Instructions: 2025 Asset Managers 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, w
3) Distribution Channel Risk,
4) Controls and Quality of Risk Mitigation,
5) Signatories.

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

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

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

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Glossary

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

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

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

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

Instructions, Inherent Risk

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

Q#	Question Text	Instructions
Q6	Please provide the total value of funds transferred on behalf of clients (both incoming and outgoing) within the reporting period.	Please indicate the total amount of all financial flows. All transactions that result in a flow (in/out) must be recorded. Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 → **made in 2025** • Payment no. 2: €30,000 → **made in 2025** • Payment no. 3: €30,000 → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of payments: **€70,000** • **Reporting period 2026**: Total value of payments: **€30,000** This value will be validated against other answers provided to subsequent questions regarding the number of transactions carried out by individuals, legal entities, trusts, and other legal structures. The answers are mutually exclusive.
1.3 Beneficial Owners		
Q7	Does your entity record Beneficial Owner information for some or all transactions?	Information relating to beneficial owners: identification details, addresses, etc.
Q8	For what transaction conditions does your entity record Beneficial Owner information?	
Q9	Please provide the total number of unique beneficial owners that were at some point active during the reporting period.v	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).

Q#	Question Text	Instructions
		• Their direct or indirect ownership (at least 25% of the capital or voting rights of the legal entity).
Q10	Can your entity distinguish nationality of clients' BO's?	Indicate whether or not your entity is able to make the distinction.
Q11	Provide the percentage breakdown of primary nationalities of Beneficial Owners.	Provide the percentage breakdown of all clients' beneficial owner's primary nationalities, including BO's of all % ownership levels, those with direct or indirect control, and those representing a legal entity.
Q12	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.
Q13	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	
Q14	Can your entity distinguish BO's that have 25% or greater ownership?	
Q15	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	
Q16	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q17	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.	
Q18	Please provide the total number of Beneficial Owners that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership.	
1.4 Accounts Summary		
Q19	Does your entity have any accounts with or for clients?	
Q20	Please provide the total number of accounts from all client types.	

Q#	Question Text	Instructions
Q21	Can your entity distinguish BO's that are account holders that have 25% or greater ownership of an account?	
Q22	Please provide the total number of Beneficial Owners that are account holders, by BO's primary nationality, for BO's with 25% or greater ownership of an account.	
Q23	Please provide the total number of Beneficial Owners that are account holders that are Foreign Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership of an account.	
Q24	Please provide the total number of Beneficial Owners that are account holders that are Non-Residents, broken down by BO's primary nationality, for BO's with 25% or greater ownership of an account.	
1.5 Assets Under Management		
Q25	Please provide the total value of the assets under management (AUM) for clients.	
Q26	Please provide the AUM for portfolio/asset management on behalf of third parties.	
Q27	Please provide the AUM for the management of undertakings for collective investment governed by Monegasque law.	
Q28	Please provide the AUM for the management of undertakings for collective investment under foreign law.	
Q29	Please provide the AUM for trading on own account.	
1.6 Distinguishing Client Types		
Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:		
Q30	Banks?	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.
Q31	Trusts?	
Q32	Associations?	
Q33	Other Legal Arrangements not mentioned above?	
Q34	HNWI's?	
Q35	Virtual Assets Service Providers (VASPs)?	
1.7 Clients - Natural Persons		
Q36	Does your entity have clients that are Natural Persons?	
Q37	Please provide the total number of unique clients that are Nationals.	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

Q#	Question Text	Instructions
		• Individuals broken down by residence: 2 clients → 2 residents of Monaco The total number remains the same: 2 clients.
Q38	Please provide the total number of unique clients that are Foreign Residents.	
Q39	Please provide the total number of unique clients that are Non-Residents.	
Q40	*Total number of Natural Person clients (sum of 3 questions above)*	**Auto-calculated**
Q41	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual (including domestic clients).	
Q42	*# Natural Person Clients*	**Auto-calculated**
Q43	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the residency of the individual (including domestic clients).	
Q44	*# Natural Person Clients*	**Auto-calculated**
Q45	*Difference between Total by Nationality and Total by Residency.*	**Auto-calculated**
Q46	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Natural Persons.	
Q47	Please provide the total value of funds transferred on behalf of clients that are Natural Persons, both incoming and outgoing.	
1.8 Clients - Legal Persons		
Q48	Does your entity have clients that are Legal Persons?	
Q49	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
Q50	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Legal Persons.	
Q51	Please provide the total value of funds transferred on behalf of clients that are Legal Persons, both incoming and outgoing.	
Q52	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

Q#	Question Text	Instructions
		• Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person
Q53	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.9 Clients - Banks		
Q54	Does your entity have clients that are Banks?	
Q55	Please provide the total number of clients that are Banks, by type of bank.	
Q56	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Banks, by type of bank.	
Q57	Please provide the total value of funds transferred on behalf of clients that are Banks, by type of bank, both incoming and outgoing.	
1.10 Clients - Trusts		
Q58	Does your entity have clients that are Trusts?	
Q59	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
Q60	Does your entity have information related to the number and value of their transactions?	
Q61	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Trusts.	
Q62	Please provide the total value of funds transferred on behalf of clients that are Trusts, (both incoming and outgoing).	
Q63	Please provide the total number of Monegasque unique clients that are Trusts.	
Q64	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q65	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by country in which the trust was created.	
1.11 Clients - Associations		
Q66	Does your entity have clients that are Associations?	
Q67	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
Q68	Does your entity have information related to the number and value of their transactions?	
Q69	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Associations.	

