Instructions: 2025 Banking 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 31th 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 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: - 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 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: - 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
	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: (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
	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
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: • 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
1 Customer Risk		
1.1 Clients Summary		
Q1	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.	If multiple primary nationalities, enter the one most commonly used. If the nationality is unknown, please select "Unknown" from the dropdown. For questions referring to 'unique client', please consider: • 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
Q2	*Total number of clients*	**Auto-calculated field**
Q3	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.
Q4	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.
1.2 Funds Flow		
Q5	Please provide the total value of incoming funds, broken down by originating country, for the reporting period.	
Q6	Please provide the total value of outgoing funds, broken down by destination country, for the reporting period.	
1.3 Accounts Summary		
Q7	Please provide the total number of accounts from all client types.	
Q8	Does your entity record Beneficial Owner information?	Information relating to beneficial owners: identification details, addresses, etc.

Q#	Question Text	Instructions
Q9	For what conditions does your entity record Beneficial Owners' information?	
Q10	Please provide the total number of unique beneficial owners that were at some point active during the reporting period.	The complete concept of beneficial owner is referred to in Article 14 of OS No. 2.318, as amended, which can be identified by: • 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).
Q11	Please provide the total number of accounts with Beneficial Owners.	
Q12	Does your entity have any accounts without BO's?	
Q13	Please describe all reasons why accounts do not have BOs.	
Q14	Can your entity distinguish nationality of clients' BO's?	Indicate whether or not your entity is able to make the distinction.
Q15	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.
Q16	Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity's account, broken down by primary nationality.	This involves breaking down beneficial owners by category and then by 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. 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
Q17	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	

Q#	Question Text	Instructions
		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.
Q18	Can your entity distinguish BO's that are account holders that have 25% or greater ownership of an account?	
Q19	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.	
Q20	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q21	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.	
Q22	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.	
Q23	Please provide the total number of Signatories of Legal Person accounts, by Signatory's primary nationality.	
1.4 Assets Under Management		
Q24	Please provide the total value of the assets under management for clients.	
Q25	Does your entity provide Retail Banking services to clients?	
Q26	Please provide the total value (in EUR) of assets under management (deposits and securities) for Retail Banking.	
Q27	Does your entity provide Corporate Banking services to clients?	
Q28	Please provide the total value (in EUR) of assets under management (deposits and securities) for Corporate Banking.	
Q29	Does your entity provide Private Banking services to clients?	
Q30	Please provide the total value (in EUR) of assets under management (deposits and securities) for Private Banking.	
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:		
Q31	Foreign Commercial Companies?	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, HNWIs).
Q32	Foreign Patrimonial Companies?	
Q33	Trusts?	
Q34	Associations?	

Q#	Question Text	Instructions
Q35	Other Legal Arrangements not mentioned above?	This question aims to determine what your entity is capable of doing, regardless of whether you currently have such clients.
Q36	Insurance Companies?	
Q37	HNWI's?	
Q38	Lawyers or other Legal Professions?	
Q39	Accountants & Auditors?	
Q40	Nominee Shareholders / Directors?	
Q41	Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
Q42	Real Estate Agents?	
Q43	Dealers in Precious Metals and Stones?	
Q44	Trust and Company Service Providers?	
Q45	Multi-Family Offices?	
Q46	Single Family Offices?	
Q47	More Complex Ownership Structures?	
Q48	Cash Intensive Business (such as bars, restaurants)?	
Q49	Providers of or accept payments from Anonymous Prepaid Cards?	
Q50	Engaged in Art and Antiques?	
Q51	engaged in Import-Export?	
Q52	Dealing with High-Value Goods?	
Q53	Non-Profit Organization?	
Q54	Casinos/Gambling (including clients that are online casinos)?	
Q55	Engaged in Construction / Real Estate Development?	
Q56	Engaged in Extractive Industries (e.g. Oil and Gas)?	
Q57	Virtual Assets Service Providers (VASPs)?	
Q58	Engaged in Defense/Arms, including Dual-use items for proliferation of Weapons of Mass Destruction (WMD)?	
Q59	Engaged in Yachting-related Business?	
Q60	Sports Agents or Intermediaries?	
Q61	Engaged in Fund Management?	
Q62	Holding Companies?	
Q63	Auctioneers?	
Q64	Motor Vehicle Dealers?	
Q65	Government and Public Sector?	
Q66	Engaged in Aircraft Sales / Private Jets / Charters?	
Q67	Engaged in Shipping?	
1.6 Clients - Natural Persons		
Q68	Does your entity have clients that are Natural Persons?	
Q69	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. If you have a total of 2 clients, you must find 2 clients, even if the breakdown is different. Example:

Q#	Question Text	Instructions
		• Individuals broken down by nationality: 2 clients → 1 Swiss, 1 Japanese • Individuals broken down by residence: 2 clients → 2 residents of Monaco The total number remains the same: 2 clients.
Q70	*# Natural Person Clients*	**Auto-calculated**
Q71	Please provide the total number of unique clients that are Nationals.	
Q72	Please provide the total number of unique clients that are Foreign Residents.	
Q73	Please provide the total number of unique clients that are Non-Residents.	
Q74	Please provide the total number of transactions (both incoming and outgoing) with clients that are Natural Persons.	
Q75	Please provide the total value of funds transferred with clients that are Natural Persons, (both incoming and outgoing), in EUR.	
1.7 Clients - Legal Persons		
Q76	Does your entity have clients that are Legal Persons?	
Q77	Please provide the total number of unique clients that are Legal Persons.	
Q78	Please provide the total number of transactions (both incoming and outgoing) with clients that are Legal Persons.	
Q79	Please provide the total value of funds transferred with clients that are Legal Persons, both incoming and outgoing.	
Q80	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	• 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
Q81	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.8 Clients - Foreign Commercial Companies		
Q82	Does your entity have clients that are Foreign Commercial Companies?	

