Instructions: 2025 Trust and Company Service Providers AML/CFT/CPF Survey

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

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

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

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

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

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Glossary

Term	Definition
Active Account	Only clients that are active for the reporting period or were at some point active during the reporting period.
AML/CFT/CPF/CPF	Anti-Money Laundering / Counter Financing of Terrorism / Counter Financing of Proliferation of Weapons of Mass Destruction
AMSF (previously SICCFIN)	Autorité Monégasque de Sécurité Financière (AMSF), The national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption. https://amsf.mc
Association	For the purposes of this questionnaire, an association is a freely formed organization (group with members) that has acquired the legal personality; for example to open a bank account, enter contracts, appear in courts, buy estate, and receive donations. Refer to Monaco law n° 1.355 of 2008/12/23 for registered associations. Associations shall also include foreign associations with a similar capacity to act, specifically to open a bank account.
Beneficial Owner	Beneficial Owner is defined in Article 21 of Law 1.362 of 3 August 2009 amended by law 1.503 of 23 December 2020 on the fight against money laundering, terrorist financing and corruption: - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted, or - the natural person(s) who ultimately exercise effective control over a legal entity or legal arrangement.
Beneficial Owner	Beneficial Owner is defined in Article 21 of Law 1.362 of 3 August 2009 amended by law 1.503 of 23 December 2020 on the fight against money laundering, terrorist financing and corruption: - any natural person(s) who ultimately owns or controls the client; or - any natural person(s) on whose behalf a transaction or activity is conducted.
Client / Customer	A Client (identical meaning to Customer) should be understood as a Natural Person or a Legal Person/entity with whom the reporting entity has a business relationship or for whom the reporting entity carried out an occasional transaction. In this context, clients refer to all existing clients with whom the entity has had a business relationship within the reporting period including occasional (walk-in) clients who have been serviced during the reporting period. Reference to clients is made in respect of those who have benefited from a product or service falling within the scope of AML/CFT/CPF regulation.
Correspondent banking	Correspondent banking is the provision of banking services by one bank as the correspondent to another bank as the respondent, including providing a current or other liability account and related services, such as cash management, international funds transfers, cheque clearing, payable-through accounts and foreign exchange services.
DPMS	Dealers in Precious Metals and Stones
DBT	Direction du Budget et du Trésor de Monaco
Dual-use items	Dual-use item means items, including software and technology, which can be used for both civil and military purposes, and includes items which can be

Term	Definition
	used for the design, development, production or use of nuclear, chemical or biological weapons or their means of delivery, including all items which can be used for both non-explosive uses and assisting in any way in the manufacture of nuclear weapons or other nuclear explosive devices.
FIU	Financial Intelligence Unit
Financial institutions	Financial institutions mean any natural or legal person who conducts as a business one or more of the following activities or operations for or on behalf of a customer: 1. Acceptance of deposits and other repayable funds from the public. 2. Lending. 3. Financial leasing. 4. Money or value transfer services. 5. Issuing and managing means of payment (e.g. credit and debit cards, cheques, traveler's cheques, money orders and bankers' drafts, electronic money). 6. Financial guarantees and commitments. 7. Trading in: (a) money market instruments (cheques, bills, certificates of deposit, derivatives etc.); (b) foreign exchange; (c) exchange, interest rate and index instruments; (d) transferable securities; (e) commodity futures trading. 8. Participation in securities issues and the provision of financial services related to such issues. 9. Individual and collective portfolio management. 10. Safekeeping and administration of cash or liquid securities on behalf of other persons. 11. Otherwise investing, administering or managing funds or money on behalf of other persons. 12. Underwriting and placement of life insurance and other investment-related insurance. 13. Money and currency changing.
Foreign Residents	For the purpose of this questionnaire, is a non-Monégasque national that is a resident in Monaco.
Government / Public Sector	Government/public entity is an organization or body providing services to the public on behalf of the government or another public entity.
High Net Worth Individual (HNWI)	For the purposes of this survey, a High-Net-Worth-Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 5 million.
High Net Worth (HNW) Group	For the purposes of this survey, a HNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 5 million.
Holding Company	A holding company is a financial vehicle for owning and controlling other assets, such as real estate, stocks, or companies. Using a holding company creates legal separation between the assets and the owners.
Legal Arrangement	A relationship established by means of a contract between two or more parties that do not result in the creation of a legal personality such as Trusts

Term	Definition
	or other similar arrangements. Examples of other similar arrangements (for AML/CFT/CPF purposes) include fiducie, treuhand and fideicomiso.
Legal Person	Legal persons refer to any entities other than natural persons that can establish a permanent customer relationship with a financial institution or otherwise own property. This can include companies, corporate bodies, foundations, institute, partnerships, or associations and other relevantly similar entities.
ML / TF / PF	Money Laundering / Terrorist Financing / Financing the Proliferation of Weapons of Mass Destruction
Money or value transfer services (MVTS)	Money or value transfer services (MVTS) refers to financial services that involve the acceptance of cash, cheques, other monetary instruments or other stores of value and the payment of a corresponding sum in cash or other forms to a beneficiary by means of communication, message, transfer, or through a clearing network to which the MVTS provider belongs.
More Complex Ownership Structure	For the purposes of this survey, a More Complex Ownership Structure refers to clients in which the reporting entity has increased effort or difficulty in independently verifying the identity of the Beneficial Owner of the customer. For this survey, More Complex Ownership Structures are structures with 3 or more layers of ownership between the Account Holder and the Beneficial Owner, or, structures that are less than 3 layers of ownership but that are difficult to verify the Beneficial Owner due to obscurity or obfuscation, such as when information is not publicly accessible, lacks transparency, involves a foreign company or trust, requires foreign cooperation to verify, or when the recorded owner is a professional (lawyer, accountant, company services business).
Nationals	Natural Person who is a Monégasque national.
Non-Profit Organizations (NPOs)	Non-Profit Organizations (NPOs) refers to a legal person or arrangement or organization that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”.
Occasional Transaction	Any Transaction other than a Transaction carried out in the course of an established Business Relationship.
Payment types on behalf of clients	Payments on behalf of clients are transactions made by the reporting entity to third parties on behalf of clients. Examples of such arrangements may be with power of attorney, Signatory on accounts, or similar.
Payment types with clients	Payments with clients are transactions between the reporting entity and its clients for products or services offered by the entity, transactions made in person, and deposit taking.
PEPs	PEPs are individuals who are or have been entrusted with prominent public functions, for example, Heads of State or government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials. The PEP regime in Monaco applies to all PEPs, both domestic and foreign.
Primary Nationality	For the purposes of this questionnaire, an individual with multiple nationalities should be reported as having a primary nationality, which should be based on the following ordering: nationality of birth country, nationality that is their country of residence, other nationality.
Resident	For the purpose of this questionnaire, a resident is a Natural Person who is a Monégasque or who has a legal right to work and live in Monaco.

