


## Instructions: 2024 TCSPs AML/ CFT Survey

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

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

- Responses provided should include activity related to when your entity provides products or services to clients that fall under the scope of AML/CFT regulation in Monaco.
- The reporting period is 1 January 2023 to 31 December 2023.
- Questions related to number of clients shall include clients that are active at the end of the reporting period and clients that were at some point active during the reporting period.
- The term “unique clients” denotes that while a client might have several accounts it should only be counted as one client.
- Questions related to number or value of transactions are relevant for activity performed within the reporting period.
- Questions related to number or value of transactions should capture the instances when the reporting entity (1) prepares for or (2) carries out transactions for the clients concerning the activities mentioned.
- All questions to provide monetary values require an answer in EUR. Only value questions are indicated with the currency symbol € in the survey.
- All questions asking for responses with country breakdown are ISO 3166-1 Country Names or can be answered with the Bulk-paste feature when using country names, or the ISO 2-alpha, 3-alpha, and 3-numeric codes. A link to the acceptable country names and codes exists on the Bulk-paste popup window. This window is accessible for questions having the symbol .
- If the nationality, residency, or other requested breakdown is unknown, please select “Unknown” from the dropdown.
- For questions related to legal entity / profession type and business classification types, NIS or NACE code systems may be used, or alternative equivalent. For questions relating to classification types but not specified by the entity’s sector classification system used, please refer to industry practices.
- Responses provided in the survey shall be for the reporting entity only, and should not include any group totals.
- If data is not available, do not enter ‘0’, leave blank and provide a reason for incompleteness. Only enter ‘0’ when there is zero of that activity.

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## Glossary

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

Term	Definition
	<p>7. Trading in:</p> <ul style="list-style-type: none"> <li>(a) money market instruments (cheques, bills, certificates of deposit, derivatives etc.);</li> <li>(b) foreign exchange;</li> <li>(c) exchange, interest rate and index instruments;</li> <li>(d) transferable securities;</li> <li>(e) commodity futures trading.</li> </ul> <p>8. Participation in securities issues and the provision of financial services related to such issues.</p> <p>9. Individual and collective portfolio management.</p> <p>10. Safekeeping and administration of cash or liquid securities on behalf of other persons.</p> <p>11. Otherwise investing, administering or managing funds or money on behalf of other persons.</p> <p>12. Underwriting and placement of life insurance and other investment-related insurance.</p> <p>13. Money and currency changing.</p>
Foreign Residents	For the purpose of this questionnaire, is a non-Monégasque national that is a resident in Monaco.
Government / Public Sector	Government/public entity is an organization or body providing services to the public on behalf of the government or another public entity.
High Net Worth Individual (HNWI)	For the purposes of this survey, a High-Net-Worth-Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million.
High Net Worth (HNW) Group	For the purposes of this survey, a HNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 5 million.
Legal Arrangement	A relationship established by means of a contract between two or more parties that do not result in the creation of a legal personality such as Trusts or other similar arrangements. Examples of other similar arrangements (for AML/CFT purposes) include fiducie, treuhand and fideicomiso.
Legal Person	Legal persons refer to any entities other than natural persons that can establish a permanent customer relationship with a financial institution or otherwise own property. This can include companies, corporate bodies, foundations, institute, partnerships, or associations and other relevantly similar entities.
ML / TF / PF	Money Laundering / Terrorist Financing / Financing the Proliferation of Weapons of Mass Destruction
Money or value transfer services (MVTs)	Money or value transfer services (MVTs) refers to financial services that involve the acceptance of cash, cheques, other monetary instruments or other stores of value and the payment of a corresponding sum in cash or other forms to a beneficiary by means of communication, message, transfer, or through a clearing network to which the MVTs provider belongs.
More Complex Ownership Structure	For the purposes of this survey, a More Complex Ownership Structure refers to clients in which the reporting entity has increased effort or difficulty in independently verifying the identity of the Beneficial Owner of the customer. For this survey, More Complex Ownership Structures are structures with 3 or more layers of ownership between the Account Holder and the Beneficial Owner, or, structures that are less than 3 layers of ownership but that are difficult to verify the Beneficial Owner due to obscurity or obfuscation, such as when information is not publicly accessible, lacks transparency, involves a foreign company or trust, requires foreign cooperation to verify, or when the recorded owner is a professional (lawyer, accountant, company services business).
Nationals	Natural Person who is Monégasque nationals.

Term	Definition
Non-Profit Organizations (NPOs)	Non-Profit Organizations (NPOs) refers to a legal person or arrangement or organization that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”.
Occasional Transaction	Any Transaction other than a Transaction carried out in the course of an established Business Relationship.
Payment types by clients	Payments by clients are transactions from client accounts initiated and performed by the client. For example, a client makes an electronic transfer to pay a rent.
Payment types on behalf of clients	Payments on behalf of clients are transactions made by the reporting entity to third parties on behalf of clients. Examples of such arrangements may be with power of attorney, Signatory on accounts, or similar.
Payment types with clients	Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity, transactions made in person, and deposit taking.
PEPs	PEPs are individuals who are or have been entrusted domestically 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.
Primary Nationality	For the purposes of this questionnaire, an individual with multiple nationalities should be reported as having a primary nationality, which should be based on the following ordering: nationality of birth country, nationality that is their country of residence, other nationality.
Resident	For the purpose of this questionnaire, a resident is a Natural Person who is a Monégasque or who has a legal right to work and live in Monaco.
Non-Resident	For the purpose of this questionnaire, a non-resident is a Natural Person who is a non-Monégasque national and does not have residency in Monaco.
Senior management	Senior management is an officer or employee with sufficient knowledge of the institution's money laundering and terrorist financing risk exposure and with sufficient seniority to take decisions affecting its risk exposure, and who need not, in all cases, be a member of the board of directors.
SICCFIN (maintenant 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. (now AMSF)
Sports agent	A sports agent is any person who, whether occasionally or habitually and in consideration of remuneration, brings interested parties together to make a contract, either for the paid exercise of a sporting activity, or for the agreement of an employment contract for the paid exercise of a sporting or training activity.
TFS	Targeted Financial Sanctions
Trust and Company Service Providers	Trust and Company Service Providers refers to all persons or businesses that are not covered elsewhere, and which as a business, provide any of the following services to third parties: <ul style="list-style-type: none"> <li>• Acting as an agent in the creation or establishment of legal persons</li> <li>• 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</li> <li>• Providing a registered office, work address, residence, correspondence address, or administrative address for a legal person or legal arrangement</li> <li>• 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</li> <li>• Acting or arranging for another person to act as a nominee shareholder in favor of another person.</li> </ul>

