

Instructions: Antiques AML/ CFT Survey 2025

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

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

- Responses must include all products or services offered to customers that fall within the scope of the AML/CFT regulations in force in Monaco.
- The reporting period is 1 January 2024 to 31 December 2024.
- Questions related to number of clients shall include clients that are active at the end of the reporting period and clients that were at some point active during the reporting period.
- The term “unique clients” denotes that while a client might have several accounts it should only be counted as one client.
- Questions related to number or value of transactions are relevant for activity performed within the reporting period.
- 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.

Contents

Glossary.....	4
Instructions, Inherent Risk.....	8
1 Customer Risk	8
1.1 Subject To Law n° 1.362.....	8
1.2 Clients Summary	8
1.3 Beneficial Owners	8
1.4 Distinguishing Client Types	9
1.5 Clients - Natural Persons.....	9
1.6 Clients - Legal Persons.....	10
1.7 Clients - Trusts.....	10
1.8 Clients - Associations.....	11
1.9 Clients - Other Legal Arrangements.....	11
1.10 HNWI's and UHNWI's.....	11
1.11 Politically Exposed Persons (PEPs).....	12
1.12 Comments & Feedback.....	12
2 Products & Services Risk	12
2.1 Payment Types with Clients - Cheques.....	12
2.2 Payment Types with Clients - Electronic Transfers.....	13
2.3 Payment Types with Clients - Cash	13
2.4 Payment Types with Clients - Credit Cards.....	13
2.5 Payment Types with Clients - Other Payment Form.....	14
2.6 Virtual Currencies.....	14
2.7 Products & Services.....	14
2.8 Lending.....	15
2.9 Comments & Feedback.....	15
3 Distribution Risk.....	15
3.1 Identification	15
3.2 Onboarding	16
3.3 Structure	17
3.4 Entity Finances	18
3.5 Rejected Relationships.....	18
3.6 Terminated Relationships	18
3.7 Comments & Feedback.....	18
Instructions, Controls	19
1 Controls	19
1.1 Structure	19

1.2 Policies & Procedures.....	19
1.3 Governance	20
1.4 Compliance & Violations	22
1.5 Training	22
1.6 CDD.....	23
1.7 EDD.....	26
1.8 Risk Assessments	27
1.9 Audit / Controls.....	27
1.10 Cash Transactions	27
1.11 Monitoring	28
1.12 Record Keeping	29
1.13 Targeted Financial Sanctions (TFS)	29
1.14 Politically Exposed Persons (PEPs).....	31
1.15 Suspicious Transaction Reporting.....	32
1.16 Comments & Feedback.....	33
Instructions, Signatories	34
Attestation	34

Glossary

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

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

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

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

Instructions, Inherent Risk

Q#	Question Text	Instructions
1 Customer Risk		
1.1 Subject To Law n° 1.362		
1	Within the reporting period, did you / your entity provide any products or services, have any turnover, or participate in or conduct any activities subject to the provisions of law n° 1.362? (See link here)	<p>Subject Activities:</p> <p>16°) Traders and persons who negotiate or act as intermediaries in the trade of works of art and antiques, including when this trade is carried out by art galleries.</p> <p>Only when the value of the transaction or a series of related transactions is equal to or greater than €10,000.</p>
1.2 Clients Summary		
2	Please provide the total number of unique clients that were at some point active during the reporting period, by client's primary nationality, or country of headquarters or incorporation.	<p>If multiple primary nationalities, enter the one most commonly used.</p> <p>If the nationality is unknown, please select "Unknown" from the dropdown.</p> <p>For questions referring to 'unique client', please consider:</p> <ul style="list-style-type: none"> • If the same client has several accounts, then it is considered one client • If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client • Any other situation where the same client would be double counted, please consider as one client
3	Under what conditions does your entity record the nationality of the client?	
4	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.
5	Please repeat the total number of transactions provided above.	<p>Please repeat the response from Q4.</p> <p>This value will be validated against other responses provided to later questions for numbers of cheque, electronic, and cash transactions, which are mutually exclusive.</p>
6	Please provide the total value of funds transferred with clients (both incoming and outgoing) within the reporting period.	
1.3 Beneficial Owners		
7	Does your entity record Beneficial Owner information for some or all transactions?	
8	For what transaction conditions does your entity record Beneficial Owner information?	

