AMSF AUTORITÉ MONÉGASQUE DE SÉCURITÉ FINANCIÈRE

Instructions: 2025 Real Estate 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.

Please provide answers ONLY for activities in which you or your entity have acted as a professional within the meaning of amended Law No. 1.362 in relation to the purchase, sale, or rental of real estate (only for rentals with a monthly rent equal to or greater than €10,000 including VAT), UNLESS the question specifies otherwise.

IMPORTANT:

Question 1:
Within the reporting period, have you carried out at least one of the activities subject to Law No. 1.362?

Activities concerned:

- *Purchases of real estate*
- *Sales of real estate*
- *Rentals of real estate (monthly rent >=€10,000 including VAT)*

Regarding real estate rentals specifically:

You must answer "Yes" even if you did not have any new clients, as long as you hold active property management mandates. The mere fact of continuing to manage a property for an existing client constitutes an activity carried out during the reporting period.

In the context of the STRIX annual questionnaire for real estate agents, it is important to clearly distinguish the entity's role in a rental transaction.

When the entity **does not hold a property management mandate** but has only acted **to present a property for rent** — and this introduction resulted in a successful transaction with the collection of a commission:

For questions asking for the number of unique clients and the value of rentals:

- The entity must **record this transaction as a rental**. The commercial intervention (introducing the landlord and the tenant) is considered a rental activity.

For questions asking for the number of payments by payment method:

- The entity should **not record any financial flows related to this rental** (rent, charges, etc.), since it is not responsible for managing them. These funds do not pass through the entity in the absence of a management mandate.

Example scenario:

The real estate agency represents:

- A buyer (a legal person client) and a seller (a natural person client);
- A seller (a natural person) of a business ("business assets") — the buyer is represented by another agency;
- A tenant of a real estate property (monthly rent of €10,300 including VAT) and the property owner.

For questions requesting the number of unique clients:

You must count the total number of clients represented.

In this scenario:

- The agency represents both the buyer (legal person) and the seller (natural person) of the real estate property.
  Total number of clients: 2.
- Similarly, the agency represents both the tenant and the owner of a property.
  Total number of clients: 2.
- Finally, the agency represents the seller of a business. The sale was completed with a buyer not represented by the agency.
  Total number of clients: 1.

In total, the agency must report 5 clients in STRIX

(1 buyer, 2 sellers, 1 tenant, and 1 owner).

For questions requesting the number of purchases, sales, or rentals:

You must count the number of purchases, sales, or rentals for which the agent has been mandated.

- *Purchases and sales:*

In our scenario, the real estate property is purchased by the legal person from the natural person. The agency also represented the seller of the business ("business assets").

In total, the agency must report 1 purchase and 2 sales in STRIX.

Note: If payment is made in several instalments, only **1 purchase / 1 sale** should be counted.

- *Rentals:*

In our scenario, the monthly rent paid by the tenant is €10,300 including VAT.
The tenant rents the property from the owner through the mandated agency, so there is **1 rental**.

In total, the agency must report 1 rental in STRIX.

- *Purchases, sales, and rentals (combined):*

In our scenario, for questions requesting the **total number of unique clients** active at any time during the reporting period for real estate purchases, sales, or rentals, the total to be reported is:

In total the agency must report 3 : 1 purchase, 2 sales, and 1 rental.

For questions requesting the value of purchases, sales, or rentals:

- *Purchases and sales:*

You must report the purchase/sale/rental value **excluding associated fees** (commission, management fees, notary fees).

In our scenario, this includes:

- the purchase value (excluding notary fees) paid by the legal person;
- the sale value (excluding notary fees) received by the natural person;
- the sale value (excluding notary fees) of the business ("business assets") sold by the natural person.

When the agency represents both parties (buyer and seller), **both the purchase value and the sale value must be reported**.

Example:

- Purchase value of the real estate property: **€1,000,000**
- Sale value of the real estate property: **€1,000,000**
- Notary fees for the real estate property: **€80,000**
- Sale value of the business ("fonds de commerce"): **€500,000**
- Notary fees for the business: **€40,000**

Amounts to be declared:

- **€1,000,000** under the question relating to purchase value
- **€1,500,000** under the question relating to sale value
  (= €1,000,000 real estate sale + €500,000 business sale)

Total value to be reported in STRIX for purchases and sales: €2,500,000

- *Rentals:*

You must declare in STRIX **as many operations as months of rent actually received during the reporting period**.

Example:

- Monthly rent excluding VAT: **€9,500**
- Management fees: **€800**
- Monthly rent including VAT: **€10,300**

The property was rented for 6 months, from 1 January to 30 June:

€10,300 × 6 = €61,800.

Total amount to be reported in STRIX for rental value: €61,800

For questions requesting the number of payments by payment method:

There are **no payment operations** for the purchase or sale of real estate.
These questions apply **only to property rental management** (for which the monthly rent including VAT is equal to or greater than €10,000).