Term	Definition
Non-Resident	For the purpose of this questionnaire, a non-resident is a Natural Person who is a non- Monégasque national and does not have residency in Monaco.
Senior management	Senior management is an officer or employee with sufficient knowledge of the institution's money laundering and terrorist financing risk exposure and with sufficient seniority to take decisions affecting its risk exposure, and who need not, in all cases, be a member of the board of directors.
SICCFIN (now AMSF)	Service d'Information et de Contrôle sur les Circuits Financiers (SICCFIN) is the national central authority responsible for collecting, analyzing and disseminating information related to the fight against money laundering, terrorist financing and corruption.
TFS	Targeted Financial Sanctions
Trust and Company Service Providers	Trust and Company Service Providers refers to all persons or businesses that are not covered elsewhere, and which as a business, provide any of the following services to third parties: • Acting as an agent in the creation or establishment of legal persons • Acting as a director or secretary of a company, or as a partner in a legal person or arranging for another person to act as the above • Providing a registered office, work address, residence, correspondence address, or administrative address for a legal person or legal arrangement • Performing work (or equipping another person to act) as a trustee for a direct trust or performing a similar function in favor of another form of legal arrangement Acting or arranging for another person to act as a nominee shareholder in favor of another person.
Ultra-High-Net-Worth Individual (UHNWI)	For the purposes of this survey, an Ultra High Net Worth Individual is a Natural Person whose sum of all accounts and net assets is more than EUR 50 million.
Ultra-High-Net-Worth (UHNW) Group	For the purposes of this survey, a UHNW Group is a group of family-related Natural Persons (e.g. parent, child, spouse, siblings) whose sum of all accounts and net assets is more than EUR 50 million.
VASP	Virtual Asset Service Provider

Instructions, Inherent Risk

Q#	Question Text	Instructions
1 Customer Risk		
1.1 Active in Reporting Cycle		
Q1	Within the reporting period, did you / your entity provide any products or services, have any turnover, or participate in or conduct any activities subject to the provisions of law n° 1.362?	See link here
Q2	Please specify the reason why no activity was carried out during the reporting period.	When no is answered above.
1.2 Clients Summary		
Q3	Please provide the total number of unique clients that were at some point active during the reporting period, by client's primary nationality, or country of headquarters or incorporation.	If multiple primary nationalities, enter the one most commonly used. If the nationality is unknown, please select "Unknown" from the dropdown. For questions referring to 'unique client', please consider: • If the same client has several accounts, then it is considered one client • If the entity provides multiple services or has multiple contracts with the same client, then it is considered one client • Any other situation where the same client would be double counted, please consider as one client
Q4	*Total number of clients*	**Auto-calculated field**
Q5	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients within the reporting period.	Example: A counterparty pays you in **three separate instalments** over two years: • Payment no. 1 → **made in 2025** • Payment no. 2 → **made in 2025** • Payment no. 3 → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** · **2025 reporting period**: Total number of transactions: **2**. · **2026 reporting period**: Total number of transactions: **1**. This value will be validated against other responses provided to later questions for numbers of transactions with Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive.

Q#	Question Text	Instructions
Q6	Please provide the total value of payments on behalf of clients (both incoming and outgoing) within the reporting period.	Please indicate the total amount of all financial flows. All transactions that result in a flow (in/out) must be recorded. Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 → **made in 2025** • Payment no. 2: €30,000 → **made in 2025** • Payment no. 3: €30,000 → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of payments: **€70,000** • **2026 Reporting period**: Total value of payments: **€30,000** This value will be validated against other answers provided to subsequent questions regarding the number of transactions carried out by individuals, legal entities, trusts, and other legal structures. The answers are mutually exclusive.
1.3 Accounts Summary		
Q7	Do you have any Legal Persons or Legal Arrangements as clients that don't have a bank account?	
Q8	How many foreign Legal Person or Legal Arrangements clients do not have a bank account, broken down by type?	
Q9	How many domestic Legal Person or Legal Arrangements clients do not have a bank account, broken down by type?	
Q10	Please describe briefly the reason for each client without a bank account. Please identify the type of client for each.	
Q11	Do you know if any entities that are clients don't have a bank account in Monaco?	
Q12	How many entities that are clients don't have a bank account in Monaco, by country where the account is located?	
1.4 Beneficial Owners		
Q13	Does your entity record Beneficial Owner information?	Information relating to beneficial owners: identification details, addresses, etc.
Q14	For what conditions does your entity record Beneficial Owners' information?	

Q#	Question Text	Instructions
Q15	Please provide the total number of unique beneficial owners that were at some point active during the reporting period.	The complete concept of beneficial owner is referred to in Article 14 of OS No. 2.318, as amended, which can be identified by: • Their direct or indirect control (by any means other than holding capital or voting rights, i.e. control over the capital or the management, administrative or executive bodies of the company or over the general meeting of its shareholders or the natural person); • The representative of the company when no natural person could be identified according to the criteria set out in (a) the manager(s) of SNCs, SCSs, SARLs, CSAs and civil companies; (b) the managing director or chief executive officer of public limited companies; c) the trustee appointed in the context of legal proceedings for cessation of payments, judicial settlement or liquidation of assets). • Their direct or indirect ownership (at least 25% of the capital or voting rights of the legal entity).
Q16	Can your entity distinguish nationality of clients' BO's?	Indicate whether or not your entity is able to make the distinction.
Q17	Provide the percentage breakdown of primary nationalities of Beneficial Owners.	Provide the percentage breakdown of all clients' beneficial owner's primary nationalities, including BO's of all % ownership levels, those with direct or indirect control, and those representing a legal entity.
Q18	Please provide the total number of Beneficial Owners that are having direct or indirect control of a legal entity, broken down by primary nationality.	This involves breaking down beneficial owners by category and then by nationality. These questions thus cover the entire concept of beneficial ownership, in accordance with Article 14 of OS No. 2.318 as amended, which can be identified in accordance with the above-mentioned procedures. Here, you should indicate the number of beneficial owners who have this status through their direct or indirect control (by any means other than holding capital or voting rights, i.e. control over the capital or the management, administrative or executive bodies of the company or over the general meeting of its shareholders or the natural person). This number must be broken down by nationality. If the nationality is unknown, please select 'Unknown' from the drop-down list.
Q19	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	

Q#	Question Text	Instructions
Q20	Can your entity distinguish BO's that have 25% or greater ownership?	
Q21	Please provide the total number of Beneficial Owners of clients, by BO's primary nationality, for BO's with 25% or greater ownership.	
Q22	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q23	Please provide the total number of Beneficial Owners that are Foreign Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership.	
Q24	Please provide the total number of Beneficial Owners that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership.	
1.4 Assets Under Management		
Q25	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.
1.6 Distinguishing Client Types		
Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:		
Q26	Trusts?	Indicate whether or not your entity is able to identify and record information on the types of customers targeted below (trusts, associations, other legal structures, HNWIs). This question aims to determine what your entity is capable of doing, regardless of whether you currently have such clients.
Q27	Associations?	
Q28	Other Legal Arrangements not mentioned above?	
Q29	HNWI's?	
Q30	Lawyers or other Legal Professions?	
Q31	Accountants & Auditors?	
Q32	Nominee Shareholders / Directors?	
Q33	Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
Q34	Real Estate Agents?	
Q35	Dealers in Precious Metals and Stones?	
Q36	Trust and Company Service Providers?	
Q37	Multi-Family Offices?	
Q38	More Complex Ownership Structures?	
Q39	Cash Intensive Business (such as bars, restaurants)?	
Q40	Providers of or accept payments from Anonymous Prepaid Cards / Cards with high CDD Threshold?	
Q41	Engaged in Art and Antiques?	
Q42	Engaged in Import-Export?	
Q43	Dealing with High-Value Goods?	
Q44	Non-Profit Organization?	
Q45	Casinos/Gambling (including clients that are online casinos)?	
Q46	Engaged in Construction / Real Estate Development?	
Q47	Engaged in Extractive Industries (e.g. Oil and Gas)?	
Q48	Virtual Assets Service Providers (VASPs)?	
Q49	Engaged in Defense/Arms, including Dual-use items for proliferation of Weapons of Mass Destruction (WMD)?	