Q#	Question Text	Instructions
Q70	Please provide the total value of funds transferred on behalf of clients that are Associations, both incoming and outgoing.	
1.11 Clients - Other Legal Arrangements		
Q71	Does your entity have clients that are Other Legal Arrangements?	
Q72	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
Q73	Does your entity have information related to the number and value of their transactions?	
Q74	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are Other Legal Arrangements.	
Q75	Please provide the total value of funds transferred by and on behalf of clients that are Other Legal Arrangements, both incoming and outgoing.	
Q76	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.10 HNWI's and UHNWI's		
Q77	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.
Q78	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).	
Q79	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are HNWIs or individuals belonging to a HNW Group.	
Q80	Please provide the total value of funds transferred on behalf of clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
Q81	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.	
Q82	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are HNWIs, broken down by the primary nationality of the HNWI.	
Q83	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.

Q#	Question Text	Instructions
Q84	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).	
Q85	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q86	Please provide the total value of funds transferred on behalf of clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
Q87	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.	
Q88	Please provide the total number of unique Beneficial Owners of Legal Arrangements clients (that are not Trusts) that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.14 Politically Exposed Persons (PEPs)		
Q89	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
Q90	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q91	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q92	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
Q93	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are PEPs.	
Q94	Please provide the total value of funds transferred on behalf of clients that are PEPs, both incoming and outgoing.	
Q95	Please provide the total number of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by 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.
Q96	Please provide the total number of transactions (both incoming and outgoing) on behalf of Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	

Q#	Question Text	Instructions
Q97	Please provide the total value of funds transferred on behalf of Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, both incoming and outgoing.	
1.15 2nd Nationalities		
Q98	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	
Q99	Please provide the total number of Beneficial Owner secondary nationalities, that are account holders, broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership of an account.	
Q100	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).	
Q101	Please provide the total number of secondary nationalities of unique clients that are HNWIs or individuals belonging to a HNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	
Q102	Please provide the total number of secondary nationalities of unique clients that are UHNWIs or individuals belonging to a UHNW Group, broken down by secondary nationality(ies) of the client, if applicable (including domestic clients).	
Q103	Please provide the total number of secondary nationalities of unique clients that are PEPs, broken down by secondary nationality(ies) of the PEP (including domestic clients).	
Q104	For Beneficial Owners that are account holders and are Foreign Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership of an account.	
Q105	For Beneficial Owners that are account holders and are Non-Residents, please provide the total number of Beneficial Owner secondary nationalities broken down by BO's secondary nationality(ies), for BO's with 25% or greater ownership of an account.	
Q106	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are HNWIs, broken down by the secondary nationality(ies) of the HNWI.	
Q107	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are UHNWIs, broken down by the secondary nationality(ies) of the UHNWI.	

Q#	Question Text	Instructions
Q108	Please provide the total number of secondary nationalities of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the secondary nationality(ies) of the PEP.	
1.16 Virtual Asset Service Providers		
Q109	Does your entity have clients that are VASPs?	
Q110	Please provide the total number of unique clients that are VASPs.	
Q111	Please provide the total number of transactions (both incoming and outgoing) on behalf of clients that are VASPs.	
Q112	Please provide the total value of funds transferred on behalf of clients that are VASPs (both incoming and outgoing).	
Q113	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	
Q114	Does your entity have clients that are Custodian Wallet Providers?	
Q115	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	
Q116	Please provide the total number of transactions on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	
Q117	Please provide the total value of funds transferred on behalf of VASP clients that are Custodian Wallet Providers (both incoming and outgoing).	
Q118	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	
Q119	Does your entity have clients that are Virtual Currency Exchange Providers?	
Q120	Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers, broken down by country of establishment.	
Q121	Please provide the total number of transactions on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	
Q122	Please provide the total value of funds transferred on behalf of VASP clients that are Virtual Currency Exchange Providers (both incoming and outgoing).	
Q123	Does your entity distinguish if VASPs clients are ICO related service providers?	
Q124	Does your entity have clients that are Initial Coin Offering Providers?	
Q125	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	

Q#	Question Text	Instructions
Q126	Please provide the total number of transactions on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	
Q127	Please provide the total value of funds transferred on behalf of VASP clients that are ICO related service providers (both incoming and outgoing).	
Q128	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	
Q129	Does your entity have clients that are engaged in Other VASP Services?	
Q130	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	
Q131	Please provide the total number of transactions on behalf of VASP clients related to Other Services (both incoming and outgoing).	
Q132	Please provide the total value of funds transferred on behalf of VASP clients that provide Other Services (both incoming and outgoing).	
Q133	Please specify what Other Services VASP clients are providing not mentioned above.	
1.17 Monegasque Client Types		
Q134	Did you have any Monegasque clients in the reporting period?	
Q135	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
Q136	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
Q137	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
Q138	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
Q139	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
Q140	Please provide the total number of Monegasque unique clients that are DPMS.	
Q141	Please provide the total number of Monegasque unique clients that are TCSPs.	
Q142	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
Q143	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
Q144	Please provide the total number of Monegasque unique clients that are More Complex Ownership Structures.	

Q#	Question Text	Instructions
Q145	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
Q146	Please provide the total number of Monegasque unique clients that are providers of or accept payments from Anonymous Prepaid Cards.	
Q147	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
Q148	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	
Q149	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
Q150	Please provide the total number of Monegasque unique clients that are NPOs.	
Q151	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
Q152	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
Q153	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
Q154	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
Q155	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
Q156	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
Q157	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
Q158	Please provide the total number of Monegasque unique clients that are Holding Companies.	
Q159	Please provide the total number of Monegasque unique clients that are Auctioneers.	
Q160	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
Q161	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
Q162	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
Q163	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
1.18 Comments & Feedback		
Q164	Do you have feedback related to any questions in this section?	