You must report in STRIX **as many operations as payments actually made during the reporting period**.

- *Payments made by the tenant to the agency: "payments received"*

Example 1:
If you received 12 monthly rent payments via electronic transfer, you must count **12 payments**, i.e. **12 electronic transfer operations**.

Example 2:
If you received 3 months of rent in one quarterly cheque payment, you must count **1 payment**, i.e. **1 cheque operation**.

Example 3:
If you received 12 months of rent through 4 quarterly electronic transfer payments, you must count **4 payments**, i.e. **4 electronic transfer operations**.

Example 4:
If you received 12 months of rent through a single annual electronic transfer, you must count **1 payment**, i.e. **1 electronic transfer operation**.

- *Payments made by the agency to the property owner: "payments reversed"*

Example 1:
If you remitted 12 monthly payments to the owner via electronic transfer, you must count **12 payments**, i.e. **12 electronic transfer operations**.

Example 2:
If you remitted 3 months of rent through a quarterly cheque payment to the owner, you must count **1 payment**, i.e. **1 cheque operation**.

For questions requesting the value of payments by payment method:

These questions apply **only to property rental management** (for which the monthly rent including VAT is equal to or greater than €10,000).

You must report the **total amount of operations**, broken down by payment method (electronic transfers, cheques, cash).

Examples:

Example 1:
If you remitted 4 months of rent at €10,300 including VAT via quarterly or monthly electronic transfers, you must report in STRIX:
€41,200 via electronic transfer.

Example 2:
The tenant paid the first monthly rent of €10,300 by cheque, and the remaining payments were made via monthly electronic transfers starting in February.

You must report in STRIX:

- **Cheque payments:** €10,300
- **Electronic transfer payments:** €10,300 × 11 months = **€113,300**

AMSF AUTORITÉ MONÉGASQUE DE SÉCURITÉ FINANCIÈRE

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Signatories 46

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 Period		
Q1	Within the reporting period, have you carried out at least one of the activities subject to Law No. 1.362? Activities concerned: • Purchases of real estate • Sales of real estate • Rentals of real estate (monthly rent >=€10,000 including VAT)	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		
For rental activity, please only include properties with a monthly rent of €10,000 including VAT or more, unless specifically asked to use a different threshold.		
Q3	Please provide the total number of unique clients, that were at some point active during the reporting period, for the purchase, sale and rental of real estate, broken down 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. **See examples from page 2.**
Q4	*Total number of clients*	**Auto-calculated field**
Q5	Please provide the total number of property purchases, sales and rentals with clients during the reporting period.	**See examples from page 2.**
Q6	Please provide the total value of property purchases, sales and rentals with clients during the reporting period.	**See examples from page 2.** 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.

Q#	Question Text	Instructions
1.3 Clients Summary - Purchases		
Q7	Have you purchased property with clients?	Information relating to beneficial owners: identification details, addresses, etc.
Q8	Please provide the total number of unique clients, that were at some point active during the reporting period, for the purchase of real estate, broken down by client's primary nationality, or country of headquarters or incorporation,	
Q9	Total number of clients (for purchases)	
Q10	Please provide the total number of property purchases with clients within the reporting period.	
Q11	Please provide the total value of property purchases with clients within the reporting period.	
Q12	Please provide the total number of property purchases with clients over the past five years.	
Q13	Please provide the total value of property purchases with clients over the past five years.	
Q14	Were any of the Real Estate purchases within the reporting period for the purposes of establishing Monaco residency?	
Q15	How many purchases were for Monaco residency purposes in the reporting period?	
1.4 Clients Summary - Purchases		
Q16	Have you carried out property sales with client ?	Information relating to beneficial owners: identification details, addresses, etc.
Q17	Please provide the total number of unique clients, that were at some point active during the reporting period, for the sale of real estate, broken down by client's primary nationality, or country of headquarters or incorporation,	
Q18	Total number of clients (for sales)	
Q19	Please provide the total number of property sales with clients within the reporting period.	
Q20	Please provide the total value of property sales with clients within the reporting period.	
Q21	Please provide the total number of property sales with clients over the past five years.	
Q22	Please provide the total value of property sales with clients over the past five years.	
1.5 Clients Summary - Rentals		
For rental activity, please only include properties with a monthly rent of €10,000 including VAT or more, unless specifically asked to use a different threshold.		
Q23	Have you managed rental properties for clients?	
Q24	How many rental management mandates do you have at the end of the reporting period?	
Q25	Please provide the total number of unique clients, that were at some point active during the reporting period, for the rentals of real estate, broken down by client's primary nationality, or country of headquarters or incorporation.	