Q#	Question Text	Instructions
Q50	Engaged in Yachting-related Business?	
Q51	Sports Agents or Intermediaries?	
Q52	Engaged in Fund Management?	
Q53	Holding Companies?	
Q54	Auctioneers?	
Q55	Motor Vehicle Dealers?	
Q56	Government and Public Sector?	
Q57	Engaged in Aircraft Sales / Private Jets / Charters?	
Q58	Engaged in Shipping?	
1.7 Clients - Natural Persons		
Q59	Does your entity have clients that are Natural Persons?	
Q60	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual (including domestic clients).	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person **should not** be counted as a Natural Person client. If you have a total of 2 clients, you must find 2 clients, even if the breakdown is different. Example: • Individuals broken down by nationality: 2 clients → 1 Swiss, 1 Japanese • Individuals broken down by residence: 2 clients → 2 residents of Monaco The total number remains the same: 2 clients.
Q61	*# Natural Person Clients*	**Auto-calculated**
Q62	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Natural Persons.	
Q63	Please provide the total value of payments on behalf of clients that are Natural Persons, both incoming and outgoing.	
1.8 Clients - Legal Persons		
Q64	Does your entity have clients that are legal persons?	
Q65	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
Q66	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Legal Persons.	
Q67	Please provide the total value of payments on behalf of clients that are Legal Persons, both incoming and outgoing.	
Q68	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	• Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP

Q#	Question Text	Instructions
		• Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE • Private Domain of the Monegasque State • Trusts • Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person
Q69	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.9 Clients - Trusts		
Q70	Does your entity have clients that are Trusts?	
Q71	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
Q72	Does your entity have information related to the number and value of their transactions?	
Q73	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Trusts.	
Q74	Please provide the total value of payments on behalf of clients that are Trusts, (both incoming and outgoing).	
Q75	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q76	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by country in which the trust was created.	
1.10 Clients - Associations		
Q77	Does your entity have clients that are Associations?	
Q78	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
Q79	Does your entity have information related to the number and value of their transactions?	
Q80	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Associations.	
Q81	Please provide the total value of payments on behalf of clients that are Associations, both incoming and outgoing.	
1.11 Clients - Other Legal Arrangements		
Q82	Does your entity have clients that are Other Legal Arrangements?	

Q#	Question Text	Instructions
Q83	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
Q84	Does your entity have information related to the number and value of their transactions?	
Q85	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Other Legal Arrangements.	
Q86	Please provide the total value of payments on behalf of clients that are Other Legal Arrangements, both incoming and outgoing.	
Q87	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.12 HNWI's and UHNWI's		
Q88	Does your entity have any High-Net-Worth Individuals (HNWIs) or High-Net-Worth (HNW) Groups as clients or Beneficial Owners (that are HNWIs) of Legal Persons / Legal Arrangements that are clients?	**HNWI: > 5 million** UHNWI: > 50 million An UNHWI is necessarily an HNWI. In STRIX, an UNHWI must be counted in both the HNWI and UHNWI categories.
Q89	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).	
Q90	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are HNWIs or individuals belonging to a HNW Group.	
Q91	Please provide the total value of payments on behalf of clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
Q92	Please provide the total number of Beneficial Owners of Legal Person clients that are HNWIs, broken down by the primary nationality of the HNWI.	
Q93	Please provide the total number of Beneficial Owners of Trusts (clients) that are HNWIs, broken down by the primary nationality of the HNWI.	
Q94	Please provide the total number of Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are HNWIs, broken down by the primary nationality of the HNWI.	
Q95	Does your entity have any Ultra-High-Net-Worth Individuals (UHNWIs) or Ultra-High-Net-Worth (UHNW) Groups as clients or Beneficial Owners (that are UHNWIs) of Legal Persons / Legal Arrangements that are clients?	HNWI: > 5 million **UHNWI: > 50 million** An UNHWI is necessarily an HNWI. In STRIX, an UNHWI must be counted in both the HNWI and UHNWI categories.
Q96	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).	

Q#	Question Text	Instructions
Q97	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q98	Please provide the total value of payments on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
Q99	Please provide the total number of Beneficial Owners of Legal Person clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
Q100	Please provide the total number of unique Beneficial Owners of Trust clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
Q101	Please provide the total number of Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.13 Politically Exposed Persons (PEPs)		
Q102	Does your entity have any PEPs as clients?	
Q103	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q104	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q105	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
Q106	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are PEPs, both domestic and foreign.	
Q107	Please provide the total value of payments on behalf of clients that are PEPs, (both incoming and outgoing).	
Q108	Please provide the total number of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the primary nationality of the PEP.	For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement. The term “unique Beneficial Owners” denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.
1.14 2nd Nationalities		
Q109	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
Q110	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 2nd 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

Q#	Question Text	Instructions
		would then be 2 total, broken down as 1 Spain and 1 Russia. If existence of a 2nd nationality is known but the specific country is unknown, please select "Unknown" from the dropdown.
Q111	Please provide the total number of secondary nationalities of unique clients that are HNWIs or individuals belonging to a HNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	
Q112	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).	
Q113	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).	
Q114	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.	
Q115	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are HNWIs, broken down by the secondary nationality(ies) of the HNWI.	
Q116	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.	
Q117	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the secondary nationality(ies) of the PEP.	
1.15 Lawyers and Other Legal Professions		
Q118	Does your entity have clients that are Lawyers and Other Legal Professions?	
Q119	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
1.16 Accountants & Auditors		
Q120	Does your entity have clients that are Accountants & Auditors?	
Q121	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	

Q#	Question Text	Instructions
1.17 Nominee Shareholders / Directors		
Q122	Does your entity have clients that are Nominee Shareholders / Directors?	
Q123	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
1.18 Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments		
Q124	Does your entity have clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments?	
Q125	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
1.19 Real Estate Agents		
Q126	Does your entity have clients that are Real Estate Agents?	
Q127	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
1.20 DPMS		
Q128	Does your entity have clients that are Dealers in Precious Metals and Stones?	
Q129	Please provide the total number of Monegasque unique clients that are DPMS.	
1.21 TCSPs		
Q130	Does your entity have clients that are Trusts and Corporate Service Providers?	
Q131	Please provide the total number of Monegasque unique clients that are TCSPs.	
1.22 Multi-Family Offices		
Q132	Does your entity have clients that are Multi-Family Offices?	
Q133	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
1.23 More Complex Ownership Structures		
Q134	Does your entity have clients that are More Complex Ownership Structures?	
Q135	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
1.24 Cash Intensive Businesses		
Q136	How does your entity define a Cash Intensive Business?	
Q137	Does your entity have clients that are Cash Intensive Businesses?	Such as bars, restaurants.
Q138	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
1.25 Prepaid Cards		