Q#	Question Text	Instructions
9	Can your entity distinguish nationality of clients' BO's?	
10	Provide the percentage breakdown of primary nationalities of Beneficial Owners.	Provide the percentage breakdown of all clients' beneficial owner's primary nationalities, including BO's of all % ownership levels, those with direct or indirect control, and those representing a legal entity.
11	Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality.	The information requested is in relation to number of Beneficial Owners which have direct or indirect control of clients that are legal persons, and trusts and other legal arrangements.
12	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	The information requested is in relation to number of Beneficial Owners which represent clients that are legal persons, and trusts and other legal arrangements.
13	Can your entity distinguish BO's that have 25% or greater ownership?	
14	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	
15	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	
16	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.	
17	Please provide the total number of Beneficial Owners that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership.	
1.4 Distinguishing Client Types		
18	Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are: Trusts?	
19	Associations?	
20	Other Legal Arrangements not mentioned above?	
21	HNWI's?	
1.5 Clients - Natural Persons		
22	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual (including domestic clients).	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person should not be counted as a Natural Person client.
23	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the residency of the individual (including domestic clients).	
24	Please provide the total number of transactions (both incoming and outgoing) with clients that are Natural Persons.	
25	Please provide the total value of funds transferred with clients that are Natural Persons, (both incoming and outgoing), in EUR.	

Q#	Question Text	Instructions
1.6 Clients - Legal Persons		
26	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
27	Please provide the total number of transactions (both incoming and outgoing) with clients that are Legal Persons.	
28	Please provide the total value of funds transferred with clients that are Legal Persons, both incoming and outgoing.	
29	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	<p>Legal Persons types include:</p> <ul style="list-style-type: none"> • Commercial Partnership SNC • Economic Interest Group GIE • Joint Stock Company SAM • Limited Liability Companies SARL • Limited Partnership SCS • Limited Partnership with Shares SCA • Monegasque Foundation • Monegasque Associations • Other Civil Companies SC-Autre • Other Commercial Companies • Other Legal Arrangements • Private Domain of the Monegasque State • Property Investment Partnership SCI • Sole Person • Special Civil-law Partnership SCP • Trusts
30	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.7 Clients - Trusts		
31	Does your entity have clients that are Trusts?	
32	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
33	Does your entity have information related to the number and value of their transactions?	
34	Please provide the total number of transactions (both incoming and outgoing) with clients that are Trusts.	
35	Please provide the total value of funds transferred with clients that are Trusts, (both incoming and outgoing).	
36	Please provide the total number of Monegasque unique clients that are Trusts.	
37	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
38	Please provide the total number of Natural Persons which are trustees in their professional capacity,	

Q#	Question Text	Instructions
	broken down by country in which the trust was created.	
1.8 Clients - Associations		
39	Does your entity have clients that are Associations?	
40	Please provide the total number of unique clients that are Associations, broken down by country of Associations formation.	
41	Does your entity have information related to the number and value of their transactions?	
42	Please provide the total number of transactions (both incoming and outgoing) with clients that are Associations.	
43	Please provide the total value of funds transferred with clients that are Associations, (both incoming and outgoing).	
1.9 Clients - Other Legal Arrangements		
44	Does your entity have clients that are Other Legal Arrangements?	
45	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
46	Does your entity have information related to the number and value of their transactions?	
47	Please provide the total number of transactions (both incoming and outgoing) with clients that are Other Legal Arrangements.	
48	Please provide the total value of funds transferred with clients that are Other Legal Arrangements, both incoming and outgoing.	
49	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.10 HNWI's and UHNWI's		
50	Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWIs) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an HNWI or HNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is <u>more than EUR 5 million.</u>
51	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.	
52	Does your entity have any Ultra-High-Net-Worth Individuals (UHNWIs) or Ultra-High-Net-Worth (UHNW) Groups as clients or Beneficial Owners (that are UHNWIs) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an UHNWI or UHNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is <u>more than EUR 50 million.</u>
53	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.	

Q#	Question Text	Instructions
1.11 Politically Exposed Persons (PEPs)		
54	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
55	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
56	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
57	Please provide the total number of transactions (both incoming and outgoing) with clients that are PEPs.	
58	Please provide the total value of funds transferred with clients that are PEPs, both incoming and outgoing.	
59	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
60	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.	<p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term “unique Beneficial Owners” denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.</p>
61	Please provide the total number of transactions (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
62	Please provide the total value of funds transferred (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
1.12 Comments & Feedback		
63	Do you have feedback related to any questions in this section?	
64	Please provide comments or feedback on this section here.	
2 Products & Services Risk		
2.1 Payment Types with Clients - Cheques		
65	Does your entity accept or make Cheque transactions with clients?	For example, payments made into or out of the represented person’s accounts using checks.
66	Please provide the total number of Cheque transactions with clients (both incoming and outgoing).	
67	Please provide the total value of Cheque transactions with clients (both incoming and outgoing) within the reporting period.	