Q#	Question Text	Instructions
Q165	Please provide comments or feedback on this section here.	
2 Products & Services Risk		
2.1 Direct Payments with Clients – Cheques		
Direct payments with clients: questions in these subsections concern payments made or received in the course of delivering the entity's products or services, where payments are either initiated directly *by* clients or entered into directly *with* clients, rather than through the entity or third parties acting on the clients' behalf.		
Q166	Does your entity accept or make Cheque transactions with clients?	
Q167	Did your entity accept or make Cheque transactions with clients within the reporting period?	
Q168	Please provide the total number of Cheque transactions with clients (both incoming and outgoing).	Example: A counterparty pays you in **three separate instalments** spread over two years: • Payment no. 1: €40,000 by cheque → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by cheque → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** **2025 reporting period**: Total number of transactions by cheque: **2**
Q169	Please provide the total value of funds transferred with clients using Cheques within the reporting period.	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 by cheque → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by cheque → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of payments by cheque: **€80,000**
2.2 Direct Payments with Clients - Electronic Transfers		
Q170	Does your entity accept or make transactions by Electronic Transfer with clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, direct debits, payments services providers (PSP) such as PayPal or Carlo, debit cards, credit cards, virtual currency payments, etc.
Q171	Did your entity accept or make transactions by Electronic Transfer with clients within the reporting period?	

Q#	Question Text	Instructions
Q172	Please provide the total number of transactions by Electronic Transfer with clients (both incoming and outgoing).	Example: A counterparty pays you in **three separate instalments** spread over two years: • Payment no. 1: €40,000 by electronic transfer → **made in 2025** • Payment no. 2: €40,000 by electronic transfer → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** **2025 reporting period**: Total number of transactions by electronic transfer: **2**
Q173	Please provide the total value of funds transferred by Electronic Transfer with clients (both incoming and outgoing).	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 by electronic transfer → **made in 2025** • Payment no. 2: €40,000 by electronic transfer → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of payments by electronic transfer: **€80,000**
Q174	Does your entity accept Credit Card transactions with clients?	
Q175	Did your entity accept or make transactions by Credit Card with clients within the reporting period?	
Q176	Among the electronic transfers reported, please provide the total number of Credit Card transactions with clients, within the reporting period.	
Q177	*Total number of transactions by Electronic Transfer*	**Auto-calculated**
Q178	Please provide the total value of funds transferred by Credit Card with clients, within the reporting period.	
Q179	*Total value of funds transferred by Electronic Transfer*	**Auto-calculated**
2.3 Direct Payments with Clients – Cash		
Q180	Does your entity accept or make Cash transactions with clients?	
Q181	Did your entity accept or make Cash transactions with clients within the reporting period?	

Q#	Question Text	Instructions
Q182	Please provide the total number of Cash transactions with clients, within the reporting period.	Example: A counterparty pays you in **three separate instalments** spread over two years: • Payment no. 1: €10,000 in cash → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** **2025 reporting period**: Total number of cash transactions: **1**
Q183	Please provide the total value of funds transferred, Cash payments with clients in the reporting period, both incoming and outgoing.	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments**: • Payment no. 1: €10,000 in cash → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of cash payments: **€10,000**
Q184	Please provide the total number of single cash transactions equal to or exceeding 10,000 euros with clients (both incoming and outgoing) within the reporting period.	
2.4 Direct Payments with Clients - Other Payments Forms		
Q185	Does your entity use any other payment types with clients?	
Q186	Please provide the total number of other transactions with clients, within the reporting period.	
Q187	Please provide the total value of other transactions with clients, within the reporting period.	
Q188	Which other payment types?	
2.5 Direct Payments with Clients – Summary		
Q189	*Sum of # transactions with of clients*	**Auto-calculated**

Q#	Question Text	Instructions
Q190	*Sum of value of funds transferred with clients*	**Auto-calculated**
2.6 Virtual Currencies		
Q191	Do you have clients that use cryptocurrencies?	
Q192	Please provide the total number of Virtual Assets transactions with or on behalf of clients (both incoming and outgoing).	
Q193	Please provide the value of funds transferred using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
Q194	Does your entity plan to be active, or offer products and services related to virtual assets 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.
Q195	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q196	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
2.7 Activity 1 - Portfolio/Asset Management on behalf of Third Parties		
Q197	Does your entity provide Activity 1 - Portfolio/asset management on behalf of third parties?	
Q198	Please provide the turnover related to Activity 1 - product/service of portfolio/asset management on behalf of third parties	
Q199	Please provide the total number of unique clients of Activity 1 - Portfolio/asset management on behalf of third parties by client's primary nationality, or country of headquarters or incorporation.	
Q200	Please provide the total number of accounts for Activity 1 - Portfolio/asset management on behalf of third parties.	
Q201	Please provide the total number of transactions for Activity 1 - Portfolio/asset management on behalf of third parties (both incoming and outgoing) within the reporting period.	
Q202	Please provide the total value of funds transferred related to Activity 1 - Portfolio/asset management on behalf of third parties (both incoming and outgoing) within the reporting period.	
2.8 Activity 2 - Management of Undertakings for Collective Investment Governed by Monegasque Law		
Q203	Does your entity provide Activity 2 - Management of undertakings for collective investment governed by Monegasque law?	
Q204	Please provide the turnover related to Activity 2 - product/service of the management of undertakings for collective investment governed by Monegasque law.	