Q#	Question Text	Instructions
Q83	Please provide the total number of unique clients that are Foreign Commercial Companies.	
Q84	Does your entity have information related to the number and value of their transactions?	
Q85	Please provide the total number of transactions (both incoming and outgoing) with clients that are Foreign Commercial Companies.	
Q86	Please provide the total value of funds transferred with clients that are Foreign Commercial Companies, (both incoming and outgoing).	
1.9 Clients - Foreign Patrimonial Companies		
Q87	Does your entity have clients that are Foreign Patrimonial Companies?	
Q88	Please provide the total number of unique clients that are Foreign Patrimonial companies.	
Q89	Does your entity have information related to the number and value of their transactions?	
Q90	Please provide the total number of transactions (both incoming and outgoing) with clients that are Foreign Patrimonial Companies.	
Q91	Please provide the total value of funds transferred with clients that are Foreign Patrimonial Companies (both incoming and outgoing).	
1.10 Clients - Trusts		
Q92	Does your entity have clients that are Trusts?	
Q93	Please provide the total number of unique clients that are Trusts.	
Q94	Does your entity have information related to the number and value of their transactions?	
Q95	Please provide the total number of transactions (both incoming and outgoing) with clients that are Trusts.	
Q96	Please provide the total value of funds transferred with clients that are Trusts, (both incoming and outgoing).	
Q97	Please provide the total number of Monegasque unique clients that are Trusts.	
Q98	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q99	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.	
1.11 Clients - Associations		
Q100	Does your entity have clients that are Associations?	
Q101	Please provide the total number of unique clients that are Associations.	
Q102	Does your entity have information related to the number and value of their transactions?	

Q#	Question Text	Instructions
Q103	Please provide the total number of transactions (both incoming and outgoing) with clients that are Associations.	
Q104	Please provide the total value of funds transferred with clients that are Associations, both incoming and outgoing.	
1.12 Clients - Other Legal Arrangements		
Q105	Does your entity have clients that are Other Legal Arrangements?	
Q106	Please provide the total number of unique clients that are Other Legal Arrangements.	
Q107	Does your entity have information related to the number and value of their transactions?	
Q108	Please provide the total number of transactions (both incoming and outgoing) with clients that are Other Legal Arrangements.	
Q109	Please provide the total value of funds transferred with clients that are Other Legal Arrangements, both incoming and outgoing.	
Q110	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.13 Clients - Insurance Companies		
Q111	Does your entity have clients that are Insurance Companies?	
Q112	Please provide the total number of unique clients that are Insurance Companies.	
Q113	Does your entity have information related to the number and value of their transactions?	
Q114	Please provide the total number of transactions (both incoming and outgoing) with clients that are Insurance Companies.	
Q115	Please provide the total value of funds transferred with clients that are Insurance Companies (both incoming and outgoing).	
1.14 HNWI's and UHNWI's		
Q116	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 An UNHWI is necessarily an HNWI. In STRIX, an UNHWI must be counted in both the HNWI and UHNWI categories.
Q117	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).	
Q118	Please provide the total number of transactions (both incoming and outgoing) with clients that are HNWIs or individuals belonging to a HNW Group.	

Q#	Question Text	Instructions
Q119	Please provide the total value of funds transferred with clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
Q120	Please provide the total number of Beneficial Owners of Legal Person clients that are HNWIs, broken down by the primary nationality of the HNWI.	
Q121	Please provide the total number of Beneficial Owners of Trusts clients that are HNWIs, broken down by the primary nationality of the HNWI.	
Q122	Please provide the total number of Beneficial Owners of Other Legal Arrangements clients (that are not Trusts) that are HNWIs, broken down by the primary nationality of the HNWI.	
Q123	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** An UNHWI is necessarily an HNWI. In STRIX, an UNHWI must be counted in both the HNWI and UHNWI categories.
Q124	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).	
Q125	Please provide the total number of transactions (both incoming and outgoing) with clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q126	Please provide the total value of funds transferred with clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
Q127	Please provide the total number of Beneficial Owners of Legal Person clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
Q128	Please provide the total number of unique Beneficial Owners of Trust clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
Q129	Please provide the total number of Beneficial Owners of Other Legal Arrangements clients (that are not Trusts) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.15 Politically Exposed Persons (PEPs)		
Q130	Does your entity have any PEPs as clients?	
Q131	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q132	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q133	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
Q134	Please provide the total number of transactions (both incoming and outgoing) with clients that are PEPs.	

Q#	Question Text	Instructions
Q135	Please provide the total value of funds transferred with clients that are PEPs, (both incoming and outgoing).	
Q136	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.
Q137	Please provide the total number of transactions (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
Q138	Please provide the total value of funds transferred with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, (both incoming and outgoing).	
1.16 2nd Nationalities		
Q139	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
Q140	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.	
Q141	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.	
Q142	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.	
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 HNWIs 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 Beneficial Owners of Legal Person/Legal Arrangement clients that are HNWIs,	

Q#	Question Text	Instructions
	broken down by the secondary nationality(ies) of the HNWI.	
Q146	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).	
Q147	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.	
Q148	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).	
Q149	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the secondary nationality(ies) of the PEP.	
1.17 Lawyers and Other Legal Professions		
Q150	Does your entity have clients that are Lawyers and Other Legal Professions?	
Q151	Please provide the total number of unique clients that are Lawyers and Other Legal Professions.	
Q152	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
1.18 Accountants & Auditors		
Q153	Does your entity have clients that are Accountants & Auditors?	
Q154	Please provide the total number of unique clients that are Auditors/Accountants.	
Q155	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
1.19 Nominee Shareholders / Directors		
Q156	Does your entity have clients that are Nominee Shareholders / Directors?	
Q157	Please provide the total number of unique clients that are Nominee Shareholders / Directors.	
Q158	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
1.20 Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments		
Q159	Does your entity have clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	