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



## Survey Question Instructions, Inherent Risk

Q#	Question Text	Instructions
1 Customer Risk		
1.1 Active in Reporting Cycle		
1	Within the reporting period, did you / your entity provide any products or services, have any turnover, or participate in or conduct any activities subject to the provisions of law n° 1.362?	<a href="https://legimonaco.mc/">https://legimonaco.mc/</a>  If no, please provide a comment at bottom explaining why no activity this reporting period.
1.2 Clients Summary		
2	Please provide the total number of unique clients that were at some point active during the reporting period, by client's primary nationality, or country of headquarters or incorporation.	<p>The reporting entity shall provide the <u>number of clients</u>, from business relationships and occasional customers/clients, broken down by client's primary nationality (if Natural Person), or country of headquarters or incorporation (if Legal Person or Legal Arrangement), for the reporting period.</p> <p>If multiple primary nationalities, enter the one most commonly used.</p> <p>If the nationality is unknown, please select "Unknown" from the dropdown.</p> <p>The term "unique clients" denotes that while a client might have several accounts it should only be counted as one client.</p> <p>Only clients that are active for the reporting period or were at some point active during the reporting period should be reported.</p>
3	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients within the reporting period.	<p>The question should capture the instances when the reporting entity (1) prepares for or (2) carries out transactions for the clients.</p> <p>This value will be validated against other responses provided to later questions for numbers of transactions by Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive.</p>
4	Please confirm the total number of transactions provided above.	<p><b>Repeat the answer from above question.</b></p> <p>This value will be validated against other responses provided to later questions for numbers of cheque, electronic, and cash transactions, which are mutually exclusive.</p>
5	Please provide the total value of funds transferred by and on behalf of clients (both incoming and outgoing) within the reporting period.	The question should capture the instances when the reporting entity (1) prepares for or (2) carries out transactions for the clients concerning the activities mentioned above. Provide the response in EUR.

Q#	Question Text	Instructions
6	Can your entity distinguish BO's that are account holders that have 25% or greater ownership of an account?	
7	Please provide the total number of Beneficial Owners of clients, by BO's primary nationality, for BO's with 25% or greater ownership.	
<b>1.3 Accounts Summary</b>		
8	Do you have any Legal Persons or Legal Arrangements as clients that don't have a bank account?	
9	How many foreign Legal Person or Legal Arrangements clients do not have a bank account, broken down by type?	
10	How many domestic Legal Person or Legal Arrangements clients do not have a bank account, broken down by type?	
11	Please describe briefly the reason for each client without a bank account. Please identify the type of client for each.	
12	Do you know if any entities that are clients don't have a bank account in Monaco?	
13	How many entities that are clients don't have a bank account in Monaco, by country where the account is located?	
<b>1.4 Assets Under Management</b>		
14	Please provide the total value (in EUR) of the assets under administration for clients.	The value at the end of the reporting period should be used.
<b>1.5 Distinguishing Client Types</b>		
15	Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:  Trusts?	
16	Associations?	
17	Other Legal Arrangements not mentioned above?	
18	HNWI's?	
19	Lawyers or other Legal Professions?	
20	Accountants & Auditors?	
21	Nominee Shareholders / Directors?	
22	Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
23	Real Estate Agents?	
24	Dealers in Precious Metals and Stones?	
25	Trust and Company Service Providers?	
26	Multi-Family Offices?	
27	More Complex Ownership Structures?	

Q#	Question Text	Instructions
28	Cash Intensive Business?	(such as bars, restaurants)
29	Providers of or accept payments from Anonymous Prepaid Cards / Cards with high CDD Threshold?	
30	Engaged in Art and Antiques?	
31	Engaged in Import-Export?	
32	Dealing with High-Value Goods?	
33	Non-Profit Organization?	
34	Casinos/Gambling (including clients that are online casinos)?	
35	Engaged in Construction / Real Estate Development?	
36	Engaged in Extractive Industries (e.g. Oil and Gas)?	
37	Virtual Assets Service Providers (VASPs)?	
38	Engaged in Defense/Arms, including Dual-use items for proliferation of Weapons of Mass Destruction (WMD)?	
39	Engaged in Yachting-related Business?	
40	Sports Agents or Intermediaries?	
41	Engaged in Fund Management?	
42	Engaged in Asset Holding?	
43	Auctioneers?	
44	Motor Vehicle Dealers?	
45	Government and Public Sector?	
46	Engaged in Aircraft Sales / Private Jets / Charters?	
47	Engaged in Shipping?	
<b>1.6 Clients - Natural Persons</b>		
48	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 <b>should not</b> be counted as a Natural Person client.
49	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Natural Persons.	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, it <b>should not</b> be counted as a Natural Person client.
50	Please provide the total value of funds transferred by and on behalf of clients that are Natural Persons, (both incoming and outgoing), in EUR.	
<b>1.7 Clients - Legal Persons</b>		
51	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
52	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Legal Persons.	

Q#	Question Text	Instructions
53	Please provide the total value of funds transferred by and on behalf of clients that are Legal Persons, both incoming and outgoing.	
54	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	<p>Legal Persons types include:</p> <ul style="list-style-type: none"> <li>• Limited Liability Companies SARL</li> <li>• Limited Partnership SCS</li> <li>• Commercial Partnership SNC</li> <li>• Joint Stock Company SAM</li> <li>• Limited Partnership with Shares SCA</li> <li>• Property Investment Partnership SCI</li> <li>• Special Civil-law Partnership SCP</li> <li>• Other Civil Law Partnership SC-Autre</li> <li>• Monegasque Foundation</li> <li>• Monegasque Associations</li> <li>• Economic Interest Group GIE</li> </ul>
55	Please provide the number of Monegasque Legal Persons as clients, by type.	
<b>1.8 Clients - Trusts</b>		
56	Does your entity have clients that are Trusts?	
57	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
58	Does your entity have information related to the number and value of their transactions?	
59	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Trusts.	
60	Please provide the total value of funds transferred by and on behalf of clients that are Trusts, (both incoming and outgoing).	
61	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
62	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.	
<b>1.9 Clients - Associations</b>		
63	Does your entity have clients that are Associations?	
64	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
65	Does your entity have information related to the number and value of their transactions?	