Q#	Question Text	Instructions
Q26	Total number of client (for rentals)	
Q27	Please provide the total number of rentals with clients within the reporting period.	
Q28	Please provide the total value of property rentals with clients within the reporting period.	
Q29	Have you been involved in rental management for properties with a monthly rent of less than €10,000 including VAT ?	
Q30	How many rental management mandates (monthly rents < €10,000 including VAT) do you have at the end of the reporting period?	
Q31	Please provide the total number of property rental whose rent is less than €10,000 including VAT with clients within the reporting period.	
Q32	Please provide the total value of property rental with a rent of less than €10,000 including VAT with clients within the reporting period.	
1.6 Beneficial Owners		
Q33	Does your entity record Beneficial Owner information?	Information relating to beneficial owners: identification details, addresses, etc.
Q34	For what conditions does your entity record Beneficial Owners' information?	
Q35	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).
Q36	Can your entity distinguish nationality of clients' beneficial owners?	Indicate whether or not your entity is able to make the distinction.
Q37	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

Q#	Question Text	Instructions
		indirect control, and those representing a legal entity.
Q38	Please provide the total number of Beneficial Owners having direct or indirect control of a legal entity, broken down by primary nationality.	This involves breaking down beneficial owners by category and then by nationality. 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.
Q39	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	
Q40	Can your entity distinguish BO's that have 25% or greater ownership?	
Q41	Please provide the total number of Beneficial Owners with 25% or greater ownership, by BO's primary nationality	
Q42	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q43	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.	
Q44	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.	
1.7 Distinguishing Client Types		
Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:		
Q45	Trusts and Other Legal Arrangements?	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.
Q46	Associations?	
Q47	Virtual Assets Service Providers (VASPs)?	
Q48	HNWI's?	
Q49	UHNWI's?	

Q#	Question Text	Instructions
1.8 Clients - Natural Persons		
Q50	Does your entity have clients that are Natural Persons?	
Property purchases		
Q51	Please provide the total number of unique clients that are Natural Persons, broken down by the primary nationality of the individual for property purchases.	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.
Q52	*# Natural Person Clients - Purchases*	**Auto-calculated**
Q53	Please provide the total number of unique clients that are Natural Persons, broken down by the residency of the individual for property purchases.	
Q54	*# Natural Person Clients - Purchases*	**Auto-calculated**
Q55	*Difference between Total by Nationality and Total by Residency - Purchase*	**Auto-calculated**
Q56	Please provide the total number of property purchases with clients that are Natural Persons.	
Q57	Please provide the total value of property purchases with clients that are Natural Persons, in EUR.	
Property sales		
Q58	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual for property sales.	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.
Q59	*# Natural Person Clients - Sales*	**Auto-calculated**
Q60	Please provide the total number of unique clients that are Natural Persons, broken down by the residency of the individual for property sales.	
Q61	*# Natural Person Clients - Sales*	**Auto-calculated**
Q62	*Difference between Total by Nationality and Total by Residency - Sales*	**Auto-calculated**
Q63	Please provide the total number of property sales with clients that are Natural Persons.	

Q#	Question Text	Instructions
Q64	Please provide the total value of property sales with clients that are Natural Persons, in EUR.	
For rental activity, please only include properties with a monthly rent of €10,000 or more, unless specifically asked to use a different threshold.		
Q65	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual for property rentals.	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.
Q66	*# Natural Person Clients - Rentals*	**Auto-calculated**
Q67	Please provide the total number of unique clients that are Natural Persons, broken down by the residency of the individual for property rentals.	
Q68	*# Natural Person Clients - Rentals*	**Auto-calculated**
Q69	*Difference between Total by Nationality and Total by Residency - Rentals*	**Auto-calculated**
Q70	Please provide the total number of property rentals with clients that are Natural Persons.	
Q71	Please provide the total value of sales with clients that are Natural Persons, in EUR.	
1.9 Clients - Legal Persons		
Q72	Does your entity have clients that are Legal Persons?	
Property purchases		
Q73	Please provide the total number of unique clients that are Legal Persons, broken down by country of headquarters or incorporation, for property purchases.	
Q74	Please provide the total number of property purchases by clients that are Legal Persons.	
Q75	Please provide the total value of property purchases with clients that are Legal Persons, in EUR.	
Property sales		
Q76	Please provide the total number of unique clients that are Legal Persons, broken down by country of headquarters or incorporation, for property sales.	
Q77	Please provide the total number of property sales by clients that are Legal Persons.	
Q78	Please provide the total value of property sales with clients that are Legal Persons, in EUR.	

