

Instructions: 2025 Multi-Family Office AML/CFT/CPF Survey

This document provides the definitions and instructions that will help an obliged entity in completing the AML/CFT/CPF Risk Assessment Information Request. There are five tabs to be completed:

- 1) Customer Risk, 2) Products, Services, & Transactional Risk, 3) Distribution Channel Risk, 4) Controls and Quality of Risk Mitigation, 5) Signatories.

The questionnaire should be completed in full. The questionnaire may be submitted incomplete when all information on the last tab has been provided, including the reason for submitting incomplete. Failure to provide required information may result in enhanced oversight or other action.

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

- Responses must include all products or services offered to customers that fall within the scope of the AML/CFT/CPF regulations in force in Monaco.
- The reporting period is 1st January 2025 to 31st December 2025.
- Questions related to number of clients shall include clients that are active at the end of the reporting period and clients that were at some point active during the reporting period.
- The term “unique clients” denotes that while a client might have several accounts it should only be counted as one client.
- Questions related to number or value of transactions are relevant for activity performed within the reporting period.
- Questions related to number or value of transactions that are by and on behalf of clients should capture the instances when the reporting entity (1) prepares transactions for clients and instances when the reporting entity (2) carries out transactions on behalf of clients.
- All questions to provide monetary values require an answer in EUR. Only value questions are indicated with the currency symbol € in the survey.
- All questions asking for responses with country breakdown are ISO 3166-1 Country Names or can be answered with the Bulk-paste feature when using country names, or the ISO 2-alpha, 3-alpha, and 3-numeric codes. A link to the acceptable country names and codes exists on the Bulk-paste popup window. This window is accessible for questions having the symbol.
- If the nationality, residency, or other requested breakdown is unknown, please select “Unknown” from the dropdown.
- For questions related to legal entity / profession type and business classification types, NIS or NACE code systems may be used, or alternative equivalent. For questions relating to classification types but not specified by the entity’s sector classification system used, please refer to industry practices.
- Responses provided in the survey shall be for the reporting entity only, and should not include any group totals.
- If data is not available, do not enter ‘0’, leave blank and provide a reason for incompleteness. Only enter ‘0’ when there is zero of that activity.

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Glossary

| Term | Definition |
|------------------------------|--|
| Active Account | Only clients that are active for the reporting period or were at some point active during the reporting period. |
| AML/CFT/CPF/CPF | Anti-Money Laundering / Counter Financing of Terrorism / Counter Financing of Proliferation of Weapons of Mass Destruction |
| AMSF (previously SICCFIN) | Autorité Monégasque de Sécurité Financière (AMSF), The national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. https://amsf.mc |
| Association | For the purposes of this questionnaire, an association is a freely formed organization (group with members) that has acquired the legal personality; for example to open a bank account, enter contracts, appear in courts, buy estate, and receive donations. Refer to Monaco law n° 1.355 of 2008/12/23 for registered associations. Associations shall also include foreign associations with a similar capacity to act, specifically to open a bank account. |
| Beneficial Owner | Beneficial Owner is defined in Article 21 of <u>Law 1.362 of 3 August 2009 amended by law 1.503 of 23 December 2020 on the fight against money laundering, terrorist financing and corruption:</u> <ul style="list-style-type: none"> - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted, or - the natural person(s) who ultimately exercise effective control over a legal entity or legal arrangement. |
| 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> <ul style="list-style-type: none"> - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted. |
| Client / Customer | A Client (identical meaning to Customer) should be understood as a Natural Person or a Legal Person/entity with whom the reporting entity has a business relationship or for whom the reporting entity carried out an occasional transaction. In this context, clients refer to all existing clients with whom the entity has had a business relationship within the reporting period including occasional (walk-in) clients who have been serviced during the reporting period. Reference to clients is made in respect of those who have benefited from a product or service falling within the scope of AML/CFT/CPF regulation. |
| Correspondent banking | Correspondent banking is the provision of banking services by one bank as the correspondent to another bank as the respondent, including providing a current or other liability account and related services, such as cash management, international funds transfers, cheque clearing, payable-through accounts and foreign exchange services. |
| DPMS | Dealers in Precious Metals and Stones |
| DBT | Direction du Budget et du Trésor de Monaco |
| Dual-use items | Dual-use item means items, including software and technology, which can be used for both civil and military purposes, and includes items which can be |

| Term | Definition |
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| | 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 | <p>Financial institutions mean any natural or legal person who conducts as a business one or more of the following activities or operations for or on behalf of a customer:</p> <ol style="list-style-type: none"> 1. Acceptance of deposits and other repayable funds from the public. 2. Lending. 3. Financial leasing. 4. Money or value transfer services. 5. Issuing and managing means of payment (e.g. credit and debit cards, cheques, traveler's cheques, money orders and bankers' drafts, electronic money). 6. Financial guarantees and commitments. 7. Trading in: <ol style="list-style-type: none"> (a) money market instruments (cheques, bills, certificates of deposit, derivatives etc.); (b) foreign exchange; (c) exchange, interest rate and index instruments; (d) transferable securities; (e) commodity futures trading. 8. Participation in securities issues and the provision of financial services related to such issues. 9. Individual and collective portfolio management. 10. Safekeeping and administration of cash or liquid securities on behalf of other persons. 11. Otherwise investing, administering or managing funds or money on behalf of other persons. 12. Underwriting and placement of life insurance and other investment-related insurance. 13. Money and currency changing. |
| Foreign Residents | For the purpose of this questionnaire, is a non-Monégasque national that is a resident in Monaco. |
| Government / Public Sector | Government/public entity is an organization or body providing services to the public on behalf of the government or another public entity. |
| High Net Worth Individual (HNWI) | For the purposes of this survey, a High-Net-Worth-Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million. |
| High Net Worth (HNW) Group | For the purposes of this survey, a HNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 5 million. |
| Holding Company | A holding company is a financial vehicle for owning and controlling other assets, such as real estate, stocks, or companies. Using a holding company creates legal separation between the 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 |

| Term | Definition |
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| | or other similar arrangements. Examples of other similar arrangements (for AML/CFT/CPF purposes) include fiducie, treuhand and fideicomiso. |
| Legal Person | Legal persons refer to any entities other than natural persons that can establish a permanent customer relationship with a financial institution or otherwise own property. This can include companies, corporate bodies, foundations, institute, partnerships, or associations and other relevantly similar entities. |
| ML / TF / PF | Money Laundering / Terrorist Financing / Financing the Proliferation of Weapons of Mass Destruction |
| Money or value transfer services (MVTs) | Money or value transfer services (MVTs) refers to financial services that involve the acceptance of cash, cheques, other monetary instruments or other stores of value and the payment of a corresponding sum in cash or other forms to a beneficiary by means of communication, message, transfer, or through a clearing network to which the MVTs provider belongs. |
| More Complex Ownership Structure | For the purposes of this survey, a More Complex Ownership Structure refers to clients in which the reporting entity has increased effort or difficulty in independently verifying the identity of the Beneficial Owner of the customer. For this survey, More Complex Ownership Structures are structures with 3 or more layers of ownership between the Account Holder and the Beneficial Owner, or, structures that are less than 3 layers of ownership but that are difficult to verify the Beneficial Owner due to obscurity or obfuscation, such as when information is not publicly accessible, lacks transparency, involves a foreign company or trust, requires foreign cooperation to verify, or when the recorded owner is a professional (lawyer, accountant, company services business). |
| Nationals | Natural Person who is a Monégasque national. |
| Non-Profit Organizations (NPOs) | Non-Profit Organizations (NPOs) refers to a legal person or arrangement or organization that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of "good works". |
| Occasional Transaction | Any Transaction other than a Transaction carried out in the course of an established Business Relationship. |
| Payment types 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. |