Q#	Question Text	Instructions
Q160	Please provide the total number of unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
Q161	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
1.21 Real Estate Agents		
Q162	Does your entity have clients that are Real Estate Agents?	
Q163	Please provide the total number of unique clients that are Real Estate Agents.	
Q164	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
1.22 DPMS		
Q165	Does your entity have clients that are Dealers in Precious Metals and Stones?	
Q166	Please provide the total number of unique clients that are DPMS.	
Q167	Please provide the total number of Monegasque unique clients that are DPMS.	
1.23 TCSPs		
Q168	Does your entity have clients that are Trusts and Corporate Service Providers?	
Q169	Please provide the total number of unique clients that are TCSPs.	
Q170	Please provide the total number of Monegasque unique clients that are TCSPs.	
1.24 Single-Family Offices and Multi-Family Offices		
Q171	Does your entity have clients that are Multi-Family Offices?	
Q172	Please provide the total number of unique clients that are Multi-Family Offices.	
Q173	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
Q174	Does your entity have clients that are Single-Family Offices?	
Q175	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
1.25 More Complex Ownership Structures		
Q176	Does your entity have clients that are More Complex Ownership Structures?	
Q177	Please provide the total number of unique clients with More Complex Ownership Structures.	
Q178	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
Q179	Does your entity have information related to the number and value of their transactions?	

Q#	Question Text	Instructions
Q180	Please provide the total number of transactions (both incoming and outgoing) with More Complex Ownership Structures.	
Q181	Please provide the total value of funds transferred with clients with More Complex Ownership Structures, (both incoming and outgoing).	
	1.26 Cash Intensive Businesses	
Q182	How does your entity define a Cash Intensive Business?	
Q183	Does your entity have clients that are Cash Intensive Businesses?	
Q184	Please provide the total number of unique clients that are engaged in Cash Intensive Business.	
Q185	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
	1.27 Prepaid Cards	
Q186	Does your entity have clients that are providers of or accept payments from Anonymous Prepaid Cards with high CDD Threshold?	
Q187	Please provide the total number of unique clients that are providers of or accept payments from Anonymous Prepaid Cards / Cards with a high CDD Threshold.	
Q188	Please provide the total number of Monegasque unique clients that are providers of or accept payments from Anonymous Prepaid Cards / Cards with a high CDD Threshold.	
	1.28 Art and Antiques	
Q189	Does your entity have clients that are engaged in Art and Antiques?	
Q190	Please provide the total number of unique clients that are engaged in Art and Antiques.	
Q191	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
Q192	Does your entity have information related to the number and value of their transactions?	
Q193	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are engaged in Art and Antiques.	
Q194	Please provide the total value of funds transferred with clients that are engaged in Art and Antiques (both incoming and outgoing).	
	1.29 Import-Export	
Q195	Does your entity have clients that are engaged in Import-Export?	
Q196	Please provide the total number of unique clients that are engaged in Import-Export.	
Q197	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	

Q#	Question Text	Instructions
Q198	Does your entity have information related to the number and value of their transactions?	
Q199	Please provide the total number of transactions (both incoming and outgoing) with clients that are engaged in Import-Export.	
Q200	Please provide the total value of funds transferred with clients that are engaged in Import-Export (both incoming and outgoing).	
1.30 High-Value Goods		
Q201	Does your entity have clients that are High-Value Goods?	
Q202	Please provide the total number of unique clients that are engaged in dealing with High-Value Goods.	
Q203	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
Q204	Does your entity have information related to the number and value of their transactions?	
Q205	Please provide the total number of transactions (both incoming and outgoing) with clients that are engaged in dealing with High-Value Goods.	
Q206	Please provide the total value of funds transferred with clients that are engaged in dealing with High-Value Goods (both incoming and outgoing).	
1.31 NPOs		
Q207	Does your entity have clients that are Non-Profit Organizations?	
Q208	Please provide the total number of unique clients that are NPOs.	
Q209	Please provide the total number of Monegasque unique clients that are NPOs.	
1.32 Casinos / Gambling		
Q210	Does your entity have clients that are Casinos/Gambling or who are involved in Casino/Gambling ?	If you have clients who are directors, shareholders or partners (e.g. investors, lenders, service providers, etc.) of a casino or gambling establishment, please answer 'Yes'.
Q211	Please provide the total number of unique clients who are casinos or who are involved as directors, shareholders or partners (e.g. investors, lenders, service providers, etc.).	
Q212	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
1.33 Construction / Real Estate Development		
Q213	Does your entity have clients that are engaged in Construction / Real Estate Development?	
Q214	Please provide the total number of unique clients that are engaged in Construction/Real Estate Development.	
Q215	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	

Q#	Question Text	Instructions
Q216	Does your entity have information related to the number and value of their transactions?	
Q217	Please provide the total number of transactions (both incoming and outgoing) with clients that are engaged in Construction/Real Estate Development.	
Q218	Please provide the total value of funds transferred with clients that are engaged in Construction/Real Estate Development (both incoming and outgoing).	
1.34 Extractive Industries (e.g. Oil and Gas)		
Q219	Does your entity have clients that are engaged in Extractive Industries?	
Q220	Please provide the total number of unique clients that are engaged in Extractive Industries.	
Q221	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
Q222	Does your entity have information related to the number and value of their transactions?	
Q223	Please provide the total number of transactions (both incoming and outgoing) with clients that are engaged in Extractive Industries.	
Q224	Please provide the total value of funds transferred with clients that are engaged in Extractive industries (both incoming and outgoing).	
1.35 Virtual Asset Service Providers		
Q225	Does your entity have clients that are VASPs?	
Q226	Please provide the total number of unique clients that are VASPs.	
Q227	Please provide the total number of transactions (both incoming and outgoing) with clients that are VASPs.	
Q228	Please provide the total value of funds transferred with clients that are VASPs (both incoming and outgoing).	
Q229	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
Q230	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
Q231	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
Q232	Please provide the total number of transactions with VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q233	Please provide the total value of funds transferred with VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q234	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q235	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers

Q#	Question Text	Instructions
Q236	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
Q237	Please provide the total number of transactions with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
Q238	Please provide the total value of funds transferred with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
Q239	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO
Q240	Does your entity have clients that are Initial Coin Offering Providers?	ICO
Q241	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
Q242	Please provide the total number of transactions with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q243	Please provide the total value of funds transferred with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q244	Does your entity distinguish if VASP clients provide Other Services not mentioned above?	Other Services
Q245	Does your entity have clients that are engaged in Other VASP Services?	Other Services
Q246	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services
Q247	Please provide the total number of transactions with VASP clients related to Other Services (both incoming and outgoing).	Other Services
Q248	Please provide the total value of funds transferred with VASP clients that provide Other Services (both incoming and outgoing).	Other Services
Q249	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
Q250	Does your entity record if clients conduct transfers to or from VASPs from an account with your entity?	
Q251	Please provide the total number of unique clients that have conducted transactions with VASPs from an account with your entity.	
Q252	Please provide the total number of transactions (both incoming and outgoing) with with VASPs from an account with your entity.	
Q253	Please provide the total value of funds transferred by clients with VASPs (both incoming and outgoing) from an account with your entity.	
1.36 Defense / Arms		

Q#	Question Text	Instructions
Q254	Does your entity have clients that are engaged in Defense / Arms?	
Q255	Please provide the total number of unique clients that are engaged in Defense/Arms.	
Q256	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
1.37 Yachting-Related Business		
Q257	Does your entity have clients that are engaged in Yachting related business?	
Q258	Please provide the total number of unique clients that are engaged in Yachting-related Business.	
Q259	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
1.38 Sports Agents and Intermediaries		
Q260	Does your entity have clients that are Sports Agents or Intermediaries?	
Q261	Please provide the total number of unique clients that are Sports Agents or Intermediaries.	
Q262	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
1.39 Fund Management		
Q263	Does your entity have clients that are engaged in Fund Management?	
Q264	Please provide the total number of unique clients that are engaged in Fund Management.	
Q265	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
Q266	Does your entity have information related to the number and value of their transactions?	
Q267	Please provide the total number of transactions (both incoming and outgoing) with clients that are engaged in Fund Management.	
Q268	Please provide the total value of funds transferred with clients that are engaged in Fund Management (both incoming and outgoing).	
1.40 Holding Companies		
Q269	Does your entity have clients that are Holding Companies?	
Q270	Please provide the total number of unique clients that are Holding Companies.	
Q271	Please provide the total number of Monegasque unique clients that are Holding Companies.	
Q272	Does your entity have information related to the number and value of their transactions?	
Q273	Please provide the total number of transactions (both incoming and outgoing) with clients that are Holding Companies.	

Q#	Question Text	Instructions
Q274	Please provide the total value of funds transferred with clients that are Holding Companies, both incoming and outgoing.	
1.41 Auctioneers		
Q275	Does your entity have clients that are Auctioneers?	
Q276	Please provide the total number of unique clients that are Auctioneers.	
Q277	Please provide the total number of Monegasque unique clients that are Auctioneers.	
1.42 Motor Vehicle Dealers		
Q278	Does your entity have clients that are Motor Vehicle Dealers?	
Q279	Please provide the total number of unique clients that are Motor Vehicle Dealers.	
Q280	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
Q281	Does your entity have information related to the number and value of their transactions?	
Q282	Please provide the total number of transactions (both incoming and outgoing) with clients that are Motor Vehicle Dealers.	
Q283	Please provide the total value of funds transferred with clients that are Motor Vehicle Dealers (both incoming and outgoing).	
1.43 Government and Public Sector		
Q284	Does your entity have clients that are Government and Public Sector?	
Q285	Please provide the total number of unique clients that are Government and Public Sector.	
Q286	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
Q287	Does your entity have information related to the number and value of their transactions?	
Q288	Please provide the total number of transactions (both incoming and outgoing) with clients that are Government and Public Sector.	
Q289	Please provide the total value of funds transferred with clients that are Government and Public Sector (both incoming and outgoing).	
1.44 Aircraft Sales / Private Jets / Charters		
Q290	Does your entity have clients that are engaged in Aircraft Sales / Private Jets / Charters?	
Q291	Please provide the total number of unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
Q292	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
Q293	Does your entity have information related to the number and value of their transactions?	

Q#	Question Text	Instructions
Q294	Please provide the total number of transactions (both incoming and outgoing) with clients that are engaged in Aircraft Sales / Private Jets / Charters.	
Q295	Please provide the total value of funds transferred with clients that are engaged in Aircraft Sales / Private Jets / Charters (both incoming and outgoing).	
	1.45 Shipping	
Q296	Does your entity have clients that are engaged in Shipping?	
Q297	Please provide the total number of unique clients that are engaged in Shipping.	
Q298	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
Q299	Does your entity have information related to the number and value of their transactions?	
Q300	Please provide the total number of transactions (both incoming and outgoing) with clients that are engaged in Shipping.	
Q301	Please provide the total value of funds transferred with clients that are engaged in Shipping (both incoming and outgoing).	
	1.46 Comments & Feedback	
Q302	Do you have feedback related to any questions in this section?	
Q303	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.	
Q304	Does your entity accept or make Cheque transactions with clients?	
Q305	Did your entity accept or make Cheque transactions with clients within the reporting period?	
Q306	Please provide the total number of Cheque transactions with clients (both incoming and outgoing).	
Q307	Does your entity have information related to the value of these transactions?	

Q#	Question Text	Instructions
Q308	Please provide the total value of funds transferred with clients using Cheques within the reporting period.	
2.2 Direct Payments with Clients - Electronic Transfers		
Q309	Does your entity accept or make transactions by Electronic Transfers with clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, direct debits, payments services providers (PSP) such as PayPal or Carlo, debit cards, credit cards, virtual currency payments, etc.
Q310	Did your entity accept or make transactions by Electronic Transfer with clients within the reporting period?	
Q311	Please provide the total number of transactions by Electronic Transfer with clients (both incoming and outgoing).	
Q312	Does your entity have information related to the value of these transactions?	
Q313	Please provide the total value of funds transferred by Electronic Transfer with clients (both incoming and outgoing).	
2.3 Direct Payments with Clients – Cash		
Q314	Does your entity accept or make Cash transactions with clients?	
Q315	Did your entity accept or make Cash transactions with clients within the reporting period?	
Q316	Please provide the total number of Cash transactions with clients, within the reporting period.	
Q317	Please provide the total value of funds transferred, Cash payments in the reporting period.	
Q318	Please provide the total number of single cash transactions with clients equal to or greater than 10,000 euros.	
Q319	Can your entity distinguish cash transactions above EUR 100,000 in your record keeping?	