Q#	Question Text	Instructions
66	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are Associations.	
67	Please provide the total value of funds transferred by and on behalf of clients that are Associations, both incoming and outgoing.	
<b>1.10 Clients - Other Legal Arrangements</b>		
68	Does your entity have clients that are Other Legal Arrangements?	
69	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
70	Does your entity have information related to the number and value of their transactions?	
71	Please provide the total number of transactions (both incoming and outgoing) with and by clients that are Other Legal Arrangements.	
72	Please provide the total value of funds transferred by and on behalf of clients that are Other Legal Arrangements, both incoming and outgoing.	
73	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
<b>1.11 HNWI's and UHNWI's</b>		
74	Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWIs) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an HNWI or HNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is more than EUR 5 million.
75	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).	
76	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are HNWIs or individuals belonging to a HNW Group.	
77	Please provide the total value of funds transferred by and on behalf of clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
78	Please provide the total number of unique Beneficial Owners of Legal Person clients that are HNWIs, broken down by the primary nationality of the HNWI.	

Q#	Question Text	Instructions
79	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are HNWI, broken down by the primary nationality of the HNWI.	
80	Does your entity have any Ultra-High-Net-Worth Individuals (UHNWIs) or Ultra-High-Net-Worth (UHNW) Groups as clients or Beneficial Owners (that are UHNWIs) of Legal Persons / Legal Arrangements that are clients?	For the purposes of this survey, an UHNWI or UHNW Group is a Natural Person or Group of family-related Natural Persons whose sum of all accounts and net assets is more than EUR 50 million.
81	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).	
82	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group.	
83	Please provide the total value of funds transferred by and on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
84	Please provide the total number of unique Beneficial Owners of Legal Person clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
85	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
<b>1.12 PEPs</b>		
86	Does your entity have any PEPs as clients?	
87	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
88	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
89	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
90	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are PEPs, both domestic and foreign.	
91	Please provide the total value of funds transferred by and on behalf of clients that are PEPs, (both incoming and outgoing), in EUR.	
92	Please provide the total number of unique Beneficial Owners of Legal Person/Legal	For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective

Q#	Question Text	Instructions
	Arrangement clients that are PEPs, broken down by the primary nationality of the PEP.	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.
<b>1.13 Secondary Nationalities</b>		
93	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
94	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).	Count individual’s 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.  If existence of a 2 <sup>nd</sup> nationality is known but the specific country is unknown, please select “Unknown” from the dropdown.
95	Please provide the total number of secondary nationalities of unique clients that are HNWI or individuals belonging to a HNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	Count individual’s 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
96	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).	Count individual’s 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
97	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).	Count individual’s 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the primary nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.
98	Please provide the total number of Beneficial Owner secondary nationalities, of clients that are serviced, broken down by BO’s secondary nationality(ies), for BO’s with 25% or greater ownership.	Count individual’s 2 <sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.  When a Natural Person is the Beneficial Owner of several Legal Persons/Arrangements it should only be counted as one.

Q#	Question Text	Instructions
99	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are HNWI, broken down by the secondary nationality(ies) of the HNWI.	<p>Count individual's 2<sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p> <p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term "unique Beneficial Owners" denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.</p>
100	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.	<p>Count individual's 2<sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p> <p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term "unique Beneficial Owners" denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.</p>
101	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.	<p>Count individual's 2<sup>nd</sup> or more nationalities (e.g. an individual with more than one passport). For example, a unique client having 3 nationalities (UK, Spain, and Russia) may claim UK nationality as the main nationality. The response to this question would then be 2 total, broken down as 1 Spain and 1 Russia.</p> <p>For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement.</p> <p>The term "unique Beneficial Owners" denotes that while a Natural Person might be the Beneficial Owners of several</p>



Q#	Question Text	Instructions
		Legal Persons/Arrangements it should only be counted as one.
<b>1.14 Lawyers and other Legal Professions</b>		
102	Does your entity have clients that are Lawyers and Other Legal Professions?	
103	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
<b>1.15 Accountants &amp; Auditors</b>		
104	Does your entity have clients that are Accountants & Auditors?	
105	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
<b>1.16 Nominee Shareholders / Directors</b>		
106	Does your entity have clients that are Nominee Shareholders / Directors?	
107	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
<b>1.17 Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments</b>		
108	Does your entity have clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
109	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
<b>1.18 Real Estate Agents</b>		
110	Does your entity have clients that are Real Estate Agents?	
111	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
<b>1.19 DPMS</b>		
112	Does your entity have clients that are Dealers in Precious Metals and Stones?	
113	Please provide the total number of Monegasque unique clients that are DPMS.	
<b>1.20 TCSPs</b>		
114	Does your entity have clients that are Trusts and Corporate Service Providers?	
115	Please provide the total number of Monegasque unique clients that are TCSPs.	
<b>1.21 Multi-Family Offices</b>		
116	Does your entity have clients that are Multi-Family Offices?	
117	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	

Q#	Question Text	Instructions
<b>1.22 More Complex Ownership Structures</b>		
118	Does your entity have clients that are More Complex Ownership Structures?	Refer to the definition of complex ownership structures.
119	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
<b>1.23 Cash Intensive Businesses</b>		
120	How does your entity define a Cash Intensive Business?	
121	Does your entity have clients that are Cash Intensive Businesses?	(such as bars, restaurants)
122	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
<b>1.24 Prepaid Cards</b>		
123	Does your entity have clients that are providers of or accept payments from Anonymous Prepaid Cards with high CDD Threshold?	
124	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.	
<b>1.25 Art and Antiques</b>		
125	Does your entity have clients that are engaged in Art and Antiques?	
126	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
<b>1.26 Import-Export</b>		
127	Does your entity have clients that are engaged in Import-Export?	
128	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
<b>1.27 High-Value Goods</b>		
129	Does your entity have clients that are High-Value Goods?	
130	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
<b>1.28 NPOs</b>		
131	Does your entity have clients that are Non-Profit Organizations?	
132	Please provide the total number of Monegasque unique clients that are NPOs.	
<b>1.29 Casinos / Gambling</b>		
133	Does your entity have clients that are Casinos/Gambling?	