| Term | Definition |
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| 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. |
| 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. |
| 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 |
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| 1 Customer Risk | | |
| 1.1 Subject To Law n° 1.362 | | |
| Q1 | 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? | Link |
| Q2 | Please specify the reason why no activity was carried out during the reporting period. | (when no is answered above) |
| 1.2 Clients Summary | | |
| Q3 | Please provide the total number of unique clients that were at some point active during the reporting period, by client's primary nationality, or country of headquarters or incorporation. | <p>If multiple primary nationalities, enter the one most commonly used.</p> <p>If the nationality is unknown, please select "Unknown" from the dropdown.</p> <p>For questions referring to 'unique client', please consider:</p> <ul style="list-style-type: none"> • If the same client has several accounts, then it is considered one client • If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client • Any other situation where the same client would be double counted, please consider as one client |
| Q4 | <i>Total number of clients</i> | Auto-calculated field |
| Q5 | Please provide the total number of transactions (both incoming and outgoing) with clients within the reporting period. | This value will be validated against other responses provided to later questions for numbers of transactions with Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive. |
| Q6 | Please provide the total number of single transactions of 10,000 EUR and above with clients (both incoming and outgoing). | |
| Q7 | Please provide the total value of funds transferred with clients (both incoming and outgoing) within the reporting period. | Please indicate the total amount of all financial flows. All transactions that result in a flow (in/out) must be recorded. This value will be validated against other answers provided to subsequent questions regarding the number of transactions carried out by individuals, legal entities, trusts, and other legal structures. The answers are mutually exclusive. |
| Q8 | Does your entity have any accounts with or for clients, for the keeping of running costs of products or services provided by your entity? | Please indicate whether your entity has opened one or more accounts with clients for the purpose of holding operating costs for products or services provided by your entity. |

| Q# | Question Text | Instructions |
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| Q9 | As part of services provided, does your entity make payments on behalf of clients? | i.e. does it have power of attorney or a signatory right on their clients' accounts. |
| Q10 | Please provide the total number of transactions (both incoming and outgoing) on behalf of clients within the reporting period. | This value will be validated against other responses provided to later questions for numbers of transactions by and on behalf of Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive. |
| Q11 | Please provide the total number of single transactions of 10,000 EUR and above on behalf of clients (both incoming and outgoing). | |
| Q12 | Please provide the total value of funds transferred on behalf of clients (both incoming and outgoing) within the reporting period. | |
| Q13 | Please provide the total value of the assets under management for clients. | |
| 1.3 Beneficial Owners | | |
| Q14 | Does your entity record Beneficial Owner information for some or all transactions? | Information relating to beneficial owners: identification details, addresses, etc. |
| Q15 | For what transaction conditions does your entity record Beneficial Owner information? | |
| Q16 | Please provide the total number of unique beneficial owners that were at some point active during the reporting period. | <p>The complete concept of beneficial owner is referred to in Article 14 of OS No. 2.318, as amended, which can be identified by:</p> <ul style="list-style-type: none"> • Their direct or indirect control (by any means other than holding capital or voting rights, i.e. control over the capital or the management, administrative or executive bodies of the company or over the general meeting of its shareholders or the natural person); • The representative of the company when no natural person could be identified according to the criteria set out in (a) the manager(s) of SNCs, SCSs, SARLs, CSAs and civil companies; (b) the managing director or chief executive officer of public limited companies; (c) the trustee appointed in the context of legal proceedings for cessation of payments, judicial settlement or liquidation of assets). • Their direct or indirect ownership (at least 25% of the capital or voting rights of the legal entity). <p>This value will be validated in relation to the other answers provided to subsequent questions concerning beneficial owners.</p> |
| Q17 | Can your entity distinguish nationality of clients' BO's? | Indicate whether or not your entity is able to make the distinction. |
| Q18 | Provide the percentage breakdown of primary nationalities of Beneficial Owners. | Provide the percentage breakdown of all clients' beneficial owner's primary nationalities, including |

| Q# | Question Text | Instructions |
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| | | BO's of all % ownership levels, those with direct or indirect control, and those representing a legal entity. |
| Q19 | Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity , broken down by primary nationality. | This involves breaking down beneficial owners by category and then by nationality. |
| Q20 | Please provide the total number of Beneficial Owners that represent a legal entity , broken down by primary nationality. | These questions thus cover the entire concept of beneficial ownership, in accordance with Article 14 of OS No. 2.318 as amended, which can be identified in accordance with the above-mentioned procedures. |
| Q21 | Can your entity distinguish BO's that have 25% or greater ownership? | |
| Q22 | Please provide the total number of Beneficial Owners with 25% or greater ownership , by primary nationality. | |
| Q23 | For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency? | Here, you should indicate the number of beneficial owners who have this status through their direct or indirect control (by any means other than holding capital or voting rights, i.e. control over the capital or the management, administrative or executive bodies of the company or over the general meeting of its shareholders or the natural person). This number must be broken down by nationality. If the nationality is unknown, please select 'Unknown' from the drop-down list. |
| Q24 | 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. | Indicate whether or not your entity registers residence. |
| Q25 | Please provide the total number of Beneficial Owners that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership. | |
| 1.4 Accounts Summary | | |
| Q26 | Please provide the total number of accounts from all client types. | |
| Q27 | Can your entity distinguish BO's that are account holders that have 25% or greater ownership of an account? | |
| Q28 | 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. | |
| Q29 | 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. | |
| Q30 | 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. | |

| Q# | Question Text | Instructions |
|---|---|---|
| Q31 | Please provide the total number of Signatories of Legal Person accounts, by Signatory's primary nationality. | |
| Q32 | Do you have any Legal Persons or Legal Arrangements as clients that don't have a bank account? | |
| Q33 | How many foreign Legal Person or Legal Arrangements clients do not have a bank account, broken down by type? | |
| Q34 | How many domestic Legal Person or Legal Arrangements clients do not have a bank account, broken down by type? | |
| Q35 | Please describe briefly the reason for each client without a bank account. Please identify the type of client for each. | |
| Q36 | Do you know if any entities that are clients don't have a bank account in Monaco? | |
| Q37 | How many clients don't have a bank account in Monaco, by country where the account is located? | |
| 1.5 Distinguishing Client Types | | |
| Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are: | | |
| Q38 | Trusts? | Indicate whether or not your entity is able to identify and record information on the types of customers targeted below (trusts, associations, other legal structures, HNWI's, VASPs). |
| Q39 | Associations? | |
| Q40 | Other Legal Arrangements not mentioned above? | |
| Q41 | HNWI's? | This question aims to determine what your entity is capable of doing, regardless of whether you currently have such clients. |
| Q42 | Virtual Assets Service Providers (VASPs)? | |
| 1.6 Clients - Natural Persons | | |
| Q43 | Does your entity have clients that are Natural Persons? | |
| Q44 | Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual (including domestic clients). | <p>If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person should not be counted as a Natural Person client.</p> <p>If you have a total of 2 clients, you must find 2 clients, even if the breakdown is different.</p> <p>Example:</p> <ul style="list-style-type: none"> Individuals broken down by nationality: 2 clients → 1 Swiss, 1 Japanese Individuals broken down by residence: 2 clients → 2 residents of Monaco <p>The total number remains the same: 2 clients.</p> |
| Q45 | # Natural Person Customers | Auto-calculated |
| Q46 | Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the residency of the individual (including domestic clients). | |
| Q47 | # Natural Person Customers | Auto-calculated |
| Q48 | Difference between Total by Nationality and Total by Residency. | Validate your inputs , when correctly entered, the total between these should be '0'. |