Q#	Question Text	Instructions
For rental activity, please only include properties with a monthly rent of €10,000 or more, unless specifically asked to use a different threshold.		
Q79	Please provide the total number of unique clients that are Legal Persons, broken down by country of headquarters or incorporation, for property rentals.	
Q80	Please provide the total number of property rentals with clients that are Legal Persons.	
Q81	Please provide the total value of property rentals with clients that are Legal Persons, in EUR.	
Q82	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	• Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP • Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE • Private Domain of the Monegasque State • Trusts • Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person
Q83	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.10 Clients - Trusts		
Q84	Does your entity have clients that are Trusts or Other Legal Arrangements?	
Q85	Please provide the total number of unique clients that are Trusts and Other Legal Arrangements broken down by country of headquarters or incorporation, for property purchases.	
Q86	Please provide the total number of unique clients that are Trusts and Other Legal Arrangements broken down by country of headquarters or incorporation, for property sales.	
For rental activity, please only include properties with a monthly rent of €10,000 or more, unless specifically asked to use a different threshold.		
Q87	Please provide the total number of unique clients that are Trusts and Other Legal Arrangements broken down by country of headquarters or incorporation, for property rentals.	
Q88	Please provide the total number of Monegasque unique clients that are Trusts and Other Legal Arrangements for purchases, sales, and rentals.	
Q89	Please provide the total number of Natural Persons which are trustees in their professional capacity,	

Q#	Question Text	Instructions
	broken down by country in which the trust was created, for purchases, sales, and rentals.	
Q90	Does your entity have information related to the number and value of purchases, sales or rentals with clients that are Trusts and Other Legal Arrangements?	
Q91	Please provide the total number of property purchases with clients that are Trusts and Other Legal Arrangements.	
Q92	Please provide the total value of property purchases with clients that are Trusts and Other Legal Arrangements, in EUR.	
Q93	Please provide the total number of property sales with clients that are Trusts & Other Legal Arrangements.	
Q94	Please provide the total value of property sales with clients that are Trusts and Other Legal Arrangements, in EUR.	
Q95	Please provide the total number of property rentals with clients that are Trusts and Other Legal Arrangements.	
Q96	Please provide the total value of rentals with clients that are Trusts and Other Legal Arrangements, in EUR.	
Q97	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.11 Clients - Associations		
Q98	Does your entity have clients that are Associations?	
Property purchases		
Q99	Please provide the total number of unique clients that are associations, broken down by country of Association formation, for property purchases.	
Q100	Please provide the total number of property purchases with clients that are associations.	
Q101	Please provide the total value of property purchases with clients that are associations, in EUR.	
Property sales		
Q102	Please provide the total number of unique clients that are associations, broken down by country of Association formation, for property sales.	
Q103	Please provide the total number of property sales with clients that are associations.	
Q104	Please provide the total value of property sales with clients that are associations, in EUR.	
For rental activity, please only include properties with a monthly rent of €10,000 or more, unless specifically asked to use a different threshold.		
Q105	Please provide the total number of unique clients that are associations broken down by country of Association formation, for property rentals.	
Q106	Please provide the total number of property rentals with clients that are associations.	

Q#	Question Text	Instructions
Q107	Please provide the total value of sales with clients that are associations, in EUR.	
1.12 HNWI's and UHNWI's		
Q108	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.
Q109	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).	
Q110	Please provide the total number of purchases, sales and rentals of real estate with clients that are HNWIs or individuals belonging to a HNW Group.	
Q111	Please provide the total value of purchases, sales and rentals of real estate with clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
Q112	Please provide the total number of unique Beneficial Owners of Legal Person clients that are HNWIs, broken down by the primary nationality of the HNWI.	
Q113	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.
Q114	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).	
Q115	Please provide the total number of purchases, sales and rentals of real estate with clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q116	Please provide the total value of purchases, sales and rentals of real estate with clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
Q117	Please provide the total number of unique Beneficial Owners of Legal Person clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.13 Politically Exposed Persons (PEPs)		
Q118	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
For rental activity, please include only rentals with monthly rents ≥ €10,000		
Q119	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients), for property purchases, sales, and rentals.	

Q#	Question Text	Instructions
Q120	*# PEP Clients*	**Auto-calculated**
Q121	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients), for property purchases, sales, and rentals.	
Q122	*# PEP Clients*	**Auto-calculated**
Q123	*Difference between Total by Nationality and Total by Residency - PEPs*	**Auto-calculated**
Q124	Please provide the total number of property purchase, sales and rentals by clients that are PEPs.	
Q125	Please provide the total value of property purchases, sales and rentals with clients that are PEPs, in EUR.	
Q126	Please provide the total number of unique Beneficial Owners of Legal Person/Trusts and Other 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.
Q127	Please provide the total number of property purchase, sales and rentals by Beneficial Owners of Legal Person/Trusts and Other Legal Arrangement clients that are PEPs.	
1.14 Virtual Asset Service Providers		
Q128	Does your entity have clients that are VASPs?	
Q129	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
Q130	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
For rental activity, please include only rentals with monthly rents ≥ €10,000		
Q131	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment, for purchases, sales, and rentals.	Custodian Wallet Providers
Q132	Please provide the total number of property purchase, sales and rentals by VASP clients that are Custodian Wallet Providers.	Custodian Wallet Providers
Q133	Please provide the total value of funds transferred by VASP clients that are Custodian Wallet Providers for property purchases, sales, and rentals.	Custodian Wallet Providers
Q134	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q135	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q136	Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers,	Virtual Currency Exchange Providers