Q#	Question Text	Instructions
Q139	Does your entity have clients that are providers of or accept payments from Anonymous Prepaid Cards with high CDD Threshold?	
Q140	Please provide the total number of Monegasque unique clients that are providers of or accept payments from Anonymous Prepaid Cards / Cards with a high CDD Threshold.	
1.26 Art and Antiques		
Q141	Does your entity have clients that are engaged in Art and Antiques?	
Q142	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
1.27 Import-Export		
Q143	Does your entity have clients that are engaged in Import-Export?	
Q144	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
1.28 High-Value Goods		
Q145	Does your entity have clients that are High-Value Goods?	
Q146	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
1.29 NPOs		
Q147	Does your entity have clients that are Non-Profit Organizations?	
Q148	Please provide the total number of Monegasque unique clients that are NPOs.	
1.30 Casinos / Gambling		
Q149	Does your entity have clients that are Casinos/Gambling?	
Q150	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
1.31 Construction / Real Estate Development		
Q151	Does your entity have clients that are engaged in Construction / Real Estate Development?	
Q152	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
1.32 Extractive Industries (e.g. Oil and Gas)		
Q153	Does your entity have clients that are engaged in Extractive Industries?	
Q154	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
1.33 Virtual Asset Service Providers		
Q155	Does your entity have clients that are VASPs?	
Q156	Please provide the total number of unique clients that are VASPs.	

Q#	Question Text	Instructions
Q157	Please provide the total number of transactions (both incoming and outgoing) with clients that are VASPs.	
Q158	Please provide the total value of payments with clients that are VASPs (both incoming and outgoing).	
Q159	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
Q160	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
Q161	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
Q162	Please provide the total number of transactions with VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q163	Please provide the total value of payments with VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	Custodian Wallet Providers
Q164	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q165	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q166	Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers, broken down by country of establishment.	Virtual Currency Exchange Providers
Q167	Please provide the total number of transactions with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
Q168	Please provide the total value of payments with VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	Virtual Currency Exchange Providers
Q169	Does your entity distinguish if VASPs clients are Initial Coin Offering (ICO) related service providers?	ICO
Q170	Does your entity have clients that are ICO Providers?	ICO
Q171	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
Q172	Please provide the total number of transactions with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q173	Please provide the total value of payments with VASP clients that are ICO related service providers (both incoming and outgoing).	ICO
Q174	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	Other Services
Q175	Does your entity have clients that are engaged in Other VASP Services?	Other Services
Q176	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services

Q#	Question Text	Instructions
Q177	Please provide the total number of transactions with VASP clients related to Other Services (both incoming and outgoing).	Other Services
Q178	Please provide the total value of payments with VASP clients that provide Other Services (both incoming and outgoing).	Other Services
Q179	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
1.34 Defense / Arms		
Q180	Does your entity have clients that are engaged in Defense / Arms?	The reporting entity should disclose whether it has clients that are engaged in Defense/Arms 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.
Q181	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
1.35 Yachting-Related Business		
Q182	Does your entity have clients that are engaged in Yachting related business?	
Q183	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
1.36 Sports Agents and Intermediaries		
Q184	Does your entity have clients that are Sports Agents or Intermediaries?	
Q185	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
1.37 Fund Management		
Q186	Does your entity have clients that are engaged in Fund Management?	
Q187	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
1.38 Holding Companies		
Q188	Does your entity have clients that are Holding Companies?	This involves determining whether clients hold property/assets through a holding company (which itself would hold the shares/stocks of the company that legally owns the target property/asset).
Q189	Please provide the total number of Monegasque unique clients that are Holding Companies.	
1.39 Auctioneers		
Q190	Does your entity have clients that are Auctioneers?	
Q191	Please provide the total number of Monegasque unique clients that are Auctioneers.	
1.40 Motor Vehicle Dealers		
Q192	Does your entity have clients that are Motor Vehicle Dealers?	
Q193	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	

Q#	Question Text	Instructions
1.41 Government and Public Sector		
Q194	Does your entity have clients that are Government and Public Sector?	
Q195	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
1.42 Aircraft Sales / Private Jets / Charters		
Q196	Does your entity have clients that are engaged in Aircraft Sales / Private Jets / Charters?	
Q197	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
1.43 Shipping		
Q198	Does your entity have clients that are engaged in Shipping?	
Q199	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
1.44 Comments & Feedback		
Q200	Do you have feedback related to any questions in this section?	
Q201	Please provide comments or feedback on this section here.	
2 Products & Services Risk		
2.1 Payments On Behalf of Clients - Cheques		
Payments on behalf of clients: questions in these subsections concern payments made or received by the entity in the course of delivering its products or services, where the entity executes or intermediates payments for the benefit of clients, including cases of indirect client involvement.		
Q202	Does your entity accept or make Cheque transactions on behalf of clients?	For example, payments made into or out of the represented person's accounts using cheques.
Q203	Did your entity accept or make Cheque transactions on behalf of clients within the reporting period?	
Q204	Please provide the total number of Cheque transactions on behalf of clients (both incoming and outgoing).	Example: A counterparty pays you in **three separate instalments** spread over two years: • Payment no. 1: €40,000 by cheque → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by cheque → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** **2025 reporting period**: Total number of transactions by cheque: **2**

Q#	Question Text	Instructions
Q205	Please provide the total value of payments on behalf of clients using Cheques within the reporting period.	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 by cheque → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by cheque → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of payments by cheque: **€80,000**
2.2 Payments On Behalf of Clients - Electronic Transfers		
Q206	Does your entity accept or make transactions by Electronic Transfer **on behalf** of clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, payment service provider (PSP) such as PayPal, debit cards, credit cards, virtual currency payments, etc.
Q207	Did your entity accept or make transactions by Electronic Transfer on behalf of clients within the reporting period?	
Q208	Please provide the total number of transactions by Electronic Transfer on behalf of clients (both incoming and outgoing).	Example: A counterparty pays you in **three separate instalments** spread over two years: • Payment no. 1: €40,000 by electronic transfer → **made in 2025** • Payment no. 2: €40,000 by electronic transfer → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** **2025 reporting period**: Total number of transactions by electronic transfer: **2**
Q209	Please provide the total value of payments by Electronic Transfer on behalf clients (both incoming and outgoing) within the reporting period.	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 by electronic transfer → **made in 2025** • Payment no. 2: €40,000 by electronic transfer → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026**