| Q# | Question Text | Instructions |
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| Q49 | Please provide the total number of transactions with clients that are Natural Persons, both incoming and outgoing. | |
| Q50 | Please provide the total value of funds transferred with clients that are Natural Persons, both incoming and outgoing. | |
| Q51 | Please provide the total number of transactions on behalf of clients that are Natural Persons, both incoming and outgoing. | |
| Q52 | Please provide the total value of funds transferred on behalf of clients that are Natural Persons, both incoming and outgoing. | |
| 1.7 Clients - Legal Persons | | |
| Q53 | Does your entity have clients that are Legal Persons? | |
| Q54 | Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation. | |
| Q55 | Please provide the total number of transactions with clients that are Legal Persons, both incoming and outgoing. | |
| Q56 | Please provide the total value of funds transferred with clients that are Legal Persons, both incoming and outgoing. | |
| Q57 | Please provide the total number of transactions on behalf of clients that are Legal Persons, both incoming and outgoing. | |
| Q58 | Please provide the total value of funds transferred on behalf of clients that are Legal Persons, both incoming and outgoing. | |
| Q59 | Does your entity distinguish whether Legal Person clients are Monegasque Legal Persons and the type of Legal Person? | |
| Q60 | Please provide the number of Monegasque Legal Persons as clients, by type. | <ul style="list-style-type: none"> • Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP • Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE • Private Domain of the Monegasque State • Trusts • Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person |

| Q# | Question Text | Instructions |
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| 1.8 Clients - Trusts | | |
| Q61 | Does your entity have clients that are Trusts? | |
| Q62 | Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation. | |
| Q63 | Does your entity have information related to the number and value of their transactions? | |
| Q64 | Please provide the total number of transactions with clients that are Trusts, both incoming and outgoing. | |
| Q65 | Please provide the total value of funds transferred with clients that are Trusts, both incoming and outgoing. | |
| Q66 | Please provide the total number of transactions on behalf of clients that are Trusts, both incoming and outgoing. | |
| Q67 | Please provide the total value of funds transferred on behalf of clients that are Trusts, both incoming and outgoing. | |
| Q68 | Please provide the total number of Monegasque unique clients that are Trusts. | |
| Q69 | Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality. | |
| Q70 | Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by country in which the trust was created. | |
| 1.9 Clients - Associations | | |
| Q71 | Does your entity have clients that are Associations? | |
| Q72 | Please provide the total number of unique clients that are Associations, broken down by country of Association formation. | |
| Q73 | Does your entity have information related to the number and value of their transactions? | |
| Q74 | Please provide the total number of transactions <u>with</u> clients that are Associations, both incoming and outgoing. | |
| Q75 | Please provide the total value of funds transferred <u>with</u> clients that are Associations, both incoming and outgoing. | |
| Q76 | Please provide the total number of transactions <u>on behalf of</u> clients that are Associations, both incoming and outgoing. | |
| Q77 | Please provide the total value of funds transferred <u>on behalf of</u> clients that are Associations, both incoming and outgoing. | |
| 1.10 Clients - Other Legal Arrangements | | |
| Q78 | Does your entity have clients that are Other Legal Arrangements? | |

| Q# | Question Text | Instructions |
|--------------------------------|--|---|
| Q79 | Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation. | |
| Q80 | Does your entity have information related to the number and value of their transactions? | |
| Q81 | Please provide the total number of transactions <u>with</u> clients that are Other Legal Arrangements, both incoming and outgoing. | |
| Q82 | Please provide the total value of funds transferred <u>with</u> clients that are Other Legal Arrangements, both incoming and outgoing. | |
| Q83 | Please provide the total number of transactions <u>on behalf of</u> clients that are Other Legal Arrangements, both incoming and outgoing. | |
| Q84 | Please provide the total value of funds transferred <u>on behalf of</u> clients that are Other Legal Arrangements, both incoming and outgoing. | |
| Q85 | Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients. | |
| 1.11 HNWI's and UHNWI's | | |
| Q86 | Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWIs) of Legal Persons / Legal Arrangements that are clients? | HNWI: > 5 million. UHNWI: > 50 million. A UNHWI is necessarily an HNWI. In STRIX, a UNHWI must be counted in both the HNWI and UHNWI categories. |
| Q87 | 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). | |
| Q88 | Please provide the total number of transactions (both incoming and outgoing) with clients that are HNWIs or individuals belonging to a HNW Group. | |
| Q89 | Please provide the total value of funds transferred with clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing). | |
| Q90 | Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are HNWIs or individuals belonging to a HNW Group. | |
| Q91 | Please provide the total value of funds transferred on behalf of clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing). | |
| Q92 | Please provide the total number of unique Beneficial Owners of Legal Person clients that are HNWIs, broken down by the primary nationality of the HNWI. | |
| Q93 | Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are HNWIs, broken down by the primary nationality of the HNWI. | |

| Q# | Question Text | Instructions |
|--|---|---|
| Q94 | Does your entity have any Ultra-High-Net-Worth Individuals (UHNWIs) or Ultra-High-Net-Worth (UHNW) Groups as clients or Beneficial Owners (that are UHNWIs) of Legal Persons / Legal Arrangements that are clients? | HNWI: > 5 million. UHNWI: > 50 million. A UNHWI is necessarily an HNWI. In STRIX, a UNHWI must be counted in both the HNWI and UHNWI categories. |
| Q95 | 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). | |
| Q96 | Please provide the total number of transactions (both incoming and outgoing) with clients that are UHNWIs or individuals belonging to a UHNW Group. | |
| Q97 | Please provide the total value of funds transferred with clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing). | |
| Q98 | Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group. | |
| Q99 | Please provide the total value of funds transferred on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing). | |
| Q100 | 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. | |
| Q101 | 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. | |
| 1.12 Politically Exposed Persons (PEPs) | | |
| Q102 | Does your entity have any PEPs as clients? | |
| Q103 | Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients). | |
| Q104 | Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients). | |
| Q105 | How many foreign PEPs have residency in Monaco, broken down by primary nationality? | |
| Q106 | Please provide the total number of transactions with clients that are PEPs, both incoming and outgoing. | |
| Q107 | Please provide the total value of funds transferred with clients that are PEPs, both incoming and outgoing. | |
| Q108 | Please provide the total number of transactions on behalf of clients that are PEPs, both incoming and outgoing. | |

| Q# | Question Text | Instructions |
|---|---|--|
| Q109 | Please provide the total value of funds transferred on behalf of clients that are PEPs, both incoming and outgoing. | |
| Q110 | 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. |
| Q111 | Please provide the total number of transactions with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, both incoming and outgoing. | |
| Q112 | Please provide the total value of funds transferred with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, both incoming and outgoing. | |
| 1.13 Virtual Asset Service Providers | | |
| Q113 | Does your entity have clients that are VASPs? | |
| Q114 | Please provide the total number of unique clients that are VASPs. | |
| Q115 | Please provide the total number of transactions with or on behalf of clients that are VASPs, both incoming and outgoing. | |
| Q116 | Please provide the total value of funds transferred with or on behalf of clients that are VASPs, both incoming and outgoing. | |
| Q117 | Does your entity distinguish if VASPs clients are Custodian Wallet Providers? | Custodian Wallet Providers |
| Q118 | Does your entity have clients that are Custodian Wallet Providers? | Custodian Wallet Providers |
| Q119 | Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment. | Custodian Wallet Providers |
| Q120 | Please provide the total number of transactions with or on behalf of VASP that are Custodian Wallet Providers, both incoming and outgoing. | Custodian Wallet Providers |
| Q121 | Please provide the total value of funds transferred with or on behalf of VASP clients that are Custodian Wallet Providers, both incoming and outgoing. | Custodian Wallet Providers |
| Q122 | Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers? | Virtual Currency Exchange Providers |
| Q123 | Does your entity have clients that are Virtual Currency Exchange Providers? | Virtual Currency Exchange Providers |
| Q124 | 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 |