Q#	Question Text	Instructions
	broken down by country of establishment, for purchases, sales, and rentals.	
Q137	Please provide the total number of property purchases, sales, and rentals with and by VASP clients that are Virtual Currency Exchange Providers.	Virtual Currency Exchange Providers
Q138	Please provide the total value of funds transferred by VASP clients that are Virtual Currency Exchange Providers for property purchases, sales, and rentals.	Virtual Currency Exchange Providers
Q139	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO
Q140	Does your entity have clients that are Initial Coin Offering Providers?	ICO
Q141	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment, for purchases, sales, and rentals.	ICO
Q142	Please provide the total number of property purchases, sales, and rentals by VASP clients that are ICO related service providers.	ICO
Q143	Please provide the total value of funds transferred by VASP clients that are ICO related service providers for property purchases, sales, and rentals.	ICO
Q144	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	Other Services
Q145	Does your entity have clients that are engaged in Other VASP Services?	Other Services
Q146	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment, for purchases, sales, and rentals.	Other Services
Q147	Please provide the total number of property purchases, sales, and rentals by VASP clients related to Other Services.	Other Services
Q148	Please provide the total value of funds transferred by VASP clients that provide Other Services for property purchases, sales, and rentals.	Other Services
Q149	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
1.15 2nd Nationalities		
Q150	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
Q151	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).	
1.16 Monegasque Client Types - Purchases and Sales		
Q152	Did you have any Monegasque clients for purchases and sales in the reporting period?	

Q#	Question Text	Instructions
Q153	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
Q154	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
Q155	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
Q156	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
Q157	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
Q158	Please provide the total number of Monegasque unique clients that are DPMS.	
Q159	Please provide the total number of Monegasque unique clients that are TCSPs.	
Q160	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
Q161	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
Q162	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
Q163	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
Q164	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.	
Q165	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
Q166	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
Q167	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
Q168	Please provide the total number of Monegasque unique clients that are NPOs.	
Q169	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
Q170	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
Q171	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
Q172	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	

Q#	Question Text	Instructions
Q173	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
Q174	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
Q175	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
Q176	Please provide the total number of Monegasque unique clients that are Holding Companies.	
Q177	Please provide the total number of Monegasque unique clients that are Auctioneers.	
Q178	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
Q179	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
Q180	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
Q181	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
1.17 Comments & Feedback		
Q182	Do you have feedback related to any questions in this section?	
Q183	Please provide comments or feedback on this section here.	
2 Products & Services Risk		
2.1 Direct Payments with Clients - Cheques for property rental		
Direct payments with clients: questions in these subsections concern payments made or received in the course of delivering the entity's products or services, where payments are either initiated directly *by* clients or entered into directly *with* clients, rather than through the entity or third parties acting on the clients' behalf.		
For rental activity, please include only rentals with monthly rents ≥ €10,000 including VAT		
Q184	Does your entity accept or make payments by Cheque with clients for property rental?	
Q185	Did your entity accept or make payments by Cheque with clients for rental management within the reporting period?	
Q186	Please provide the total number of payments received by cheque from tenants for property rental.	**See examples from page 2.**
Q187	Please provide the total value of payments received by cheque from tenants for property rental.	**See examples from page 2.**
Q188	Please provide the total number of payments reversed by cheque to the owners in the context of property rental.	**See examples from page 2.**
Q189	Please provide the total value of payments reversed by cheque to the owners for property rental.	**See examples from page 2.**

Q#	Question Text	Instructions
2.2 Direct Payments with Clients - Electronic Transfers for property rental		
For rental activity, please include only rentals with monthly rents ≥ €10,000 including VAT		
Q190	Does your entity accept or make payments by Electronic Transfer with clients for property rental?	Electronic transfers include payments originating in an electronic form, such as wire transfers, direct debits, payments services providers (PSP) such as PayPal or Carlo, debit cards, credit cards, virtual currency payments, etc.
Q191	Did your entity accept or make payments by Electronic Transfer with clients for property rental within the reporting period ?	
Q192	Please provide the total number of payments received by electronic transfer from tenants for property rental.	**See examples from page 2.**
Q193	Please provide the total value of payments received by electronic transfer from tenants for property rental.	**See examples from page 2.**
Q194	Please provide the total number of payments reversed by electronic transfer to the owners for property rental.	**See examples from page 2.**
Q195	Please provide the total value of payments reversed by electronic transfers to the owners for property rental.	**See examples from page 2.**
Q196	Does your entity accept Credit Card transactions with clients for property rental?	
Q197	Did your entity accept or make transactions by Credit Card with clients for property rental within the reporting period ?	
Q198	Among the electronic transfers reported, please provide the total number of Credit Card payments received from tenants for property rental.	
Q199	Among the electronic transfers reported, please provide the total number of Credit Card payments reversed to the owners for property rental.	
Q200	*Total number of transactions by Electronic Transfer*	**Auto-calculated**
Q201	Please provide the total value of Credit Card payments received from tenants for property rental.	
Q202	Please provide the total value of Credit Card payments reversed to the owners for property rental.	
Q203	*Total value of payments by Electronic Transfer*	**Auto-calculated**
2.3 Direct Payments with Clients – Cash		
For rental activity, please include only rentals with monthly rents ≥ €10,000 including VAT		
Q204	Does your entity accept or make payments in Cash with clients for property rental?	
Q205	Did your entity accept or make Cash payments with clients for property rental within the reporting period?	
Q206	Please provide the total number of payments received in cash from tenants for property rental.	**See examples from page 2.**
Q207	Please provide the total value of payments received in Cash from tenants for property rental.	**See examples from page 2.**