Q#	Question Text	Instructions
Q320	Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period.	
Q321	Number of physical cash transactions with Monegasque Legal Persons in excess of EUR 100,000 within the reporting period.	
Q322	Number of physical cash transactions with Foreign Legal Persons in excess of EUR 100,000 within the reporting period.	
2.4 Direct Payments with Clients – Summary		
Q323	*Sum of # transactions with clients*	**Auto-calculated**
Q324	*# Transactions with clients (Repeat of Q3)*	**Repeat field, used for data validation. Auto-calculated**
Q325	*Sum of value payments with clients*	**Auto-calculated**
Q326	*Value payments with clients (Repeat of Q4)*	**Repeat field, used for data validation. Auto-calculated**
2.5 Virtual Currencies		
Q327	Do you have clients that use cryptocurrencies?	
Q328	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.
Q329	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q330	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
2.6 Services Offered		
Q331	Does your entity conduct correspondent-type business relationships, where your entity acts as the correspondent?	
Q332	Please provide the total number of correspondent-type transactions, both incoming and outgoing, where your entity acts as the correspondent.	
Q333	Please provide the total value of funds transferred for correspondent-type transactions where your entity acts as the correspondent. Sum both incoming and outgoing transactions from/to the respondent.	
Q334	Does your entity have client accounts that are Conventional Titles?	
Q335	Please provide the total number of transactions (both incoming and outgoing) by client accounts that have Conventional Titles.	
Q336	Please provide the total value of funds transferred by client accounts that have Conventional Titles, both incoming and outgoing.	
Q337	Does your entity Deal in Precious Metals and Stones?	

Q#	Question Text	Instructions
Q338	Please provide the total number of transactions (both bought and sold) related to Dealings of Precious Metals and Stones.	
Q339	Please provide the total value of funds transferred, both buying and selling, related to Dealings of Precious Metals and Stones.	
Q340	Does your entity provide financial products in the form of Cash Bonds?	
Q341	Please provide the total number of transactions (both bought and sold) of Cash Bonds.	
Q342	Please provide the total value of funds transferred, both buying and selling, of Cash Bonds.	
Q343	Does your entity provide financial products in the form of Treasury Bills?	
Q344	Please provide the total number of transactions (both bought and sold) of Treasury Bills.	
Q345	Please provide the total value of funds transferred, both buying and selling, of Treasury Bills.	
Q346	Does your entity provide financial products in the form of Life Insurance Contracts?	
Q347	Please provide the total number of transactions (both bought and sold) of Life Insurance Contracts.	
Q348	Please provide the total value of funds transferred, both buying and selling, of Life Insurance Contracts.	
Q349	Does your entity provide Safe Deposit Rental Services?	
Q350	Please provide the total number of Safe Deposit Rentals.	
Q351	Please provide the total number of transactions related to Safe Deposit Rental Services.	
Q352	Must the customer be an account holder at your entity to use Safe Deposit Rental Services?	
Q353	Does your entity accept or make transactions from/to Occasional Customers?	
Q354	Please provide the total number of transactions (both incoming and outgoing) with Occasional Customers.	
Q355	Please provide the total value of funds transferred with Occasional Customers, both incoming and outgoing.	
Q356	Does your entity provide Family Office services?	
Q357	Please provide the total number of transactions (both incoming and outgoing) related to Family Office Services.	
Q358	Please provide the total value of funds transferred, both incoming and outgoing, related to Family Office Services.	
Q359	Does your entity offer trade financing products or services?	
Q360	Does your entity offer prepaid cards for sale?	
Q361	Please provide the total number of cards sold within the reporting period.	

Q#	Question Text	Instructions
Q362	Please provide the total value of cards sold within the reporting period.	
2.7 Lending		
Q363	Please provide the total number of loans provided to clients.	
Q364	Please provide the total value of loans provided to clients.	
Q365	Does your entity provide loan products in the form of Fixed Term Advance (ATF)?	
Q366	Does your entity provide loan products in the form of Mortgage loans?	
Q367	Does your entity provide loan products in the form of Lombard loans?	
Q368	Does your entity provide products for Overdraft in Current Accounts?	
Q369	Does your entity provide Issuance of Payment Guarantees?	
Q370	Does your entity have any Other Loan Products, not mentioned above, that it offers to clients?	
Q371	Please specify the type of Other Loan Products at your entity not mentioned above it offers to clients.	
2.8 Comments & Feedback		
Q372	Do you have feedback related to any questions in this section?	
Q373	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q374	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.
Q375	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.	
Q376	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q377	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.
Q378	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		

Q#	Question Text	Instructions
Q379	Did your entity onboard clients within the reporting period?	
Q380	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	This refers to the number of new unique natural person clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q381	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	This refers to the number of new unique legal person clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q382	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	This refers to the number of new unique trusts clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q383	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	This refers to the number of new unique clients who are other legal arrangements entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q384	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.
Q385	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique natural person clients should be indicated here.
Q386	Please provide the n umber of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique legal person clients should be indicated here.
Q387	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new clients without a physical meeting, the number of new unique trust clients should be indicated here.
Q388	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique clients that are other legal entities should be indicated here.
Q389	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.
Q390	Can the entity provide client nationality information for clients onboarded through introducers?	
Q391	Can the entity provide introducers residency information?	
Q392	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.
Q393	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.
Q394	*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.**
Q395	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.
Q396	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.
Q397	*Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Cumulative.*	**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		
Q398	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.
Q399	Does your entity have any Branches, Subsidiaries, or Agencies?	
Q400	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	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".
Q401	Is your entity a Branch or Subsidiary of a Foreign Entity?	
Q402	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
Q403	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q404	Please provide the number of shareholders with 25% or greater shareholding, broken down by primary	