Q#	Question Text	Instructions
Q205	Please provide the total number of unique clients of Activity 2 - Management of undertakings for collective investment governed by Monegasque law by client's primary nationality, or country of headquarters or incorporation.	
Q206	Please provide the total number of accounts for Activity 2 - Management of undertakings for collective investment governed by Monegasque law.	
Q207	Please provide the total number of transactions for Activity 2 - Management of undertakings for collective investment governed by Monegasque law (both incoming and outgoing) within the reporting period.	
Q208	Please provide the total value of funds transferred related to Activity 2 - Management of undertakings for collective investment governed by Monegasque law (both incoming and outgoing) within the reporting period.	
Q209	Please provide the number of collective investments managed or administered.	
Q210	Does your entity manage or administer Master Funds governed by Monegasque law?	
Q211	Does your entity manage or administer Feeder Funds governed by Monegasque law?	
Q212	Does your entity manage or administer Limited Investor Funds governed by Monegasque law?	
Q213	Does your entity manage or administer Administered Funds governed by Monegasque law?	
Q214	Does your entity manage or administer Licensed Funds governed by Monegasque law?	
Q215	Does your entity manage or administer Private Funds governed by Monegasque law?	
Q216	Does your entity manage or administer non-funds governed by Monegasque law?	
2.9 Activity 3 - Reception and Transmission of Orders on behalf of Third Parties		
Q217	Does your entity provide Activity 3 - Reception and transmission of orders on behalf of third parties?	
Q218	Please provide the turnover related to Activity 3 - product/service of the reception and transmission of orders on behalf of third parties.	
Q219	Please provide the total number of unique Natural Persons of Activity 3 - Reception and transmission of orders on behalf of third parties by client's primary nationality.	
Q220	Please provide the total number of unique Legal Persons of Activity 3 - Reception and transmission of orders on behalf of third parties by client's country of headquarters or incorporation.	
Q221	Please provide the total number of unique Legal Arrangements of Activity 3 - Reception and	

Q#	Question Text	Instructions
	transmission of orders on behalf of third parties by client's country of headquarters or incorporation.	
Q222	Please provide the total number of transactions for Activity 3 - Reception and transmission of orders on behalf of third parties (both incoming and outgoing) within the reporting period.	
Q223	Please provide the total value of funds transferred related to Activity 3 - Reception and transmission of orders on behalf of third parties (both incoming and outgoing) within the reporting period.	
2.10 Activity 4.1 - Providing Advice and Assistance in the matters for Portfolio/Asset Management on behalf of Third Parties		
Q224	Does your entity provide Activity 4.1 - advice and assistance in the matters for Portfolio/asset management on behalf of third parties?	
Q225	Please provide the turnover related to Activity 4.1 - product/service of providing advice and assistance in the matters referred to in number for Activity 1 of portfolio/asset management on behalf of third parties.	
Q226	Please provide the total number of unique clients of Activity 4.1 - Providing advice and assistance in the matters for Portfolio/asset management on behalf of third parties by client's primary nationality, or country of headquarters or incorporation.	
Q227	Number of clients, of which are Portfolio/asset management institutions.	
Q228	Please provide the total value of funds transferred related to Portfolio/asset management institutions (both incoming and outgoing) within the reporting period.	
Q229	What are the types of advice and assistance your entity provides?	
2.11 Activity 4.2 - Providing Advice and Assistance in the Matters for Management of Undertakings for Collective Investment Governed by Monegasque Law		
Q230	Does your entity provide Activity 4.2 - advice and assistance in the matters for Management of undertakings for collective investment governed by Monegasque law?	
Q231	Please provide the turnover related to Activity 4.2 - product/service of providing advice and assistance in the matters referred to in number for Activity 2 the management of undertakings for collective investment governed by Monegasque law.	
Q232	Please provide the total number of unique clients of Activity 4.2 - Providing advice and assistance in the matters for Management of undertakings for collective investment governed by Monegasque law by client's primary nationality, or country of headquarters or incorporation.	

Q#	Question Text	Instructions
Q233	Please provide the total value of funds transferred related to Activity 4.2 - Providing advice and assistance in the matters for Management of undertakings for collective investment governed by Monegasque law (both incoming and outgoing) within the reporting period.	
Q234	Does your entity provide advice or assistance related to Master Funds governed by Monegasque law?	
Q235	Does your entity provide advice or assistance related to Feeder Funds governed by Monegasque law?	
Q236	Does your entity provide advice or assistance related to Limited Investor Funds governed by Monegasque law?	
Q237	Does your entity provide advice or assistance related to Administered Funds governed by Monegasque law?	
Q238	Does your entity provide advice or assistance related to Licensed Funds governed by Monegasque law?	
Q239	Does your entity provide advice or assistance related to Private Funds governed by Monegasque law?	
Q240	What other types of advice and assistance does your entity provide? Include other fund types if any.	
2.12 Activity 4.3 - Providing Advice and Assistance in the Matters for the Reception and Transmission of Orders on behalf of Third Parties		
Q241	Does your entity provide Activity 4.3 - advice and assistance in the matters for the reception and transmission of orders on behalf of third parties?	
Q242	Please provide the turnover related to Activity 4.3 - product/service of providing advice and assistance in the matters referred to in number for Activity 3 of the reception and transmission of orders on behalf of third parties.	
Q243	Please provide the total number of unique Natural Persons of Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties by client's primary nationality.	
Q244	Please provide the total number of unique Legal Persons of Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties, by client's country of headquarters or incorporation.	
Q245	Please provide the total number of unique Legal Arrangements of Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties, by client's country of headquarters or incorporation.	
Q246	What are the types of advice and assistance your entity provides related to Activity 4.3 - Providing advice and assistance in the matters for the reception and transmission of orders on behalf of third parties?	