Q#	Question Text	Instructions
134	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
<b>1.30 Construction / Real Estate Development</b>		
135	Does your entity have clients that are engaged in Construction / Real Estate Development?	
136	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
<b>1.31 Extractive Industries (e.g. Oil and Gas)</b>		
137	Does your entity have clients that are engaged in Extractive Industries?	
138	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
<b>1.32 Virtual Asset Service Providers</b>		
139	Does your entity have clients that are VASPs?	
140	Please provide the total number of unique clients that are VASPs.	
141	Please provide the total number of transactions (both incoming and outgoing) by and on behalf of clients that are VASPs.	
142	Please provide the total value of funds transferred by and on behalf of clients that are VASPs (both incoming and outgoing).	
143	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	
144	Does your entity have clients that are Custodian Wallet Providers?	
145	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	
146	Please provide the total number of transactions by and on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	
147	Please provide the total value of funds transferred by and on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	
148	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	
149	Does your entity have clients that are Virtual Currency Exchange Providers?	
150	Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers, broken down by country of establishment.	

Q#	Question Text	Instructions
151	Please provide the total number of transactions by and on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	
152	Please provide the total value of funds transferred by and on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	
153	Does your entity distinguish if VASPs clients are ICO related service providers?	
154	Does your entity have clients that are Initial Coin Offering Providers?	
155	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	
156	Please provide the total number of transactions by and on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	
157	Please provide the total value of funds transferred by and on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	
158	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	
159	Does your entity have clients that are engaged in Other VASP Services?	
160	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	
161	Please provide the total number of transactions by and on behalf of VASP clients related to Other Services (both incoming and outgoing).	
162	Please provide the total value of funds transferred by and on behalf of VASP clients that provide Other Services (both incoming and outgoing).	
163	Please specify what Other Services VASP clients are providing not mentioned above.	
<b>1.33 Defense / Arms</b>		
164	Does your entity have clients that are engaged in Defense / Arms?	The reporting entity should disclose whether it has clients that are engaged in <u>Defense/Arms</u> including Dual-use items for proliferation of Weapons of Mass Destruction (WMD) to whom the reporting entity provides products or services that fall under the scope of AML/CFT regulation in Monaco.
165	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	

Q#	Question Text	Instructions
<b>1.34 Yachting-related Business</b>		
166	Does your entity have clients that are engaged in Yachting related business?	
167	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
<b>1.35 Sports Agents and Intermediaries</b>		
168	Does your entity have clients that are Sports Agents or Intermediaries?	
169	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
<b>1.36 Fund Management</b>		
170	Does your entity have clients that are engaged in Fund Management?	
171	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
<b>1.37 Asset Holding</b>		
172	Does your entity have clients that are engaged in Asset Holding?	
173	Please provide the total number of Monegasque unique clients that are engaged in Asset Holding.	
<b>1.38 Auctioneers</b>		
174	Does your entity have clients that are Auctioneers?	
175	Please provide the total number of Monegasque unique clients that are Auctioneers.	
<b>1.39 Motor Vehicle Dealers</b>		
176	Does your entity have clients that are Motor Vehicle Dealers?	
177	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
<b>1.40 Government and Public Sector</b>		
178	Does your entity have clients that are Government and Public Sector?	
179	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
<b>1.41 Aircraft Sales / Private Jets / Charters</b>		
180	Does your entity have clients that are engaged in Aircraft Sales / Private Jets / Charters?	
181	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
<b>1.42 Shipping</b>		
182	Does your entity have clients that are engaged in Shipping?	

Q#	Question Text	Instructions
183	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
<b>1.43 Comments &amp; Feedback</b>		
184	Do you have feedback related to any questions in this section?	
185	Please provide comments or feedback on this section here.	
<b>2 Products &amp; Services Risk</b>		
<b>2.1 Payment Types by and on behalf of Clients - Cheques</b>		
186	Does your entity accept or make Cheque transactions by or on behalf of clients?	
187	Please provide the total number of Cheque transactions by and on behalf of clients (both incoming and outgoing).	
<b>2.2 Payment Types by and on behalf of Clients - Electronic Transfers</b>		
188	Does your entity accept or make Electronic Transfers (i.e. wire transfers) by and on behalf of clients?	
189	Please provide the total number of Electronic Transactions by and on behalf of clients (both incoming and outgoing).	
<b>2.3 Payment types by and on behalf of clients using Cash</b>		
190	Does your entity accept or make Cash transactions by or on behalf of clients?	
191	Please provide the total number of Cash transactions by and on behalf of clients, within the reporting period.	
192	Please provide the total value of funds transferred, Cash payments in the reporting period, both incoming and outgoing.	
193	Please provide the total number of single cash transactions exceeding 10,000 EUR (both incoming and outgoing) within the reporting period.	
194	Can your entity distinguish cash transactions above EUR 100,000 in your record keeping?	
195	Number of physical cash transactions by or on behalf of Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
196	Number of physical cash transactions by or on behalf of Monegasque Legal Persons / Legal Arrangements in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
197	Number of physical cash transactions by or on behalf of Foreign Legal Persons / Legal Arrangements in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	

Q#	Question Text	Instructions
<b>2.4 Virtual Currencies</b>		
198	Do you have clients that use cryptocurrencies?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client
199	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client  This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
200	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
201	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with. Name all the apply.	
<b>2.5 Structures Created</b>		
202	Total number of structures created, broken down by country of registration.	
203	Number of Civil Companies under Monegasque law created.	
204	Number of Foreign Commercial Companies created.	
205	Number of Foreign Patrimonial Companies created.	
206	Number of Trusts created.	
207	Number of Holding Companies created.	
208	Number of Other Legal Entities created (foundations, associations, etc.)	
209	Has your entity created Other Structures not mentioned above?	
210	Number of Other Structures created.	
211	Specify Other Structures created.	
<b>2.6 Structures Managed, or Administered</b>		
212	Total number of structures managed or administered, broken down by country of registration.	
<b>2.7 Manage or Administer Civil Companies</b>		
213	Does your entity manage or administer Civil Companies under Monegasque law?	
214	Number of Civil Companies under Monegasque law managed or administered.	