Q#	Question Text	Instructions
	nationality (Natural Person) or country of establishment (Legal Persons and Arrangements)	
Q405	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.	
Q406	Does your entity have foreign correspondent bank relationships?	
Q407	Please provide the number of foreign bank respondent relationships, broken down by respondent country, at the end of the reporting period.	
Q408	Within the reporting period, has your entity experienced any of the following:	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? Undergone a significant evolution or modification of activities? Any other statutory changes? Change of AML/CFT/CPF responsible persons?
Q409	Please indicate the development or modification.	
	3.4 Rejected Relationships	
Q410	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q411	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.	
Q412	Can your entity distinguish whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	
Q413	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, due to client attributes / activities / deficiencies.	
Q414	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to ML/TF/PF?	
Q415	Please provide the total number of new client business relationships that have been rejected due to Money Laundering considerations during the reporting period due to client attributes / activities / deficiencies.	
Q416	Please provide the total number of new client business relationships that have been rejected due to Terrorism	

Q#	Question Text	Instructions
	Financing considerations during the reporting period due to client attributes / activities / deficiencies.	
Q417	Please provide the total number of new client business relationships that have been rejected due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period due to client attributes / activities / deficiencies.	
3.5 Blocked/Rejected Transactions		
Q418	Did you block/reject client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period?	
Q419	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	
Q420	Can your entity distinguish whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	
Q421	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period due to client attributes / activities / deficiencies.	
Q422	Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to ML/TF/PF?	
Q423	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering considerations due to client attributes / activities / deficiencies within the reporting period.	
Q424	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Terrorism Financing considerations due to client attributes / activities / deficiencies within the reporting period.	
Q425	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Financing the Proliferation of Weapons of Mass Destruction considerations due to client attributes / activities / deficiencies within the reporting period.	
3.6 Terminated Relationships		
Q426	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	

Q#	Question Text	Instructions
Q427	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
Q428	Can your entity distinguish whether client relationship was terminated due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	
Q429	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period due to client attributes / activities / deficiencies.	
Q430	Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due to ML/TF/PF?	
Q431	Please provide the total number of client business relationships that have been terminated due to Money Laundering considerations during the reporting period due to client attributes / activities / deficiencies.	
Q432	Please provide the total number of client business relationships that have been terminated due to Terrorism Financing considerations during the reporting period due to client attributes / activities / deficiencies.	
Q433	Please provide the total number of client business relationships that have been terminated due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period due to client attributes / activities / deficiencies.	
3.7 Comments & Feedback		
Q434	Do you have feedback related to any questions in this section?	
Q435	Please provide comments or feedback on this section here.	

Instructions, Controls

C#	Question Text	Instructions
Controls		
1.1 Structure		
Whether or not you carried out the activity during the reporting period, you must answer all of the following questions, as they concern: your internal organisation (structure, policies, procedures, training, etc.) and the risk mitigation measures you have put in place. These obligations remain applicable even in the absence of clients or transactions.		
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.	**Repeat the response from Q398.** The reporting entity should disclose the number of employees, partners, and owners irrespective of their function. The number at the end of the reporting period should be used.
C2	Please provide the total number of full-time equivalent persons working at your entity, at the end of the reporting period.	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. 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. 1 full-time person = 1 FTE. One half-time person = 0,5 FTE. One ¼ time person = 0,25 FTE.
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.	
C5	Does the MLRO fulfil any other role or job function?	
C6	What percentage of time does the MLRO spend on additional functions?	
C7	Is your entity part of a Group?	
1.2 Policies & Procedures		
C8	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.
C9	Were these policies and procedures approved by the board and 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).
C10	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C11	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.

C#	Question Text	Instructions
C12	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C13	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C14	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.
C15	Does your entity have a group-wide AML/CFT/CPF programme?	
C16	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?	
C17	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.
C18	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
1.3 Governance		
C19	Does the board and senior management of your entity demonstrate overall responsibility for AML/CFT/CPF?	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: (1) senior management includes AML/CFT/CPF 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; (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; (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.;

C#	Question Text	Instructions
		(5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT/CPF legislation are introduced; (6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.
C20	Does the board and senior management of your entity regularly receive AML/CFT/CPF reports?	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. Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/FT risk and trends.
C21	Does the board and senior management of your entity ensure that AML/CFT/CPF shortcomings are rectified?	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. 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: (a) approving budgetary resources to hire more employees for AML/CFT/CPF Compliance, investing in employees' knowledge and expertise through training, seminars, certifications (b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions, (c) prioritizing AML/CFT/CPF area for internal audit, etc.
C22	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		
C23	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.

C#	Question Text	Instructions
C24	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.
C25	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C26	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C27	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C28	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C29	Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period?	
C30	Did your entity conduct AML/CFT/CPF training for its Compliance Department Employees in the reporting period?	
C31	Did your entity conduct AML/CFT/CPF training for its Internal Audit Department in the reporting period?	
C32	Please provide the total number of employees trained on AML/CFT/CPF matters during the reporting cycle.	
C33	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?	
C34	Provide the estimated average number of hours per person spent on Initial Training.	
C35	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
C36	Provide the number of staff that have received Refresher Training within the reporting period.	
C37	Provide the estimated average number of hours per person spent on Refresher Training.	
C38	Does the entity provide specialized training for employees working in high-risk areas, such as compliance and customer due diligence?	
C39	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
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?	

C#	Question Text	Instructions
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?	
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?	
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?	