| Q# | Question Text | Instructions |
|-------------------------------|---|-------------------------------------|
| Q125 | Please provide the total number of transactions with or on behalf of VASP clients that are Virtual Currency Exchange Providers, both incoming and outgoing. | Virtual Currency Exchange Providers |
| Q126 | Please provide the total value of funds transferred with or on behalf of VASP clients that are Virtual Currency Exchange Providers, both incoming and outgoing. | Virtual Currency Exchange Providers |
| Q127 | Does your entity distinguish if VASPs clients are ICO related service providers? | ICO |
| Q128 | Does your entity have clients that are Initial Coin Offering Providers? | ICO |
| Q129 | Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment. | ICO |
| Q130 | Please provide the total number of transactions with or on behalf of VASP clients that are ICO related service providers, both incoming and outgoing. | ICO |
| Q131 | Please provide the total value of funds transferred with or on behalf of VASP clients that are ICO related service providers, both incoming and outgoing. | ICO |
| Q132 | Does your entity distinguish if VASPs clients provide Other Services not mentioned above? | Other Services |
| Q133 | Does your entity have clients that are engaged in Other VASP Services? | Other Services |
| Q134 | Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment. | Other Services |
| Q135 | Please provide the total number of transactions with or on behalf of VASP clients related to Other Services, both incoming and outgoing. | Other Services |
| Q136 | Please provide the total value of funds transferred with or on behalf of VASP clients that provide Other Services, both incoming and outgoing. | Other Services |
| Q137 | Please specify what Other Services VASP clients are providing not mentioned above. | Other Services |
| Q138 | Does your entity record if clients conduct transfers to or from VASPs from an account with your entity? | |
| Q139 | Please provide the total number of unique clients that have conducted transactions with VASPs from an account with your entity. | |
| Q140 | Please provide the total number of transactions with and by clients with VASPs from an account with your entity, both incoming and outgoing. | |
| Q141 | Please provide the total value of funds transferred with and by clients with VASPs from an account with your entity, both incoming and outgoing. | |
| 1.14 2nd Nationalities | | |
| Q142 | For clients with Multiple/dual citizenships, does your entity register all nationalities of a client? | |

| Q# | Question Text | Instructions |
|------|---|--|
| Q143 | 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). | |
| Q144 | 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). | |
| Q145 | Please provide the total number of secondary nationalities of unique clients that are UHNWIs or individuals belonging to a UHNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients). | |
| Q146 | 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). | |
| Q147 | 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. | <p>Concerns:</p> <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. |
| Q148 | For Beneficial Owners that are account holders and are Foreign Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership of an account. | |
| Q149 | 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. | |
| Q150 | Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are HNWI, broken down by the secondary nationality(ies) of the HNWI. | |
| Q151 | Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are UHNWIs, broken down by the secondary nationality(ies) of the UHNWI. | |
| Q152 | 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. | |

| Q# | Question Text | Instructions |
|--|--|--|
| 1.15 Comments & Feedback | | |
| Q153 | Do you have feedback related to any questions in this section? | |
| Q154 | Please provide comments or feedback on this section here. | |
| 2 Products & Services Risk | | |
| 2.1 Direct Payments with Clients – Cheques | | |
| Direct payments with clients: questions in these subsections concern payments made or received in the course of delivering the entity’s products or services, where payments are either initiated directly by clients or entered into directly with clients, rather than through the entity or third parties acting on the clients’ behalf. | | |
| Q155 | Does your entity accept or make Cheque transactions with clients? | |
| Q156 | Please provide the total number of Cheque transactions with clients, both incoming and outgoing. | |
| Q157 | Please provide the total value of Cheque transactions with clients within the reporting period, both incoming and outgoing. | |
| 2.2 Direct Payments with Clients - Electronic Transfers | | |
| Q158 | Does your entity accept or make Electronic Transfers with clients? | Electronic transfers include payments originating in an electronic form, such as wire transfers, payment service provider (PSP) such as PayPal, debit cards, credit cards, virtual currency payments, etc. |
| Q159 | Please provide the total number of Electronic Transfers with clients, both incoming and outgoing. | |
| Q160 | Please provide the total value of Electronic Transfers with clients within the reporting period, both incoming and outgoing. | |
| Q161 | Does your entity accept Credit Card transactions with clients? | |
| Q162 | Please provide the total number of Credit Card transactions with clients, both incoming and outgoing. | |
| Q163 | Please provide the total value of Credit Card transactions with clients within the reporting period, both incoming and outgoing. | |
| 2.3 Direct Payments with Clients – Cash | | |
| Q164 | Does your entity accept or make Cash transactions with clients? | |
| Q165 | Please provide the total number of cash transactions with clients, within the reporting period. | |
| Q166 | Please provide the total value of funds transferred, cash payments with clients in the reporting period, both incoming and outgoing. | |
| Q167 | Please provide the total value of funds transferred with clients, cash payments in currency other than EUR, during the reporting period. | |
| Q168 | Please provide the total number of single cash transactions of 10,000 EUR and above with clients (both incoming and outgoing) within the reporting period. | |

| Q# | Question Text | Instructions |
|--|---|--|
| 2.4 Direct Payments with Clients – Summary | | |
| Q169 | Sum of # Transactions with clients | Auto-calculated field |
| Q170 | # Transactions with clients (Repeat of Q5) | Repeat field, used for data validation |
| Q171 | Sum of Value Transactions with clients | Auto-calculated field |
| Q172 | Value Transactions with clients (repeat of Q7) | Repeat field, used for data validation |
| 2.5 Payments On Behalf of Clients - Cheques | | |
| Payments on behalf of clients: questions in these subsections concern payments made or received by the entity in the course of delivering its products or services, where the entity executes or intermediates payments for the benefit of clients, including cases of indirect client involvement. | | |
| Q173 | Does your entity accept or make Cheque transactions on behalf of clients? | For example, payments made into or out of the represented person's accounts using cheques. |
| Q174 | Please provide the total number of Cheque transactions on behalf of clients, both incoming and outgoing. | |
| Q175 | Please provide the total value of Cheque transactions on behalf of clients within the reporting period, both incoming and outgoing. | |
| 2.6 Payments On Behalf of Clients - Electronic Transfers | | |
| Q176 | Does your entity accept or make Electronic Transfers on behalf of clients? | Electronic transfers include payments originating in an electronic form, such as wire transfers, payment service provider (PSP) such as PayPal, debit cards, credit cards, virtual currency payments, etc. |
| Q177 | Please provide the total number of Electronic Transfers on behalf of clients, both incoming and outgoing. | |
| Q178 | Please provide the total value of Electronic Transfers on behalf of clients within the reporting period, both incoming and outgoing. | |
| Q179 | Does your entity accept Credit Card transactions on behalf of clients? | |
| Q180 | Please provide the total number of Credit Card transactions on behalf of clients, within the reporting period. | |
| Q181 | Please provide the total value of Credit Card transactions on behalf of clients, within the reporting period. | |
| 2.7 Payments On Behalf of Clients – Cash | | |
| Q182 | Does your entity accept or make Cash transactions on behalf of clients? | |
| Q183 | Please provide the total number of cash transactions on behalf of clients, within the reporting period. | |
| Q184 | Please provide the total value of funds transferred on behalf of clients, Cash payments in the reporting period, both incoming and outgoing. | |
| Q185 | Please provide the total value of funds transferred on behalf of clients, Cash payments in foreign currency, during the reporting period, both incoming and outgoing. | |