Q#	Question Text	Instructions
		Only payments made during the reporting period are to be recorded. • **2025 reporting period**: Total value of payments by electronic transfer: **€80,000**
Q210	Does your entity accept Credit Card transactions on behalf of clients?	
Q211	Did your entity accept transactions by Credit Card on behalf of clients within the reporting period?	
Q212	Among the electronic transfers reported, please provide the total number of Credit Card transactions on behalf of clients, within the reporting period.	
Q213	*Total number of transactions by Electronic Transfer*	Auto-calculated field
Q214	Please provide the total value of Credit Card payments on behalf of clients, within the reporting period.	
Q215	*Total value of payments by Electronic Transfer*	Auto-calculated field
2.3 Payments On Behalf of Clients – Cash		
Q216	Does your entity accept or make Cash transactions on behalf of clients?	
Q217	Did your entity accept or make Cash transactions on behalf of clients within the reporting period?	
Q218	Please provide the total number of Cash transactions on behalf of clients, within the reporting period.	Example: A counterparty pays you in **three separate instalments** spread over two years: • Payment no. 1: €10,000 in cash → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** **2025 reporting period**: Total number of cash transactions: **1**
Q219	Please provide the total value of payments in cash on behalf of clients, in the reporting period, both incoming and outgoing.	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments**: • Payment no. 1: €10,000 in cash → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025**

Q#	Question Text	Instructions
		• Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of cash payments: **€10,000**
Q220	Please provide the total number of single cash transactions by or on behalf of clients equal to or greater than 10,000 euros, both incoming and outgoing.	
Q221	Can your entity distinguish cash transactions above EUR 100,000 in your record keeping?	
Q222	Number of physical cash transactions on behalf of Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q223	Number of physical cash transactions on behalf of Monegasque Legal Persons and Legal Arrangements in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q224	Number of physical cash transactions on behalf of Foreign Legal Persons and Legal Arrangements in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
2.4 Payments On Behalf of Clients - Other Payments Forms		
Q225	Does your entity use any other payment types on behalf of clients?	
Q226	Which other payment types?	
Q227	Please provide the total number of other transactions on behalf of clients, within the reporting period.	
Q228	Please provide the total value of other payments on behalf of clients, within the reporting period.	
2.5 Payments On Behalf of Clients – Summary		
Q229	*Sum of # transactions on behalf of clients*	Auto-calculated
Q230	*# Transactions on behalf of Clients (Repeat of Q5)*	Repeat field, used for data validation. Auto-calculated
Q231	*Sum of value of payments on behalf of clients*	Auto-calculated
Q232	*Value payments on behalf of clients (Repeat of Q6)*	Repeat field, used for data validation. Auto-calculated
2.6 Virtual Currencies		
Q233	Do you have clients that use cryptocurrencies?	
Q234	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?	The reporting entity should declare whether it intends to be active or offer products and services relating to virtual assets in the following years, accept or make payments to/from customers, or invest in virtual assets.
Q235	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	

Q#	Question Text	Instructions
Q236	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
2.7 Structures Created		
Q237	Total number of structures created, broken down by country of registration.	
Q238	Number of Civil Companies under Monegasque law created.	
Q239	Number of Foreign Commercial Companies created.	
Q240	Number of Foreign Patrimonial Companies created.	
Q241	Number of Trusts created.	
Q242	Number of Holding Companies created.	
Q243	Number of Other Legal Entities created (foundations, associations, etc.)	
Q244	Has your entity created Other Structures not mentioned above?	
Q245	Number of Other Structures created.	
Q246	Specify Other Structures created.	
2.8 Structures Managed, or Administered		
Q247	Total number of structures managed or administered, broken down by country of registration.	
2.9 Manage or Administer Civil Companies		
Q248	Does your entity manage or administer Civil Companies under Monegasque law?	
Q249	Number of Civil Companies under Monegasque law managed or administered.	
Q250	Do you know all the bank account locations for the Monegasque Civil Companies that you manage or administer?	
Q251	Do any of the Monegasque Civil Companies managed or administered not have a Monaco bank account?	
Q252	How many Monegasque Civil Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
Q253	Does your entity have a role in managing any Monegasque Civil Companies bank accounts?	
Q254	Of the Monegasque Civil Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
2.10 Manage or Administer Monegasque Commercial Companies		
Q255	Does your entity manage or administer Commercial Companies under Monegasque law?	
Q256	Number of Monegasque Commercial Companies managed or administered.	
Q257	Do you know all the bank account locations for the Monegasque Commercial Companies that you manage or administer?	

Q#	Question Text	Instructions
Q258	Do any of the Monegasque Commercial Companies managed or administered not have a Monaco bank account?	
Q259	How many Monegasque Commercial Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
Q260	Does your entity have a role in managing any Monegasque Commercial Companies bank accounts?	
Q261	Of the Monegasque Commercial Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
2.11 Manage or Administer Foreign Commercial Companies		
Q262	Does your entity manage or administer Foreign Commercial Companies?	
Q263	Number of Foreign Commercial Companies managed or administered.	
Q264	Do you know all the bank account locations for the Foreign Commercial Companies that you manage or administer?	
Q265	Do any of the Foreign Commercial Companies managed or administered not have a Monaco bank account?	
Q266	How many Foreign Commercial Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
Q267	Does your entity have a role in managing any Foreign Commercial Companies bank accounts?	
Q268	Of the Foreign Commercial Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
2.12 Manage or Administer Foreign Patrimonial Companies		
Q269	Does your entity manage or administer Foreign Patrimonial Companies?	
Q270	Number of Foreign Patrimonial Companies managed or administered.	
Q271	Do you know all the bank account locations for the Foreign Patrimonial Companies that you manage or administer?	
Q272	Do any of the Foreign Patrimonial Companies managed or administered not have a Monaco bank account?	
Q273	How many Foreign Patrimonial Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
Q274	Does your entity have a role in managing any Foreign Patrimonial Companies bank accounts?	
Q275	Of the Foreign Patrimonial Companies bank accounts managed, how many accounts are not in Monaco,	

Q#	Question Text	Instructions
	broken down by country where the account is located?	
	2.13 Manage or Administer Trusts	
Q276	Does your entity manage or administer Trusts?	
Q277	Number of Trusts managed or administered.	
Q278	Do you know all the bank account locations for the Trusts that you manage or administer?	
Q279	Do any of the Trusts managed or administered not have a Monaco bank account?	
Q280	How many Trusts do not have Monaco bank accounts, by country where the account is located?	
Q281	Does your entity have a role in managing any Trusts bank accounts?	
Q282	Of the Trusts bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
	2.14 Manage or Administer Holding Companies	
Q283	Does your entity manage or administer Holding Companies?	A holding company is a company that owns the shares or stocks of other companies.
Q284	Number of Holding Companies managed or administered.	
Q285	Do you know all the bank account locations for the Holding Companies that you manage or administer?	
Q286	Do any of the Holding Companies managed or administered not have a Monaco bank account?	
Q287	How many Holding Companies managed or administered do not have Monaco bank accounts, by country where the account is located?	
Q288	Does your entity have a role in managing any Holding Companies bank accounts?	
Q289	Of the Holding Companies bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
	2.15 Manage or Administer Other Legal Entities	
Q290	Does your entity manage or administer Other Legal Entities (foundations, associations, etc.)?	
Q291	Number of Other Legal Entities managed or administered.	
Q292	Do you know all the bank account locations for the Other Legal Entities that you manage or administer?	
Q293	Do any of the Other Legal Entities managed or administered not have a Monaco bank account?	
Q294	How many Other Legal Entities managed or administered do not have Monaco bank accounts, by country where the account is located?	
Q295	Does your entity have a role in managing any Other Legal Entities bank accounts?	
Q296	Of the Other Legal Entities bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	