Q#	Question Text	Instructions
215	Do you know all the bank account locations for the Monegasque Civil Companies that you manage or administer?	
216	Do any of the Monegasque Civil Companies managed or administered not have a Monaco bank account?	
217	How many Monegasque Civil Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
218	Does your entity have a role in managing any Monegasque Civil Companies bank accounts?	
219	Of the Monegasque Civil Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
<b>2.8 Manage or Administer Monegasque Commercial Companies</b>		
220	Does your entity manage or administer Commercial Companies under Monegasque law?	
221	Number of Monegasque Commercial Companies managed or administered.	
222	Do you know all the bank account locations for the Monegasque Commercial Companies that you manage or administer?	
223	Do any of the Monegasque Commercial Companies managed or administered not have a Monaco bank account?	
224	How many Monegasque Commercial Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
225	Does your entity have a role in managing any Monegasque Commercial Companies bank accounts?	
226	Of the Monegasque Commercial Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
<b>2.9 Manage or Administer Foreign Commercial Companies</b>		
227	Does your entity manage or administer Foreign Commercial Companies?	
228	Number of Foreign Commercial Companies managed or administered.	
229	Do you know all the bank account locations for the Foreign Commercial Companies that you manage or administer?	
230	Do any of the Foreign Commercial Companies managed or administered not have a Monaco bank account?	



Q#	Question Text	Instructions
231	How many Foreign Commercial Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
232	Does your entity have a role in managing any Foreign Commercial Companies bank accounts?	
233	Of the Foreign Commercial Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
<b>2.10 Manage or Administer Foreign Patrimonial Companies</b>		
234	Does your entity manage or administer Foreign Patrimonial Companies?	
235	Number of Foreign Patrimonial Companies managed or administered.	
236	Do you know all the bank account locations for the Foreign Patrimonial Companies that you manage or administer?	
237	Do any of the Foreign Patrimonial Companies managed or administered not have a Monaco bank account?	
238	How many Foreign Patrimonial Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
239	Does your entity have a role in managing any Foreign Patrimonial Companies bank accounts?	
240	Of the Foreign Patrimonial Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
<b>2.11 Manage or Administer Trusts</b>		
241	Does your entity manage or administer Trusts?	
242	Number of Trusts managed or administered.	
243	Do you know all the bank account locations for the Trusts that you manage or administer?	
244	Do any of the Trusts managed or administered not have a Monaco bank account?	
245	How many Trusts do not have Monaco bank accounts, by country where the account is located?	
246	Does your entity have a role in managing any Trusts bank accounts?	
247	Of the Trusts bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	

Q#	Question Text	Instructions
<b>2.12 Manage or Administer Holding Companies</b>		
248	Does your entity manage or administer Holding Companies?	
249	Number of Holding Companies managed or administered.	
250	Do you know all the bank account locations for the Holding Companies that you manage or administer?	
251	Do any of the Holding Companies managed or administered not have a Monaco bank account?	
252	How many Holding Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
253	Does your entity have a role in managing any Holding Companies bank accounts?	
254	Of the Holding Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
<b>2.13 Manage or Administer Other Legal Entities</b>		
255	Does your entity manage or administer Other Legal Entities (foundations, associations, etc.)?	
256	Number of Other Legal Entities managed or administered.	
257	Do you know all the bank account locations for the Other Legal Entities that you manage or administer?	
258	Do any of the Other Legal Entities managed or administered not have a Monaco bank account?	
259	How many Other Legal Entities managed or administered do not have Monaco bank accounts, by country where the account is located?	
260	Does your entity have a role in managing any Other Legal Entities bank accounts?	
261	Of the Other Legal Entities bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
<b>2.14 Manage or Administer Other Structures</b>		
262	Does your entity manage or administer Other Structures?	
263	Number of Other Structures managed or administered.	
264	Specify Other Structures managed or administered.	
265	Do you know all the bank account locations for the Other Structures that you manage or administer?	

Q#	Question Text	Instructions
266	Do any of the Other Structures managed or administered not have a Monaco bank account?	
267	How many Other Structures managed or administered do not have Monaco bank accounts, by country where the account is located?	
268	Does your entity have a role in managing any Other Structures bank accounts?	
269	Of the Other Structures bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
<b>2.15 Accounting</b>		
270	Number of structures for which you provide accounting.	
<b>2.16 Bank Account Signature</b>		
271	Number of structures managed or administered, that hold bank accounts for which your entity is the only signatory.	
272	Number of structures managed or administered, that hold bank accounts for which the Beneficial Owner is the sole signatory.	
273	Number of structures managed or administered, that hold bank accounts for which your entity has a joint signature with the Beneficial Owner.	
274	Number of structures managed or administered, that hold bank accounts for which the Beneficial Owner has designated a third party as signatory.	
275	Number of structures managed or administered, that do not have a bank account.	
276	Among the structures created, managed, or administered, for how many of them do you provide domiciliation?	
<b>2.17 Comments &amp; Feedback</b>		
277	Do you have feedback related to any questions in this section?	
278	Please provide comments or feedback on this section here.	
<b>3 Distribution Risk</b>		
<b>3.1 Identification</b>		
279	Does your entity rely on Domestic Third Parties to undertake some/all CDD measures towards clients?	Financial institutions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
280	Please provide the total number of clients which Domestic Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client.	

Q#	Question Text	Instructions
281	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	Financial institutions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
282	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.	
283	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.	
<b>3.2 Onboarding</b>		
284	Does your entity accept clients through Introducers?	An introducer is a Financial Institution / Designated Non-Financial Businesses and Professions who has a direct relationship with a client but delegates the financial transaction execution to another Financial Institution (i.e. an introducer is a company that brings a client to the licensed entity).
285	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).	<b>Cumulative over time.</b>
286	Does your Entity onboard clients on a non-face-to-face basis, i.e. not physically present?	The reporting entity should disclose whether clients are onboarded (for CDD purposes) on a non-face-to-face basis (not physically present).
287	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	
288	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	
289	Please provide the number of new unique clients, that are Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
<b>3.3 Structure</b>		
290	Please provide the total number of employees of the licensed domestic Entity.	
291	Does your Entity have any Branches, Subsidiaries, or Agencies?	
292	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 entity of the parent company. Please do not include offices/client service locations which are sometimes informally referred to as "branches".
293	Is your entity a Branch or Subsidiary of an Other Entity?	