| Q# | Question Text | Instructions |
|---|--|---|
| Q186 | Please provide the total number of single cash transactions of 10,000 EUR and above on behalf of clients (both incoming and outgoing) within the reporting period. | |
| 2.8 Payments On Behalf of Clients – Summary | | |
| Q187 | <i>Sum of # Transactions on behalf of clients</i> | Auto-calculated field |
| Q188 | <i># Transactions on behalf of clients (repeat of Q10)</i> | Repeat field, used for data validation |
| Q189 | <i>Sum of Value Transactions on behalf of clients</i> | Auto-calculated field |
| Q190 | <i>Value Transactions on behalf of clients (repeat of Q12)</i> | Repeat field, used for data validation |
| 2.9 Payments Summary | | |
| Q191 | <i>Total number of transactions (Q5 + Q10)</i> | Auto-calculated field |
| Q192 | <i>Total value of funds transferred (Q7 + Q12)</i> | Auto-calculated field |
| 2.10 Virtual Currencies | | |
| Q193 | Do you have clients that use cryptocurrencies? | |
| Q194 | Please provide the total number of Virtual Assets transactions with or on behalf of clients, both incoming and outgoing. | <p>In any of the following forms:</p> <p>I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets</p> <p>II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client</p> <p>This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).</p> |
| Q195 | Please provide the value of funds transferred using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period. | |
| Q196 | Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year? | The reporting entity should declare whether it intends to be active or offer products and services relating to virtual assets in the following years, accept or make payments to/from customers, or invest in virtual assets. |
| Q197 | Does your entity have business relationships with Virtual Assets Platforms or Intermediaries? | |
| Q198 | Please name the Virtual Asset Platforms or Intermediaries with which your entity has business relationships. | |
| 2.11 Additional Services Offered | | |
| Does your entity offer to its clients services to intermediate or facilitate access to: | | |
| Q199 | Loan Products | |
| Q200 | Tax advisory services | |
| Q201 | Legal advisory services | |
| Q202 | Services related to buying or selling of Real Estate | |
| Q203 | Domiciliation advisory services | |
| Q204 | Corporate acquisition, divestiture, merger advisory | |
| Q205 | Services related to buying, selling, charting of yachts | |
| Q206 | Other services | |
| Q207 | Please provide the total value of transactions on behalf of clients related to the above services within the reporting period, both incoming and outgoing. | |

| Q# | Question Text | Instructions |
|---------------------------------|--|--------------|
| Q208 | Please provide the total value of transactions with clients related to the above services within the reporting period, both incoming and outgoing. | |
| Q209 | Please provide the total value of transactions with service providers related to the above services within the reporting period, both incoming and outgoing. | |
| Q210 | Please provide the top three advice topics by estimation of percentage of total advice given (description should clarify how that is calculated). | |
| Q211 | Do you provide advice to Individuals that are Monegasque residents? | |
| Q212 | Do you provide advice to Individuals that are not Monegasque residents? | |
| 2.12 Structures Serviced | | |
| Q213 | Total number of structures advised or serviced, broken down by country of registration. | |
| Q214 | Does the Multi-Family Office have a role in managing Individual's (Natural Persons) bank accounts? | |
| Q215 | How many Individuals (Natural Persons) do not have Monaco bank accounts, by country where the account is located? | |
| Q216 | Does your entity advise or service Civil Companies under Monegasque law? | |
| Q217 | Number of Civil Companies under Monegasque law advised or serviced. | |
| Q218 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q219 | How many Civil Companies do not have Monaco bank accounts, by country where the account is located? | |
| Q220 | Does your entity advise or service Monegasque commercial companies? | |
| Q221 | Number of Monegasque commercial companies advised or serviced. | |
| Q222 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q223 | How many Monegasque commercial companies do not have Monaco bank accounts, by country where the account is located? | |
| Q224 | Does your entity advise or service foreign patrimonial companies? | |
| Q225 | Number of foreign patrimonial companies advised or serviced. | |
| Q226 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q227 | How many foreign patrimonial companies do not have Monaco bank accounts, by country where the account is located? | |
| Q228 | Does your entity advise or service foreign commercial companies? | |

| Q# | Question Text | Instructions |
|-------------------------------------|--|---|
| Q229 | Number of foreign commercial companies advised or serviced. | |
| Q230 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q231 | How many foreign commercial companies do not have Monaco bank accounts, by country where the account is located? | |
| Q232 | Does your entity advise or service Trusts? | |
| Q233 | Number of Trusts advised or serviced. | |
| Q234 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q235 | How many Trusts do not have Monaco bank accounts, by country where the account is located? | |
| Q236 | Does your entity advise or service Holding Companies? | |
| Q237 | Number of Holding Companies advised or serviced. | |
| Q238 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q239 | How many Holding Companies do not have Monaco bank accounts, by country where the account is located? | |
| Q240 | Does your entity advise or service Other Legal Persons (foundations, associations, etc.)? | |
| Q241 | Number of Other Legal Persons advised or serviced. | |
| Q242 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q243 | How many Other Legal Persons do not have Monaco bank accounts, by country where the account is located? | |
| Q244 | Does your entity advise or service Other Structures? | |
| Q245 | Number of Other Structures advised or serviced. | |
| Q246 | Specify Other Structures advised or serviced. | |
| Q247 | Does the Multi-Family Office have a role in managing any of these company bank accounts? | |
| Q248 | How many Other Structures do not have Monaco bank accounts, by country where the account is located? | |
| 2.13 Comments & Feedback | | |
| Q249 | Do you have feedback related to any questions in this section? | |
| Q250 | Please provide comments or feedback on this section here. | |
| 3 Distribution Risk | | |
| 3.1 Identification | | |
| Q251 | 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. |
| Q252 | Please provide the total number of clients which Domestic Third Parties were used to undertake | |

| Q# | Question Text | Instructions |
|-----------------------|---|---|
| | some/all CDD measures within the reporting period, broken down by primary nationality of the client. | |
| Q253 | Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients? | |
| Q254 | Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client. | Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met. |
| Q255 | Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party. | |
| 3.2 Onboarding | | |
| Q256 | Did your entity onboard clients within the reporting period? | These questions refers to new unique clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period. |
| Q257 | Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period. | |
| Q258 | Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period. | |
| Q259 | Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period. | |
| Q260 | Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period. | |
| Q261 | Does your entity onboard clients on a non-face-to-face basis, i.e. not physically present? | This section indicates whether the entity agrees to establish a relationship without a physical meeting with the client. |
| Q262 | Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes. | |
| Q263 | Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes. | |
| Q264 | Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes. | |
| Q265 | Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes. | |
| Q266 | Does your entity accept clients through Introducers? | A business introducer is a natural or legal person (financial institution or designated non-financial business or profession) who acts as an intermediary between the regulated entity and potential clients or partners. In this sense, they maintain a direct relationship with a customer but delegate the execution of the transaction to the regulated entity. |

| Q# | Question Text | Instructions |
|----------------------|---|---|
| | | As such, the business introducer brings clients to the entity. |
| Q267 | Can the entity provide client nationality information for clients onboarded through introducers? | |
| Q268 | Can the entity provide introducers residency information? | |
| Q269 | Please provide the total number of clients onboarded that were Introduced through Third Parties, within the reporting period, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement). | Reporting Period. |
| Q270 | Please provide the total number of clients onboarded that were Introduced through Third Parties within the reporting period, broken down by residency of the Third Party. | Reporting Period. |
| Q271 | Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Reporting Period. | Validate your inputs , when correctly entered, the total between these should be '0'. If this is not the case, please modify your answers. |
| Q272 | Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement). | Cumulative over time. |
| Q273 | Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party. | Cumulative over time. |
| Q274 | <i>Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Cumulative.</i> | Validate your inputs , when correctly entered, the total between these should be '0'. If this is not the case, please modify your answers. |
| 3.3 Structure | | |
| Q275 | <p>What is the legal form of your entity?</p> <ul style="list-style-type: none"> • Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP • Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE • Private Domain of the Monegasque State • Trusts • Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person | |