Q#	Question Text	Instructions
2.13 Activity 5 - Execution of Orders on behalf of Third Parties		
Q247	Does your entity provide Activity 5 - Execution of orders on behalf of third parties?	
Q248	Please provide the turnover related to Activity 5 - product/service of the execution of orders on behalf of third parties.	
Q249	Please provide the total number of unique Natural Persons of Activity 5 - Execution of orders on behalf of third parties, by client's primary nationality.	
Q250	Please provide the total number of unique Legal Persons of Activity 5 - Execution of orders on behalf of third parties, by client's country of headquarters or incorporation.	
Q251	Please provide the total number of unique Legal Arrangements of Activity 5 - Execution of orders on behalf of third parties, by client's country of headquarters or incorporation.	
Q252	Please provide the total value of funds transferred related to Activity 5 - Execution of orders on behalf of third parties both incoming and outgoing) within the reporting period.	
2.14 Activity 6 - Management of Undertakings for Collective Investment under Foreign Law		
Q253	Does your entity provide Activity 6 - Management of undertakings for collective investment under foreign law?	
Q254	Please provide the turnover related to Activity 6 - product/service of the management of undertakings for collective investment under foreign law.	
Q255	Please provide the total number of unique clients of Activity 6 - Management of undertakings for collective investment under foreign law by client's primary nationality, or country of headquarters or incorporation.	
Q256	Please provide the total number of accounts for Activity 6 - Management of undertakings for collective investment under foreign law.	
Q257	Please provide the total number of transactions for Activity 6 - Management of undertakings for collective investment under foreign law (both incoming and outgoing) within the reporting period.	
Q258	Please provide the total value of funds transferred related to Activity 6 - Management of undertakings for collective investment under foreign law (both incoming and outgoing) within the reporting period.	
Q259	Please provide the number of collective investments managed or administered, by the location (country) of where the product / service is registered / established.	
Q260	Does your entity manage or administer Master Funds governed by foreign law?	

Q#	Question Text	Instructions
Q261	Does your entity manage or administer Feeder Funds governed by foreign law?	
Q262	Does your entity manage or administer Limited Investor Funds governed by foreign law?	
Q263	Does your entity manage or administer Administered Funds governed by foreign law?	
Q264	Does your entity manage or administer Licensed Funds governed by foreign law?	
Q265	Does your entity manage or administer Private Funds governed by foreign law?	
Q266	Does your entity manage or administer non-funds governed by foreign law?	
2.15 Activity 7 - Trading on Own Account		
Q267	Does your entity conduct Activity 7 - Trading on own account?	
Q268	Please provide the turnover related to Activity 7 - product/service of trading on own account.	
Q269	Please provide the total number of accounts for Activity 7 - Trading on own account.	
Q270	Please provide the total number of transactions for Activity 7 - Trading on own account (both incoming and outgoing) within the reporting period.	
Q271	Please provide the total value of funds transferred related to Activity 7 - Trading on own account (both incoming and outgoing) within the reporting period.	
2.16 Activity 8 - Actively Managed Certificates		
Q272	Does your entity conduct Activity 8 - Marketing AMC products (Actively Managed Certificates)?	
Q273	Please provide the total value of the AMC products marketed.	
Q274	What type of clientele is most represented?	
Q275	Are the products represented in the asset baskets linked to virtual or similar assets?	
Q276	Do the products represented in the asset baskets present a significant risk in terms of AML/CFT/CPF due to their nature, opacity or sophistication?	
2.17 Comments & Feedback		
Q277	Do you have feedback related to any questions in this section?	
Q278	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q279	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.
Q280	Please provide the total number of clients which Domestic Third Parties were used to undertake	

Q#	Question Text	Instructions
	some/all CDD measures within the reporting period, broken down by primary nationality of the client.	
Q281	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q282	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.
Q283	Please provide the total number of clients which Foreign Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by residency of the Foreign Third Party.	
3.2 Onboarding		
Q284	Did your entity onboard clients within the reporting period?	
Q285	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.
Q286	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.
Q287	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.
Q288	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.
Q289	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.
Q290	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.
Q291	Please provide the number 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.

Q#	Question Text	Instructions
Q292	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.
Q293	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.
Q294	Does your entity accept clients through Introducers?	A business introducer is a natural or legal person (financial institution or designated non-financial business or profession) who acts as an intermediary between the regulated entity and potential clients or partners. In this sense, they maintain a direct relationship with a customer but delegate the execution of the transaction to the regulated entity. As such, the business introducer brings clients to the entity.
Q295	Does the entity record information on the nationality of clients approached by the business introducer?	
Q296	Can the entity provide introducers residency information?	
Q297	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.
Q298	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.
Q299	*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.**
Q300	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.
Q301	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.
Q302	*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		
Q303	What is the legal form of your entity?	• Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI

Q#	Question Text	Instructions
		• 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
Q304	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).	The reporting entity is required to disclose the number of all personnel employed: employees, associates and owners, regardless of their function.
Q305	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.	
Q306	Please provide the total number of salaried and non-salaried persons within your entity including, where applicable, managers, partners or owner-operators, at the end of the reporting period.	The reporting entity is required to disclose the number of all personnel employed: employees, associates and owners, regardless of their function. The number at the end of the reporting period should be used.
Q307	Does your entity have any Branches, Subsidiaries, or Agencies?	
Q308	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
Q309	Is your entity a Branch or Subsidiary of another entity?	For the purpose of this question, branch should be understood as a secondary establishment of the parent company. Please do not include offices/client service locations which are sometimes informally referred to as "branches".
Q310	Is your entity a Branch or Subsidiary of a Foreign entity?	
Q311	If a Foreign entity Branch or Subsidiary, in which country is the parent undertaking?	
Q312	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q313	Is your entity part of an international business network or group?	
Q314	If so, please specify.	
Q315	Is your entity a member of a professional association or society?	
Q316	If so, please specify.	
Q317	Do you work with depositories located abroad?	
Q318	Please provide the number of depositories, by country in which they are operating.	