Q#	Question Text	Instructions
294	Is your entity a Branch or Subsidiary of a Foreign Entity?	
295	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	If the reporting entity is a branch or subsidiary of another entity that is established in a foreign country, identify the parent undertaking country of establishment.
296	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	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".
297	Please provide the number of shareholders with 25% or greater shareholding, broken down by primary nationality (Natural Person) or country of establishment (Legal Persons and Arrangements)	
298	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.	
299	Within the reporting period, has your entity experienced any of the following:	<p>A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners, any other person exercising direct or indirect control over your entity or the conduct of its activity?</p> <p>Undergone a significant evolution or modification of activities?</p> <p>Any other statutory changes?</p> <p>Change of AML/CFT/CPF responsible persons?</p>
300	Please indicate the development or modification.	
<b>3.4 Entity Finances</b>		
301	Turnover for the reporting period.	
302	Turnover for the reporting period realized in the Principality of Monaco.	
303	Turnover for the reporting period realized outside the Principality of Monaco.	
<b>3.5 Rejected Relationships</b>		
304	Please provide the total <b>number of new client business relationships (potential clients) that have been rejected</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	

Q#	Question Text	Instructions
<b>3.6 Blocked/Rejected Transactions</b>		
305	Please provide the total <b>number of blocked/rejected client transactions</b> (both incoming and outgoing) due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
<b>3.7 Terminated Relationships</b>		
306	Please provide the total <b>number of client business relationships (clients) that have been terminated</b> due to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period.	
<b>3.8 Comments &amp; Feedback</b>		
307	Do you have feedback related to any questions in this section?	
308	Please provide comments or feedback on this section here.	

## Survey Question Instructions, Controls

C#	Question Text	Instructions
1 Controls		
1.1 Structure		
1	Please provide the total number of employees at your entity.	The reporting entity should disclose the number of employees irrespective of their function.  The number at the end of the reporting period should be used.
2	Please provide the total number of full-time equivalent employees at your entity.	The reporting entity should disclose the number of full-time equivalent employees irrespective of their function.  The number at the end of the reporting period should be used.
3	Please provide the number of employees in AML/CFT Compliance at your entity.	The number at the end of the reporting period should be used.
4	Please provide the number of full-time equivalent employees in AML/CFT Compliance at your entity.	The number at the end of the reporting period should be used.
5	Does your entity have a compliance department?	
6	Does the MLRO fulfil any other role or job function?	
7	What percentage of time does the MLRO spend on additional functions?	
8	Is your entity part of a Group?	
1.2 Policies & Procedures		
9	Did your Entity prepare a documented set of AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT legal requirements.
10	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 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).
11	Did your Entity circulate these policies and procedures to all its employees?	
12	Did your Entity ensure awareness of these policies and procedures to all its employees?	
13	Did your Entity update their written AML/CFT Policies and Procedures in the last year?	
14	Please provide the date of the last update to your entity's written AML/CFT Policies and Procedures.	
15	Does your Entity have a systematic practice of tracking and managing changes to the AML/CFT Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.

C#	Question Text	Instructions
16	Does your entity have a group-wide AML/CFT/CPF programme?	
17	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?	
18	Who prepared your Entity's Policies and Procedures?	<p>The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors?</p> <p>Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.</p>
19	Did your Entity conduct a Self-Assessment of Adequacy of AML/CFT Procedures?	
<b>1.3 Governance</b>		
20	Does the board and senior management of your Entity demonstrate overall responsibility for AML/CFT?	<p>Does the board and senior management of your Entity demonstrate overall responsibility for AML/CFT?</p> <p>Actions taken by the Board and senior management that could demonstrate board's and senior management's engagement in AML/CFT matters could include:</p> <p>(1) senior management includes AML/CFT matters into the daily/ weekly/monthly/quarterly/yearly agenda;</p> <p>(2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks;</p> <p>(3) senior management requests ad-hoc reporting on AML/CFT matters whenever issues arise; orders internal or external audit to test AML/CFT controls;</p> <p>(4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT), buying AML/CFT monitoring software or sanction screening software, etc.;</p> <p>(5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT legislation are introduced;</p> <p>(6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.</p>



C#	Question Text	Instructions
21	Does the board and senior management of your Entity regularly receive AML/CFT reports?	<p>The reporting entity should disclose whether the board and senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT compliance.</p> <p>Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/TF risk and trends.</p>
22	Does the board and senior management of your Entity ensure that AML/CFT shortcomings are rectified?	<p>The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control, take actions to rectify shortcomings in AML/CFT compliance areas and mitigate ML/TF risks.</p> <p>The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT reporting, supervisory onsite examination reports, etc. Examples of such actions might include:</p> <p>(a) approving budgetary resources to hire more employees for AML/CFT Compliance, investing in employees' knowledge and expertise through training, seminars, certifications</p> <p>(b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions,</p> <p>(c) prioritizing AML/CFT area for internal audit, etc.</p>
23	Does the senior management of your Entity review (give approval) for taking on high-risk clients?	<p>In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.</p>
<b>1.4 Compliance &amp; Violations</b>		
24	Has your entity had any AML/CFT related violations in the past 5 years?	<p>The reporting entity should disclose whether it had any AML/CFT related compliance failures, including minor shortcomings, within the past 5 years.</p>
25	Please provide the total number of AML/CFT related violations in the past 5 Years.	<p>Any AML/CFT related compliance failures, including minor shortcomings, should be counted under this question.</p>
26	Please identify the number and types of AML/CFT violations.	
<b>1.5 Training</b>		
27	Did your entity conduct AML/CFT training for its Directors / Management in the reporting period?	
28	Did your entity conduct AML/CFT training for its Office employees in the reporting period?	