Q#	Question Text	Instructions
2.16 Manage or Administer Other Structures		
Q297	Does your entity manage or administer Other Structures?	
Q298	Number of Other Structures managed or administered.	
Q299	Specify Other Structures managed or administered.	
Q300	Do you know all the bank account locations for the Other Structures that you manage or administer?	
Q301	Do any of the Other Structures managed or administered not have a Monaco bank account?	
Q302	How many Other Structures managed or administered do not have Monaco bank accounts, by country where the account is located?	
Q303	Does your entity have a role in managing any Other Structures bank accounts?	
Q304	Of the Other Structures bank accounts managed, how many accounts are not in Monaco, broken down by country where the account is located?	
2.17 Accounting		
Q305	Number of structures for which you provide accounting.	
2.18 Bank Account Signature		
Q306	Number of structures managed or administered, that hold bank accounts for which your entity is the only signatory.	
Q307	Number of structures managed or administered, that hold bank accounts for which the Beneficial Owner is the sole signatory.	
Q308	Number of structures managed or administered, that hold bank accounts for which your entity has a joint signature with the Beneficial Owner.	
Q309	Number of structures managed or administered, that hold bank accounts for which the Beneficial Owner has designated a third party as signatory.	
Q310	Number of structures managed or administered, that do not have a bank account.	
Q311	Among the structures created, managed, or administered, for how many of them do you provide domiciliation?	
2.19 Comments & Feedback		
Q312	Do you have feedback related to any questions in this section?	
Q313	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q314	Does your entity rely on Domestic Third Parties to undertake some/all CDD measures towards clients?	Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to

Q#	Question Text	Instructions
		introduce business, provided that the criteria set are met.
Q315	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.	
Q316	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q317	Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client.	Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
Q318	Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party.	
3.2 Onboarding		
Q319	Did your entity onboard clients within the reporting period?	
Q320	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	This refers to the number of new unique natural person clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q321	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	This refers to the number of new unique legal person clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q322	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	This refers to the number of new unique trusts clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q323	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	This refers to the number of new unique clients who are other legal arrangements entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q324	Does your entity onboard clients on a non-face-to-face basis, i.e. not physically present?	This section indicates whether the entity agrees to establish a relationship without a physical meeting with the client.
Q325	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new

Q#	Question Text	Instructions
		unique natural person clients should be indicated here.
Q326	Please provide the n umber of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique legal person clients should be indicated here.
Q327	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new clients without a physical meeting, the number of new unique trust clients should be indicated here.
Q328	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique clients that are other legal entities should be indicated here.
Q329	Does your entity accept clients through Introducers?	A business introducer is a natural or legal person (financial institution or designated non-financial business or profession) who acts as an intermediary between the regulated entity and potential clients or partners. In this sense, they maintain a direct relationship with a customer but delegate the execution of the transaction to the regulated entity. As such, the business introducer brings clients to the entity.
Q330	Can the entity provide client nationality information for clients onboarded through introducers?	
Q331	Can the entity provide introducers residency information?	
Q332	Please provide the total number of clients onboarded that were Introduced through Third Parties, within the reporting period, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement).	Reporting Period.
Q333	Please provide the total number of clients onboarded that were Introduced through Third Parties within the reporting period, broken down by residency of the Third Party.	Reporting Period.
Q334	*Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Reporting Period.*	**Validate your inputs**, when correctly entered, the total between these should be '0'. **If this is not the case, please modify your answers.**
Q335	Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement).	Cumulative.
Q336	Please provide the total number of clients onboarded that were Introduced through Third Parties, in total, broken down by residency of the Third Party.	Cumulative.
Q337	*Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Cumulative.*	**Validate your inputs**, when correctly entered, the total between these should be '0'. **If this is not the case, please modify your answers.**
3.3 Structure		

Q#	Question Text	Instructions
Q338	Please provide the total number of salaried and non-salaried persons within your entity including, where applicable, managers, partners or owner-operators, at the end of the reporting period.	
Q339	Does your entity have any Branches, Subsidiaries, or Agencies?	The reporting entity is required to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.
Q340	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
Q341	Is your entity a Branch or Subsidiary of another Entity?	
Q342	Is your entity a Branch or Subsidiary of a Foreign Entity?	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".
Q343	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
Q344	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q345	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)	
Q346	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.	
Q347	Within the reporting period, has your entity experienced any of the following:	
Q348	Please indicate the development or modification.	A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners, any other person exercising direct or indirect control over your entity or the conduct of its activity? Undergone a significant evolution or modification of activities? Any other statutory changes? Change of AML/CFT/CPF responsible persons?
3.4 Entity Finances		
Q349	Turnover for the reporting period.	
Q350	Turnover for the reporting period realized in the Principality of Monaco.	
Q351	Turnover for the reporting period realized outside the Principality of Monaco.	
Q352	Please provide the amount of your last annual VAT return.	The declarations for the 12 months must be added together to obtain the net VAT (net VAT = VAT collected – VAT paid).
3.5 Rejected Relationships		

Q#	Question Text	Instructions
Q353	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q354	Please provide the total number of new client business relationships (potential clients) that have been rejected due to ML/TF/PF considerations during the reporting period.	
3.6 Blocked/Rejected Transactions		
Q355	Did you block/reject client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period?	
Q356	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	
3.7 Terminated Relationships		
Q357	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q358	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
3.8 Comments & Feedback		
Q359	Do you have feedback related to any questions in this section?	
Q360	Please provide comments or feedback on this section here.	

Instructions, Controls

C#	Question Text	Instructions
Controls		
1.1 Structure		
Whether or not you carried out the activity during the reporting period, you must answer all of the following questions, as they concern: your internal organisation (structure, policies, procedures, training, etc.) and the risk mitigation measures you have put in place. These obligations remain applicable even in the absence of clients or transactions.		
C1	Please provide the total number of salaried and non-salaried persons within your entity including, where applicable, managers, partners or owner-operators, at the end of the reporting period.	**Repeat the response from Q338.** The reporting entity should disclose the number of employees, partners, and owners irrespective of their function. The number at the end of the reporting period should be used.
C2	Please provide the total number of full-time equivalent persons working at your entity, at the end of the reporting period.	The reporting entity should disclose the number of full-time equivalent persons, including salaried and non-salaried persons including, where applicable, managers, partners or owner-operators irrespective of their function. Provide the estimate as a decimal of FTE time. For example if there is one full time person and two ¼ time persons, then the total would be 1.5 FTE. 1 full-time person = 1 FTE. One half-time person = 0,5 FTE. One ¼ time person = 0,25 FTE.
C3	Please provide the number of full-time equivalent persons in AML/CFT/CPF Compliance at your entity, at the end of the reporting period.	
C4	Approximately how many hours were spent on AML/CFT/CPF per month?	
C5	Does your entity have a compliance department?	
C6	Does the MLRO fulfil any other role or job function?	
C7	What percentage of time does the MLRO spend on additional functions?	
C8	Is your entity part of a Group?	
C9	Does your entity have a board and/or senior management?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility. Examples of a board or senior management, would be an entity having: • Chief Officers (CEO, CFO, CTO…) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual • A legal requirement for a board or specific role needed to achieve compliance