Q#	Question Text	Instructions
Q319	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?
Q320	Please indicate the development or modification.	
	3.4 Entity Finances	
Q321	Turnover for the reporting period.	
Q322	Turnover for the reporting period realized in the Principality of Monaco.	
Q323	Turnover for the reporting period realized outside the Principality of Monaco.	
Q324	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	
Q325	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q326	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.	
Q327	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to ML/TF/PF?	The entity should identify if it is possible to determine if the reason for new client rejection was due to both: **a.** a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the entity's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and **b.** Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction.
Q328	Please provide the total number of new client business relationships that have been rejected due to Money Laundering considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to entity

Q#	Question Text	Instructions
Q329	Please provide the total number of new client business relationships that have been rejected due to Terrorism Financing considerations during the reporting period due to client attributes / activities / deficiencies.	dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
Q330	Please provide the total number of new client business relationships that have been rejected due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period due to client attributes / activities / deficiencies.	
3.6 Blocked/Rejected Transactions		
Q331	Did you block/reject client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period?	
Q332	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	
Q333	Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to ML/TF/PF?	The entity should identify if it is possible to determine if the reason for blocking/rejecting a transaction was due to both: a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the entity's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
Q334	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering considerations due to client attributes / activities / deficiencies within the reporting period.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to entity dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
Q335	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Terrorism Financing considerations due to client attributes / activities / deficiencies within the reporting period.	
Q336	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Financing the Proliferation of Weapons of Mass	

Q#	Question Text	Instructions
	Destruction considerations due to client attributes / activities / deficiencies within the reporting period.	
	3.7 Terminated Relationships	
Q337	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q338	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
Q339	Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due to ML/TF/PF?	The entity should identify if it is possible to determine if the reason for terminating a client business relationship was due to both: a. a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the entity's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and b. Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
Q340	Please provide the total number of client business relationships that have been terminated due to Money Laundering considerations during the reporting period due to client attributes / activities / deficiencies.	Client attributes / activities / deficiencies are client dependent, examples: new or different transaction behavior, new status (PEP or HNWI), added to Blacklisting or Sanctions. This is opposed to entity dependent practices / decisions, examples: changes in commercial approach, de-risking implementation.
Q341	Please provide the total number of client business relationships that have been terminated due to Terrorism Financing considerations during the reporting period due to client attributes / activities / deficiencies.	
Q342	Please provide the total number of client business relationships that have been terminated due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period due to client attributes / activities / deficiencies.	
	3.7 Comments & Feedback	
Q343	Do you have feedback related to any questions in this section?	
Q344	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 Q306.** The reporting entity should disclose the number of employees, partners, and owners irrespective of their function. The number at the end of the reporting period should be used.
C2	Please provide the total number of full-time equivalent persons working at your entity, at the end of the reporting period.	The reporting entity should disclose the number of full-time equivalent persons, including salaried and non-salaried persons including, where applicable, managers, partners or owner-operators irrespective of their function. Provide the estimate as a decimal of FTE time. For example if there is one full time person and two ¼ time persons, then the total would be 1.5 FTE. 1 full-time person = 1 FTE. One half-time person = 0,5 FTE. One ¼ time person = 0,25 FTE.
C3	Please provide the number of persons in charge of AML/CFT/CPF compliance within your entity at the end of the reporting period.	
C4	Please provide the number of full-time equivalent employees in AML/CFT/CPF Compliance at your entity, at the end of the reporting period.	
C5	Does your entity have a compliance department?	
C6	Does the MLRO fulfil any other role or job function?	
C7	What percentage of time does the MLRO spend on other than AML/CFT/CPF compliance functions?	
C8	Is your entity part of a Group?	
C9	Does your entity have a board and/or senior management?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility. Examples of a board or senior management, would be an entity having: • Chief Officers (CEO, CFO, CTO…) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual • A legal requirement for a board or specific role needed to achieve compliance

C#	Question Text	Instructions
		Examples of an entity that does not have a board or senior management: • A sole proprietor • A partnership • A small business with a single layer of management
1.2 Policies & Procedures		
C10	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.
C11	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).
C12	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C13	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.
C14	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C15	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C16	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.
C17	Does your entity have a group-wide AML/CFT/CPF programme?	
C18	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?	
C19	Who prepared your entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors? Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
C20	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
C21	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 ?	

C#	Question Text	Instructions
C22	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C23	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C24	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.
C25	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. Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/FT risk and trends.
C26	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.

C#	Question Text	Instructions
		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.
C27	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		
C28	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.
C29	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.
C30	Please identify the number and types of AML/CFT/CPF violations.	
1.5 CDD		
C31	Does your entity record all of the following in your customer database: • First Name • Last Name • Date of Birth • Place of Birth • Nationality • Country of Residence • Tax Residence • Activity • Source of Wealth • Source of Funds	
C32	Please specify which items are not collected.	
C33	Does the entity's database contain all of the following, when applicable:	

C#	Question Text	Instructions
	• Name • Country of Incorporation • Foundation Date • Administrators/Directors • Beneficial Owner • Legal Representatives • Level of Risk • Representative of Company or Client	
C34	Please specify which items are not collected.	
C35	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 • Renters of Safe Deposit Boxes • Settlor/Constituent • Shareholders • Trustee	
C36	Please specify which items are not collected.	
C37	Does your entity record all of the following in your customer database: • Account Holders • Credit Card Holders • Depositors/3rd Party Guarantors • Beneficiary of a Trust or other Legal Arrangement • Insurance Policy Payee • Insurance Policy Holder • Insurance Policy Beneficiary • Insurance Policy Insured	
C38	Please specify which items are not collected.	
C39	Does your entity record other client information or register client activity information in their database?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly exercise control of

C#	Question Text	Instructions
		a Foundation, Protector, More Complex Ownership Structures, Introducers?
C40	Please specify what other information is included in your database.	
C41	Does your entity research clients on the Internet?	
C42	Does your entity research client using the Journal de Monaco?	
C43	Does your entity research client using sites specializing in services of risk detection?	
C44	Does your entity research client using business websites?	
C45	Does your entity research client's organization, board members, etc.?	
C46	Does your entity research clients in the press?	
C47	What other information is used to research the client?	
C48	Are the results of the research systematically recorded?	
C49	Does the evolution of the clients services requested contribute to the identification of red flags?	
C50	Is past 5 years of client relationship data accessible by AMSF upon request?	
C51	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C52	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C53	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.
C54	Please provide the total number of unique clients that are active for the reporting period or were at some point active during the reporting period.	**Repeat the response from Q4.**
C55	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C56	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C57	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C58	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C59	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C60	Please specify other measures taken for high-risk clients, before customer take-on.	
C61	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	