Q#	Question Text	Instructions
2.2 Payment Types with Clients - Electronic Transfers		
68	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.
69	Please provide the total number of Electronic Transfers with clients (both incoming and outgoing).	
70	Please provide the total value of Electronic Transfers with clients (both incoming and outgoing) within the reporting period.	
2.3 Payment Types with Clients - Cash		
71	Does your entity accept or make Cash transactions with clients?	
72	Please provide the total number of Cash transactions with clients, within the reporting period.	
73	Please provide the total value of funds transferred, Cash payments in the reporting period, with clients both incoming and outgoing.	
74	Please provide the total value of funds transferred with clients, cash payments in currencies other than Euro, during the reporting period, both incoming and outgoing.	
75	Please provide the total number of single cash transactions equal to or exceeding 10,000 euros with clients (both incoming and outgoing) within the reporting period.	
76	Does your entity make cash transactions with clients for Precious Metals and Stones?	
77	Please provide the total number of Cash transactions with clients (both incoming and outgoing) of Precious Metals and Stones.	
78	Please provide the total value of funds transferred with clients, Cash payments, both incoming and outgoing of Precious Metals and Stones.	
79	Can your entity distinguish cash transactions with clients above EUR 100,000 in your record keeping?	
80	Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
81	Number of physical cash transactions with Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
82	Number of physical cash transactions with foreign legal persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
2.4 Payment Types with Clients - Credit Cards		
83	Does your entity accept Credit Card transactions with clients?	

Q#	Question Text	Instructions
84	Please provide the total number of Credit Card transactions with clients, within the reporting period.	
85	Please provide the total value of Credit Card transactions with clients, within the reporting period.	
2.5 Payment Types with Clients - Other Payment Form		
86	Does your entity use any other payment types?	
87	Which other payment types?	
88	Please provide the total number of other transactions types with clients, within the reporting period.	
89	Please provide the total value of other transactions types with clients, within the reporting period.	
2.6 Virtual Currencies		
90	Do you have clients that use cryptocurrencies?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs on behalf of the client
91	Please provide the total number of Virtual Assets transactions with clients (both incoming and outgoing).	
92	Please provide the value of funds transferred with clients using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
93	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs, either itself or on behalf of the client
94	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
95	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	
2.7 Products & Services		
96	What is the proportion of transaction value that is with Occasional Customers?	
97	Does your entity deal in Precious Metals and Stones?	
98	Please provide the total number of transactions (both bought and sold) related to dealings of Precious Metals and Stones.	
99	Please provide the total value of funds transferred, both buying and selling, related to dealings of Precious Metals and Stones.	
100	How many goods were sold within the reporting period?	
101	Value of goods sold within the reporting period.	
102	Does your entity perform auctioning related services?	

Q#	Question Text	Instructions
103	How many goods were auctioned within the reporting period?	
104	Number of incoming transactions, related to auctioning services, by originating country.	
105	Value of incoming transactions, related to auctioning services, by originating country.	
106	Number of outgoing transactions, related to auctioning services, by destination country.	
107	Value of outgoing transactions, related to auctioning services, by destination country.	
108	Does your entity function as an agent for auctions houses?	
109	Which auction house(s)?	
110	Does the entity specialize in a specific set of goods?	
111	Which goods?	
2.8 Lending		
112	Does your entity propose and facilitate lending or credit to clients?	
113	With which companies does the entity work with for providing lending and credit facilities?	
114	Please provide the total number of loans provided to clients.	
115	Please provide the total value of loans provided to clients.	
116	Does your entity have any Other Loan Products, not mentioned above, that it offers to clients?	
117	Please specify the type of Other Loan Products at your entity not mentioned above it offers to clients.	
2.9 Comments & Feedback		
118	Do you have feedback related to any questions in this section?	
119	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
120	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.
121	Please provide the total number of clients which Domestic Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client.	
122	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.

