reporting period.	Please repeat the answer provided in Q6.
125	Please provide the total number of Alerts in Reporting Period by the system related to Money Laundering.	
126	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
127	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
128	Please provide the total number of Alerts in Reporting Period by the system related to Terrorism Financing.	

C#	Question Text	Instructions
129	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
130	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
1.11 Monitoring - Rejected Potential Clients		
131	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 (i.e. not entering into a business relationship).	Please repeat the answer provided in Q293.
132	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p>Please repeat the answer provided in Q294.</p> <p>The entity should identify if it is possible to determine if the reason for new client rejection was due to both:</p> <ul style="list-style-type: none"> a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and b. Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
133	Please provide the total number of new client business relationships (potential clients) that have been rejected due to <u>Money Laundering</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, a bank's discretionary AML/CFT practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.

C#	Question Text	Instructions
134	Please provide the total number of new client business relationships (potential clients) that have been rejected due to <u>Terrorism Financing</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, a bank's discretionary AML/CFT practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.
135	Please provide the total number of new client business relationships (potential clients) that have been rejected due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, a bank's discretionary AML/CFT practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.
1.12 Monitoring - Blocked/Rejected Transactions		
136	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	Please repeat the answer provided in Q298.
137	Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to Money Laundering, Terrorism Financing, Financing the Proliferation of Weapons of Mass Destruction?	<p>Please repeat the answer provided in Q299.</p> <p>The entity should identify if it is possible to determine if the reason for blocking/rejecting a transaction was due to both:</p> <ul style="list-style-type: none"> a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), <p>and</p>

C#	Question Text	Instructions
		<p>b. Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction</p>
138	<p>Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to <u>Money Laundering</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u>.</p>	<p>For this question, a bank's discretionary AML/CFT practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.</p>
139	<p>Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to <u>Terrorism Financing</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u>.</p>	<p>For this question, a bank's discretionary AML/CFT practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.</p>
140	<p>Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u>.</p>	<p>For this question, a bank's discretionary AML/CFT practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWI or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.</p>
1.13 Monitoring - Terminated Relationships		
141	<p>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. (i.e. existing business relationship terminated)</p>	<p>Please repeat the answer provided in Q303.</p>
142	<p>Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due</p>	<p>Please repeat the answer provided in Q304.</p>

C#	Question Text	Instructions
	to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction?	<p>The entity should identify if it is possible to determine if the reason for blocking/rejecting a transaction was due to both:</p> <ul style="list-style-type: none"> a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the bank's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and b. Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
143	Please provide the total number of client business relationships (clients) that have been terminated due to <u>Money Laundering</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, termination of a client would generally be related to a change in discretionary AML/CFT practices, or an ongoing implementation thereof. This is opposed to terminations due to reasons related to non-discretionary client attributes, activities or deficiencies, such as being added to a sanctions list, becoming a PEP, etc.
144	Please provide the total number of client business relationships (clients) that have been terminated due to <u>Terrorism Financing</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, termination of a client would generally be related to a change in discretionary AML/CFT practices, or an ongoing implementation thereof. This is opposed to terminations due to reasons related to non-discretionary client attributes, activities or deficiencies, such as being added to a sanctions list, becoming a PEP, etc.
145	Please provide the total number of client business relationships (clients) that have been terminated due to <u>Financing the Proliferation of Weapons of Mass Destruction</u> considerations during the reporting period, that are <u>based mainly on your bank's discretionary AML/CFT/CPF practices</u> .	For this question, termination of a client would generally be related to a change in discretionary AML/CFT practices, or an ongoing implementation thereof. This is opposed to terminations due to reasons related to non-discretionary client attributes, activities or deficiencies, such as being added to a sanctions list, becoming a PEP, etc.
1.14 Record Keeping		
146	Does your entity keep transaction records for at least 5 years?	
147	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	

C#	Question Text	Instructions
148	Does your entity keep these records and documents in a safe and secure place?	
149	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"> (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.
150	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.15 Targeted Financial Sanctions (TFS)		
151	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"> (a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons; (b) Frequency and scope of screening; (c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).
152	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"> (1) approval of TFS-related policies, procedures and instructions by the board or senior management; (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