Commenté [NG1]: Q202 and Q204 : move before Q199

Commenté [EC2R1]: Note: these two questions are here, near the respective CC question because they help reference the DV constraint that CC <= ET. Please confirm you want to move them away.

Q#	Question Text	Instructions
Q208	Please provide the total value of payments received in cash in currencies other than the Euro, from tenants for property rental.	**See examples from page 2.**
Q209	Please provide the total number of payments reversed in cash to the owners for property rental.	**See examples from page 2.**
Q210	Please provide the total value of payments reversed in Cash to the owners for property rental.	**See examples from page 2.**
Q211	Please provide the total value of payments reversed in cash in currencies other than the Euro, to the owners for property rental.	
Q212	Please provide the total number of payments received and reversed with clients equal to or greater than 10,000 euros for property rental.	
Q213	Can your entity distinguish cash payments above EUR 100,000 in your record keeping?	
Q214	Number of physical cash transactions with Natural Persons in excess of EUR 100,000 for property rental within the reporting period, both incoming and outgoing.	
Q215	Number of physical cash transactions with Monegasque Legal Persons in excess of EUR 100,000 for property rental within the reporting period, both incoming and outgoing.	
Q216	Number of physical cash transactions with Foreign Legal Persons in excess of EUR 100,000 for property rental within the reporting period, both incoming and outgoing.	
2.4 Direct Payments with Clients – Summary		
Q217	*Sum of # payments with clients*	**Auto-calculated**
Q218	*Sum of value payments with clients*	**Auto-calculated**
2.5 Virtual Currencies		
Q219	Do you accept or make transactions using Virtual Currencies with clients?	
Q220	Does you plan to accept payment, or offer Real Estate products and services, using Virtual Currencies 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.
Q221	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q222	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
2.6 Products, Services, Activities		
Q223	Have you had any purchases or sales involving a substitution of the buyer during the reporting period?	
Q224	How many purchases and sales were affected by substitution during the reporting period?	

Q#	Question Text	Instructions
Q225	How many of these purchases and sales involved buyers unrelated to the original clients?	
Q226	Have you been able to obtain all the documentation relating to new buyers?	
Q227	Did you carry out any purchases or sales of real estate for investment purposes, excluding properties used as a primary residence by purchaser or purchaser's related persons?	
Q228	How many Real Estate purchases and sales within the reporting period were for the purposes of investment, excluding properties used as a primary residence by purchaser or purchaser's related persons?	
Q229	Were any sales made preemptive to the State of Monaco?	
Q230	How many properties were purchased by the State of Monaco preemptive?	
Q231	What was the total value of property purchased by the State of Monaco preemptive?	
Q232	Did you carry out any transactions with property dealers during the reporting period?	
Q233	How many unique property dealers did you conduct transactions with during the reporting period?	
2.7 Comments & Feedback		
Q234	Do you have feedback related to any questions in this section?	
Q235	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q236	Does your entity rely on Domestic Third Parties to undertake some/all CDD measures towards clients?	Financial Institutions / Designated Non-Financial Businesses and Professions may permit reliance on third parties to perform elements of the CDD to introduce business, provided that the criteria set are met.
Q237	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.	
Q238	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q239	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.
Q240	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.	

Q#	Question Text	Instructions
3.2 Onboarding		
Q241	Did your entity onboard clients within the reporting period?	
Q242	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.
Q243	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.
Q244	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.
Q245	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.
Q246	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.
Q247	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique natural person clients should be indicated here.
Q248	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.
Q249	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.
Q250	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.
Q251	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

Q#	Question Text	Instructions
		execution of the transaction to the regulated entity. As such, the business introducer brings clients to the entity.
Q252	Can the entity provide client nationality information for clients onboarded through introducers?	
Q253	Can the entity provide introducers residency information?	
Q254	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.
Q255	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.
Q256	*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.**
Q257	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.
Q258	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.
Q259	*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		
Q260	What is the legal form of your entity?	• Commercial Partnership SNC • Economic Interest Group GIE • Joint Stock Company SAM • Limited Liability Companies SARL • Limited Partnership SCS • Limited Partnership with Shares SCA • Monegasque Foundation • Monegasque Associations • Other Civil Companies SC-Autre • Other Commercial Companies • Other Legal Arrangements • Private Domain of the Monegasque State • Property Investment Partnership SCI • Sole Person • Special Civil-law Partnership SCP • Trusts
Q261	Please provide the total number of salaried and non-salaried persons within your entity including, where	The reporting entity is required to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.