| Q# | Question Text | Instructions |
|------|---|---|
| Q276 | Please provide the total number of salaried and non-salaried persons within your entity including, where applicable, managers, partners or owner-operators, at the end of the reporting period. | The reporting entity is required to disclose the number of all personnel employed: employees, associates and owners, regardless of their function. |
| Q277 | 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". |
| Q278 | Please provide the total number of branches, subsidiaries, and agencies of the licensed domestic entity, broken down by country. | |
| Q279 | Is your entity a branch or subsidiary of another entity? | |
| Q280 | Is your entity a branch or subsidiary of a foreign entity? | |
| Q281 | If a foreign entity branch or subsidiary, in which country is the parent undertaking? | |
| Q282 | Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco). | |
| Q283 | 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) | |
| Q284 | 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. | |
| Q285 | Does your entity have foreign correspondent bank relationships? | |
| Q286 | Please provide the number of foreign bank respondent relationships, broken down by respondent country, at the end of the reporting period. | |
| Q287 | Is your entity part of an international business network or group? | |
| Q288 | If so, please specify. | |
| Q289 | Is your entity a member of a professional association or society? | |
| Q290 | Which association or society? | |
| Q291 | 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/CPF responsible persons?</p> |

| Q# | Question Text | Instructions |
|--|--|---|
| Q292 | Please indicate the development or modification. | |
| 3.4 Entity Finances | | |
| Q293 | Turnover for the reporting period. | |
| Q294 | Turnover for the reporting period realized in the Principality of Monaco. | |
| Q295 | Turnover for the reporting period realized outside the Principality of Monaco. | |
| Q296 | Please provide the amount of your last annual VAT return. | The declarations for the 12 months must be added together to obtain the net VAT (net VAT = VAT collected – VAT paid). |
| 3.5 Rejected Relationships | | |
| Q297 | Did you reject any prospects due to concerns about ML/TF/PF during the reporting period? | |
| Q298 | Please provide the total number of new client business relationships (potential clients) that have been rejected due to ML/TF/PF considerations during the reporting period. | |
| 3.6 Blocked/Rejected Transactions | | |
| Q299 | Did you reject block / reject any client transactions (incoming or outgoing) due to concerns about ML/TF/PF during the reporting period? | |
| Q300 | Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period. | |
| 3.7 Terminated Relationships | | |
| Q301 | Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period? | |
| Q302 | Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period. | |
| 3.8 Comments & Feedback | | |
| Q303 | Do you have feedback related to any questions in this section? | |
| Q304 | Please provide comments or feedback on this section here. | |

Instructions, Controls

| C# | Question Text | Instructions |
|---------------|---|---|
| Controls | | |
| 1.1 Structure | | |
| C1 | Please provide the total number of salaried and non-salaried persons within your entity including, where applicable, managers, partners or owner-operators, at the end of the reporting period. | <p>Repeat the response from Q276.</p> <p>The reporting entity should disclose the number of employees, partners, and owners irrespective of their function.</p> <p>The number at the end of the reporting period should be used.</p> |
| C2 | Please provide the total number of full-time equivalent persons working at your entity, at the end of the reporting period. | <p>The reporting entity should disclose the number of full-time equivalent persons, including salaried and non-salaried persons including, where applicable, managers, partners or owner-operators irrespective of their function.</p> <p>Provide the estimate as a decimal of FTE time. For example if there is one full time person and two ¼ time persons, then the total would be 1.5 FTE.</p> <p>1 full-time person = 1 FTE. One half-time person = 0,5 FTE. One ¼ time person = 0,25 FTE.</p> |
| C3 | Please provide the number of persons in charge of AML/CFT/CPF compliance within your entity at the end of the reporting period. | |
| C4 | Please provide the number of full-time equivalent persons in AML/CFT/CPF Compliance at your entity, at the end of the reporting period. | |
| C5 | Approximately how many hours are spent on AML/CFT/CPF per month? | |
| C6 | Does your entity have a compliance department? | |
| C7 | Is your entity part of a Group? | |
| C8 | Does your entity have a board and/or senior management? | <p>This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility.</p> <p>Examples of a board or senior management, would be an entity having:</p> <ul style="list-style-type: none"> • Chief Officers (CEO, CFO, CTO...) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual • A legal requirement for a board or specific role needed to achieve compliance <p>Examples of an entity that does not have a board or senior management:</p> |

| C# | Question Text | Instructions |
|--------------------------------------|---|--|
| | | <ul style="list-style-type: none"> • A sole proprietor • A partnership • A small business with a single layer of management |
| C9 | Do you use external service providers for AML/CFT/CPF? | |
| C10 | What is the purpose of your contract with these external service providers? | |
| C11 | Please provide the total number of full-time equivalent of external AML/CFT/CPF service providers within your entity, at the end of the reporting period. | |
| C12 | Approximately how many hours do external service providers spend each month on AML/CFT/CPF compliance? | |
| 1.2 Policies & Procedures | | |
| C13 | Did your entity prepare a documented set of AML/CFT/CPF Policies and Procedures? | The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT/CPF legal requirements. |
| C14 | Were these policies and procedures approved by the board and/or senior management of your entity? | The reporting entity should disclose whether its written AML/CFT/CPF policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power). |
| C15 | Did your entity circulate these policies and procedures to all its employees? | This includes employees at your entity plus non-employee partners and owners. |
| C16 | Did your entity ensure awareness of these policies and procedures to all its employees? | This includes employees at your entity plus non-employee partners and owners. |
| C17 | Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year? | |
| C18 | Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures. | |
| C19 | Does your entity have a systematic practice of tracking and managing changes to the AML/CFT/CPF Policies and Procedures? | The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT/CPF Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes. |
| C20 | Does your entity have a group-wide AML/CFT/CPF programme? | |
| C21 | 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? | |
| C22 | 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? |

| C# | Question Text | Instructions |
|-----------------------|--|---|
| | | Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group. |
| C23 | Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures? | |
| C24 | 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) | For information, all numbers of obliged entities to this law are listed in Articles 1 and 2 of Law No. 1.362. |
| C25 | Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF. | |
| C26 | Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF. | |
| 1.3 Governance | | |
| C27 | Does the board and/or senior management of your entity demonstrate overall responsibility for AML/CFT/CPF? | <p>Actions taken by the Board and/or senior management that could demonstrate board's and senior management's engagement in AML/CFT/CPF matters could include:</p> <p>(1) senior management includes AML/CFT/CPF matters into the daily/ weekly/monthly/quarterly/yearly agenda;</p> <p>(2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks;</p> <p>(3) senior management requests ad-hoc reporting on AML/CFT/CPF matters whenever issues arise; orders internal or external audit to test AML/CFT/CPF controls;</p> <p>(4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT/CPF), buying AML/CFT/CPF monitoring software or sanction screening software, etc.;</p> <p>(5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT/CPF legislation are introduced;</p> <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> |

| C# | Question Text | Instructions |
|--|--|---|
| C28 | Does the board and/or senior management of your entity regularly receive AML/CFT/CPF 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/CPF compliance.</p> <p>Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/TF risk and trends.</p> |
| C29 | Does the board and/or senior management of your entity ensure that AML/CFT/CPF 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/CPF compliance areas and mitigate ML/TF risks.</p> <p>The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT/CPF reporting, supervisory onsite examination reports, etc. Examples of such actions might include:</p> <p>(a) approving budgetary resources to hire more employees for AML/CFT/CPF Compliance, investing in employees' knowledge and expertise through training, seminars, certifications</p> <p>(b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions,</p> <p>(c) prioritizing AML/CFT/CPF area for internal audit, etc.</p> |
| C30 | Does the senior management of your entity review (give approval) for taking on high-risk clients? | In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities. |
| 1.4 Compliance & Violations | | |
| C31 | Has your entity had any AML/CFT/CPF related violations in the past 5 years? | The reporting entity should disclose whether it had any AML/CFT/CPF related compliance failures, including minor shortcomings, within the past 5 years. |
| C32 | Please provide the total number of AML/CFT/CPF related violations in the past 5 Years. | Any AML/CFT/CPF related compliance failures, including minor shortcomings, should be counted under this question. |
| C33 | Please identify the number and types of AML/CFT/CPF violations. | |