Q#	Question Text	Instructions
123	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.	
124	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		
125	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	
126	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	
127	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	
128	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	
129	Does your entity onboard clients on a non-face-to-face basis, i.e. not physically present?	The reporting entity should disclose whether clients are onboarded (for CDD purposes) on a non-face-to-face basis (not physically present).
130	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	
131	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	
132	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	
133	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
134	Does your entity accept clients through Introducers?	An introducer is a Financial Institution / Designated Non-Financial Businesses and Professions who has a direct relationship with a client but delegates the financial transaction execution to another obliged entity (i.e. an introducer is a company that brings a client to the licensed entity).
135	Can the entity provide client nationality information for clients onboarded through introducers?	
136	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).	

Q#	Question Text	Instructions
137	Can the entity provide introducers residency information?	
138	Please provide the total number of clients onboarded that were Introduced through Third Parties within the reporting period, broken down by residency of the Third Party.	
3.3 Structure		
139	What is the legal form of your entity?	<p>Legal Persons types include:</p> <ul style="list-style-type: none"> • Commercial Partnership SNC • Economic Interest Group GIE • Joint Stock Company SAM • Limited Liability Companies SARL • Limited Partnership SCS • Limited Partnership with Shares SCA • Monegasque Foundation • Monegasque Associations • Other Civil Companies SC-Autre • Other Commercial Companies • Other Legal Arrangements • Private Domain of the Monegasque State • Property Investment Partnership SCI • Sole Person • Special Civil-law Partnership SCP • Trusts
140	Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, at the end of the reporting period.	The reporting entity has to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.
141	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".
142	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
143	Is your entity a Branch or Subsidiary of another entity?	
144	Is your entity a Branch or Subsidiary of a Foreign Entity?	
145	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
146	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
147	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)	
148	Please provide the number of beneficial owners with 25% or greater shareholding, direct or indirect control	

Q#	Question Text	Instructions
	of the company, or is a senior managing official, broken down by primary nationality.	
149	Is your entity part of an international business network or group?	
150	If so, please specify.	
151	Is your entity a member of a professional association or society?	
152	If so, please specify.	
153	Do you work with agents located abroad?	
154	Within the reporting period, has your entity experienced any of the following:	<p>A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners, any other person exercising direct or indirect control over your entity or the conduct of its activity?</p> <p>Undergone a significant evolution or modification of activities?</p> <p>Any other statutory changes?</p> <p>Change of AML/CFT/CPF responsible persons?</p>
155	Please indicate the development or modification.	
3.4 Entity Finances		
156	Turnover for the reporting period.	
157	Turnover for the reporting period realized in the Principality of Monaco.	
158	Turnover for the reporting period realized outside the Principality of Monaco.	
159	Please provide the amount of your last annual VAT return.	Total of twelve monthly payments.
3.5 Rejected Relationships		
160	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
3.6 Terminated Relationships		
161	Please provide the total number of client business relationships that have been terminated due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
3.7 Comments & Feedback		
162	Do you have feedback related to any questions in this section?	
163	Please provide comments or feedback on this section here.	

Instructions, Controls

C#	Question Text	Instructions
1 Controls		
1.1 Structure		
1	Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, at the end of the reporting period.	<p>Repeat the response from Q140.</p> <p>The reporting entity has to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.</p>
2	Please provide the total number of full-time equivalent employees at your entity, at the end of the reporting period.	<p>The reporting entity should disclose the number of full-time equivalent employees and non-employee partners and owners, irrespective of their function.</p> <p>Provide the estimate as a decimal of FTE time. For example if there is one full time employee and two ¼ time employees, then the total would be 1.5 FTE.</p> <p>1 full-time employee = 1 FTE. One half-time employee = 0,5 FTE. One ¼ time employee = 0,25 FTE.</p>
3	Approximately how many employee hours were spent on AML/CFT per month?	
4	Is your entity part of a Group?	
5	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> <ul style="list-style-type: none"> • A sole proprietor • A partnership • A small business with a single layer of management
1.2 Policies & Procedures		
6	Did your entity prepare a documented set of AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT legal requirements.