C#	Question Text	Instructions
C62	What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity?	
C63	Does your entity examine the source of wealth before customer take-on?	
C64	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
C65	How does the company verify the Beneficial Owners of Virtual Assets?	
C66	Does your entity perform or arrange its own CDD activities?	
C67	Does your entity ever rely on third parties to collect CDD information about clients?	
C68	Does your entity ever conduct tests on third parties regarding their willingness and ability to provide information during the relationship on request and without delay?	
C69	Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed?	
C70	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).	
1.6 EDD		
C71	Did you apply enhanced due diligence measures to clients during the reporting period?	
C72	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C73	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C74	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.
C75	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C76	Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	i.e. number of enhanced due diligence Beneficial Owners of Legal Persons and Legal Arrangements ÷ total number of Beneficial Owners of Legal Persons and Legal Arrangements.
1.7 Risk Assessments		
C77	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C78	How many AML/CFT/CPF risk levels does your entity have for clients?	
C79	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	

C#	Question Text	Instructions
C80	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C81	Do you have clients whose risk level has not yet been determined?	
C82	Please provide the total number of unique clients that are without a risk level determined yet.	
C83	Does your entity's High-Risk assignment considerations include ALL of the following: • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types • Distribution Channels • Accounts with Conventional Title • Assets Under Management • Volume of Operations • Nature of Operations • Trigger Events	
C84	Please specify which items are not considered.	
C85	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
C86	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
C87	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C88	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)
C89	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C90	What client activities does your entity associate with High-Risk clients?	
C91	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
C92	Does your entity consider ML and TF risks separately?	(entity's own assessment)
1.8 Audit / Controls		
C93	Does your entity's internal control process include a Permanent Controller?	
C94	Is the permanent controller a different person from the AML/CFT/CPF Manager?	
C95	Does your entity's internal control process include an Internal Audit Department?	
C96	How many significant audit issues were identified in the latest audit report (relating to AML/CFT/CPF)?	
C97	When did your entity last have a SICCFIN/AMSF audit?	

C#	Question Text	Instructions
C98	When did your entity last have an Internal AML/CFT/CPF audit?	
C99	When did your entity last have a Group AML/CFT/CPF audit?	
C100	Did your entity have any Other Audits not mentioned above?	
C101	Specify the types of Other Audits, and provide the year of the last audit of each kind.	
1.9 Training		
C102	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C103	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C104	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C105	Did your entity conduct AML/CFT/CPF training for its Compliance Employees in the reporting period?	
C106	Did your entity conduct AML/CFT/CPF training for its Internal Audit Department in the reporting period?	
C107	Please provide the total number of employees trained on AML/CFT/CPF matters in Reporting Cycle.	
C108	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters within the reporting period.	
C109	Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance…)?	
C110	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C111	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	
C112	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C113	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	
C114	Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member?	
C115	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C116	What other AML/CFT/CPF training/awareness raising activities did it include?	
C117	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C118	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	

C#	Question Text	Instructions
C119	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
C120	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
C121	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C122	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C123	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C124	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C125	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C126	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C127	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C128	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C129	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C130	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C131	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	
1.10 Cash Transactions		
C132	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C133	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C134	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Monitoring		
C135	Does your entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
C136	Has the automated system been adapted to the entity in Monaco?	
C137	Please provide the total number of transactions (both incoming and outgoing) by or on behalf of clients within the reporting period.	**Repeat the response from Q5.**
C138	Do you have a system that generates alerts related to Money Laundering?	

C#	Question Text	Instructions
C139	Please provide the total number of Alerts in Reporting Period by the system related to Money Laundering.	
C140	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
C141	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
C142	Do you have a system that generates alerts related to Terrorism Financing?v	
C143	Please provide the total number of Alerts in Reporting Period by the system related to Terrorism Financing.	
C144	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
C145	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
	1.12 Monitoring - Rejected Potential Clients	
C146	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
C147	Please provide the total number of new client business relationships (potential clients) that have been rejected due to ML/TF/PF considerations during the reporting period (i.e. not entering into a business relationship.	
C148	Can your entity distinguish both, whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for rejection were due to ML, TF, or PF?	The entity should identify if it is possible to determine if the reason for new client rejection was due to both: **a.** a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the entity's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and **b.** Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
C149	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Money Laundering considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	For this question, the entity's discretionary AML/CFT/CPF practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or

C#	Question Text	Instructions
C150	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Terrorism Financing considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.
C151	Please provide the total number of new client business relationships (potential clients) that have been rejected due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	
1.13 Monitoring - Blocked/Rejected Transactions		
C152	Did you block/reject client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period?	
C153	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	
C154	Can your entity distinguish both, whether a transaction was blocked/rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for blocking/rejecting were due to ML/TF/PF?	The entity should identify if it is possible to determine if the reason for new client rejection was due to both: **a.** a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the entity's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and **b.** Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
C155	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Money Laundering considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	For this question, the entity's discretionary AML/CFT/CPF practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or
C156	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Terrorism Financing considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	