| C# | Question Text | Instructions |
|---------------------|--|--------------|
| 1.5 Training | | |
| C34 | Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period? | |
| C35 | Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period? | |
| C36 | Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period? | |
| C37 | Did your entity conduct AML/CFT/CPF training for its administrative employees, in the reporting period? | |
| C38 | Please provide the total number of persons trained on AML/CFT/CPF matters during the reporting cycle. | |
| C39 | Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters within the reporting period. | |
| C40 | Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)? | |
| C41 | Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings? | |
| C42 | Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website? | |
| C43 | Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco? | |
| C44 | Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco? | |
| C45 | Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member? | |
| C46 | Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities? | |
| C47 | What other AML/CFT/CPF training/awareness raising activities did it include? Please specify all that apply. | |
| C48 | Did any of the training/awareness raising activities cover topics related to Internal AML Procedures? | |
| C49 | Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures? | |
| C50 | Did any of the training/awareness raising activities cover topics related to Group AML Procedures? | |
| C51 | Did any of the training/awareness raising activities cover topics related to Group CFT Procedures? | |
| C52 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies? | |
| C53 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases? | |
| C54 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News? | |

| C# | Question Text | Instructions |
|----------------|---|--------------|
| C55 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption? | |
| C56 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism? | |
| C57 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency? | |
| C58 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction? | |
| C59 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion? | |
| C60 | Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud? | |
| C61 | Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above? | |
| C62 | What other topics did the AML/CFT/CPF training/awareness raising activities cover? Please specify all that apply. | |
| 1.6 CDD | | |
| C63 | Does your entity identify all customers regardless of payment method? | |
| C64 | Does your entity record all of the following in your customer database: <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 | |
| C65 | Please specify which items are not collected? | |
| C66 | Does the entity's database contain all of the following information, when applicable: <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 | |

| C# | Question Text | Instructions |
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| | <ul style="list-style-type: none"> • Founders • Donors • Person who directly or indirectly exercises control of the foundation • Protector • More Complex Ownership Structures • Introducers | |
| C67 | <p>Does the entity's database contain all of the following information, when applicable:</p> <ul style="list-style-type: none"> • Credit Card Holders • Complex Ownership Structure • Depositors/3rd Party Guarantors • Occasional Customers • Prospective Customers • Insurance Policy Payee • Insurance Policy Holder • Insurance Policy Beneficiary • Insurance Policy Insured | |
| C68 | <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> |
| C69 | <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 exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?</p> |
| C70 | <p>Please specify what other information is included in your database.</p> | |
| C71 | <p>Does your entity research clients on the Internet?</p> | |
| C72 | <p>Does your entity research clients using the Journal de Monaco?</p> | |
| C73 | <p>Does your entity research clients using sites specializing in services of risk detection?</p> | |
| C74 | <p>Does your entity research clients using business websites?</p> | |
| C75 | <p>Does your entity research clients' organization, board members, etc.?</p> | |
| C76 | <p>Does your entity research clients in the press?</p> | |
| C77 | <p>What other information is used to research the client?</p> | |

| C# | Question Text | Instructions |
|-----|---|--|
| C78 | Are the results of the research systematically recorded? | |
| C79 | Is past 5 years of client relationship data accessible by AMSF upon request? | |
| C80 | Does your entity identify and verify its clients using reliable and independent information in all cases of CDD? | |
| C81 | Does your entity apply a risk-based approach to customer due diligence measures (CDD)? | |
| C82 | Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD? | (e.g. simplified, standard and enhanced due diligence) |
| C83 | Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period. | Please repeat the answer provided in Q4. |
| C84 | Has your entity performed Simplified Due Diligence on any clients within the reporting period? | |
| C85 | Please provide the total number of unique clients that are subject to Simplified Due Diligence measures. | |
| C86 | Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on? | |
| C87 | How often is ongoing due diligence done on clients classified as High-Risk for ML/FT? | |
| C88 | Did you select "Trigger Event" in the previous question? | |
| C89 | Please name all trigger events for ongoing due diligence done on clients classified as High-Risk for ML/FT. | |
| C90 | Does your entity undertake other measures for high-risk clients, before customer take-on? | |
| C91 | Please specify other measures taken for high-risk clients, before customer take-on. | If not applicable, state 'NA'. |
| C92 | Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity? | |
| C93 | What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity? | Law No. 1.362, as amended, sets a threshold of 25% ownership above which a person is automatically considered a beneficial owner. So, what is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity? It may be lower than the legal threshold, depending on your risk appetite. |
| C94 | Does your entity conduct Virtual Assets transactions with or on behalf of clients? | |
| C95 | How does the company verify the Beneficial Owners of Virtual Assets? | |
| C96 | Does your entity examine the source of wealth before customer take-on? | |

| C# | Question Text | Instructions |
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| C97 | 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. |
| C98 | 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? | |
| C99 | Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed? | |
| C100 | 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). | |
| C101 | Does the evolution of the clients services requested contribute to the identification of red flags? | |
| 1.7 EDD | | |
| C102 | Did you apply enhanced due diligence measures to clients during the reporting period? | |
| C103 | Please provide the total number of unique clients where enhanced due diligence was applied at onboarding. | |
| C104 | Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships. | |
| C105 | 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. |
| C106 | Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied. | |
| C107 | Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied. | i.e. number of enhanced due diligence <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements ÷ total number of <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements. |
| 1.8 Risk Assessments | | |
| C108 | Does your entity apply AML/CFT/CPF risk ratings to its clients? | |
| C109 | How many AML/CFT/CPF risk levels does your entity have for clients? | |
| C110 | Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period? | |
| C111 | Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF. | |
| C112 | Do you have clients whose risk level has not yet been determined? | |
| C113 | Please provide the total number of unique clients that are without a risk level determined yet. | |
| C114 | Does your entity's High-Risk assignment considerations include ALL of the following: <ul style="list-style-type: none"> Country of Residence | |

| C# | Question Text | Instructions |
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| | <ul style="list-style-type: none"> • 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 | |
| C115 | Please specify which items are not considered? | |
| C116 | Does your entity's High-Risk assignment consideration include any additional measures not mentioned above? | |
| C117 | Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations. Name all that apply. | |
| C118 | Does your entity have a tool or process for making AML/CFT/CPF risk assessments? | (client assessments) |
| C119 | Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment? | (client assessments) |
| C120 | Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment? | (client assessments) |
| C121 | What client activities does your entity associate with High-Risk clients? | |
| C122 | Does your entity consider ML and TF risks separately? | (entity's own assessment) |
| C123 | Does your entity have a tool or process for making AML/CFT/CPF risk assessments? | (entity's own assessment) |
| 1.9 Audit / Controls | | |
| C124 | When did your entity last have a SICCFIN/AMSF audit? | |
| C125 | Has your entity had an on-site AMSF audit? | |
| C126 | Date of last AMSF on-site audit. | |
| C127 | When did your entity last have a CCAF audit? | |
| C128 | Did your entity have any Other Audits not mentioned above? | (AML/CFT/CPF related audits only) |
| C129 | Specify the types of Other Audits, and provide the year of the last audit of each kind. | (AML/CFT/CPF related audits only) |
| 1.10 Cash Transactions | | |
| C130 | Does your entity conduct cash transactions with clients? | Both incoming and outgoing payments. |
| C131 | Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions? | |
| C132 | Does your entity consider multiple or cumulative transactions? | |
| C133 | Please describe the specific controls and procedures for cash transactions your entity applies. | |
| C134 | Please provide a pdf copy of the entity's AML/CFT/CPF controls and procedures for cash transactions | |