Q#	Question Text	Instructions
	applicable, managers, partners or owner-operators, at the end of the reporting period.	
Q262	Is the licensed holder conducting Real Estate Agent activities a Legal Person?	
Q263	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)	
Q264	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.	
Q265	Does your entity have any Branches, Subsidiaries, or Agencies?	
Q266	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	For the purpose of this question, branch should be understood as a secondary establishment of the parent company. Please do not include offices/client service locations which are sometimes informally referred to as "branches".
Q267	Is your entity a Branch or Subsidiary of another Entity?	
Q268	Is your entity a Branch or Subsidiary of a Foreign Entity?	
Q269	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
Q270	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q271	Within the reporting period, has your entity experienced any of the following:	A change in the legal manager(s), members of senior management or board of directors or supervisory board, partners/shareholders, beneficial owners, any other person exercising direct or indirect control over your entity or the conduct of its activity? Undergone a significant evolution or modification of activities? Any other statutory changes? Change of AML/CFT/CPF responsible persons?
Q272	Please indicate the development or modification.	
Q273	Is your entity part of an international business network or group?	
Q274	Please specify.	
Q275	Is your entity a member of a professional association or society?	
Q276	Please specify.	
3.4 Entity Finances		
Q277	Turnover for the reporting period.	
Q278	Turnover for the reporting period realized in the Principality of Monaco.	
Q279	Turnover for the reporting period realized outside the Principality of Monaco.	

Q#	Question Text	Instructions
Q280	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		
Q281	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q282	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.	
Q283	Can your entity distinguish whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice?	
Q284	Please provide the total number of new client business relationships (potential clients) that have been rejected due to ML/CF/PF considerations during the reporting period, due to client attributes / activities / deficiencies.	
3.6 Terminated Relationships		
Q285	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q286	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
Q287	Can your entity distinguish whether client relationship was terminated due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice?	
Q288	Please provide the total number of client business relationships that have been terminated due to ML/CF/PF considerations during the reporting period due to client attributes / activities / deficiencies.	
3.7 Comments & Feedback		
Q289	Do you have feedback related to any questions in this section?	
Q290	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 Q261.** 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 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 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

C#	Question Text	Instructions
C6	Does your entity have a compliance department?	
C7	Is your entity part of a Group?	
C8	Do you use external service providers for AML/CFT/CPF?	
C9	What is the purpose of your contract with these external service providers?	
C10	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.	
C11	Approximately how many hours do external service providers spend each month on AML/CFT/CPF compliance?	
1.2 Policies & Procedures		
C12	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.
C13	Were these policies and procedures approved by the board and/or senior management of your entity?	The reporting entity should disclose whether its written AML/CFT/CPF policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
C14	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C15	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.
C16	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C17	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C18	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.
C19	Does your entity have a group-wide AML/CFT/CPF programme?	
C20	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?	
C21	Who prepared your entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors?

C#	Question Text	Instructions
		Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
C22	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
C23	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 ?	
C24	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C25	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C26	Does the board and/or 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.
C27	Does the board and/or senior management of your entity regularly receive AML/CFT/CPF reports?	The reporting entity should disclose whether the board and/or senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT/CPF compliance.

C#	Question Text	Instructions
		Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/FT risk and trends.
C28	Does the board and/or 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.
C29	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		
C30	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.
C31	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.
C32	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C33	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C34	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C35	Did your entity conduct AML/CFT/CPF training for its Office employees in the reporting period?	
C36	Did your entity conduct AML/CFT/CPF training for its Compliance Employees in the reporting period?	

C#	Question Text	Instructions
C37	Please provide the total number of persons trained on AML/CFT/CPF matters during the reporting cycle.	
C38	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?	
C39	Provide the estimated average number of hours per person spent on Initial Training.	
C40	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
C41	Provide the number of staff that have received Refresher Training within the reporting period.	
C42	Provide the estimated average number of hours per person spent on Refresher Training.	
C43	Does the entity provide specialized training for employees working in high-risk areas, such as compliance and customer due diligence?	
C44	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
C45	Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance…)?	
C46	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C47	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	
C48	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C49	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	
C50	Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member?	
C51	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C52	What other AML/CFT/CPF training/awareness raising activities did it include?	
C53	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C54	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
C55	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
C56	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	

C#	Question Text	Instructions
C57	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C58	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C59	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C60	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C61	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C62	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C63	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C64	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C65	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C66	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C67	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	
1.6 CDD		
C68	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	
C69	Specify which items are not collected.	
C70	When the client transaction is by an individual, does your entity record the individual's Identity Card?	
C71	When the client transaction is by an individual, does your entity record the individual's Passport?	
C72	When the client transaction is by an individual, does your entity record the individual's Residence Card?	