C#	Question Text	Instructions
		Examples of an entity that does not have a board or senior management: • A sole proprietor • A partnership • A small business with a single layer of management
C10	Do you use external service providers for AML/CFT/CPF?	
C11	What is the purpose of your contract with these external service providers?	
C12	Please provide the total number of full-time equivalent of external AML/CFT/CPF service providers within your entity, at the end of the reporting period.	
C13	Approximately how many hours do external service providers spend each month on AML/CFT/CPF compliance?	
1.2 Policies & Procedures		
C14	Did your entity prepare a documented set of AML/CFT/CPF Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT/CPF legal requirements.
C15	Were these policies and procedures approved by the board and senior management of your entity?	The reporting entity should disclose whether its written AML/CFT/CPF policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
C16	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C17	Did your entity ensure awareness of these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C18	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C19	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C20	Does your entity have a systematic practice of tracking and managing changes to the AML/CFT/CPF Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT/CPF Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.
C21	Does your entity have a group-wide AML/CFT/CPF programme?	
C22	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?	

C#	Question Text	Instructions
C23	Who prepared your entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors? Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
C24	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
C25	Under art. 33, did you establish internal procedures and did you establish and communicate the report referred to in article 33 L. n° 1.362 ?	
C26	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C27	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C28	Does the board and senior management of your entity demonstrate overall responsibility for AML/CFT/CPF?	Actions taken by the Board and/or senior management that could demonstrate board's and senior management's engagement in AML/CFT/CPF matters could include: (1) senior management includes AML/CFT/CPF matters into the daily/ weekly/monthly/quarterly/yearly agenda; (2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks; (3) senior management requests ad-hoc reporting on AML/CFT/CPF matters whenever issues arise; orders internal or external audit to test AML/CFT/CPF controls; (4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT/CPF), buying AML/CFT/CPF monitoring software or sanction screening software, etc.; (5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT/CPF legislation are introduced; (6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.
C29	Does the board and senior management of your entity regularly receive AML/CFT/CPF reports?	The reporting entity should disclose whether the board and/or senior management receive regular

C#	Question Text	Instructions
		reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT/CPF compliance. Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/FT risk and trends.
C30	Does the board and senior management of your entity ensure that AML/CFT/CPF shortcomings are rectified?	The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control, take actions to rectify shortcomings in AML/CFT/CPF compliance areas and mitigate ML/TF risks. The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT/CPF reporting, supervisory onsite examination reports, etc. Examples of such actions might include: (a) approving budgetary resources to hire more employees for AML/CFT/CPF Compliance, investing in employees' knowledge and expertise through training, seminars, certifications (b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions, (c) prioritizing AML/CFT/CPF area for internal audit, etc.
C31	Does the senior management of your entity review (give approval) for taking on high-risk clients?	In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.
1.4 Compliance & Violations		
C32	Has your entity had any AML/CFT/CPF related violations in the past 5 years?	The reporting entity should disclose whether it had any AML/CFT/CPF related compliance failures, including minor shortcomings, within the past 5 years.
C33	Please provide the total number of AML/CFT/CPF related violations in the past 5 Years.	Any AML/CFT/CPF related compliance failures, including minor shortcomings, should be counted under this question.
C34	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C35	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C36	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C37	Did your entity conduct AML/CFT/CPF training for its Office employees in the reporting period?	

C#	Question Text	Instructions
C38	Did your entity conduct AML/CFT/CPF training for its Compliance Employees in the reporting period?	
C39	Please provide the total number of persons trained on AML/CFT/CPF matters during the reporting cycle.	
C40	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?	
C41	Provide the estimated average number of hours per person spent on Initial Training.	
C42	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
C43	Provide the number of staff that have received Refresher Training within the reporting period.	
C44	Provide the estimated average number of hours per person spent on Refresher Training.	
C45	Does the entity provide specialized training for employees working in high-risk areas, such as compliance and customer due diligence?	
C46	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
C47	Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance…)?	
C48	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C49	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	
C50	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C51	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	
C52	Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member?	
C53	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C54	What other AML/CFT/CPF training/awareness raising activities did it include?	
C55	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C56	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
C57	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	

C#	Question Text	Instructions
C58	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
C59	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C60	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C61	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C62	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C63	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C64	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C65	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C66	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C67	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C68	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C69	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	
1.6 CDD		
C70	Does your entity record all of the following in your customer database: • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence • Tax Residence • Level of Risk • Activity • Source of Wealth • Source of Funds	
C71	Please specify which items are not collected.	
C72	When the client transaction is by an individual, does your entity record the individual's Identity Card?	
C73	When the client transaction is by an individual, does your entity record the individual's Passport?	

C#	Question Text	Instructions
C74	When the client transaction is by an individual, does your entity record the individual's Residence Card?	
C75	When the client transaction is by an individual, does your entity record the individual's Proof of Address?	
C76	When the client transaction is by an individual, does your entity record any other data of the individual?	
C77	Please specify other data of Individual recorded.	
C78	Does the entity's database contain all of the following, when applicable: • Name • Country of Incorporation • Foundation Date • Administrators/Directors • Beneficial Owner • Legal Representatives • Level of Risk • Representative of Company or Client	
C79	Please specify which items are not collected.	
C80	Does the entity's database contain all of the following, when applicable: • Donors • Founders • Introducers • More Complex Ownership Structures • Person who directly or indirectly exercises control of a Foundation • Protector • Settlor/Constituent • Shareholders • Trustee	
C81	Please specify which items are not collected.	
C82	Does your entity record other client information or register client activity information in their database?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?

C#	Question Text	Instructions
C83	Please specify what other information is included in your database.	
C84	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's commercial register extract?	
C85	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's statutes?	
C86	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's Meeting Minutes?	
C87	When the transaction is by a Legal Person/Legal Arrangement, does your entity record the client's identity documents of all effective Beneficial Owners (owning 25% or more of the entity)?	
C88	Is past 5 years of client relationship data accessible by AMSF upon request?	
C89	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C90	Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?	The reporting entity should indicate whether it has implemented written policies and procedures that specify the difference in documentation and requirements for simplified, standard, and enhanced due diligence.
C91	Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period.	**Repeat the response from Q4.**
C92	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C93	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C94	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C95	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C96	What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity?	
C97	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C98	Does your entity examine the source of wealth before customer take-on?	
C99	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C100	Please specify other measures taken for high-risk clients, before customer take-on.	