C#	Question Text	Instructions
7	Were these policies and procedures approved by the board and/or senior management of your entity?	The reporting entity should disclose whether its written AML/CFT policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
8	Does your entity have Policies and Procedures to refuse goods for reasons of suspicion of ML/TF?	
9	For what reasons are goods or clients refused for suspicion of ML/TF?	
10	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
11	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.
12	Did your entity update their written AML/CFT Policies and Procedures in the last year?	
13	Please provide the date of the last update to your entity's written AML/CFT Policies and Procedures.	
14	Does your entity have a systematic practice of tracking and managing changes to the AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.
15	Does your entity have a group-wide AML/CFT/CPF program?	
16	Has your entity conducted an analysis to identify whether the group AML/CFT/CPF program complies with Monaco's legislation and regulatory framework for each branch/subsidiary?	
17	Who prepared your entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors? Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
18	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures?	
1.3 Governance		
19	Does the board and/or senior management of your entity demonstrate overall responsibility for AML/CFT?	Actions taken by the Board and/or senior management that could demonstrate board's and senior management's engagement in AML/CFT matters could include: (1) senior management includes AML/CFT matters into the daily/ weekly/monthly/quarterly/yearly agenda; (2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks;

C#	Question Text	Instructions
		<p>(3) senior management requests ad-hoc reporting on AML/CFT matters whenever issues arise; orders internal or external audit to test AML/CFT controls;</p> <p>(4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT), buying AML/CFT monitoring software or sanction screening software, etc.;</p> <p>(5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT legislation are introduced;</p> <p>(6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.</p>
20	Does the board and/or senior management of your entity regularly receive AML/CFT reports?	<p>The reporting entity should disclose whether the board and/or senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT compliance.</p> <p>Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/TF risk and trends.</p>
21	Does the board and/or senior management of your entity ensure that AML/CFT shortcomings are rectified?	<p>The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control, take actions to rectify shortcomings in AML/CFT compliance areas and mitigate ML/TF risks.</p> <p>The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT reporting, supervisory onsite examination reports, etc. Examples of such actions might include:</p> <p>(a) approving budgetary resources to hire more employees for AML/CFT Compliance, investing in employees' knowledge and expertise through training, seminars, certifications</p> <p>(b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions,</p> <p>(c) prioritizing AML/CFT area for internal audit, etc.</p>
22	Does the senior management of your entity review (give approval) for taking on high-risk clients?	<p>In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.</p>

C#	Question Text	Instructions
1.4 Compliance & Violations		
23	Has your entity had any AML/CFT related violations in the past 5 years?	The reporting entity should disclose whether it had any AML/CFT related compliance failures, including minor shortcomings, within the past 5 years.
24	Please provide the total number of AML/CFT related violations in the past 5 Years.	Any AML/CFT related compliance failures, including minor shortcomings, should be counted under this question.
25	Please identify the number and types of AML/CFT violations.	
1.5 Training		
26	Did your entity conduct any AML/CFT training in the reporting period?	
27	Did your entity conduct AML/CFT training for its Directors / Management in the reporting period?	
28	Did your entity conduct AML/CFT training for its client-facing employees in the reporting period?	
29	Did your entity conduct AML/CFT training for its non-client-facing employees in the reporting period?	
30	Please provide the total number of employees trained on AML/CFT matters in Reporting Cycle.	
31	Are employees required to participate in AML/CFT/CPF training prior to their assignment to customer-facing or other duties of relevance for AML/CFT/CPF?	
32	Provide the estimated average number of hours per person spent on Initial Training.	
33	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters within the reporting period.	
34	Did any of the AML/CFT training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)?	
35	Did any of the AML/CFT training/awareness raising activities include Internal Meetings?	
36	Did any of the AML/CFT training/awareness raising activities include Consultation of AMSF's Website?	
37	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider in Monaco?	
38	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider outside Monaco?	
39	Did any of the AML/CFT training/awareness raising activities include Training by Another Group Member?	
40	Did any of the AML/CFT training/awareness raising activities include any Other Activities?	
41	What other AML/CFT training/awareness raising activities did it include?	

C#	Question Text	Instructions
42	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
43	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
44	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
45	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
46	Did any of the AML/CFT training/awareness raising activities cover topics related to Typologies?	
47	Did any of the AML/CFT training/awareness raising activities cover topics related to Practical Cases?	
48	Did any of the AML/CFT training/awareness raising activities cover topics related to News?	
49	Did any of the AML/CFT training/awareness raising activities cover topics related to Corruption?	
50	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing of Terrorism?	
51	Did any of the AML/CFT training/awareness raising activities cover topics related to Cryptocurrency?	
52	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
53	Did any of the AML/CFT training/awareness raising activities cover topics related to Tax Evasion?	
54	Did any of the AML/CFT training/awareness raising activities cover topics related to Fraud?	
55	Did any of the AML/CFT training/awareness raising activities cover other topics not mentioned above?	
56	What other topics did the AML/CFT training/awareness raising activities cover?	
1.6 CDD		
57	Does your entity identify all customers regardless of payment method?	
58	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 • Level of Risk 	
59	Please specify which items are not collected.	
60	When the client transaction is by an individual, does your entity record the individual's Identity Card?	
61	When the client transaction is by an individual, does your entity record the individual's Passport?	