C#	Question Text	Instructions
C73	When the client transaction is by an individual, does your entity record the individual's Proof of Address?	
C74	When the client transaction is by an individual, does your entity record any other data of the individual?	
C75	Please specify what other information is included in your database.	
C76	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	
C77	Please specify which items are not collected.	
C78	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	
C79	Please specify which items are not collected.	
C80	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's commercial register extract?	
C81	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's statutes?	
C82	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's Meeting Minutes?	
C83	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)?	
C84	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record any other data?	
C85	Please specify other data of Legal Persons / Legal Arrangements recorded.	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

C#	Question Text	Instructions
		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?
C86	Is past 5 years of client relationship data accessible by AMSF upon request?	
C87	Are all of these documents systematically kept?	
C88	Does your entity keep summary records of all of the above data?	
C89	Does your entity keep these summary records in an electronic database?	
C90	Does your entity use tools to perform CDD?	
C91	Which tools?	
C92	Are the CDD tool's results systematically stored?	
C93	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C94	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.
C95	Please provide the total number of unique clients, that were at some point active during the reporting period, for property purchases, sales, and rentals.	**Repeat the response from Q4.**
C96	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C97	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C98	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C99	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C100	Does your entity rely on third parties to collect CDD information about clients?	
C101	Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed?	
C102	Please provide the main reason for the difficulties (e.g. legal reason, commercial reason, unavailability of information, other) and the type of third parties (e.g. financial institution, DNFBP).	

C#	Question Text	Instructions
C103	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C104	Does your entity examine the source of wealth before customer take-on?	
C105	How often is ongoing due diligence done on clients of real estate purchases and sales that are classified as High-Risk for ML/FT?	
C106	How often is ongoing due diligence done on rental clients classified as High-Risk for ML/FT?	
C107	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C108	Please specify other measures taken for high-risk clients, before customer take-on.	
C109	Do your clients make real estate purchases, sales, or rental transactions using Virtual Currencies?	
C110	How does the company verify the Beneficial Owners of Virtual Assets?	
1.7 EDD		
C111	Did you apply enhanced due diligence measures to clients during the reporting period?	
C112	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C113	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C114	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.
1.8 Risk Assessments		
C115	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C116	How many AML/CFT/CPF risk levels does your entity have for clients?	
C117	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C118	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C119	Do you have clients whose risk level has not yet been determined?	
C120	Please provide the total number of unique clients that are without a risk level determined yet.	
C121	Does your entity's High-Risk assignment considerations include ALL of the following: • Country of Residence • Activity • PEP status • Type of Customer	

C#	Question Text	Instructions
	• Products & Services • Transaction Types • Distribution Channels • Volume of Operations • Nature of Operations • Trigger Events	
C122	Please specify which items are not considered.	
C123	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)
C124	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C125	What client activities does your entity associate with High-Risk clients?	
C126	Does your entity consider ML and TF risks separately?	(entity's own assessment)
1.9 AMSF Audit		
C127	When did your entity last have a SICCFIN/AMSF audit?	
C128	Has your entity had an on-site AMSF audit?	
C129	Date of last AMSF on-site audit.	
1.10 Cash Transactions		
C130	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C131	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C132	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Record Keeping		
C133	Does your entity keep transaction records for at least 5 years?	
C134	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C135	Does your entity keep these records and documents in a safe and secure place?	
C136	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 configured to enable easy access to the required data.

C#	Question Text	Instructions
C137	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.12 Targeted Financial Sanctions (TFS)		
C138	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).
C139	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for terrorist financing and proliferation financing?	
C140	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
C141	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C142	Does your entity have a system (manual or automated) to check its customer database in accordance with the Sovereign Ordinance no. 8.664 of 26 May 2021?	
1.13 Politically Exposed Persons (PEPs)		
C143	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C144	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
C145	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.

C#	Question Text	Instructions
C146	Did you enter into any relationships with PEPs during the reporting period?	
C147	Does PEP screening occur as part of the CDD process for new customers?	
C148	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C149	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C150	Does screening for PEPs occur on an ongoing basis?	
C151	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C152	Are PEPs subject to increased monitoring?	
C153	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C154	Among your clientele, are there any individuals who became PEPS during the course of the business relationship during the reporting period?	
1.14 Suspicious Transaction Reporting		
C155	Is your entity registered with goAML?	
C156	Please describe why.	In case the above question is answered “No”.
C157	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C158	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)
C159	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C160	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C161	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).
C162	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).
C163	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C164	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.	
C165	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	

C#	Question Text	Instructions
C166	Did your entity respond internally to the suspicious transactions?	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
C167	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?	
1.15 Comments & Feedback		
C168	Do you have feedback related to any questions in this section?	
C169	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.