C#	Question Text	Instructions
		<p>(trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.;</p> <p>(3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities,</p> <p>(4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.</p>
153	<p>Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?</p>	<p>The reporting entity should disclose whether its policies and procedures cover:</p> <p>(a) direct control and</p> <p>(b) indirect control of assets by designated persons;</p> <p>(c) internal processes and systems designed to detect persons who exercise direct and indirect control over assets owned by designated persons.</p>
154	<p>Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?</p>	
155	<p>Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?</p>	
156	<p>Does your entity have an automated system to check the Customer Database?</p>	
157	<p>Does the entity's automated System perform checks on Entry into Relationship for all of the following:</p> <ul style="list-style-type: none"> • Account Holder • Representative of Company or Client • Beneficial Owner • Administrators/Directors • Shareholders • Legal Representatives • Settlor/Constituent • Trustee • Protector • Introducers 	<p>(when applicable by client / activity type)</p>

C#	Question Text	Instructions
158	<p>Does the entity's automated system perform checks on Entry into Relationship for all of the following:</p> <ul style="list-style-type: none"> • Credit Card Holders • Complex Ownership Structure • Depositors/3rd Party Guarantors • Occasional Customers • Prospective Customers • Insurance Policy Payee • Insurance Policy Holder • Insurance Policy Beneficiary • Insurance Policy Insured 	(when applicable by client / activity type)
159	If your entity does not collect the items mentioned in the above two questions, please specify which items are not collected?	
160	Does the entity's automated System perform any Other Checks on Entry into Relationship, not already mentioned above?	
161	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	Reference Sovereign Ordinance no. 8.664.
162	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.
163	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	Reference Sovereign Ordinance no. 8.664.
164	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	Reference Sovereign Ordinance no. 8.664.
165	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	Reference Sovereign Ordinance no. 8.664.
166	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	Reference Sovereign Ordinance no. 8.664.
167	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	Reference Sovereign Ordinance no. 8.664.
168	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	Reference Sovereign Ordinance no. 8.664.
169	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	Reference Sovereign Ordinance no. 8.664.

C#	Question Text	Instructions
170	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	Reference Sovereign Ordinance no. 8.664.
171	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.
172	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Depositors / 3rd Party Guarantors?	Reference Sovereign Ordinance no. 8.664.
173	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Recipients of Funds?	Reference Sovereign Ordinance no. 8.664.
174	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary?	
175	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
176	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
177	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.	
178	Please provide the total value of assets frozen (in EUR) related to Terrorism Financing within the reporting period.	
179	Please provide the total value of assets frozen (in EUR) related to financing of Proliferation of Weapons of Mass Destruction within the reporting period.	
180	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
181	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
182	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	
183	Has your entity taken any other actions related to Terrorism Financing?	
184	Has your entity taken any other actions related to financing of Proliferation of Weapons of Mass Destruction?	

C#	Question Text	Instructions
1.16 PEPs		
185	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
186	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs? Please specify all that apply.	
187	What additional AML/CFT procedures are applied for PEPs (compared to a standard risk client)? Please specify all that may apply.	<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>
188	Does PEP screening occur as part of the CDD process for new customers?	
189	Does screening for PEPs occur on an ongoing basis?	
190	Are PEPs subject to increased monitoring?	
191	Does your entity consider all PEP relationships as High-Risk for AML/CFT?	
192	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?	
1.17 Cash Transactions		
193	Does your entity conduct cash transactions with clients?	Incoming or outgoing.
194	Does your entity apply any specific AML/CFT controls and procedures for cash transactions?	
195	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.18 Suspicious Transaction Reporting		
196	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)
197	Did your entity file any STRs/SARs to the FIU within the reporting period?	
198	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).

C#	Question Text	Instructions
199	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).
200	Please provide the total number of STRs/SARs related to a Monegasque Legal Person provided to the FIU within the reporting period.	
201	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
202	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
203	Please provide the total number of STRs/SARs related to a Foreign Tax Offenses (criminal or administrative) provided to the FIU within the reporting period.	
204	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
205	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
206	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
207	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	
208	Did your entity respond internally to the suspicious transactions? (e.g. modification of the client relationship, modification of the client risk's assessment)	
209	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?	
1.19 Comments & Feedback		
210	Do you have feedback related to any questions in this section?	
211	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.