C#	Question Text	Instructions
	1.6 CDD	
C63	Does your entity record all of the following in your customer database: • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence • Tax Residence • Activity • Wealth	
C64	Please specify which items are not collected.	
C65	Does the entity's database contain all of the following, when applicable: • Name • Country of Incorporation • Foundation Date • Administrators/Directors • Beneficial Owner • Legal Representatives • Authorised Representative • Level of Risk • Representative of Company or Client	
C66	Please specify which items are not collected.	
C67	Does the entity's database contain all of the following, when applicable: • Donors • Founders • Introducers • More Complex Ownership Structures • Person who directly or indirectly exercises control of a Foundation • Protector • Settlor/Constituent • Shareholders • Trustee	
C68	Please specify which items are not collected.	
C69	Does the entity's database contain all of the following, when applicable: • Account holders • Credit Card Holders • Complex Ownership Structure • Depositors/3rd Party Guarantors • Occasional Customers • Prospective Customers • Insurance Policy Payee	

C#	Question Text	Instructions
	• Insurance Policy Holder • Insurance Policy Beneficiary • Insurance Policy Insured • Renters of Safe Deposit Boxes	
C70	Please specify which items are not collected.	
C71	Does your entity record other client information or register client activity information in their database?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder, 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?
C72	Please specify what other information is included in your database.	
C73	Is past 5 years of client relationship data accessible by AMSF upon request?	
C74	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C75	Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?	The reporting entity should indicate whether it has implemented written policies and procedures that specify the difference in documentation and requirements for simplified, standard, and enhanced due diligence.
C76	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.	**Repeat the response from Q1.**
C77	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C78	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C79	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C80	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C81	What % shareholding threshold does your entity use for recording Beneficial Owner information?	
C82	What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity?	

C#	Question Text	Instructions
C83	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C84	Does your entity examine the source of wealth before customer take-on?	
C85	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C86	Please specify other measures taken for high-risk clients, before customer take-on.	
C87	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C88	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
C89	How does the company verify the Beneficial Owners of Virtual Assets?	
C90	Does your entity ever rely on third parties to collect CDD information about clients?	
C91	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?	
1.7 EDD		
C92	Did you apply enhanced due diligence measures to clients during the reporting period?	
C93	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C94	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C95	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.
C96	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C97	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 Beneficial Owners of Legal Persons and Legal Arrangements ÷ total number of Beneficial Owners of Legal Persons and Legal Arrangements.
1.8 Risk Assessments		
C98	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C99	How many AML/CFT/CPF risk levels does your entity have for clients?	
C100	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C101	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	

C#	Question Text	Instructions
C102	Do you have clients whose risk level has not yet been determined?	
C103	Please provide the total number of unique clients that are without a risk level determined yet.	
C104	Does your entity's High-Risk assignment considerations include ALL of the following: • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types • Distribution Channels • Accounts with Conventional Title • Assets Under Management • Volume of Operations • Nature of Operations	
C105	Please specify which items are not considered.	
C106	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
C107	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
C108	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C109	Does your entity use a list of sensitive countries for AML/CFT/CPF risk assessment?	(client assessments)
C110	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C111	What client activities does your entity associate with High-Risk clients?	
C112	Does your entity consider ML and TF risks separately?	(entity's own assessment)
C113	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
1.9 Audit / Controls		
C114	Does your entity's internal control process include a Permanent Controller?	
C115	Is the permanent controller a different person from the AML/CFT/CPF Manager?	
C116	Does your entity's internal control process include an Internal Audit Department?	
C117	How many significant audit issues were identified in the latest audit report (relating to AML/CFT/CPF)?	
C118	When did your entity last have a SICCFIN/AMSF audit?	
C119	Has your entity had an on-site AMSF audit?	
C120	Date of last AMSF on-site audit.	
C121	When did your entity last have an ACPR audit?	
C122	When did your entity last have a CCAF audit?	

C#	Question Text	Instructions
C123	When did your entity last have an Internal AML/CFT/CPF audit?	
C124	When did your entity last have a Group AML/CFT/CPF audit?	
C125	Did your entity have any Other Audits not mentioned above?	
C126	Specify the types of Other Audits, and provide the year of the last audit of each kind.	
C127	Does your entity have an Annual Cheque Control program?	
1.10 Cash Transactions		
C128	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C129	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C130	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Monitoring		
C131	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
C132	Has the automated system been adapted to the entity in Monaco?	
C133	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	**Please repeat the answer provided in Q3.**
C134	Do you have a system that generates alerts related to Money Laundering?	
C135	Please provide the total number of Alerts in Reporting Period by the automated system related to Money Laundering.	
C136	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
C137	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
C138	Do you have a system that generates alerts related to Terrorism Financing?	
C139	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing.	
C140	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
C141	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
C142	Have you rejected transactions due to insufficient originator or beneficiary information?	

C#	Question Text	Instructions
C143	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	
C144	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	
C145	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
C146	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	
1.12 Monitoring - Rejected Potential Clients		
C147	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	**Please repeat the answer provided in Q410.**
C148	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.	**Please repeat the answer provided in Q411.**
C149	Can your entity distinguish whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practices?	**Please repeat the answer provided in Q412.**
C150	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 (i.e. not entering into a business relationship), that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C151	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to ML/TF/PF?	**Please repeat the answer provided in Q414.**
C152	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C153	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Terrorism Financing considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C154	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Financing the Proliferation of Weapons of Mass Destruction considerations during	

C#	Question Text	Instructions
	the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
	1.13 Monitoring - Blocked/Rejected Transactions	
C155	Did you block/reject client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period?	**Please repeat the answer provided in Q418.**
C156	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	**Please repeat the answer provided in Q419.**
C157	Can your entity distinguish whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	**Please repeat the answer provided in Q420.**
C158	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C159	Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to ML/TF/PF?	**Please repeat the answer provided in Q422.**
C160	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C161	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Terrorism Financing considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C162	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
	1.14 Monitoring - Terminated Relationships	
C163	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	**Please repeat the answer provided in Q426.**
C164	Please provide the total number of client business relationships that have been terminated due to Money Laundering, ML/TF/PF considerations during the reporting period. (i.e. existing business relationship terminated)	**Please repeat the answer provided in Q427.**