| C# | Question Text | Instructions |
|------------------------|---|---|
| 1.11 Monitoring | | |
| C135 | Does your entity have in place a system for monitoring transactions for potential suspicion and reporting suspicious transactions? | <p>All entities subject to these requirements are required to monitor their operations in order to detect any suspicious activity. This monitoring must be tailored to the nature and activity of the entity; it may be carried out using an automated system (e.g., an automatic tool) or a manual system (e.g., an Excel tracking file).</p> <p>Only certain entities strictly referred to in Article 28 of Sovereign Order No. 2.318, as amended, are required to implement an automated monitoring system.</p> <p>If you have not implemented a transaction monitoring system, please indicate the reason in the comment field at the bottom of this section.</p> |
| C136 | Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions? | |
| C137 | Has the automated system been adapted to the entity in Monaco? | |
| C138 | Please provide the total number of transactions (both incoming and outgoing) by and/or on behalf of clients within the reporting period. | Please repeat the answer provided in Q191. |
| C139 | Do you have a system that generates alerts related to Money Laundering? | |
| C140 | Please provide the total number of Alerts in Reporting Period by the system related to Money Laundering. | |
| C141 | Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering. | |
| C142 | Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering. | |
| C143 | Do you have a system that generates alerts related to Terrorism Financing? | |
| C144 | Please provide the total number of Alerts in Reporting Period by the system related to Terrorism Financing. | |
| C145 | Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing. | |
| C146 | Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing. | |
| C147 | Has your entity formalized and used the identification thresholds required by your sector? | |
| C148 | Does your entity monitor client cash transaction activity for ensuring the 30,000 EUR cash limit is not exceeded within 6 months? | |

| C# | Question Text | Instructions |
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| C149 | How many times has your entity refused a client transaction due to exceeding the 30,000 EUR cash limit within 6 months? | |
| C150 | Have you rejected transactions due to insufficient originator or beneficiary information? | |
| C151 | Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information. | |
| C152 | Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR. | |
| C153 | Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information. | |
| C154 | Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR. | |
| 1.12 Record Keeping | | |
| C155 | Does your entity keep transaction records for at least 5 years? | |
| C156 | Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship? | |
| C157 | Does your entity keep these records and documents in a safe and secure place? | |
| C158 | Are these records and documents available promptly to the relevant authorities upon request? | <p>When providing its response, the reporting entity should consider the following factors:</p> <ol style="list-style-type: none"> (1) is the above data collected in electronic format and easily retrievable from the IT systems? (2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly? (3) is there manual effort required to find clients' data, e.g., if files are stored only in paper format; or, when they are stored in electronic format, IT systems are not configured to enable easy access to the required data. |
| C159 | Does your entity have backups for CDD and business correspondence information with a disaster recovery plan? | |

| C# | Question Text | Instructions |
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| 1.13 Targeted Financial Sanctions (TFS) | | |
| C160 | Do entity's policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing? | <p>The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements.</p> <p>Policies and procedures should cover targeted financial sanctions-related requirements of at least the following:</p> <p>(a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons;</p> <p>(b) Frequency and scope of screening;</p> <p>(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).</p> |
| C161 | Are the board and senior management of your entity engaged in overseeing risks and compliance matters related to TFS for Terrorist Financing and Proliferation Financing? | <p>The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include:</p> <p>(1) approval of TFS-related policies, procedures and instructions by the board or senior management;</p> <p>(2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.;</p> <p>(3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities,</p> <p>(4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.</p> |
| C162 | Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated? | |
| C163 | Does your entity have a system to check the Customer Database? | |
| C164 | Do you have clients which have chains of payments to or from Ultimate Beneficiaries? | |
| C165 | Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant | |

| C# | Question Text | Instructions |
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| | to the full chain of payments to the ultimate beneficiary? | |
| C166 | Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period. | |
| C167 | Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing. | |
| C168 | Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction. | |
| 1.14 Politically Exposed Persons (PEPs) | | |
| C169 | Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)? | |
| C170 | What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs? Please specify all that apply. | |
| C171 | What additional AML/CFT/CPF 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> |
| C172 | Did you enter into any relationships with PEPs during the reporting period? | |
| C173 | Does PEP screening occur as part of the CDD process for new customers? | |
| C174 | Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client. | |
| C175 | Provide the estimated percentage of self-declared information matching with PEP status determinations. | |
| C176 | Does screening for PEPs occur on an ongoing basis? | |
| C177 | Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes). | |
| C178 | Are PEPs subject to increased monitoring? | |
| C179 | Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF? | |

| C# | Question Text | Instructions |
|--|---|--|
| C180 | 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? | |
| C181 | Among your clientele, are there any individuals who became PEPS during the course of the business relationship during the reporting period? | |
| 1.15 Suspicious Transaction Reporting | | |
| C182 | Is your entity registered with goAML? | |
| C183 | Please describe why. | |
| C184 | Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period? | |
| C185 | Please provide the total number of suspicious transactions and activities identified and reported internally (at your entity) to the Compliance Officer within the reporting period. | (not necessarily filed to the FIU) |
| C186 | Did your entity submit any STRs/SARs to the FIU within the reporting period? | |
| C187 | Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period. | |
| C188 | Please provide the total number of STRs/ SARs related to Terrorism Financing that your entity reported to the FIU within the reporting period. | The reporting entity should disclose the <u>number of Suspicious Transactions, related to Terrorism Financing</u> , it has reported to Monaco's FIU (https://amsf.mc). |
| C189 | Please provide the total number of STRs/ SARs related to Money Laundering that your entity reported to the FIU within the reporting period. | The reporting entity should disclose the <u>number of Suspicious Transactions, related to Money Laundering</u> , it has reported to Monaco's FIU (https://amsf.mc). |
| C190 | Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period. | |
| C191 | Please provide the total number of STRs/SARs related to Virtual Assets or Virtual Asset Service Providers provided to the FIU within the reporting period. | |
| C192 | Please provide the total number of STRs/SARs related to a Monegasque Legal Person provided to the FIU within the reporting period. | Where the Monegasque Legal Person is the subject of the STR/SAR. |
| C193 | Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period. | |
| C194 | Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period. | |
| C195 | Please provide the total number of STRs/SARs related to a Foreign Tax Offenses (criminal or administrative) provided to the FIU within the reporting period. | |

| C# | Question Text | Instructions |
|-------------------------------------|---|---|
| C196 | Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period. | |
| C197 | Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period. | |
| C198 | Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period. | |
| C199 | Please provide the total number of STRs/ SARs related to other reasons not mentioned above that your entity reported to the FIU within the reporting period. | |
| C200 | Please provide the total number of attempted transactions reported to the FIU, within the reporting period. | |
| C201 | Did your entity respond internally to the suspicious transactions? | e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc. |
| C202 | Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period? | |
| 1.16 Comments & Feedback | | |
| C203 | Do you have feedback related to any questions in this section? | |
| C204 | Please provide comments or feedback on this section here. | |

Instructions, Signatories

| S# | Question Text | Instructions |
|-------------|--|--|
| Signatories | | |
| S1 | The person or persons name(s) added here attests that she/he/they have provided accurate responses to questions, to the best of their ability. | |
| S2 | The person's name added here attests that she/he is duly authorized to represent the reporting entity and has ensured the submitted data has been adequately reviewed and is an accurate representation, to the best of their ability. | |
| S3 | Do you need to submit your survey in an Incomplete state? | If no, please write 'Complete'. If yes, provide the reason for submitting incomplete. An incomplete submission may result in enhanced oversight or other action. |