C#	Question Text	Instructions
29	Did your entity conduct AML/CFT training for its Compliance Department Employees in the reporting period?	
30	Please provide the total number of employees trained on AML/CFT matters in Reporting Cycle.	
31	Are employees required to participate in AML/CFT/CPF training prior to their assignment to customer-facing or other duties of relevance for AML/CFT/CPF?	
32	Provide the estimated average number of hours per person spent on Initial Training.	
33	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
34	Provide the number of staff that have received Refresher Training within the reporting period.	
35	Provide the estimated average number of hours per person spent on Refresher Training.	
36	Does the entity provide specialized training for employees working in high-risk areas, such as compliance and customer due diligence?	
37	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
38	Did any of the AML/CFT training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance...)?	
39	Did any of the AML/CFT training/awareness raising activities include Internal Meetings?	
40	Did any of the AML/CFT training/awareness raising activities include Consultation of AMSF's Website?	
41	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider in Monaco?	
42	Did any of the AML/CFT training/awareness raising activities include Training with External Service Provider outside Monaco?	
43	Did any of the AML/CFT training/awareness raising activities include Training by Another Group Member?	
44	Did any of the AML/CFT training/awareness raising activities include any Other Activities?	
45	What other AML/CFT training/awareness raising activities did it include? Please specify all that apply.	
46	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
47	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	

C#	Question Text	Instructions
48	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
49	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
50	Did any of the AML/CFT training/awareness raising activities cover topics related to Typologies?	
51	Did any of the AML/CFT training/awareness raising activities cover topics related to Practical Cases?	
52	Did any of the AML/CFT training/awareness raising activities cover topics related to News?	
53	Did any of the AML/CFT training/awareness raising activities cover topics related to Corruption?	
54	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing of Terrorism?	
55	Did any of the AML/CFT training/awareness raising activities cover topics related to Cryptocurrency?	
56	Did any of the AML/CFT training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
57	Did any of the AML/CFT training/awareness raising activities cover topics related to Tax Evasion?	
58	Did any of the AML/CFT training/awareness raising activities cover topics related to Fraud?	
59	Did any of the AML/CFT training/awareness raising activities cover other topics not mentioned above?	
60	What other topics did the AML/CFT training/awareness raising activities cover? Please specify all that apply.	
<b>1.6 CDD</b>		
61	<p>Does your entity record all of the following in your customer database:</p> <ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Date of Birth</li> <li>• Place of Birth</li> <li>• Nationality</li> <li>• Country of Residence</li> <li>• Tax Residence</li> <li>• Activity</li> <li>• Source of Wealth</li> <li>• Source of Funds</li> </ul>	
62	If your entity does not collect all of the above mentioned items, please specify which items are not collected?	If all are collected respond "NA".

C#	Question Text	Instructions
63	<p>Does the entity's database contain all of the following, when applicable:</p> <ul style="list-style-type: none"> <li>• Account Holder</li> <li>• Representative of Company or Client</li> <li>• Beneficial Owner</li> <li>• Administrators/Directors</li> <li>• Shareholders</li> <li>• Legal Representatives</li> <li>• Settlor/Constituent</li> <li>• Trustee</li> <li>• Beneficiary of a Trust or other Legal Arrangement</li> <li>• Founders</li> <li>• Donors</li> <li>• Person who directly or indirectly exercises control of a Foundation</li> <li>• Protector</li> <li>• More Complex Ownership Structures</li> <li>• Introducers?</li> </ul>	
64	<p>If your entity does not collect the items in the two above questions, please specify which items are not collected?</p>	<p>If all are collected respond "NA".</p>
65	<p>Does your entity record other client information or register client activity information in their database?</p>	<p>The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?</p>
66	<p>Please specify what other information is included in your database, specify all that apply.</p>	
67	<p>Is past 5 years of client relationship data accessible by AMSF upon request?</p>	
68	<p>Does your Entity apply a risk-based approach to customer due diligence measures (CDD)?</p>	
69	<p>Does your Entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?</p>	<p>(e.g. simplified, standard and enhanced due diligence)</p>

C#	Question Text	Instructions
70	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.	<b>Please repeat the answer provided in Q2.</b>
71	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
72	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
73	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
74	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
75	What % shareholding threshold does your entity use for recording Beneficial Owner information?	
76	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
77	Does your entity examine the source of wealth before customer take-on?	
78	Does your entity undertake other measures for high-risk clients, before customer take-on?	
79	Please specify other measures taken for high-risk clients, before customer take-on.	
80	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	The reporting entity should disclose whether all high-risk clients are subject to enhanced CDD measures before customer take-on.
81	How does the company verify the Beneficial Owners of Virtual Assets?	If not applicable, state 'NA'.
82	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?	Third parties has the meaning of any other entity / service provider which performs elements of CDD on behalf of the entity.
<b>1.7 EDD</b>		
83	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
84	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
85	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.
86	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
87	Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	i.e. number of enhanced due diligence <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements ÷ total

C#	Question Text	Instructions
		number of <u>Beneficial Owners</u> of Legal Persons and Legal Arrangements.
<b>1.8 Risk Assessments</b>		
88	How many AML/CFT risk levels does your entity have for clients?	
89	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT.	
90	Please provide the total number of unique clients that are without a risk level determined yet.	
91	<p>Does your entity's High-Risk Assignment Considerations include ALL of the following:</p> <ul style="list-style-type: none"> <li>• Country of Residence</li> <li>• Activity</li> <li>• PEP status</li> <li>• Type of Customer</li> <li>• Products &amp; Services</li> <li>• Transaction Types</li> <li>• Distribution Channels</li> <li>• Accounts with Conventional Title</li> <li>• Assets Under Management</li> <li>• Volume of Operations</li> <li>• Nature of Operations</li> <li>• Trigger Events</li> </ul>	
92	If your entity does not take into consideration all of the above mentioned elements, please specify which items are not considered?	If all are considered respond "NA".
93	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
94	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations. Name all that apply.	Name all that apply.
95	Does your entity have a tool or process for making AML/CFT risk assessments?	(client assessments)
96	Does your entity use a list of sensitive countries for AML/CFT risk assessment?	
97	Does your entity use a list of Sensitive Activities for AML/CFT risk assessment?	
98	What client activities does your entity associate with High-Risk clients?	
99	Does your entity consider ML and TF risks separately?	(entity's own assessment)
100	Does your entity have a tool or process for making AML/CFT risk assessments?	(entity's own assessment)

C#	Question Text	Instructions
<b>1.9 Internal Audit / Controls</b>		
101	Does your entity's internal control process include a Permanent Controller?	
102	Is the permanent controller a different person from the AML/CFT Manager?	
103	Does your entity's internal control process include an Internal Audit Department?	
104	How many significant audit issues were identified in the latest audit report (relating to AML/CFT/CPF)?	
105	When did your entity last have a SICCFIN/AMSF audit?	
106	When did your entity last have an Internal AML/CFT audit?	
107	When did your entity last have a Group AML/CFT audit?	
108	Did your entity have any Other Audits not mentioned above?	
109	Specify the types of Other Audits, and provide the year of the last audit of each kind.	
<b>1.10 Monitoring</b>		
110	Does your Entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	If No, please provide reason why in the comment field at the bottom of this section.
111	Has the automated system been adapted to the entity in Monaco?	
112	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	<b>Please repeat the answer provided in Q3.</b>
113	Please provide the total number of Alerts in Reporting Period by the automated system related to Money Laundering.	
114	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
115	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
116	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing.	
117	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
118	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
<b>1.11 Record Keeping</b>		
119	Does your Entity keep transaction records for at least 5 years?	