C#	Question Text	Instructions
62	When the client transaction is by an individual, does your entity record the individual's Residence Card?	
63	When the client transaction is by an individual, does your entity record the individual's Proof of Address?	
64	When the client transaction is by an individual, does your entity record any other data of the individual?	
65	Please specify other data of Individual recorded.	
66	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's commercial register extract?	
67	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's statutes?	
68	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's Meeting Minutes?	
69	When the transaction is by a Legal Person/Legal Arrangement, does your entity record the client's identity documents of all effective Beneficial Owners (owning 25% or more of the entity)?	
70	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record any other data?	
71	Please specify other data of Legal Persons / Legal Arrangements recorded.	
72	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence • Level of Risk • Account Holder • Representative of Company or Client • Beneficial Owner • Administrators/Directors • Shareholders • Legal Representatives • Settlor/Constituent • Trustee • Protector • More Complex Ownership Structures • Introducers 	
73	Please specify which items are not collected.	
74	Does your entity record other client information or register client activity information in their database?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as

C#	Question Text	Instructions
		First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Level of Risk, 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?
75	Please specify what other information is included in your database.	
76	Does your entity research clients on the Internet?	
77	Does your entity research client using the Journal de Monaco?	
78	Does your entity research client using sites specializing in services of risk detection?	
79	Does your entity research client using business websites?	
80	Does your entity research client's organization, board members, etc.?	
81	Does your entity research clients in the press?	
82	What other information is used to research the client?	
83	Are the results of the research systematically recorded?	
84	Is past 5 years of client relationship data accessible by AMSF upon request?	
85	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
86	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
87	For when BO info is recorded, at what % shareholding threshold does your entity use for recording Beneficial Owner information?	
88	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
89	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)
90	Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period.	Please repeat the answer provided in Q2.
91	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
92	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	

C#	Question Text	Instructions
93	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
94	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
95	Did you select "Trigger Event" in the previous question?	
96	Please name all trigger events for ongoing due diligence done on clients classified as High-Risk for ML/FT.	
97	Does your entity examine the source of wealth before customer take-on?	
98	Does your entity undertake other measures for high-risk clients, before customer take-on?	
99	Please specify other measures taken for high-risk clients, before customer take-on.	
100	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
101	How does the company verify the Beneficial Owners of Virtual Assets?	If not applicable, state 'NA'.
102	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.
103	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?	
104	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).	
105	Does the evolution of the clients' services requested contribute to the identification of red flags?	
1.7 EDD		
106	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
107	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
108	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.
109	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
110	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.

C#	Question Text	Instructions
1.8 Risk Assessments		
111	Does your entity apply AML/CFT risk ratings to its clients?	
112	How many AML/CFT risk levels does your entity have for clients?	
113	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT.	
114	Please provide the total number of unique clients that are without a risk level determined yet.	
115	Does your entity's High-Risk Assignment Considerations include ALL of the following: <ul style="list-style-type: none"> • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types • Distribution Channels 	
116	Please specify which items are not considered.	
117	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
118	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
119	Does your entity have a tool or process for making AML/CFT risk assessments?	(client assessments)
120	Does your entity use a list of Sensitive Countries for AML/CFT risk assessment?	(client assessments)
121	Does your entity use a list of Sensitive Activities for AML/CFT risk assessment?	(client assessments)
122	What client activities does your entity associate with High-Risk clients?	
123	Does your entity consider ML and TF risks separately?	(entity's own assessment)
124	Does your entity have a tool or process for making AML/CFT risk assessments?	(entity's own assessment)
1.9 Audit / Controls		
125	When did your entity last have a SICCFIN/AMSF audit?	
126	Did your entity have any Other Audits not mentioned above?	(AML/CFT related audits only)
127	Specify the types of Other Audits, and provide the year of the last audit of each kind.	(AML/CFT related audits only)
1.10 Cash Transactions		
128	Does the headquarters of your entity or any branches or subsidiaries conduct cash transactions with clients?	Incoming or outgoing.
129	Does your entity apply any specific AML/CFT controls and procedures for cash transactions?	