C#	Question Text	Instructions
C165	Can your entity distinguish whether a business relationship was terminated due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice?	**Please repeat the answer provided in Q428.**
C166	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C167	Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the bank's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due to ML/TF/PF?	**Please repeat the answer provided in Q430.**
C168	Please provide the total number of client business relationships that have been terminated due to Money Laundering considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C169	Please provide the total number of client business relationships that have been terminated due to Terrorism Financing considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
C170	Please provide the total number of client business relationships that have been terminated due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, that are based mainly on your bank's discretionary AML/CFT/CPF practices.	
1.15 Record Keeping		
C171	Does your entity keep transaction records for at least 5 years?	
C172	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C173	Does your entity keep these records and documents in a safe and secure place?	
C174	Are these records and documents available promptly to the relevant authorities upon request?	When providing its response, the reporting entity should consider the following factors: (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

C#	Question Text	Instructions
		electronic format, IT systems are not configured to enable easy access to the required data.
C175	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.16 Targeted Financial Sanctions (TFS)		
C176	Do entity policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing?	The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements. Policies and procedures should cover targeted financial sanctions-related requirements of at least the following: (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).
C177	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?	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: (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 (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.; (3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities, (4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.

C#	Question Text	Instructions
C178	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	
C179	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
C180	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C181	Does your entity have an automated System to Check the Customer Database in accordance with Article 16 of Sovereign Ordinance no. 8.664 of 26 May 2021?	
C182	Does the entity's automated system perform checks on entry into relationship for all of the following (When applicable by client / activity type): • Account Holder • Representative of Company or Client • Beneficial Owner • Administrators/Directors • Shareholders • Legal Representatives • Settlor/Constituent • Trustee • Protector • Renters of Safe Deposit Boxes • Introducers	
C183	Does the entity's automated system perform checks on entry into relationship for all of the following (When applicable by client / activity type): • Introducers • 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	
C184	If your entity does not collect the items mentioned in the above two questions, please specify which items are not collected?	If all are collected respond "NA".
C185	Does the entity's automated System perform any Other Checks on entry into relationship, not already mentioned above?	

C#	Question Text	Instructions
C186	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Account Holders (Titulaires)?	Reference Sovereign Ordinance no. 8.664.
C187	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Representative of Company or Client (Mandataires)?	Reference Sovereign Ordinance no. 8.664.
C188	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Beneficial Owners (and Beneficiaries)?	Reference Sovereign Ordinance no. 8.664.
C189	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Administrators / Directors?	Reference Sovereign Ordinance no. 8.664.
C190	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Shareholders?	Reference Sovereign Ordinance no. 8.664.
C191	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Legal Representatives?	Reference Sovereign Ordinance no. 8.664.
C192	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Settlor / Constituent?	Reference Sovereign Ordinance no. 8.664.
C193	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Trustees?	Reference Sovereign Ordinance no. 8.664.
C194	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Protectors?	Reference Sovereign Ordinance no. 8.664.
C195	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Renters of Safe Deposit Boxes?	Reference Sovereign Ordinance no. 8.664.
C196	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Introducers?	Reference Sovereign Ordinance no. 8.664.
C197	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Credit Card Holders?	Reference Sovereign Ordinance no. 8.664.
C198	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	Reference Sovereign Ordinance no. 8.664.
C199	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Depositors / 3rd Party Guarantors?	Reference Sovereign Ordinance no. 8.664.
C200	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Payee?	Reference Sovereign Ordinance no. 8.664.
C201	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Holder?	Reference Sovereign Ordinance no. 8.664.

C#	Question Text	Instructions
C202	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Beneficiary?	Reference Sovereign Ordinance no. 8.664.
C203	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Insurance Policy Insured?	Reference Sovereign Ordinance no. 8.664.
C204	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Recipients of Funds?	Reference Sovereign Ordinance no. 8.664.
C205	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary.	
C206	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
C207	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.	
C208	Please provide the total value of assets frozen (in EUR) related to Terrorism Financing within the reporting period.	
C209	Please provide the total value of assets frozen (in EUR) related to financing of Proliferation of Weapons of Mass Destruction within the reporting period.	
C210	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C211	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
C212	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	
C213	What other actions has your entity taken related to Terrorism Financing?	
C214	What other actions has your entity taken related to financing of Proliferation of Weapons of Mass Destruction?	
1.17 Politically Exposed Persons (PEPs)		
C215	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C216	What measures does your entity apply to determine whether clients and beneficial owners are PEPs?	
C217	What additional AML/CFT/CPF procedures are applied for PEPs (compared to a standard risk client)?	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:

C#	Question Text	Instructions
		(a) before establishing a business relationship (b) during the course of a business relationship. 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.
C218	Did you enter into any relationships with PEPs during the reporting period?	
C219	Does PEP screening occur as part of the CDD process for new customers?	
C220	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C221	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C222	Does screening for PEPs occur on an ongoing basis?	
C223	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C224	Are PEPs subject to increased monitoring?	
C225	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C226	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?	
C227	Among your clientele, are there any individuals who became PEPS during the course of the business relationship during the reporting period?	
1.18 Suspicious Transaction Reporting		
C228	Is your entity registered with goAML?	
C229	Please describe why.	In case the above question is answered “No”.
C230	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C231	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)
C232	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C233	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C234	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 number of Suspicious Transactions, related to Terrorism Financing, it has reported to Monaco’s FIU (https://amsf.mc).

C#	Question Text	Instructions
C235	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 number of Suspicious Transactions, related to Money Laundering, it has reported to Monaco's FIU (https://amsf.mc).
C236	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C237	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.	
C238	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.
C239	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C240	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C241	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.	
C242	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C243	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
C244	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
C245	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.	
C246	Please provide the total number of unsuccessful transactions attempts reported to the FIU, within the reporting period.	
C247	Please provide the total number of unsuccessful transactions attempts reported to the FIU, within the reporting period.	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
C248	Did your entity respond internally to the suspicious transactions? (e.g. modification of the client relationship, modification of the client risk's assessment)	
1.19 Comments & Feedback		
C249	Do you have feedback related to any questions in this section?	
C250	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.