C#	Question Text	Instructions
C157	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	deficiencies, such as presence on a sanctions list or missing key documentation.
1.14 Monitoring - Terminated Relationships		
C158	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
C159	Please provide the total number of client business relationships (clients) that have been terminated due to ML/TF/PF considerations during the reporting period. (i.e. existing business relationship terminated)	
C160	Can your entity distinguish both, whether the reason for terminating a client business relationship was due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice, AND ALSO whether the grounds for termination were due to ML/TF/PF?	The entity should identify if it is possible to determine if the reason for new client rejection was due to both: **a.** a client attribute/activity/deficiency (such as presence on a sanctions list or missing key documentation) or was mainly due to the entity's discretionary AML/CFT/CPF practices (decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF), and **b.** Whether the grounds for rejection were related to Money Laundering, Terrorism Financing, or Financing the Proliferation of Weapons of Mass Destruction
C161	Please provide the total number of client business relationships (clients) that have been terminated due to Money Laundering considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	For this question, the entity's discretionary AML/CFT/CPF practices could be related to decisions on profit or revenue vs. costs or effort to monitor a client, application of group politics or policies, risk appetite or de-risking objectives (such as HNWIs or PEPs), capability or willingness to perform commensurate monitoring, or other commercial reasons related to AML/CFT/CPF. This is opposed to rejections due to reasons related to a non-discretionary client attributes, activities or deficiencies, such as presence on a sanctions list or missing key documentation.
C162	Please provide the total number of client business relationships (clients) that have been terminated due to Terrorism Financing considerations during the	

C#	Question Text	Instructions
	reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	
C163	Please provide the total number of client business relationships (clients) that have been terminated due to Financing the Proliferation of Weapons of Mass Destruction considerations during the reporting period, that are based mainly on your entity's discretionary AML/CFT/CPF practices.	
	1.15 Record Keeping	
C164	Does your entity keep transaction records for at least 5 years?	
C165	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C166	Does your entity keep these records and documents in a safe and secure place?	
C167	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.
C168	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
	1.16 Targeted Financial Sanctions (TFS)	
C169	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).

C#	Question Text	Instructions
C170	Are the board and senior management of your entity engaged in overseeing risks and compliance matters related to TFS for Terrorist Financing and Proliferation Financing?	The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include: (1) approval of TFS-related policies, procedures and instructions by the board or senior management; (2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.; (3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities, (4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.
C171	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	
C172	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
C173	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C174	Does your entity have an automated system to check the Customer Database?	
C175	Does the entity's automated system perform checks on Entry into Relationship for all of the following: • Account Holder • Representative of Company or Client • Beneficial Owner • Administrators/Directors • Shareholders • Legal Representatives • Settlor/Constituent • Trustee • Protector • Introducers • Complex Ownership Structure • Depositors/3rd Party Guarantors • Recipient of Funds	
C176	Does the entity's automated system perform checks on Entry into Relationship for all of the following:	

C#	Question Text	Instructions
	• Credit Card Holders • Complex Ownership Structure • Depositors/3rd Party Guarantors • Occasional Customers • Prospective Customers • Insurance Policy Payee • Insurance Policy Holder • Insurance Policy Beneficiary • Insurance Policy Insured	
C177	If your entity does not collect the items mentioned in the above two questions, please specify which items are not collected?	
C178	Does the entity's automated System perform any Other Checks on Entry into Relationship, not already mentioned above?	
C179	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	
C180	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	
C181	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	
C182	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	
C183	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	
C184	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	
C185	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	
C186	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	
C187	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	
C188	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	
C189	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial	

C#	Question Text	Instructions
	sanctions) for clients with More Complex Ownership Structures?	
C190	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Depositors / 3rd Party Guarantors?	
C191	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for Recipients of Funds?	
C192	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary?	
C193	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
C194	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
C195	Please provide the total number of persons identified by your entity related to financing of the Proliferation of Weapons of Mass Destruction within the reporting period.	
C196	Please provide the total value of assets frozen (in EUR) related to Terrorism Financing within the reporting period.	
C197	Please provide the total value of assets frozen (in EUR) related to financing of Proliferation of Weapons of Mass Destruction within the reporting period.	
C198	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C199	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
C200	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	
C201	Has your entity taken any other actions related to Terrorism Financing?	
C202	Has your entity taken any other actions related to financing of Proliferation of Weapons of Mass Destruction?	
1.17 Politically Exposed Persons (PEPs)		
C203	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C204	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	

C#	Question Text	Instructions
C205	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.
C206	Did you enter into any relationships with PEPs during the reporting period?	
C207	Does PEP screening occur as part of the CDD process for new customers?	
C208	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C209	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C210	Does screening for PEPs occur on an ongoing basis?	
C211	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C212	Are PEPs subject to increased monitoring?	
C213	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C214	Does your entity always require senior management approval to onboard a Client or Beneficial Owner or beneficiary of an insurance policy that is a PEP and to continue such relationship when the Client, Beneficial Owner, or beneficiary becomes a PEP after the business relationship was established?	
C215	Among your clientele, are there any individuals who became PEPs during the course of the business relationship during the reporting period?	
1.18 Suspicious Transaction Reporting		
C216	Is your entity registered with goAML?	
C217	Please describe why.	In case the above question is answered “No”.
C218	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C219	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)
C220	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C221	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	

C#	Question Text	Instructions
C222	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).
C223	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).
C224	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C225	Please provide the total number of STRs/SARs related to a Monegasque Legal Person provided to the FIU within the reporting period.	Where the Monegasque Legal Person is the subject of the STR/SAR.
C226	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C227	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C228	Please provide the total number of STRs/SARs related to a Foreign Tax Offenses (criminal or administrative) provided to the FIU within the reporting period.	
C229	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C230	Please provide the total number of STRs/SARs related to other reasons not mentioned above that your entity reported to the FIU within the reporting period.	
C231	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
C232	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
C233	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	
C234	Did your entity respond internally to the suspicious transactions? (e.g. modification of the client relationship, modification of the client risk's assessment)	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
C235	Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to improve STR within the reporting period?	
1.19 Comments & Feedback		
C236	Do you have feedback related to any questions in this section?	

C#	Question Text	Instructions
C237	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.