C#	Question Text	Instructions
120	Does your Entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
121	Does your Entity keep these records and documents in a safe and secure place?	
122	Are these records and documents available promptly to the relevant authorities upon request?	<p>When providing its response, the reporting entity should consider the following factors:</p> <ul style="list-style-type: none"> <li>(1) is the above data collected in electronic format and easily retrievable from the IT systems?</li> <li>(2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly?</li> <li>(3) is there manual effort required to find clients' data, e.g., if files are stored only in paper format; or, when they are stored in electronic format, IT systems are not configured to enable easy access to the required data.</li> </ul>
123	Does your Entity have backups for CDD and business correspondence information with a disaster recovery plan?	
<b>1.12 Targeted Financial Sanctions (TFS)</b>		
124	Do Entity's policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements.</p> <p>Policies and procedures should cover targeted financial sanctions-related requirements of at least the following:</p> <ul style="list-style-type: none"> <li>(a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons;</li> <li>(b) Frequency and scope of screening;</li> <li>(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).</li> </ul>



C#	Question Text	Instructions
125	Are the board and senior management of your Entity engaged in overseeing risks and compliance matters related to TFS for Terrorist Financing and Proliferation Financing?	<p>The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include:</p> <p>(1) approval of TFS-related policies, procedures and instructions by the board or senior management;</p> <p>(2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.;</p> <p>(3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities,</p> <p>(4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.</p>
126	Does your Entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	<p>The reporting entity should disclose whether its policies and procedures cover:</p> <p>(a) direct control and</p> <p>(b) indirect control of assets by designated persons;</p> <p>(c) internal processes and systems designed to detect persons who exercise direct and indirect control over assets owned by designated persons.</p>
127	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
128	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Account Holders (Titulaires)?	Reference Sovereign Ordinance no. 8.664.
129	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.
130	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Beneficial Owners (and Beneficiaries)?	Reference Sovereign Ordinance no. 8.664.
131	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Administrators / Directors?	Reference Sovereign Ordinance no. 8.664.

C#	Question Text	Instructions
132	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Shareholders?	Reference Sovereign Ordinance no. 8.664.
133	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Legal Representatives?	Reference Sovereign Ordinance no. 8.664.
134	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Settlor / Constituent?	Reference Sovereign Ordinance no. 8.664.
135	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Trustees?	Reference Sovereign Ordinance no. 8.664.
136	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Protectors?	Reference Sovereign Ordinance no. 8.664.
137	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Introducers?	Reference Sovereign Ordinance no. 8.664.
138	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.
139	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
140	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.	
141	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
142	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
<b>1.13 PEPs</b>		
143	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
144	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	Please specify all that apply.
145	What additional AML/CFT procedures are applied for PEPs (compared to a standard risk client)? Please specify all that may apply.	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:  (a) before establishing a business relationship

C#	Question Text	Instructions
		(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.
146	Does PEP screening occur as part of the CDD process for new customers?	
147	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
148	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
149	Does screening for PEPs occur on an ongoing basis?	
150	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
151	Are PEPs subject to increased monitoring?	
152	Does your entity consider all PEP relationships as High-Risk for AML/CFT?	
153	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?	
<b>1.14 Cash Transactions</b>		
154	Does your Entity conduct cash transactions with clients?	Incoming or outgoing.
155	Does your Entity apply any specific AML/CFT controls and procedures for cash transactions?	
156	Please describe the specific controls and procedures for cash transactions your entity applies.	
<b>1.15 Suspicious Transaction Reporting</b>		
157	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)
158	Did your entity file any STRs/SARs to the FIU within the reporting period?	
159	Please provide the total number of STRs/ SARs related to <u>Terrorism Financing</u> that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Terrorism Financing</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
160	Please provide the total number of STRs/ SARs related to <u>Money Laundering</u> that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the <u>number of Suspicious Transactions</u> , related to <u>Money Laundering</u> , it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).

C#	Question Text	Instructions
161	Please provide the total number of STRs/SARs related to <u>Virtual Assets or Virtual Asset Service Providers</u> provided to the FIU within the reporting period.	
162	Please provide the total number of STRs/SARs related to a <u>Monegasque Legal Person</u> provided to the FIU within the reporting period.	
163	Please provide the total number of STRs/SARs related to a <u>Foreign Legal Person</u> provided to the FIU within the reporting period.	
164	Please provide the total number of STRs/SARs related to a <u>Foreign Trust</u> provided to the FIU within the reporting period.	
165	Please provide the total number of STRs/SARs related to a <u>Foreign Tax Offenses</u> (criminal or administrative) provided to the FIU within the reporting period.	
166	Please provide the total number of STRs/SARs related to <u>Organized Crime</u> provided to the FIU within the reporting period.	
167	Please provide the total number of STRs/SARs related to <u>Rejected Relationships</u> provided to the FIU within the reporting period.	
168	Please provide the total number of STRs/SARs related to <u>Rejected Transactions</u> provided to the FIU within the reporting period.	
169	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	The reporting entity should disclose the number of Suspicious Transactions, related to attempted Transactions, it has reported to Monaco's FIU ( <a href="https://amsf.mc">https://amsf.mc</a> ).
170	Did your entity respond internally to the suspicious transactions?	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
171	Did your entity take any steps to strengthen internal controls for AML/CFT, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	
<b>1.16 Comments &amp; Feedback</b>		
172	Do you have feedback related to any questions in this section?	
173	Please provide comments or feedback on this section here.	

### Survey Question Instructions, Signatories

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