C#	Question Text	Instructions
130	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Monitoring		
131	Does your entity have in place a system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
132	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	Please repeat the answer provided in Q4.
133	Please provide the total number of Alerts in reporting period by the system related to Money Laundering.	
134	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
135	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
136	Please provide the total number of Alerts in reporting period by the system related to Terrorism Financing.	
137	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
138	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
139	Has your entity formalized and used the identification thresholds required by your sector?	
140	Does your entity consider multiple or cumulative transactions?	
141	How many threshold-triggered CDD examinations were performed in the reporting period?	
142	Does your entity monitor client cash transaction activity for ensuring the 30,000 EUR cash limit is not exceeded within 6 months?	
143	How many times has your entity refused a client transaction due to exceeding the 30,000 EUR cash limit within 6 months?	
144	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	
145	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	
146	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
147	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	

C#	Question Text	Instructions
1.12 Record Keeping		
148	Does your entity keep transaction records for at least 5 years?	
149	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
150	Does your entity keep these records and documents in a safe and secure place?	
151	Are these records and documents available promptly to the relevant authorities upon request?	<p>When providing its response, the reporting entity should consider the following factors:</p> <ul style="list-style-type: none"> (1) is the above data collected in electronic format and easily retrievable from the IT systems? (2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly? (3) is there manual effort required to find clients' data, e.g., if files are stored only in paper format; or, when they are stored in electronic format, IT systems are not configured to enable easy access to the required data.
152	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.13 Targeted Financial Sanctions (TFS)		
153	Do entity's policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements.</p> <p>Policies and procedures should cover targeted financial sanctions-related requirements of at least the following:</p> <ul style="list-style-type: none"> (a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons; (b) Frequency and scope of screening; (c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).
154	Are the board and senior management of your entity engaged in overseeing risks and compliance matters related to TFS for Terrorist Financing and Proliferation Financing?	<p>The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include:</p> <ul style="list-style-type: none"> (1) approval of TFS-related policies, procedures and instructions by the board or senior management; (2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area

C#	Question Text	Instructions
		<p>(trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.;</p> <p>(3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities,</p> <p>(4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.</p>
155	Does your entity have a system to check the Customer Database?	
156	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
157	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
158	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	
159	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	
160	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	
161	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	
162	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	
163	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	
164	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	
165	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	
166	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	
167	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	
168	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	

C#	Question Text	Instructions
169	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary?	
170	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
171	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
172	Please provide the total number of persons identified by your entity related to financing of the Proliferation of Weapons of Mass Destruction within the reporting period.	
173	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
174	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)		
175	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
176	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
177	What additional AML/CFT procedures are applied for PEPs (compared to a standard risk client)?	<p>The reporting entity should provide a list of specific and enhanced measures that are additionally being taken for PEPs, compared to standard risk clients. For example:</p> <p>(a) before establishing a business relationship (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>
178	Does PEP screening occur as part of the CDD process for new customers?	
179	Does screening for PEPs occur on an ongoing basis?	
180	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
181	Are PEPs subject to increased monitoring?	
182	Does your entity consider all PEP relationships as High-Risk for AML/CFT?	
183	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	

C#	Question Text	Instructions
	Owner, or beneficiary becomes a PEP after the business relationship was established?	
1.15 Suspicious Transaction Reporting		
184	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)
185	Did your entity file any STRs/SARs to the FIU within the reporting period?	
186	Please provide the total number of STRs/ SARs related to Terrorism Financing that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Terrorism Financing</u> , it has reported to Monaco's FIU (https://amsf.mc).
187	Please provide the total number of STRs/ SARs related to Money Laundering that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Money Laundering</u> , it has reported to Monaco's FIU (https://amsf.mc).
188	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.	
189	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.
190	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
191	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
192	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.	
193	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
194	Has your entity refused to take goods based on suspicion within the reporting period?	
195	What are the main reasons to your entity refused to take goods within the reporting period?	
196	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	
197	Did your entity respond internally to the suspicious transactions? (e.g. modification of the client relationship, modification of the client risk's assessment)	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
198	Did your entity take any steps to strengthen internal controls for AML/CFT, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	

C#	Question Text	Instructions
1.16 Comments & Feedback		
199	Do you have feedback related to any questions in this section?	
200	Please provide comments or feedback on this section here.	

Instructions, Signatories

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