C#	Question Text	Instructions
C101	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C102	How does the company verify the Beneficial Owners of Virtual Assets?	
C103	Does your entity ever conduct tests on third parties regarding their willingness and ability to provide information during the relationship on request and without delay?	
	1.7 EDD	
C104	Did you apply enhanced due diligence measures to clients during the reporting period?	
C105	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C106	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C107	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.
C108	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C109	Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	i.e. number of enhanced due diligence Beneficial Owners of Legal Persons and Legal Arrangements ÷ total number of Beneficial Owners of Legal Persons and Legal Arrangements.
	1.8 Risk Assessments	
C110	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C111	How many AML/CFT/CPF risk levels does your entity have for clients?	
C112	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C113	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C114	Do you have clients whose risk level has not yet been determined?	
C115	Please provide the total number of unique clients that are without a risk level determined yet.	
C116	Does your entity's High-Risk assignment considerations include ALL of the following: • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types	

C#	Question Text	Instructions
	• Distribution Channels • Volume of Operations • Nature of Operations • Trigger events	
C117	Please specify which items are not considered.	
C118	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
C119	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
C120	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C121	Does your entity use a list of sensitive countries for AML/CFT/CPF risk assessment?	(client assessments)
C122	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C123	What client activities does your entity associate with High-Risk clients?	
C124	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
C125	Does your entity consider ML and TF risks separately?	(entity's own assessment)
1.9 Audit / Controls		
C126	Does your entity's internal control process include a Permanent Controller?	
C127	Is the permanent controller a different person from the AML/CFT/CPF Manager?	
C128	Does your entity's internal control process include an Internal Audit Department?	
C129	How many significant audit issues were identified in the latest audit report (relating to AML/CFT/CPF)?	
C130	When did your entity last have a SICCFIN/AMSF audit?	
C131	Has your entity had an on-site AMSF audit?	
C132	Date of last AMSF on-site audit.	
C133	When did your entity last have an Internal AML/CFT/CPF audit?	
C134	When did your entity last have a Group AML/CFT/CPF audit?	
C135	Did your entity have any Other Audits not mentioned above?	AML/CFT/CPF related audits only
C136	Specify the types of Other Audits, and provide the year of the last audit of each kind.	AML/CFT/CPF related audits only
1.10 Cash Transactions		
C137	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C138	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C139	Please describe the specific controls and procedures for cash transactions your entity applies.	

C#	Question Text	Instructions
1.11 Monitoring		
C140	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
C141	Has the automated system been adapted to the entity in Monaco?	
C142	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients within the reporting period.	**Repeat the response from Q5.**
C143	Do you have a system that generates alerts related to Money Laundering?	
C144	Please provide the total number of Alerts in Reporting Period by the automated system related to Money Laundering.	
C145	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
C146	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
C147	Do you have a system that generates alerts related to Terrorism Financing?	
C148	Please provide the total number of Alerts in Reporting Period by the automated system related to Terrorism Financing.	
C149	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
C150	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
1.12 Record Keeping		
C151	Does your entity keep transaction records for at least 5 years?	
C152	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C153	Does your entity keep these records and documents in a safe and secure place?	
C154	Are these records and documents available promptly to the relevant authorities upon request?	When providing its response, the reporting entity should consider the following factors: (1) is the above data collected in electronic format and easily retrievable from the IT systems? (2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly? (3) is there manual effort required to find clients' data, e.g., if files are stored only in paper format; or, when they are stored in electronic format, IT systems are not

C#	Question Text	Instructions
		configured to enable easy access to the required data.
C155	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.13 Targeted Financial Sanctions (TFS)		
C156	Do entity's policies and procedures adequately cover TFS screening and alerts for Terrorist Financing and Proliferation Financing?	The reporting entity should disclose whether its policies and procedures adequately cover TFS screening and alert elements. Policies and procedures should cover targeted financial sanctions-related requirements of at least the following: (a) Clients, Beneficial Owners, parties to a transaction, relevant third parties (intermediaries, agents), or other related persons; (b) Frequency and scope of screening; (c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).
C157	Are the board and senior management of your entity engaged in overseeing risks and compliance matters related to TFS for Terrorist Financing and Proliferation Financing?	The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include: (1) approval of TFS-related policies, procedures and instructions by the board or senior management; (2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.; (3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities, (4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.

C#	Question Text	Instructions
C158	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	
C159	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C160	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Account Holders (Titulaires)?	
C161	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Representative of Company or Client (Mandataires)?	
C162	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Beneficial Owners (and Beneficiaries)?	
C163	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Administrators / Directors?	
C164	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Shareholders?	
C165	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Legal Representatives?	
C166	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Settlor / Constituent?	
C167	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Trustees?	
C168	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Protectors?	
C169	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Introducers?	
C170	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	
C171	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
C172	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	

C#	Question Text	Instructions
C173	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.	
C174	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C175	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
1.14 Politically Exposed Persons (PEPs)		
C176	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C177	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
C178	What additional AML/CFT/CPF procedures are applied for PEPs (compared to a standard risk client)?	The reporting entity should provide a list of specific and enhanced measures that are additionally being taken for PEPs, compared to standard risk clients. For example: (a) before establishing a business relationship (b) during the course of a business relationship. If the above measures differ for domestic and foreign PEPs, please indicate which measure applies to a domestic PEP and which to a foreign PEP.
C179	Did you enter into any relationships with PEPs during the reporting period?	
C180	Does PEP screening occur as part of the CDD process for new customers?	
C181	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C182	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C183	Does screening for PEPs occur on an ongoing basis?	
C184	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C185	Are PEPs subject to increased monitoring?	
C186	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C187	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?	

C#	Question Text	Instructions
C188	Among your clientele, are there any individuals who became PEPS during the course of the business relationship during the reporting period?	
1.15 Suspicious Transaction Reporting		
C189	Is your entity registered with goAML?	
C190	Please describe why.	In case the above question is answered “No”.
C191	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C192	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)
C193	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C194	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C195	Please provide the total number of STRs/ SARs related to Terrorism Financing that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the number of Suspicious Transactions, related to Terrorism Financing, it has reported to Monaco’s FIU (https://amsf.mc).
C196	Please provide the total number of STRs/ SARs related to Money Laundering that your entity reported to the FIU within the reporting period.	The reporting entity should disclose the number of Suspicious Transactions, related to Money Laundering, it has reported to Monaco’s FIU (https://amsf.mc).
C197	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C198	Please provide the total number of STRs/SARs related to Virtual Assets or Virtual Asset Service Providers provided to the FIU within the reporting period.	
C199	Please provide the total number of STRs/SARs related to a Monegasque Legal Person provided to the FIU within the reporting period.	Where the Monegasque Legal Person is the subject of the STR/SAR.
C200	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C201	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C202	Please provide the total number of STRs/SARs related to a Foreign Tax Offenses (criminal or administrative) provided to the FIU within the reporting period.	
C203	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C204	Please provide the total number of STRs/ SARs related to other reasons not mentioned above that your entity reported to the FIU within the reporting period.	

C#	Question Text	Instructions
C205	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
C206	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
C207	Please provide the total number of unsuccessful transactions attempts reported to the FIU, within the reporting period.	
C208	Did your entity respond internally to the suspicious transactions? (e.g. modification of the client relationship, modification of the client risk's assessment)	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
C209	Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	
1.16 Comments & Feedback		
C210	Do you have feedback related to any questions in this section?	
C211	Please provide comments or feedback on this section here.	

Instructions, Signatories

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